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REPORT BY THE U.S.

# General Accounting Office

## Mission And Functions Of The National Capital Planning Commission

The National Capital Planning Commission has 12 members, including Federal and local government officials and private citizens; a staff of about 50; and an annual budget of about \$2.2 million. Its functions are aimed at protecting the Federal interest in the National Capital Region. GAO's report contains information regarding five specific areas in which the requestors expressed interest.

GAO found that the term "Federal interest" is an undefined and sometimes controversial term relating to the image, character, and functioning of Washington, D.C., and its environs. The views of Federal, State, regional, and local officials contacted by GAO differed on what the "Federal interest" is and how the Commission should protect it. Absent agreement on a definition of "Federal interest," GAO could not determine the Commission's effectiveness in carrying out its planning function.



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RESOURCES, COMMUNITY,  
AND ECONOMIC DEVELOPMENT  
DIVISION

B-205447

The Honorable Charles McC. Mathias  
Chairman  
The Honorable Thomas F. Eagleton  
Ranking Minority Member  
Subcommittee on Governmental Efficiency  
and the District of Columbia  
Committee on Governmental Affairs  
United States Senate

The Honorable John Warner  
The Honorable Ted Stevens  
United States Senate

In November 1981, you asked us to evaluate the National Capital Planning Commission's (NCPC's) mission and functions. You asked that we review five specific areas and answer a series of questions, including certain policy questions, on NCPC's role, functions, and mission.

In subsequent discussions with your office, we said that because NCPC's activities are aimed at protecting the Federal interest in the Nation's Capital and its environs and no agreed-upon definition of the Federal interest exists, we could not respond to the policy questions. Thus, we agreed to respond only to those questions requiring the collection of factual data. This letter provides general background on the work we did and a summary of information gathered in each of the five areas in your request. Our response to the series of questions in your request is contained in appendix I. Our detailed objectives, scope, and methodology are contained in appendix II.

NCPC'S MEMBERSHIP AND FUNCTIONS

NCPC, the central Federal planning agency in the National Capital Region, comprises 12 members, including Federal and local government officials and private citizens. Established by the National Capital Planning Act of 1952, its functions include

- preparing Federal elements or portions of a comprehensive plan for the National Capital and its environs;
- annually recommending to the Congress a multi-year Federal Capital Improvements Program containing Federal land acquisition and development proposals for the region;

- approving proposed Federal and District of Columbia development projects and building plans in certain areas; and
- reviewing State, regional, and local government plans and programs, and private development projects and building plans.

These functions are aimed at protecting the Federal interest, an undefined and sometimes controversial term relating to the image, character, and functioning of Washington, D.C., and its environs as the National Capital.

NCPC employs about 50 staff members. In fiscal year 1982, NCPC expended \$2.4 million, 89 percent of which was for personnel and rent.

Following are the five areas highlighted in your letter and a summary of the information we gathered in each of these areas.

WHAT ELEMENTS OF THE COMPREHENSIVE PLAN  
FOR THE NATIONAL CAPITAL HAS NCPC  
ADOPTED AND WHAT ELEMENTS REMAIN?

NCPC has adopted five elements of the comprehensive plan--foreign missions and international agencies, Federal environment, Federal goals, Federal facilities, and Federal employment. Three additional elements remain to be finalized and adopted. These are preservation and historic features, open space and natural features, and visitors and tourists.

The Commission and its staff have recently emphasized completing the comprehensive plan. NCPC staff estimated that most staff time had been devoted to or supported the comprehensive planning effort.

WHAT IS NCPC'S AUTHORITY TO IMPLEMENT  
THE COMPREHENSIVE PLAN AND ENFORCE  
DECISIONS RELATING TO ITS PROJECT  
REVIEW FUNCTION?

As with most planning commissions in the United States, NCPC has no authority to implement the goals or policies of its comprehensive plan. The Federal agency that proposes a specific Capital area development project is responsible for implementing it after obtaining NCPC approval that the proposal complies with the comprehensive plan or does not adversely affect the Federal interest. NCPC also checks to ensure that specific proposals are incorporated in the Federal Capital Improvements Program.

Our review of four proposed development projects--the District's Prevocational Center for the Handicapped, the Chancery



of Jordan, the Vietnam Veterans Memorial, and the Naval Surface Weapons Center Explosive Test Facility--showed that NCPC's comments generally resulted in the agencies and foreign governments making changes in the final site and building plans.

NCPC has no authority to enforce Section 5 of the 1952 Planning Act, which requires Federal agencies to submit proposed development projects to NCPC for review. NCPC relies on its own informal monitoring of the agencies and the Office of Management and Budget to ensure that Federal agencies submit required development plans.

WHAT IS THE ROLE OF NCPC IN RELATION  
TO OTHER FEDERAL, LOCAL, AND REGIONAL  
PLANNING BODIES?

NCPC, as the central Federal planning agency in the National Capital Region, consults with and advises other Federal, regional, and local planning bodies on matters relating to the Region's development. NCPC has authority to approve certain Federal and District government projects. Federal officials told us that NCPC's review and comment functions are appropriate. Some local officials said that they believed NCPC sometimes exceeded its authority by becoming involved in what they believed were local matters.

WHAT ARE NCPC'S PROCEDURES FOR  
ENSURING PUBLIC PARTICIPATION  
IN ITS DECISIONMAKING?

NCPC's citizen participation procedures offer the public opportunities to provide oral or written input to NCPC's deliberations on Federal and District elements of the comprehensive plan; Federal, District, and other local development plans in the region; and the Federal Capital Improvements Program. NCPC asks all organizations providing input to comment only on issues that may affect the Federal interest.

NCPC hired a consultant in fiscal year 1981 to encourage additional citizen participation and improve intergovernmental liaison.

DOES NCPC'S COMPOSITION  
REFLECT ITS MANDATE?

NCPC has 12 members--7 ex officio Federal and District government members and 5 citizen members, 3 appointed by the President and 2 by the District's Mayor.

Past and present Commission members and other Federal, regional, and local officials held varying opinions on NCPC membership. For example, some thought that a commission responsible for Federal interests should not have so many District representatives. Others said that local jurisdictions should have

greater representation. Still others said that NCPC's current membership composition was appropriate. Because the Federal interest has not been defined, we cannot say whether NCPC's composition is best suited to protect that interest.

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As you requested, in responding to your questions, we obtained the views of present and former Commission members; private citizens groups; and Federal, State, and local government officials. Appendix III lists the organizations we contacted, and appendix IV summarizes their views on the Federal interest, NCPC functions, and NCPC membership. Appendix V contains information on NCPC operations, including

- staffing and organization,
- responsiveness of staff to NCPC members,
- NCPC functions,
- implementation and enforcement authority,
- effect of transferring certain NCPC functions to the District of Columbia government as proposed in a bill (S. 1433) introduced in the 97th Congress but not acted on,
- public participation procedures, and
- NCPC expenditures.

Appendix V also contains information on the Canadian National Capital Commission, an organization with responsibilities similar to those of the National Capital Planning Commission.

Appendixes VI through XI, respectively, contain information on fiscal years 1979 to 1983 expenditures; mission descriptions of selected Federal commissions or organizations; summaries of Federal agencies, local governments, and citizens' groups questionnaire responses; and resolutions adopting the Metropolitan Washington Council of Governments/NCPC's "Principles and Process for Identifying Federal Interests in the National Capital Region" and "Proposed Procedures for Resolving Planning Issues that May Arise Between Local and Federal Agencies in the National Capital Region."

#### AGENCY COMMENTS

We sent a draft copy of this report to the National Capital Planning Commission's Chairman and Executive Director for their comments. The Chairman stated that the report was a reasonably accurate description of NCPC's operations. However, he said

that we should have included more analysis of NCPC's operations and taken a position on its effectiveness in accomplishing its mission. (See app. XII.)

As stated earlier, we could not respond to policy questions on NCPC's role, functions, and mission because there is no agreed-upon definition of the Federal interest. NCPC/Metropolitan Washington Council of Governments (COG) resolutions on the principles and processes to be used to identify the Federal interest in the National Capital Region are important steps in reaching agreement on questions of Federal interest, and we encourage such continued cooperative efforts.

The Chairman included comments from NCPC's Executive Director. These were, for the most part, detailed comments and technical corrections or updated information. However, the Executive Director also stated that NCPC is well aware of the difficulties involved in defining the Federal interest in the National Capital Region and that the cooperative effort with COG represents a useful framework for more effective intergovernmental cooperation in planning in the Washington Metropolitan area. (See app. XII.) We revised the report to respond to the technical corrections and updated information.

The COG Executive Director stated that the report documents thoroughly NCPC's laws, policies, and practices in executing its responsibilities. However, COG believed that we should have given greater emphasis in the report to the jointly developed resolutions on the Federal interest and urged us to support the resolutions' incorporation into NCPC's enabling legislation. COG also questioned whether the Congress gave NCPC "considerable discretion" in defining the Federal interest because the Congress was unsure about how to adequately define the term during debate on the 1973 Home Rule legislation for the District of Columbia. (See app. XIII.)

We agree that the resolutions will help answer questions of Federal interest and define NCPC's role in protecting the Federal interest in the National Capital Region. We support the cooperative effort to define the Federal interest but do not believe that incorporating these or similar principles into legislation is necessary. We revised the report to state that the legislative history to the Home Rule Act indicates that NCPC's review of the District government's planning activities was considered a key ingredient in protecting the Federal interest. The legislation allows NCPC to veto District government planning if it adversely affected the Federal interest. We added that the Home Rule legislation did not alter NCPC's responsibility for the Federal interest in the National Capital Region's planning and development.

COG also expressed doubt as to NCPC's role in preparing comprehensive plans for the region and said that NCPC's development of a comprehensive plan for areas not under Federal control or ownership is duplicative and unnecessary. (See app. XIII.)

As shown in appendixes VIII through X, other Federal, regional, and local government officials and citizens groups indicated that NCPC does have a role in regional comprehensive planning.

The District of Columbia Government, through its Office of Planning, stated that District and suburban government representation on NCPC was appropriate. The District also supported NCPC/COG resolutions on identifying Federal interests in the region. (See app. XIV.)

The Office of Management and Budget stated that, despite the absence of conclusions on NCPC's effectiveness in carrying out its mission, the draft report provided factual information which should be useful to the Congress. (See app. XV.)

An official of the Canadian National Capital Commission provided clarification on the portion of the report discussing its activities. We made appropriate changes to this final report. (See app. XVI.)

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Copies of this report are being sent to the Chairman and Executive Director, National Capital Planning Commission, and to other interested parties upon request.

A handwritten signature in dark ink, appearing to read "J. Dexter Peach", is written over a horizontal line.

J. Dexter Peach  
Director

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ABBREVIATIONS

COG	Council of Governments
FAA	Federal Aviation Administration
FY	fiscal year
GAO	General Accounting Office
GS	general schedule
GSA	General Services Administration
NCC	National Capital Commission (Canada)
NCPC	National Capital Planning Commission
NCR	National Capital Region (Canada)
OMB	Office of Management and Budget
OPM	Office of Personnel Management
PADC	Pennsylvania Avenue Development Corporation
SES	Senior Executive Service

ANSWERS TO SPECIFIC QUESTIONS IN CONGRESSIONAL REQUEST LETTERTHE "FEDERAL INTEREST" AND 1952 PLANNING ACT

1. What is the "Federal interest" as stated in the 1952 Planning Act?

The term "Federal interest" did not appear in the National Capital Planning Act of 1952 (66 Stat. 781). In his message accompanying Reorganization Plan No. 5 of 1966, however, President Johnson stated that the National Capital Planning Commission (NCPC) would continue to represent the Federal interest in the National Capital Region's planning and development. (Reorganization Plan No. 5 abolished the National Capital Regional Planning Council and recognized in its place the Metropolitan Washington Council of Governments as the appropriate agency for regional planning. See page 3.) The term was also used in connection with NCPC during the hearings on the 1973 District of Columbia home rule legislation, Public Law 93-198, 87 Stat. 774. That legislation sought, among other things, to transfer responsibility for purely local planning functions to the new District government while preserving the Federal Government's right to protect its unique interests in the Capital City. In the process, NCPC's duties and membership were modified.

While creating the new District government and transferring to it substantial authority, House members repeatedly evidenced concern about protecting the Federal interest in the District of Columbia.<sup>1</sup> The House Committee on the District of Columbia considered NCPC's review of the to-be-created District government's planning activities as a key ingredient in protecting the Federal interest. The Committee included a provision to ensure that NCPC may veto District government planning if it adversely affects the Federal interest. (Committee Report No. 93-198.) But the Congress, in enacting P.L. 93-198, did not define the Federal interest that NCPC was to protect. The Home Rule legislation also did not alter NCPC's responsibility for the Federal interest in the National Capital Region's planning and development.

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Commission members told us that they generally do not believe that the Federal interest can be specifically defined,

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<sup>1</sup>See Staff of House Committee on the District of Columbia, 93d Cong., 2d sess., Background and Legislative History of H.R. 9056, H.R. 9682 and Related Bills culminating in the District of Columbia Self-Government and Governmental Reorganization Act (Comm. Print 1974). This document is a multivolume compendium of the legislative history--Committee reports, mark ups, hearings, etc.--and other related materials concerning the Home Rule legislation.

but most said that some parameters for determining whether a Federal interest exists could be established. Generally, Commission members do not limit their interpretation of the Federal interest to the physical development and efficient functioning of the Federal establishment but also include those things which may have an effect on the general appearance, character, and worldwide image of the Nation's Capital and its environs. Former Commission members and citizens group representatives we contacted generally agreed with this interpretation of the Federal interest.

Other Federal, regional, and local officials we contacted also saw the Federal interest as encompassing a wide range of issues, but most of them would limit the NCPC interpretation of the Federal interest in some respect. Federal agency officials expressed various opinions about the Federal interest. For example, Office of Management and Budget (OMB) officials said that the Federal interest could include many issues, depending on the nature of each project and existing circumstances. But, in their opinion, NCPC had occasionally interpreted that interest too broadly. Representatives of the Washington-based Pennsylvania Avenue Development Corporation (PADC) and the Commission of Fine Arts said that NCPC should not become involved in matters that are the specific responsibility of other Federal agencies or levels of government. Smithsonian Institution and Department of Health and Human Services representatives said that the Federal interest included environmental and aesthetic issues, but only to the extent that they affect the Federal Government's orderly development and efficient functioning.

Regional and local planning officials we interviewed indicated that they generally would limit NCPC's jurisdiction to Federal buildings and property. They said that for non-Federal property, NCPC should be involved only to the extent provided any other concerned property owner within their jurisdiction. Each of these officials told us of examples which, in their opinion, showed that NCPC had interfered in matters that should have been completely within local jurisdiction and control. Some examples they cited were: NCPC's review of private development projects in Arlington County, Virginia, and proposed bicycle paths in the District of Columbia and Montgomery County, Maryland. Furthermore, they told us that criteria or standards for determining when a Federal interest exists are needed so that local officials will know when NCPC will become involved in local planning and development.

At the Metropolitan Washington Council of Governments' (COG's) initiative, an ad hoc interagency committee convened in January 1982 to discuss Federal interest in development decisions in the metropolitan area. COG representatives, State and local planning officials, and Commission members and staff participated. The committee developed a document containing principles for identifying Federal interests in the development of the Washington metropolitan area. Both COG and NCPC adopted



this document at their respective meetings during September 1982. In November 1982, these organizations adopted procedures for resolving potential differences that may arise between local and Federal agencies in implementing the committee's statement of principles. (See app. XI.)

2. What are the mandates of the 1952 Planning Act to the National Capital Planning Commission?

The 1952 Planning Act created two agencies--NCPC and the National Capital Regional Planning Council--responsible for planning in the National Capital Region. The act mandated NCPC to (1) prepare and adopt a comprehensive plan for the District of Columbia and the Federal establishment in the region; (2) review and, in some cases within the District of Columbia, approve Federal- and District-proposed development and construction plans; and (3) prepare a multiyear Federal Capital Improvements Program annually.

The Council, comprising the region's local planning agencies, was to be responsible for a general plan for the region's development. Working together, these two agencies were to provide for the region's orderly development and the preservation of its natural and historic features.

Two amendments to the Planning Act transferred many planning functions to local government organizations and changed the nature of planning in the region. The first--Presidential Reorganization Plan No. 5 of 1966--abolished the National Capital Regional Planning Council and recognized the Metropolitan Washington COG, an association of the region's local governments, as the responsible organization for regional planning. The plan continued NCPC's responsibility to represent the Federal interest in the region's planning and development. This change reflected the Federal Government's belief that regional planning was more appropriately carried out by State and local governments acting together.

The second amendment, the 1973 District of Columbia Self-Government and Governmental Reorganization Act (87 Stat. 774), commonly known as the Home Rule Act, changed NCPC's status as the central planning agency for the District. It made NCPC responsible for preparing and adopting only the Federal elements of the comprehensive plan. It authorized the District's Mayor to establish a planning office and made the Mayor responsible for developing District elements of the comprehensive plan, but required NCPC approval of the District elements before they could be adopted. The Home Rule Act continued NCPC's responsibility to prepare, adopt, and modify District urban renewal plans; approve sales, exchanges, or transfers of District property; and carry out similar actions generally considered to be local government responsibilities. The act did not alter NCPC's responsibility to prepare the Federal Capital Improvements Program. Also, it did not change NCPC's responsibility for the Federal interest in the region's planning and development.

Officials familiar with NCPC's history told us that before Home Rule, NCPC spent most of its time and effort on District planning and development activities. According to these officials, only after the Home Rule Act transferred many of these activities to the new District government, did NCPC begin to devote its time and effort to regional planning and development activities. In commenting on this report, NCPC staff stated that NCPC had been involved in some significant regional planning efforts prior to Home Rule, including the 1950 Comprehensive Plan, the Mass Transportation Study, and the Year 2000 Plan.

According to Commission members and staff, those NCPC activities mandated by law--development of the comprehensive plan, review of the region's planning and development activities, and preparation of the Federal Capital Improvements Program--have contributed to protecting the Federal interest. NCPC, however, also spends substantial time and effort reviewing private and State and local government planning and development activities in the region. Although not specifically mandated by the Planning Act, NCPC carries out these reviews to consult, cooperate, and coordinate with State and local government jurisdictions in the region, one of the act's stated objectives. As of March 1983, NCPC had approved five of the eight Federal elements of the comprehensive plan. It plans to have all eight completed by the end of 1983.

### 3. Are the mandates still relevant 30 years later?

We found no consensus among Federal and non-Federal planning officials and others concerned about planning in the National Capital Region on what NCPC's role in the region's planning and development activities should be. Our analysis of questionnaire responses (see apps. VIII, IX, and X) showed that, in terms of importance to NCPC in carrying out its mandate to protect the Federal interest, those NCPC functions associated with the comprehensive plan's development were considered the most important, followed by those associated with preparing the Federal Capital Improvements Program and those associated with its review functions. When we asked Commission members about NCPC's most important function, however, the number who mentioned the review of planning and development activities in the region was about the same as the number who mentioned the development of the comprehensive plan. Also, one Commission member indicated that preparation of the Federal Capital Improvements Program was most important. Other officials we interviewed expressed varying opinions about the importance of or need for various NCPC functions.

Questionnaire respondents generally agreed that NCPC should prepare a comprehensive plan. But the importance the respondents attributed to including certain geographic areas and types of property in the comprehensive plan diminished as the areas'

distance from the central core of Washington, D.C. (the area covered in French engineer Pierre C. L'Enfant's original plan for Washington) increased and as non-Federal property was added. Most regional and local planning agency representatives and two Federal agency representatives we interviewed questioned the need for NCPC to prepare a comprehensive plan for the region especially because COG had already prepared and adopted a comprehensive plan. NCPC officials, however, pointed out that the Federal interest is neither represented nor included in COG's comprehensive plan and, thus, a comprehensive plan for the Federal interest is needed.

One Federal agency representative was not familiar with NCPC comprehensive plan development activities and did not comment on the plan's need or importance. But two other Federal agency representatives and the citizens group representatives we interviewed indicated that NCPC should prepare a comprehensive plan.

With respect to NCPC's plan and project reviews, analysis of the questionnaire results indicated some differences between Federal agency and local planning agency responses. For example, only four of nine Federal agency officials indicated that NCPC's plan and project reviews are consistent with and limited to those elements that have an impact on the Federal interest, whereas three of four local planning agency officials indicated the same response. In addition, although all local planning officials agreed with the statement that these reviews help NCPC to protect the Federal interest, none of them agreed with the statement that NCPC's reviews result in better coordination among jurisdictions. NCPC officials indicated that better coordination between Federal and local plans is the primary purpose for carrying out these reviews.

All Commission members agreed that NCPC's review and comment on regional planning and development activities are necessary and proper, but one questioned its authority for reviewing construction plans for non-Federal and non-District buildings. More than half of the Commission members said however, that NCPC had not always handled its review and comment function prudently. Citizens group and Federal agency officials we interviewed also generally agreed that NCPC's review of the region's planning and development activities is proper. One agency official said, however, that once NCPC has approved a plan, further reviews should not be necessary unless the plan changes.

Regional and local planning officials we interviewed did not specifically disagree with NCPC's review and comment activities, but all of them expressed concern that NCPC had, in the past, used this function to interfere in matters they indicated should have been entirely within local jurisdiction. Local and regional planning agency officials provided us with examples to illustrate their concern. (See p. 2.)

All questionnaire respondents--Federal agencies, local governments, and citizens groups--said that they were aware of NCPC's Federal Capital Improvements Program, and two-thirds said that they used it to some degree.

Those Federal agency respondents who indicated that they used the Improvements Program generally said that they used it to learn of development proposals near their facilities and to determine any impact on their agencies. Local government respondents who used the document gave similar responses. One of them said it was useful as an "early warning" of Federal projects to be located in local jurisdictions. One citizens group respondent was dissatisfied with the extent to which NCPC kept the group informed of future Federal construction. But local government respondents and the other citizens group respondent indicated that NCPC kept them informed to some extent. Other Federal agencies received much lower marks than NCPC in this respect.

The interview data on the Federal Capital Improvements Program corresponded to the questionnaire data, although the interview data revealed more critical comments on the Program's usefulness. Some interviewees saw it as a tool for improving coordination and cooperation between the Federal Government and local jurisdictions. Others, however, said that the Program was a "wish list," that it included incomplete and unnecessary data, and that it duplicated data compiled by others. Officials of four local and regional groups doubted its value because, according to them, Federal agencies do not adhere to it anyway.

Several NCPC, Federal agency, and citizens group officials told us the Federal Capital Improvements Program was prepared for OMB. But OMB officials said that the Program was not useful to them because it was not published in time for the fall executive branch budget formulation, and it did not include enough budget data. However, they suggested the following improvements which could make it useful to others:

- Include those projects or proposals that have some assurance of being included in each agency's fiscal year budget.
- Exclude items that could be considered repair or maintenance items.
- Identify the Program's users and gear its contents to those users' needs.

OMB officials said that with these changes, the Program would become a more accurate picture of proposed Federal construction in the National Capital Region.

NCPC staff replied in comments on the draft report that Federal agencies are instructed not to include normal repair or

maintenance items in the Program and that more effort will need to be made to ensure compliance with the instructions.

4. How has the "Federal interest" been protected over the years by NCPC actions?

Generally, Commission members' statements showed that, collectively, all of NCPC's primary functions--development of the comprehensive plan, review and comment on planning and development activities in the region, and preparation of the annual Federal Capital Improvements Program--have contributed to protecting the Federal interest.

Although several Commission members expressed dissatisfaction with NCPC's progress in developing the Federal elements of the comprehensive plan since the 1973 Home Rule Act, many said that the comprehensive plan would help protect the Federal interest because it would be NCPC's statement of the sense or parameters of the Federal interest in the region's development. Some Commission members said that the foreign missions and Federal environment elements of the plan, which NCPC adopted in October 1977 and February 1981, respectively, have protected the Federal interest by providing guidance or a framework that local officials in the region can use to make sure that their future planning and development activities do not adversely affect the Federal interest.

Through its review and comment activities--including appearances before public bodies such as the Congress, other planning bodies, and the courts--NCPC has brought planning policy issues to public attention. In the opinion of several Commission members, these activities have contributed to protecting Washington's public spaces, monumental squares, circles, parklands, broad avenues, vistas, and building height limitations from development encroachment. Several Commission members said that the combination of these special features makes Washington unique and is part of its worldwide image as the Capital of the United States.

Some Commission members said that NCPC's process of preparing the annual Federal Capital Improvements Program had contributed to protecting the Federal interest. According to these members, the Program has provided for the orderly development of Federal facilities and contributed to protecting the Federal interest by giving NCPC the means to

- coordinate the development activities among the various Federal departments and agencies;
- make sure that Federal agencies give adequate attention to design and aesthetic details of proposed developments; and

- facilitate coordination with local officials on local development and services such as utilities, transportation, and housing.

One Commission member said that many "atrocities" have been avoided because of NCPC's authority in this area.

5. In the monthly meetings of the Commission, what percentage of time is devoted to statutory requirements for approval/disapproval, review, and comment? Should this time be better allocated? Is there a need for the NCPC to perform any review and comment function? Why? Who uses it?

NCPC staff's analysis of January 1982 through April 1982 Commission meetings indicated that the Commission spent

- 19 percent of its time on items requiring approval;
- 26 percent on review and comment;
- 16 percent on reports by the Chairman, Executive Director, and NCPC Task Forces;
- 22 percent on administrative and procedural matters, such as NCPC program and budget priorities; and
- 17 percent on long-range proposals and issues that may later evolve as comprehensive plan policies, review and comment submissions, and Federal Capital Improvements Program projects.

We cannot comment on how the Commission's monthly meeting time should be allocated, as this depends on how the Chairman conducts the meeting, the degree of controversy surrounding agenda items, the amount and quality of premeeting staff work on agenda items, and other uncontrollable factors.

The review and comment function is one means for NCPC to prevent or minimize adverse effect on the Federal interest. NCPC, Federal agencies, District government agencies, and other planning organizations use the results of review and comment actions to prevent adverse effect on the Federal interest or to assess potential effect on the Federal interest.

6. Are there subject or policy areas in which NCPC has involved itself which it is not statutorily authorized to? Describe.

Some local planning officials told us that they believed NCPC had used its review and comment function to become involved in land use issues that were solely within local government jurisdiction. Some examples they cited are on page 2.

Six Commission members told us that they believed NCPC had, in certain cases, interpreted the Federal interest too broadly and addressed matters not significant to the Federal interest. Seven members also said that they believed NCPC had carried out its review and comment function in the past in a way which was not consistent with its objective of facilitating coordination among various levels of government. One member questioned whether NCPC should review and comment on individual site and building plans.

7. Are there areas in which NCPC should involve itself but has not?

Despite the extent of the Federal Government's use of leased space and the regional planning implications, NCPC has no authority to review leased space planning decisions. However, in December 1982, the General Services Administration (GSA) agreed to give NCPC copies of the leasing prospectuses it submits to the Congress. GSA has also discussed leasing conditions in which NCPC will become involved. These conditions are included in the Federal facilities element of the comprehensive plan.

8. Which Federal agencies have short- and long-range master plans for their facilities in the National Capital Region? Which Federal agencies lack such plans and why? Have those Federal agencies proposed major Federal installations or relocations without such master plans?

Following is an April 1982 list of those Federal agencies which have approved or pending facility master plans on file at NCPC and those which do not. A single installation or facility may have several master plans because it is divided into sub-areas. For example, the National Park Service divides the George Washington Memorial Parkway into numerous sections--12 sections are listed below.

#### Master plans approved

1. Department of Defense, Defense Mapping Agency.
2. Department of Energy, Germantown, Md.
3. Department of Defense Federal Regional Center and Region 2 Headquarters.
4. National Park Service, George Washington Memorial Parkway.
5. Department of Commerce, National Bureau of Standards, Gaithersburg, Md.
6. National Institutes of Health, Bethesda, Md.
7. National Institutes of Health, Animal Center.
8. National Naval Medical Center, Bethesda, Md.
9. Naval Surface Weapons Center, White Oak, Md.
10. Walter Reed Army Medical Center, Forest Glen, Md.
11. Walter Reed Army Medical Center, Glen Haven, Md.
12. Andrews Air Force Base, Dormitory Complex, Camp Springs, Md.

13. D.C. Air National Guard.
14. Food and Drug Administration, Beltsville, Md.
15. National Park Service, George Washington Memorial Parkway.
16. Army, Harry Diamond Laboratory.
17. National Park Service, Oxon Cove Park, Md.
18. U.S. Postal Service, Washington Bulk Mail Center.
19. Department of the Army, Cameron Station, Alexandria, Va.
20. Army, Arlington Hall Station, Arlington, Va.
21. Army, Arlington National Cemetery.
22. Army, Fort Myer, Arlington, Va.
23. Central Intelligence Agency, Headquarters, Langley, Va.
24. Department of Transportation, Coast Guard,  
Washington, D.C.
25. Department of Transportation, Fairbank Highway Research  
Station, McLean, Va.
26. Army, Fort Belvoir, Va.
27. Department of the Interior, U.S. Geological Survey,  
Reston, Va.
28. National Park Service, George Washington Memorial Parkway.
29. National Park Service, George Washington Memorial Parkway.
30. National Park Service, Wolf Trap Farm Park, Vienna, Va.
31. Federal Aviation Administration, Air Route Traffic Control  
Center, Leesburg, Va.
32. Marine Corps Air Station, Quantico, Va.
33. Marine Corps Shopping Facilities, Quantico, Va.
34. National Federal Bureau of Investigation Academy, Quantico,  
Va.
35. Quantico National Cemetery.
36. National Park Service, Anacostia River Park,  
Washington, D.C.
37. National Park Service, Anacostia River Park.
38. National Park Service, Anacostia River Park.
39. National Park Service, Anacostia River Park.
40. National Park Service, Anacostia River Park.
41. Navy/Air Force Bolling/Anacostia Central Area,  
Washington, D.C.
42. Navy/Air Force Bolling/Anacostia Armed Forces Reserve  
Center.
43. Navy/Air Force Bolling/Anacostia Community Center.
44. Navy/Air Force Bolling/Anacostia Industrial Technical  
Complex.
45. Bureau of Engraving and Printing, Washington, D.C.<sup>2</sup>
46. Army Corps of Engineers, Dalecarlia Reservoir,  
Washington, D.C.
47. National Park Service, The Ellipse, Washington, D.C.
48. National Park Service, Fort Circle Parks--Potomac  
Palisades, Washington, D.C.
49. National Park Service, Fort Dupont Park, Washington, D.C.
50. National Park Service, Fort Stanton Park, Washington, D.C.
51. National Park Service, Fort Totten Park, Washington, D.C.

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<sup>2</sup>Endorsed expansion.



52. Government Printing Office, Washington, D.C.<sup>3</sup>
53. State Department, International Center, Washington, D.C.
54. National Park Service, Lady Bird Johnson Park, Wash., D.C.
55. National Park Service, The Mall, Washington, D.C.
56. Army Corps of Engineers, McMillen Reservoir, Wash., D.C.
57. Department of Agriculture, National Arboretum, Wash., D.C.
58. Smithsonian National Zoological Park, Washington, D.C.
59. Naval Research Laboratory, Washington, D.C.
60. Naval Security Station, Washington, D.C.
61. Army Soldiers' and Airmen's Home, Washington, D.C.
62. Veterans Administration Hospital, Washington, D.C.
63. Walter Reed Army Medical Center, Washington, D.C.

Master plans in preparation

1. National Park Service, Chesapeake and Ohio National Historic Park.
2. Naval Ship Research and Development Center, Corderock, Md.<sup>4</sup>
3. Andrews Air Force Base, Camp Springs, Md.
4. Andrews Air Force Base, Administration Complex.
5. Beltsville Agricultural Research Center, Beltsville, Md.
6. Department of Agriculture, Animal and Plant Health Inspection Service.
7. U.S. Secret Service Training Facility, Washington, D.C.
8. National Park Service, George Washington Memorial Parkway.
9. Goddard Space Flight Center, Greenbelt, Md.
10. National Park Service, Greenbelt Park.
11. Naval Communications Station, Cheltenham, Md.
12. Department of the Interior, Patuxent Wildlife Research Center.
13. General Services Administration, Suitland Federal Center, Suitland, Md.
14. General Services Administration, Smithsonian Institution, Smithsonian Subarea, Washington, D.C.
15. National Park Service, Daingerfield Island and Washington Sailing Marina.
16. Marine Corps, Henderson Hall, Arlington, Va.
17. Federal Aviation Administration, Washington National Airport.
18. U.S. Postal Service, Northern Virginia Sectional Center Facility.
19. Federal Aviation Administration, Dulles International Airport.
20. National Park Service, Manassas National Battlefield Park.
21. Marine Corps, Development and Education Command, Quantico, Va.
22. Army, Woodbridge Research Facility, Woodbridge, Va.

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<sup>3</sup>Site relocation approved.

<sup>4</sup>Update pending.

23. National Park Service, Chesapeake and Ohio Canal National Historic Park.<sup>5</sup>
24. National Park Service, East Potomac Park, Wash., D.C.
25. General Services Administration, Federal Triangle, Wash., D.C.<sup>4</sup>
26. Army, Fort McNair, Washington, D.C.
27. National Park Service, Monument Grounds.
28. Department of Health and Human Services, St. Elizabeth's Hospital, Washington, D.C.
29. General Services Administration, Southeast Federal Center, Washington, D.C.
30. Washington Navy Yard.

No master plan in preparation

1. National Park Service, Baltimore-Washington Parkway.
2. Central Intelligence Agency/Federal Bureau of Investigation/Federal Communications Center.
3. National Park Service, George Washington Memorial Parkway.
4. Air Force Globecom Radio Receiving Center.
5. National Park Service, Piscataway Park, Maryland.
6. National Park Service, Suitland Parkway.
7. Veterans Administration, Arlington National Cemetery.
8. National Park Service, George Washington Memorial Parkway.
9. National Park Service, Jones Point Park, Alexandria, Va.
10. General Services Administration, Federal Office Building 2, Washington, D.C.
11. National Park Service, George Washington Memorial Parkway.
12. National Park Service, Iwo Jima Memorial and Netherlands Carillon, Arlington, Va.
13. Navy Service Center, Arlington, Va.
14. Department of Defense, Pentagon.
15. General Services Administration, Federal Supply Service Depot.
16. National Park Service, George Washington Memorial Parkway.
17. National Park Service, George Washington Memorial Parkway.
18. National Park Service, George Washington Memorial Parkway.
19. National Park Service, George Washington Memorial Parkway.
20. General Services Administration, Hybla Valley Facility, Groveton, Va.
21. Department of the Interior's Mason Neck Wildlife Management Area, Fairfax County, Va.
22. Veterans Administration, Balls Bluff National Battlefield Cemetery, Leesburg Va.
23. National Oceanic and Atmospheric Administration, Sterling Research and Development Center, Sterling, Va.
24. Department of the Interior's Featherstone National Wildlife Refuge.
25. National Park Service, Prince William Forest Park, Prince William County, Va.
26. National Park Service, Anacostia River Park.
27. National Park Service, Anacostia River Park.
28. National Park Service, Anacostia River Park.

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<sup>5</sup>Endorsed development concept.

29. Navy/Air Force Bolling/Anacostia Administration Complex.
- 30-37. National Park Service--eight circle park areas.
38. National Park Service, Glover-Archbold Parkway, Wash., D.C.
39. Marine Corps Barracks, Washington, D.C.
40. Naval Observatory, Washington, D.C.
41. Navy/General Services Administration, Old Naval Observatory Hill, Washington, D.C.
42. National Park Service, Oxon Run Parkway.
43. National Park Service, Potomac Palisades, Washington, D.C.
44. National Park Service, Rock Creek Park, Washington, D.C.
45. National Park Service, Rock Creek Park.
46. National Park Service, Shepherd Park, Washington, D.C.
47. Army Soldiers' Home National Cemetery, Washington, D.C.
48. General Services Administration, Tempos A, B, C, Wash., D.C.
49. National Park Service, T. Roosevelt Island, Washington, D.C.
50. National Park Service, West Potomac Park, Washington, D.C.
51. National Park Service, Whitehaven Parkway, Washington, D.C.

The National Park Service and the Federal Aviation Administration (FAA) have proposed major projects without an approved master plan. Limited resources prevented the Park Service from preparing master plans for all developments. The agency is now trying to prepare master plans for those parks expected to be developed in the near future. FAA is preparing a master plan for National Airport now that the U.S. Department of Transportation has promulgated a Metropolitan Washington Airports policy. A National Airport master plan not having been made, the Commission followed a policy of giving favorable review to only those projects necessary to correct safety problems or maintain existing buildings.

#### DISTINCTION OF FUNCTIONS FROM OTHER GOVERNMENTAL BODIES

1. Distinguish between planning functions and review authorities of NCPC and the District of Columbia Office of Planning and Development.

As a result of the D.C. Home Rule Act of 1973, NCPC became responsible for developing the Federal elements of the comprehensive plan, and the District of Columbia became responsible for developing the local elements of the comprehensive plan. Under that legislation, the District elements of the plan cannot be implemented until NCPC reviews them.

In June 1978, the District completed one element of the District plan--City-wide Land Use Objectives for the District of Columbia. Between October 1982 and April 1983 the District circulated for comment additional local elements of the comprehensive plan including revised land-use objectives. In May 1983, the District circulated the historic preservation and urban design elements of the plan for public comment. The District will close the public comment period on those elements in July 1983 and submit the entire comprehensive plan for review and approval by the District Council and the Commission beginning in September 1983. At one time, both the District and NCPC planned to include a historic preservation element in their individual

plans but, according to the District's Assistant City Administrator for Planning and Development, potential duplication was avoided when District and NCPC officials agreed to develop this element jointly.

A senior planner in the District's Office of Planning and Development stated that the District and NCPC made similar reviews of proposed projects and developments. In their reviews, both analyze such things as building heights and density, impact on transportation, and impact on water supply and sewer capacities. According to this official, however, the reviews are done from different perspectives. He also said that the working relationship between District and NCPC staffs is very good. He pointed out, for example, that NCPC has agreed informally not to consider proposed projects and developments at Commission meetings until the District government's reviews have been completed. This official said that he did not know the extent to which NCPC staff (1) used information developed by the District for its review or (2) developed such information independently.

2. Distinguish between the planning functions and review authorities of NCPC and the Commission of Fine Arts.

The Commission of Fine Arts, comprising seven members appointed by the President, was established in 1910 to advise the Federal Government on matters pertaining to the appearance of Washington, D.C. According to NCPC's Secretary, although this Commission can make suggestions on how certain areas or projects should be developed, it does not carry out planning functions as such. Like the Planning Commission, however, the Commission of Fine Arts can and does provide comments on a wide variety of planning and development activities in the region. But also like NCPC, the Commission of Fine Arts' approval authority is limited by the Congress to certain geographical areas and projects, and its comments are advisory only.

Many of those we contacted, including OMB and some other Federal agency representatives, Commission of Fine Arts representatives, and Planning Commission members, told us that they perceived the reviews done by the two Commissions as being very similar. The problem, according to one former Planning Commission member, is establishing the point at which planning ends and design review begins. Comments of other Planning Commission members and Commission of Fine Arts representatives supported this view.

The Commission of Fine Arts' Secretary told us that the two Commissions' reviews, although similar, are done for different purposes. According to him, the Commission of Fine Arts' review is done to preserve or enhance the character, integrity, and order of the city and its open spaces, whereas NCPC's review is done to protect the public interest in the development of the Nation's Capital. He said, however, that NCPC also did design reviews--a result he attributed in part to the increased involvement of architects in planning bodies since the 1950's. But, in his opinion, the duplication that occurs in the two

Commissions' reviews was good because design reviews are subjective and when both agreed, which he said was most of the time, they tended to support one another. He also said that when they disagreed, the compromise required to reach agreement probably resulted in better projects. No formal coordination agreement exists between the two Commissions, but staff representatives attend one another's meetings.

Although one Federal agency representative told us that, in his opinion, NCPC should not become involved in design reviews and that his agency (the Pennsylvania Avenue Development Corporation--PADC) had decided to drop a planned project because NCPC had disliked the design, other officials we contacted had no specific problem with submitting their project plans to either Commission. Proposed plans and projects can be submitted to either Commission in no particular order. Generally, officials we talked with said that they were aware of the time needed for the required reviews by both Commissions and, thus the reviews did not usually result in increased project costs or delays.

3. Distinguish between the roles and functions of NCPC and the Joint Committee on Landmarks.

The Joint Committee on Landmarks of the National Capital is sponsored jointly by NCPC, the Commission of Fine Arts, and the District government. It was established in 1964 by the two Commissions to compile and maintain a current inventory of significant historic landmarks and historic districts in the District of Columbia and on Federal property in the remainder of the National Capital Region. In 1968, the District government designated the Committee as the State (sic) review committee for the National Register of Historic Places pursuant to the National Historic Preservation Act of 1966 (80 Stat. 915, et seq.). The Committee comprises 13 members appointed jointly by the three sponsors. In addition, NCPC's Counsel serves as counsel to the Committee and another NCPC staff member, designated by NCPC's Executive Director, serves as secretary to the Committee.

Other Committee functions include (1) advising the sponsors of Federal and District projects which may affect designated landmarks; (2) advising the District's historic preservation officer of the effect that undertakings carried out, licensed, or financially assisted by the Federal Government may have on a property listed or eligible for listing in the National Register; and (3) recommending to the sponsors programs for preserving designated landmarks. Thus, the Joint Committee serves as an advisory review body for both the local (District) government and the two Federal Commissions.

A former NCPC member, who served when the Joint Committee was established, told us that one reason the sponsors established the Committee was to eliminate the need for detailed reviews by each sponsor. Under this arrangement, plans for projects

requiring review by each sponsor were to be reviewed only once by the Joint Committee which would, in turn, provide its review results and recommendations to the sponsors. Not all sponsors, however, have relied on the Joint Committee's reviews. In their comments on this report, NCPC's Executive Director stated that NCPC usually relied on the Joint Committee's review of proposals without duplicating the reviews done by the Committee. The Commission of Fine Arts' Secretary told us, however, that since the Joint Committee had become an architectural review body carrying out functions similar to those of the Commission of Fine Arts except at the local level, and because the propriety of one advisory body seeking the advice of another is questionable, the Commission of Fine Arts performed its own reviews and did not rely on or use the information provided by the Committee.

District government and Commission of Fine Arts representatives told us of problems with the Joint Committee's structure and functions. District representatives said that the Committee was not functioning well and attributed the problems, in part, to the incompatibility of the mixture of Federal and local functions the Committee is supposed to carry out. The Commission of Fine Arts' position on the Joint Committee is stronger. According to its Secretary, the Fine Arts Commission is no longer making membership recommendations for the Joint Committee because of the former's position that the Joint Committee should either be abolished or established as a District agency. He said that the Commission feels that the Joint Committee has become a local architectural review committee because the District government designated the Committee to advise the District's local historic preservation officer under the National Historic Preservation Act of 1966. For this reason, the Fine Arts Commission's position is that the Joint Committee should not have Federal membership, and it questions the propriety of Federal agencies providing staff support to an organization carrying out local functions.

#### ENFORCEMENT POWERS OF NCPC

1. How are NCPC approvals/disapprovals enforced? Is there room for improvement?

NCPC relies on the agencies themselves to carry out projects as approved. NCPC staff said that they do not have the resources to establish a formal monitoring process and that the agencies usually keep them well informed about development plans and activities.

2. How are NCPC comments and reviews of projects used by the relevant Federal, State, and local governments?

We examined NCPC files on four proposed projects to assess NCPC's review procedures and its effect, if any, on the projects' final plans. The projects were the:

- District's Prevocational Center for the Handicapped,
- Chancery of Jordan,
- Vietnam Veterans Memorial, and
- Naval Surface Weapons Center Explosive Test Facility.

The files contained site and building plans and other documents submitted by the project sponsors and staff-prepared analyses of the impact on the Federal interest. NCPC's comments generally resulted in the project developers making some changes in the final site and building plans.

- The District acted favorably on NCPC recommendations that the District's Department of General Services assess the feasibility of reducing parking levels and increasing landscaping at the Prevocational Center for the Handicapped.
- The Department of State and Jordan Embassy reacted favorably to NCPC suggestions that the Jordan Chancery plan reduce the width of the driveway and allow for additional landscaping.
- The Department of the Interior's National Park Service reacted favorably on questions NCPC raised about handicapped access, safety, and drainage for the proposed Vietnam Veterans Memorial.
- NCPC raised no issues on the explosive test facility final plans, which complied with preliminary plans and the master plan for the weapons center.

We also examined NCPC's review of a proposed local zoning change in the Clarendon area of Arlington County, Virginia. NCPC's review resulted in an Arlington County Board resolution recognizing NCPC's right to comment on building heights in Arlington County which may affect the Federal interest.

S. 1433's TRANSFERRING FROM NCPC TO DISTRICT  
GOVERNMENT CERTAIN REVIEW AND PLANNING  
AUTHORITIES OF A LOCAL NATURE

1. This legislation, introduced by Senator Mathias at the request of the District government, would transfer approval authority of NCPC to the District government for (1) urban renewal plan adoption and modification, (2) public housing site planning and land condemnation, (3) sale of D.C. surplus property, (4) exchange of D.C. land for abutting property, and (5) conduct on District waters. Are there any

foreseeable Federal interests in any of these actions which might warrant retention of NCPC approval authority?

Senate bill 1433's objective was to give greater control over local planning activities to the District government. It would have taken from NCPC authority to approve and modify plans of several District government agencies. If NCPC had lost this approval authority, these agencies could have taken actions contrary to the Federal interest. The bill was not acted on in the 97th Congress.

#### COMPOSITION OF NCPC

##### 1. Does the composition make sense?

About a third of the questionnaire respondents and half the officials we interviewed indicated that they would change the Commission's composition in some way. Their reasons varied but included opinions that certain interests are either over- or underrepresented and that Commission members need to have specific experience or expertise. A few also expressed concern about the use and voting rights of alternates for ex officio Commission members. Although 5 of the 15 questionnaire respondents indicated the Commission's composition was not appropriate, all but 2 indicated that the Commission's current composition facilitated accomplishment of NCPC functions to a moderate or great extent. One did not answer, and the remaining respondent indicated that the current composition facilitated accomplishment to some extent.

The three Federal agency respondents who indicated that the Commission's composition was inappropriate cited the executive administration (with three ex officio Cabinet members and three Presidential appointees) and/or the District government (with two ex officio members and two mayoral appointees) as being overrepresented on NCPC. Agencies not now represented on NCPC, but mentioned as potential members, were the Architect of the Capitol and the United States Postal Service because over 180 postal facilities are located in the region.

The local government respondent who indicated that the Commission's composition was inappropriate said that local jurisdictions were not adequately represented, while the citizens group representative who indicated the Commission's composition was inappropriate saw the need for more citizen members.

Present and past Commission members and others we interviewed expressed diverse opinions on Commission membership. As did the questionnaire respondents, many questioned the number of District government representatives on the Commission. They questioned whether a Federal commission responsible for Federal interests should have so many District representatives. Many also said that they believed other local jurisdictions should



have greater representation because NCPC actions can affect the entire region, not just the Federal Government.

Generally, the questionnaire respondents and interviewees also questioned the need for specific professional expertise in such disciplines as architecture, urban planning, and landscaping. Currently, the legislation requires no specific qualifications for membership except that citizen appointees should have experience in city or regional planning.

The underlying theme of all comments about membership was that the Commission should comprise persons best qualified to achieve its mandate and represent those persons affected by its decisions. As one official pointed out, if NCPC's current level of authority over District government affairs remains as it is, four District representatives are appropriate. However, if NCPC's authority is reduced, so too should be the number of District representatives.

#### EFFECTIVE USE OF APPROPRIATIONS

1. Are appropriations for NCPC spent for the most important, statutorily mandated projects and purposes (i.e., adoption of the comprehensive plan)? Are there specific projects or contracts of questionable value (e.g., citizen participation contract; special streets study--Independence Avenue)?
2. Review existing NCPC contracts and contracts during FY '81 and '82 in terms of their relationship to NCPC's mission as spelled out in the 1952 act.

NCPC's annual appropriation has averaged \$2.3 million over the last 5 years. In fiscal year 1982, personnel and rent consumed 89 percent of the \$2.4-million expenditures. (See app. VII.)

NCPC staff do not keep formal records of how they expend their time on NCPC programs and projects. Staff estimated the amount of time spent on each division's activities. An analysis of their estimates (see app. V, pp. 54 to 56) shows that most time has been devoted to or has supported the comprehensive planning function.

During fiscal year 1981, NCPC spent \$91,000 on expert and consultant contracts. These contracts, which related generally to NCPC objectives, were as follows:

- A joint mapping project with the District for \$37,250.
- A joint mapping project with COG for \$21,750.
- A contract to improve citizen participation and intergovernmental liaison for \$20,000.

--Miscellaneous data and computer services for \$12,000.

In fiscal year 1982, NCPC extended the citizen participation contract for \$20,000 and had other contracts relating to NCPC's normal functions.

3. How is the NCPC budget prepared? Who reviews it; to whom is it submitted for approval? Do most commissions give final budget approval to staff recommendations? Does the NCPC? Should the Commission set salaries, vote on merit raises or Senior Executive Service (SES) bonuses, etc.? What should be the Commission's overall role in the budget process?

NCPC staff have established a schedule for preparing the annual budget. At the staff's request each spring, the Commission establishes general program goals and objectives for the coming year. The staff then estimate resources needed to meet these goals. The Chairman, Executive Director, and Assistant Executive Director for Administration review the estimates and submit them to the Commission for discussion and approval. Once approved, in late summer the estimates are sent to OMB as NCPC's budget request for the fiscal year.

The Commission has delegated authority for day-to-day staff operations to the Executive Director. The Executive Director implements the policies and guidance established by the Commission in accord with Federal personnel rules and regulations. The Executive Director reports to the Commission Chairman.

#### USE OF STAFF TIME

1. Is NCPC staff time well used and devoted to the most important priorities of the Commission? Interview individual Commissioners for their views. Are there task forces or other time-consuming staff assignments which divert staff time from the comprehensive planning mandate?

Staff do not keep formal records of how time is spent on NCPC's programs and functions. Our analysis of estimates the staff provided indicates that most time has been devoted to or has supported the comprehensive planning function.

Commission members and staff participate on interagency task forces such as those related to the survival of elm trees on the Mall and to the use of the Potomac River waterfront. The amount of time spent on these activities is minimal.

Nine of the 12 Commission members said that staff spend their time on NCPC priorities, although many also said more time could be spent on the comprehensive plan.

2. Does the staff of NCPC respond to the policy directive and requests of the Commission in a timely and effective way? Describe any improvements needed.

Eight of the 12 Commission members said that the staff generally acted as the Commission directed. All said that the staff had improved in the last year. Members attributed improvements to the Commission's establishment of (1) task forces to study NCPC activities, such as budgeting and staffing, and to make recommendations and (2) a schedule for completing the comprehensive plan.

3. How many staff are currently engaged in developing the Federal elements of the comprehensive plan on a full-time basis?

At the time of our review, six community planners and one secretary were permanently assigned to the Planning and Programming Division, whose primary responsibility is to prepare Federal elements of the comprehensive plan. Our analysis of the division director's time estimates for 1981 shows that 75 percent of the staff's time was spent on the plan's Federal elements, 10 percent on reviewing State and regional plans for consistency with the comprehensive plan, 5 percent on reviewing the plan's District elements, and 10 percent on other matters. Also, the 16 individual staff members of the Planning Services Division spent from 15 to 60 percent of their time in 1981 on the comprehensive plan, according to the division's director.

4. How many staff are currently assigned to reviews for project approvals pursuant to Section 5(a) of the 1952 Planning Act? Describe or categorize the projects which come before the Commission for a mandated approval and the staff time devoted to such review. What criteria do the staff and the Commission use in reviewing for approval of Federal projects?

Three community planners and one secretary-typist in the five-member Review and Implementation Division are assigned full time to project reviews pursuant to Section 5(a) of the 1952 Planning Act. The division's fifth member spends most of his time preparing the Federal Capital Improvements Program, pursuant to section 7 of the act. Most staff in the Planning Services Division support review functions on an as-needed basis. The division director estimated that 14 of the 16 individual staff members spent 15 to 45 percent of their time in 1981 on review activities.

NCPC must review and approve the following types of projects:

- Federal public buildings in the District.
- District public buildings in the District's central area.
- Urban renewal plans and modifications in the District.

- Changes in the permanent system of streets and highways for the District.
- Transfers of jurisdiction over U.S.-owned properties within the District among or between Federal and District authorities.
- Sale of surplus properties in the District owned by the District or managed by the National Park Service.
- Foreign government and international organization buildings at the International Center in northwest D.C.
- Property acquisition under the District Alley Dwelling Act.
- Title settlements near the Potomac and Anacostia Rivers.
- District harbor regulations.

NCPC has not established specific development standards to review Federal projects. Rather, staff told us that they depend on review material standards and a methodical review process to evaluate submissions. The staff's typical review process includes

- determining the adequacy of submission material;
- determining the proposal's conformance with the comprehensive plan, applicable master plan, local plans, and/or any other specialized plan, such as an urban renewal plan;
- assessing the proposed project program in terms of its meeting the sponsoring agency's needs and any related needs identified in the comprehensive plan, master plan, or other applicable documents;
- evaluating the relationship to and compatibility with the surrounding physical environment, including such factors as siting, massing, height, and predominant materials;
- assessing impacts on any historic or architecturally important buildings or sites;
- evaluating provisions for pedestrian and vehicular access, parking, and service for compatibility with the surrounding transportation infrastructure;

- assessing impacts on the natural and man-made environments; and
- evaluating plan details and specifications, such as provisions for rooftop structures and landscaping proposals.

In certain cases, staff have formulated specific development standards to guide several similar developments under a unified plan. Such uniform standards cannot, however, generally be applied to the wide variety of Federal buildings, structures, and site developments reviewed by NCPC and have applicability only in special situations, such as in the chancery complex of the International Center.

5. What amount of staff time is devoted to review of projects which do not require an NCPC approval pursuant to the act, but are available for "review and comment" pursuant to the act?

The Commission and its staff review local government development projects under NCPC's mandate to protect the Federal interest. NCPC has no authority to approve these projects. The five-member staff of the Review and Implementation Division, according to the division director's estimate, spent less than 15 percent of their time in such reviews in 1981.

6. What amount of staff time is devoted to task forces and other intergovernmental meetings not directly connected with the mandated missions of NCPC?

According to the division director, staff spend a minimal amount of time on task forces or intergovernmental meetings which are indirectly related to NCPC's mandated activities.

7. Does the turnover of Commission members put the real power of NCPC in the "staff"? E.g., does the Commission as a group tend to defer to staff decisions, recommendations, proposals, and explanations on a regular basis?

The 1952 Planning Act limits Commission members' terms to 6 years. As of December 1982, 11 of the 12 members had been appointed or designated in the last 3 years.

The Commission establishes policy for staff to implement in developing Federal elements of the comprehensive plan, reviewing proposed development projects, preparing the Federal Capital Improvements Programs, and carrying out its other functions. We found no evidence of the Commission's deferring to staff decisions or actions on a regular basis.

8. Does the staff adequately inform new Commission members about NCPC? E.g., what NCPC does; what the role of a Commissioner is; what powers belong to the Commission or have

been designated to the Chairman and the executive committee; what procedural powers individual Commissioners have to request additional information, further review, rehearings, changes in Consent Calendar, etc.?

Most Commission members told us that they believed staff took adequate time to inform them of NCPC's mission and functions. Staff had provided written materials to all new members and conducted a half-day briefing for those who could attend.

9. Who sets staff salaries, determines promotions, bonuses, work hours, etc.? NCPC with a small staff, has seven SES employees; is this high, low, average? How is their work reviewed? Who hires the director? How is his work week determined? What procedures are involved to ensure against conflicts of interest on his part?

The Commission has delegated authority for day-to-day staff operations to the Executive Director. He is responsible for determining staff salaries, bonuses, awards, etc., as well as the type and hours of work.

A comparison of the number of NCPC executives (NCPC has five SES members) with those in 10 other independent Federal commissions and boards indicated that NCPC's proportion of executives to staff (5 to 52 in fiscal year 1981) is reasonable. (See app. V, p. 52.) A Performance Review Board, composed of executives from NCPC and two randomly selected independent agencies, reviews each executive's performance.

NCPC hires the Executive Director; his performance is reviewed by the Chairman.

Numerous Commission members and staff are involved in NCPC actions and decisions. Conflict-of-interest situations are thus minimized.

10. How does the Chairman's role interface with the rest of the staff? Time spent in the office; directions to staff; liaison with rest of the Commissioners; liaison with community and other planning groups.

According to the Chairman in office at the time of our review, about 70 percent of her interaction with NCPC staff was with the Executive Director and his Executive Assistant; 20 percent with the Associate Executive Directors, Assistant Executive Director for Administration, and the General Counsel/Secretary; and 10 percent with other planning staff (division heads, projects reviewers, and task force leaders). Both the Chairman and the Executive Director told us that they encourage key staff to relate directly to the Chairman.

Interaction between the Chairman and other Commissioners occurs at NCPC meetings, work sessions, task force meetings, and staff briefings. The Chairman meets with some community and planning groups regularly by virtue of serving ex officio in planning efforts, such as the PADC Board, the Metropolitan Washington COG committees, and mayoral committees in the District of Columbia, and on an as-needed basis in response to Federal agency, local jurisdiction, and regional projects and issues.

The Chairman spent about 3 to 4 days a month in the NCPC office and an equal amount of time preparing for and/or at other meetings associated with her chairing NCPC.

#### PUBLIC PARTICIPATION

1. Is NCPC's public participation geared to comments on the "Federal interest" or does it serve as a "second shot" for citizens on local matters on which they have failed to convince local or Federal government officials?

NCPC obtains public comment on plan elements and projects it reviews through presentations at Commission meetings and written submissions. NCPC asks that all comments be directed to the Federal interest. We saw no evidence that the public participation served any other purpose.

2. What types of organizations testify before NCPC? Do they usually represent or comment upon the Federal interest? What type of organizations are not represented before NCPC but probably should be? Are they presently notified of NCPC proposed actions? Should NCPC hearing and comment procedures be subject to the Administrative Procedure Act? Why or why not?

NCPC staff said they mail agenda items to all organizations that request them and add new organizations to the mailing list either at the staff's initiative or on request from the organizations. Neighborhood citizens organizations with defined boundaries, citizens groups organized to respond to single issues, coalitions of citizens organizations, established "umbrella" citizens organizations with defined boundaries, special interest groups, and area neighborhood commissions in the District have testified before the Commission. Not all organizations testify or submit comments on all proposed projects. NCPC asks these organizations to comment only on issues that may affect the Federal interest.

Two local planning agency officials said NCPC could improve its public participation efforts by involving local communities in the policysetting or planning processes at an earlier stage. They also said that NCPC should become more involved in local planning processes, making its policies known when local policies are being established.

NCPC is an agency within the meaning of the Administrative Procedure Act and therefore must comply with the Freedom of Information Act and Privacy Act provisions thereof. NCPC takes the position that it is not subject to the Administrative Procedure Act's rulemaking provisions, however, because comprehensive plan elements are not rules within the act's meaning. NCPC receives public comments pursuant to section 4(e) of the 1952 Planning Act.



OBJECTIVES, SCOPE, AND METHODOLOGY

Four U.S. Senators requested us to evaluate NCPC's mission and functions. With no definition of the "Federal interest" to judge NCPC actions against, we could not evaluate how well NCPC achieved its mandate. Instead, with agreement from the Senators' offices, we examined NCPC's role, functions, membership, and operations.

We started our work at NCPC in January 1982 and reviewed

- the background and status of the comprehensive plan for the National Capital Region--both Federal and District elements;
- NCPC functions, including comprehensive planning, review and comment on proposed development projects, preparation of the Federal Capital Improvements Program, and miscellaneous functions related to urban renewal and zoning;
- NCPC implementation and enforcement authority;
- NCPC coordination and possible overlap with other Federal, regional, and local planning bodies;
- public participation in NCPC decisionmaking;
- composition of the Commission;
- NCPC budget preparation and review, expenditures, organization, and staffing; and
- the role and functions of the Canadian National Capital Commission, the Federal planning organization in Ottawa.

We reviewed and analyzed NCPC's legislative history; documents, publications, and files; draft and final elements of the comprehensive plan; procedures for preparing the Federal Capital Improvements Program; staffing and organization; NCPC coordination with other planning and review organizations; and procedures for preparing its budget. We discussed controls over expenditures with the Assistant Executive Director for Administration. We reviewed 19 vouchers, totaling about \$108,000, to determine if expenditures were adequately documented. We reviewed NCPC files on five development projects; we selected the five because NCPC's involvement with them had recently been completed. We reviewed the minutes of the Commission meetings held during 1981 and 1982 and attended Commission meetings from January to July 1982.

We interviewed all Commission members, six former Commission members, the Executive Director, and numerous staff members. We also interviewed officials of the Office of Management and Budget, General Services Administration, Department of Health and Human Services, Smithsonian Institution, U.S. Postal Service, Commission of Fine Arts, Pennsylvania Avenue Development Corporation, District of Columbia, Arlington (Virginia) and Montgomery (Maryland) Counties, Metropolitan Washington Council of Governments, Northern Virginia Planning District Commission, Advisory Commission on Intergovernmental Affairs, American Planning Association, and Committee of 100 on the Federal City.

We sent questionnaires requesting opinions on NCPC functions and operations to 10 Federal agencies, 5 local governments, and 5 citizens groups in the Washington metropolitan area. We judgmentally selected the 10 Federal agencies because they were likely to have large land holdings in the National Capital Region. We judgmentally selected the local governments and citizens groups because NCPC decisions can affect their interests; the specific respondents were located throughout the region. This was not a statistically representative sample. Our overall response rate was 75 percent--nine Federal agencies (90 percent response rate), four local governments (80 percent response rate), and two citizens groups (40 percent response rate) completed questionnaires.

We visited officials of Canada's National Capital Commission in Ottawa and discussed the nature of Federal Government planning with them. We obtained from them and reviewed various documents and materials.

This review was made in accordance with generally accepted government auditing standards.

LIST OF FEDERAL, REGIONAL, LOCAL, AND PRIVATE  
ORGANIZATIONS CONTACTED

FEDERAL

Department of Agriculture:

Office of Operations, Facilities  
Management Branch.<sup>a</sup>

Department of Defense:

Department of the Navy, Installations  
Planning Division, Chesapeake Division, Naval  
Facilities Engineering Command.<sup>a</sup>

Department of Health and Human Services:

Office of Facilities Engineering.

Department of the Interior:

National Park Service.<sup>a</sup>

Department of State:

International Center Project.<sup>a</sup>

Department of Transportation:

Office of Installations and Logistics,  
Facilities Management Division.<sup>a</sup>

Department of the Treasury:

Property Management.<sup>a</sup>

General Services Administration:

Office of Public Buildings and Real Property.

Government Printing Office:

Engineering.<sup>a</sup>

National Aeronautics and Space Administration:

Real Estate Management Division.<sup>a</sup>

Office of Management and Budget:

Natural Resources Division.

Office of Personnel Management:

Executive Personnel and Management Development.

Smithsonian Institution:

Office of Facilities Services

United States Postal Service:

Operational Requirements Branch, Eastern Region.<sup>a</sup>

Veterans Administration:

Office of Construction.<sup>a</sup>

Commission of Fine Arts.

Pennsylvania Avenue Development Corporation.

Advisory Commission on Intergovernmental Relations.

REGIONAL

Maryland-National Capital Park and  
Planning Commission.

Metropolitan Washington Council of  
Governments.

Northern Virginia Planning District  
Commission.

LOCAL

City of Alexandria, Va.<sup>a</sup>

City of Gaithersburg, Md.<sup>a</sup>

District of Columbia.

Arlington County, Va.

Fairfax County, Va.<sup>a</sup>

Montgomery County, Md.

Prince Georges County, Md.<sup>a</sup>

Prince William County, Va.<sup>a</sup>

PRIVATE

American Planning Association.

Committee of 100 on the Federal City.

Fairfax County Federation of Civic Associations.<sup>a</sup>

Federal City Council.<sup>a</sup>

Federation of Citizens Associations of  
the District of Columbia.<sup>a</sup>

League of Women Voters, National Capital Area.<sup>a</sup>

Montgomery County Civic Federation.<sup>a</sup>

<sup>a</sup>Indicates agencies or organizations that were sent  
questionnaires.

VARYING VIEWS EXIST ON MEANING OF "FEDERAL INTEREST"  
AND ON NCPC'S FUNCTIONS AND MEMBERSHIP

Questionnaire results and interviews showed varying views on the appropriateness of NCPC's role and functions. Differences related to

- the meaning of the term "Federal interest," although everyone agreed that it exists;
- the organizations that should be involved in determining Federal interest; and
- the scope of NCPC functions intended to protect the Federal interest.

Also, about half the questionnaire respondents and officials interviewed questioned the appropriateness of the Commission's composition and the need for Commission members to have specific types of background or expertise. According to officials of the American Planning Association and the Advisory Commission on Intergovernmental Relations, planning body membership should be consistent with the body's responsibilities and include representation of those affected by its decisions.

VIEWS ON THE FEDERAL INTEREST

Questionnaire respondents and interviewees agreed that a Federal interest exists in the National Capital Region and gave their views on the types of issues that might include a Federal interest. Respondents also indicated that NCPC should be involved in defining the Federal interest but with differing degrees of input from other organizations.

Federal interest issues

Questionnaire respondents indicated that the Federal interest should encompass a wide range of issues as seen in the following table:

<u>Federal interest issues</u>	<u>Number of respondents answering "very great," "great," or "moderate" extent</u>		
	<u>Federal agency</u> <u>(9)</u>	<u>Local gov't</u> <u>(4)</u>	<u>Citizens groups</u> <u>(2)</u>
Historic preservation	9	4	2
Building location	7	4	2
Transportation facilities and services	7	4	2
Land use and zoning	9	2	2
Building architecture	6	4	2
Building size/mass	6	4	2
Natural features	7	2	2
International missions	6	3	2
Environmental resources, conservation, and protection	7	3	1
Economic and population forecasting and trend analysis	6	3	2
Tourism	4	4	1
Housing	5	2	2
Employment trends	5	2	1
Health, welfare, and safety services	5	2	1
Educational facilities	2	0	2

Note: We ranked the issues on the basis of the number of responses given for "moderate," "great," and "very great extent." Other possible responses were "some extent," and "little, if any, extent."

Interviews with NCPC members and Federal, regional, and local agency officials provided differing perspectives. Commission members generally see the Federal interest as encompassing a wide range of issues. These include not only those things associated with the development and functioning of Federal property and facilities but also such things as the preservation and protection of the region's historical and natural features and concern for the region's overall appearance, character, and

worldwide image as the Nation's Capital. As one Commission member said, the Federal interest should be concerned with more than just the area's physical needs; it must also be concerned with how the whole area fits and works together.

Federal agency officials expressed various opinions on the scope of the Federal interest. OMB officials, for example, told us that it could include many issues depending on the nature of each project and the existing circumstances. PADC and the Commission of Fine Arts officials said that it should not encompass specific issues for which other Federal and non-Federal agencies are responsible. For example, the PADC Executive Director said that NCPC should not conduct design reviews which are the specific responsibility of the Commission of Fine Arts. Smithsonian Institution and Department of Health and Human Services representatives told us that the Federal interest included environmental and aesthetic issues but only to the extent they affected the Federal Government's orderly development and efficient functioning.

Regional and local planning officials told us that criteria or standards for determining when a Federal interest exists must be established so that local officials will know when NCPC will become involved in local planning and development activities. At Metropolitan Washington COG's initiative, an ad hoc interagency committee convened in January 1982 to discuss Federal interest in development decisions in the metropolitan area. COG representatives, State and local planning officials, and Commission members and staff participated. The committee developed a document containing principles for identifying Federal interests in the development of the Washington metropolitan area. Both COG and NCPC adopted this document at their respective September 1982 meetings. In November 1982, these organizations adopted procedures for resolving potential differences that may arise between local and Federal agencies in implementing the committee's statement of principles.

#### Defining Federal interest

All but two questionnaire respondents agreed that NCPC should be involved, to a great extent, in defining the Federal interest in the National Capital. However, respondents indicated that other organizations should also be involved in defining the Federal interest. We ranked, in the following table, the organizations that questionnaire respondents indicated should be involved in defining the Federal interest to a moderate or greater extent.

<u>Organizations involved</u>	<u>Number of respondents answering "very great," "great," or "moderate extent"</u>		
	<u>Federal agency (9)</u>	<u>Local gov't (4)</u>	<u>Citizens groups (2)</u>
District of Columbia Government	7	3	1
The Congress	6	2	2
GSA	5	2	2
Local governments	5	3	0
Citizens groups	4	3	1
The White House	5	1	2
Other Federal agencies	6	2	0
Regional planning agencies	6	1	0
OMB	3	1	2
State governments	5	0	0

Most indicated, in order of preference, that the District government, the Congress, and GSA should be involved to a moderate or greater extent in defining the Federal interest. Both citizens groups wanted OMB involved to a moderate or greater extent; six of the nine Federal agency respondents indicated that OMB should be involved only to some extent, or to little, if any extent. Both citizens groups and most Federal agency respondents indicated that the White House should be involved to a moderate or greater extent. Only one of the four local government respondents, however, indicated that the White House should be involved to a moderate or greater extent.

Ten of the 12 Commission members told us that NCPC should have the primary responsibility for determining the Federal interest. Six members said that either the Congress or the White House should also have a role; four members indicated that local governments should have some role in either establishing the parameters of or defining the Federal interest.

#### VIEWS ON NCPC FUNCTIONS

The request asked us whether NCPC's mandates are still relevant and how NCPC activities have protected the Federal interest over the years. NCPC carries out three primary functions for protecting the Federal interest. These functions are:

- Developing the Federal elements of the comprehensive plan.



- Reviewing and commenting on development plans and projects in the region.
- Preparing the annual Federal Capital Improvements Program.

We asked all those contacted for their views on how important the various functions were to NCPC's being able to protect the Federal interest. Overall, we found that most of those contacted believed that all NCPC activities helped it to protect the Federal interest. Analyses of these responses, however, showed that NCPC members and the other groups differed in their views on how important each of these various functions is to protecting the Federal interest. The following sections provide information on those differences and a summary of the various groups' views on each of the primary NCPC functions.

#### Various groups rank importance of NCPC functions differently

We asked questionnaire respondents to indicate how important various NCPC activities are to helping it protect the Federal interest. We then ranked their responses. The results of this ranking showed that most respondents saw NCPC activities associated with development of the comprehensive plan as "most important;" activities associated with its preparation of the annual Federal Capital Improvements Program as "second most important;" activities associated with its review and comment on proposed plans and projects as "third most important;" and certain miscellaneous activities, such as its review and approval of proposed zoning changes in the District of Columbia, as being "least important."

We asked Commission members to rank NCPC's three primary functions from "most important" to "least important." In most cases, their ranking of NCPC's functions paralleled their views on how the Commission can best protect the Federal interest. That is, those members who said that development of the comprehensive plan is the most important function also said that the comprehensive plan would contribute to protecting the Federal interest. Similarly, those members who said that NCPC's review and comment activities are its most important activity also said that this function best protects the Federal interest. The number of Commission members who indicated that NCPC's development of the comprehensive plan was its most important function was about the same as the number who said that its review of planning and development activities in the region was most important. Only one Commission member indicated that preparation of the Federal Capital Improvements Program was the most important NCPC function.

Representatives of OMB and the Commission of Fine Arts told us that NCPC's review and comment function was the most important function.

State, regional, and local officials generally believed that NCPC's preparation of the Federal Capital Improvements Program was its most important function. Many, however, pointed out certain weaknesses which limited the document's usefulness to them. Among the weaknesses cited were the following:

1. The document is little more than a wish list, as projects included do not always get done.
2. Agencies are not required to abide by NCPC comments included in the document.
3. The information is sometimes outdated and does not include all Federal activities.

These officials indicated that if these weaknesses were eliminated, the Program would be more useful to them and help to increase coordination and cooperation between the Federal agencies and local governments in the region.

In comments on the draft report, NCPC staff said that the Federal Capital Improvements Program does include all proposed Federal projects except those under the Architect of the Capitol's jurisdiction, some on the White House grounds, and projects initiated by the Congress that do not involve multiyear funding.

#### Comprehensive planning

Section 4(a) of the 1952 Planning Act charged NCPC with preparing a comprehensive, consistent, and coordinated plan for the National Capital. It was to include the District of Columbia and U.S.-owned territory within the environs. Issues surrounding the comprehensive plan include (1) the extent to which others should be involved in the comprehensive planning process, (2) what elements NCPC's plan should include, and (3) the plan's geographic coverage.

#### Who should be involved?

All questionnaire respondents indicated that a comprehensive plan for the Federal interest in the National Capital is needed and that NCPC should have a principal role in preparing such a plan. However, respondents had various opinions on the role other organizations should have in preparing the plan. The following table shows which organizations most respondents in each group indicated should have a moderate or greater role in preparing Federal elements of the comprehensive plan.

<u>Federal agencies (9)</u>	<u>Local governments (4)</u>	<u>Citizens groups (2)</u>
District of Columbia	District of Columbia	The Congress
Commission of Fine Arts	Local governments	The White House
Regional planning agencies	Citizens groups	Commission of Fine Arts
Local governments	Commission of Fine Arts	OMB
		GSA

The two citizens groups indicated that State and local government and regional planning agency involvement in preparing the Federal elements of the comprehensive plan should be more limited than Federal agencies' involvement.

We also asked the interviewees for their views on who should help prepare a comprehensive plan in the region. Representatives of the four regional and local planning agencies did not make a distinction between Federal and non-Federal elements of comprehensive planning. The following are examples of statements these officials made about NCPC's role in preparing a comprehensive plan for the region.

1. Planning is a local government prerogative and local governments already have plans adopted. NCPC's plan is unnecessary.
2. COG was established to improve coordination among local governments and has adopted a regional comprehensive plan. NCPC's plan is unnecessary.
3. NCPC does not have the traditional authority, power, or constituency to implement a comprehensive plan.
4. NCPC planning should be limited to Federal land and facilities.
5. Local jurisdictions, except for the District government, are not represented on NCPC; therefore, NCPC's plan should not address local land use decisions.

Representatives of two of these local planning agencies said that if NCPC engages in comprehensive planning for the region, all the local planning organizations, not just those of jurisdictions represented on the Commission, should participate in establishing goals and developing plan elements. This position is consistent with comments we obtained from American

Planning Association and Advisory Commission on Intergovernmental Relations officials, who said that planning bodies are now encouraging involvement of those affected by plans in establishing planning goals and objectives. An Advisory Commission official added that this trend has increased constituent acceptance of plans and reduced the confrontation that often occurred when plans were formulated and adopted with no public input.

Federal agency officials also expressed varying opinions about whether NCPC should prepare a comprehensive plan for the region. Officials of two Federal agencies said that NCPC's comprehensive planning effort is worthwhile--(1) because it is an opportunity for coordination and compromise among all levels of government and (2) because it provides a record of land use objectives in the region. In contrast, officials of two other Federal agencies expressed doubts about NCPC's preparation of a comprehensive plan. One questioned NCPC's comprehensive planning function because comprehensive planning involves land use alternatives, and NCPC has no land use authority in the region other than on Federal property. Officials of both these agencies saw NCPC's comprehensive planning function as being very similar to COG's comprehensive planning function. One Federal agency representative we interviewed was not familiar with NCPC's comprehensive plan development activities and did not comment on its need or importance.

#### Other agencies have similar planning functions

Both COG and the District government carry out comprehensive planning functions. In 1980, COG's Board of Directors adopted a Metropolitan Policy Guide, its first comprehensive planning document. This document is the result of a cooperative planning effort begun in 1974, with a reexamination of the document "Development Policies for the Year 2000 for the National Capital Region" prepared jointly by NCPC and the now defunct National Capital Regional Planning Council. The COG guide contains overall framework policies for the region and specifies the means by which the policies will be implemented. However, it is only advisory to the District of Columbia, State, county, and city governments that are COG members and depends on their individual actions to implement the stated policies.

Representatives of two Federal agencies and most local and regional planning agency officials we interviewed doubted the need for NCPC to also prepare a comprehensive plan for the region. Some saw the existence of two comprehensive plans as being redundant, confusing, and a potential source of controversy. NCPC officials, however, pointed out that the Federal interest is neither represented nor included in COG's comprehensive plan and, thus, a comprehensive plan for the Federal interest is needed. One of the Federal agency representatives who expressed doubt about NCPC's comprehensive planning activities also recognized the absence of the Federal interest in COG's

comprehensive planning activities but suggested that, as an alternative to both organizations doing comprehensive planning, NCPC could be represented on COG to ensure Federal involvement in one regional comprehensive planning effort.

Although the Home Rule Act gave NCPC responsibility for developing the Federal elements and the District government responsibility for developing the local elements of the comprehensive plan, without agreement between these two agencies on what those Federal and local elements are, both agencies could carry out similar planning efforts. For example, both NCPC and the District government had planned to include a historic preservation element in their respective elements of the comprehensive plan. But agreement between the District government and NCPC to jointly develop a historic preservation element avoided potential duplication in this area.

The Commission of Fine Arts also has authority to engage in some planning functions, but generally it does not. It does, however, review and provide comments on a variety of planning and development activities in the region.

In responding to a draft of this report, NCPC officials stated that this section reflected (1) confusion among those contacted during this review about the term "comprehensive planning" and (2) the differences between comprehensive planning as carried out by local governments, regional agencies like COG, and NCPC as the central Federal planning agency in the region. They provided us with information to distinguish between the types of comprehensive planning carried out at these levels. They stated that although planning in this area is done at several levels, the planning carried out at these levels is not necessarily overlapping or duplicative.

For example, the Federal elements of the Comprehensive Plan for the National Capital prepared by NCPC are advisory and focus on Federal activities, federally owned land, and Federal concerns about the future growth and development of the National Capital Region. The plan consists largely of policy statements, contains no conventional land use plan, and does not provide a basis for land use regulation except in the District of Columbia. NCPC officials also pointed out that, whereas COG's guide will be implemented primarily through actions of local governments, the NCPC plan will be implemented primarily by Federal agencies and departments through the Federal Capital Improvements Program and leasing activities. They stated that inter-governmental cooperation and coordination is needed at all levels of planning for the orderly development and growth of the National Capital Region.

#### Elements covered in the plan

Most of those we contacted indicated that the plan elements prepared by NCPC should include the following: historic preservation; building location, architecture, and size/mass; natural

features; transportation; environment; and international missions. Most Federal agency and citizens group respondents and interviewees indicated that land use and zoning should be included in the Federal elements of the comprehensive plan, but half the local government respondents and interviewees did not.

At the time of our review, NCPC had completed or was preparing eight plan elements--foreign missions and international agencies, Federal environment, Federal goals for the National Capital, Federal facilities, Federal employment, preservation and historic features, open space and natural features, and visitors and tourists. (See pp. 58 and 59 for further discussion.)

#### Geographic coverage

Questionnaire respondents indicated that Federal elements of the comprehensive plan should cover, to a great extent, Federal property and the geographic area covered in L'Enfant's original plan for the District of Columbia (the central area of the District). However, results also clearly showed that Federal installations that are farther from the central area should receive much less NCPC involvement. In addition, three of four local planning agencies provided narrative comments expressing their belief that NCPC should strictly limit its scope to Federal property and not interfere in local matters.

#### Federal Capital Improvements Program

NCPC, as the central planning agency for the Federal Government in the National Capital Region, annually prepares a multiyear Federal Capital Improvements Program that shows proposed Federal land acquisitions and development projects in the region. It also includes NCPC's comments on each of the proposals.

All questionnaire respondents--Federal agencies, local governments, and citizens groups--said that they were aware of the Federal Capital Improvements Program, and two-thirds said that they used it to some degree as shown in the following table:

<u>Extent of use</u>	Federal agency (9)	Local gov't (4)	Citizens groups (2)
Not aware of it	0	0	0
Aware of it, but do not use	3	1	1
Use it some	6	3	1
Use it extensively	0	0	0

Those Federal agency respondents who indicated that they had used the Program generally said that they used it to learn

of development proposals near their facilities and to determine any impact on their agencies. The local government respondents who had used the document gave similar responses. One of the local government respondents said it was useful as an "early warning" of Federal projects to be located in local jurisdictions. One citizens group respondent was dissatisfied with the extent to which NCPC kept the group informed of future Federal construction. But local government respondents and the other citizens group respondent indicated that NCPC kept them informed to some extent. Other Federal agencies received much lower marks than NCPC in this respect.

The interview data on the Federal Capital Improvements Program corresponded to the questionnaire data, although the interview data revealed more critical comments on the Program's usefulness. Some interviewees saw it as a tool for improving coordination and cooperation between the Federal Government and local jurisdictions. Others, however, said that the Program was a "wish list," that it included incomplete and unnecessary data, and that it duplicated data compiled by others. Officials of four local and regional groups doubted its value because, according to them, Federal agencies do not adhere to it anyway.

OMB officials said that the Federal Capital Improvements Program was not useful to them because it was not published in time for the fall executive branch budget formulating, and it did not include enough budget data. However, they suggested improvements which could make it useful to others. These were to:

- Include those projects or proposals that have some assurance of being included in each agency's fiscal year budget.
- Exclude items that could be considered repair or maintenance items.
- Identify the Program's users and gear its contents to those users' needs.

OMB officials said that with these changes, the Program would become a more accurate picture of proposed Federal construction in the National Capital Region.

#### NCPC coordination with Federal agencies on capital improvements program

Because the Planning Act requires each Federal agency to send NCPC a copy of its advance program of capital improvements in the National Capital Region, we asked nine Federal agency respondents a series of questions on their working relationship with NCPC.

All nine Federal agency respondents prepared capital improvements programs for their agency; eight submitted capital

improvements information to NCPC. The data submitted to NCPC usually differed in some respect (timeframe covered, format, amount of detail, or geographic area) from that prepared for their own agency or submitted to OMB or GSA.

All Federal agency respondents cited personal consultation and/or written communication as a means for receiving NCPC comments on their submissions. Three respondents said that their agency's actions or viewpoints reflected an agency position that changes had to be made to obtain NCPC concurrence on the capital improvements program submission. Four other respondents said that their agencies accommodated NCPC's comments to the extent feasible. One said that his agency was able to reach accommodation with NCPC, and one said the comments had no effect on the agency's final program.

Finally, seven of the nine Federal agency respondents said that the Federal Capital Improvements Program improved coordination between the Federal Government and State and local jurisdictions from a moderate to a very great extent.

#### NCPC review and comment activities

NCPC reviews and comments on many different types of plans and development activities in the region. Some of these reviews are specifically mandated by law, while others are carried out to help NCPC achieve its coordination role in the region. The specific types of NCPC reviews are as follows:

- NCPC reviews proposed Federal agency policies, plans, and programs, including regional plans, installation master plans, project plans, and annual capital budgets. Within the District of Columbia, NCPC approval is required for plans of Federal public buildings. Outside the District, NCPC comments and suggestions on proposed Federal public buildings are advisory.
- NCPC reviews proposed District government policies, plans, and programs, including installation master plans, project plans, annual capital improvements program recommendations, and proposed zoning changes. Within the District's central area, NCPC approval is required for final plans of District public buildings.<sup>1</sup> Outside the central area, NCPC comments and suggestions on proposed projects are advisory.

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<sup>1</sup>The central area was determined through an agreement between NCPC and the District of Columbia government pursuant to Section 5 of the National Capital Planning Act of 1952, as amended.



--NCPC reviews policies, plans, and programs proposed by State, regional, and local agencies or jurisdictions in the region that appear to affect Federal land in the vicinity or other Federal interests in the National Capital Region. These include proposed long-range general, comprehensive, or master plans; area or district plans indicating more detailed land use and development policies and standards; capital improvements programs; local government project plans; and local proposed zoning changes. All NCPC comments and suggestions are advisory.

These reviews are intended to identify the potential impact on Federal activities and interests in the region of such policies, plans, and programs and their relationship to NCPC's comprehensive plan. The reviews are also intended to assist non-Federal agencies by informing them of Federal interests and concerns.

Eight of the nine Federal agency respondents said that they agreed that NCPC should review their master plans. Six of nine said that they agreed that NCPC's review of Federal agency master plans improves coordination between the Federal Government and State or local governments. (See app. VIII, p. 91.)

Six of the nine Federal agency respondents indicated that NCPC required only that number of individual site and building plan reviews needed to plan for and protect the Federal interest. Two of the Federal agency respondents indicated that NCPC makes more of these reviews than are needed and five said that they thought these reviews, in general, extended beyond matters affecting the Federal interest. (See app. VIII, pp. 97 and 102.) Five of the nine respondents said that they agreed with the statement that NCPC's reviews of Federal projects and developments resulted in better projects. (See app. VIII, p. 103.)

Three of the four local government respondents indicated that their agencies believed that NCPC's review and comment process was consistent with and limited to those elements that affect the Federal interest. The fourth respondent indicated that NCPC's review and comment process was neither relevant nor necessary to protect Federal interest.

American Planning Association and Advisory Committee on Intergovernmental Relations officials told us that NCPC's review and comment functions are generally consistent with similar functions carried out by other planning bodies. Both pointed out that NCPC should limit its review to the larger, more significant issues and provide advice only to the local government officials who will be held accountable for the actions.

The Committee of 100 on the Federal City said that NCPC's reviews have greatly improved the quality of Federal site planning and facilities not otherwise subject to review by local planning and review bodies or the Commission of Fine Arts. It cited the National Institutes of Health, Dulles International Airport, and Fort Myer in Arlington, Virginia, as examples.

Commission members told us that generally, NCPC's review and comment functions are proper and necessary. Only one member questioned whether NCPC should be reviewing individual site and building plans or local jurisdiction plans rather than just Federal and District plans. Six members, however, said that they believed NCPC had, in certain cases, construed the Federal interest too broadly and addressed matters that were not significant to the Federal interest. Seven members also said that they believed the way in which NCPC carried out its review function in the past was not consistent with its objective of facilitating coordination among the various levels of government in the region.

The four regional and local planning officials we interviewed also expressed concern with NCPC's review and comment process. Each of them told us of an example which, in their opinion, showed that NCPC had used this function to become involved in matters that are solely within the local government jurisdiction. (See app. I, p. 2, for some of the examples.) One local official said that NCPC's review and comment role was proper but that NCPC should not use this function in attempts to control local government prerogatives.

Generally, Federal agency officials we interviewed indicated that NCPC's review and comment functions are appropriate, but three cited some concerns. A PADC official said that, in his opinion, NCPC should not review individual projects already included in the Pennsylvania Avenue Development Plan approved by NCPC or review the design of individual projects, which is the Commission of Fine Arts' responsibility. OMB officials said that NCPC had interpreted the Federal interest too broadly in some cases. They said that, sometimes, the Federal interest present in plans or projects NCPC reviews is not apparent but that NCPC had always been able to provide justification for its involvement when OMB had asked. The Commission of Fine Arts officials said that they believed NCPC could work more closely with local and regional governments to improve coordination and reduce the number of its reviews.

#### Similarity between NCPC's and other groups' reviews

A senior planner in the District's Office of Planning and Development stated that the District and NCPC made similar reviews of proposed projects and developments. In their reviews, both analyze such things as building heights and density, impact on transportation, and impact on water supply and sewer capacities. According to this official, however, the reviews are done

from different perspectives. He also said that the working relationship between District and NCPC staffs is very good. He pointed out, for example, that NCPC has agreed informally not to consider proposed projects and developments at Commission meetings until the District government's reviews have been completed. He said that he did not know the extent to which NCPC staff (1) used information developed by the District for its review or (2) developed such information independently.

Many of those we contacted, including OMB and some other Federal agency representatives, the Commission of Fine Arts representatives, and Planning Commission members, said that they perceive the reviews done by the Commission of Fine Arts and NCPC as being very similar. The problem, according to one former Planning Commission member, is establishing the point at which planning ends and design review begins. Comments of other Planning Commission members and the Commission of Fine Arts representatives supported this view.

The Commission of Fine Arts' Secretary told us that the two Commissions' reviews, although similar, are done for different purposes. According to him, the Commission of Fine Arts' review is done to preserve or enhance the character, integrity, and order of the city and its open spaces, whereas NCPC's review is done to protect the public interest in the development of the Nation's Capital. He said, however, that NCPC also did design reviews--a result he attributed in part to the increased involvement of architects on planning bodies since the 1950's. But, in his opinion, the duplication that occurs in the two Commissions' reviews was good because design reviews are subjective, and when both agreed, which he said was most of the time, they tended to support one another. He also said that when they disagreed, the compromise required to reach agreement probably resulted in better projects. No formal coordination agreement exists between these two Commissions, but staff representatives attend one another's meetings.

PADC's Executive Director told us that, in his opinion, NCPC should not become involved in design reviews and that his agency had decided to drop a planned project because NCPC had disliked the design. However, other officials we contacted had no specific problem with submitting their project plans to both Commissions. Proposed plans and projects can be submitted to either Commission in no particular order. Generally, the officials we contacted said that they were aware of the time needed for the required reviews by both Commissions and, thus, the reviews did not usually result in increased project costs or delays.

#### VIEWS ON COMMISSION MEMBERSHIP

The Commission's composition raised numerous questions. About half of those we contacted indicated that the Commission's membership should be changed in some way.

Questionnaire respondents were about equally divided in their opinions on the appropriateness of the current composition, as shown below:

<u>Response</u>	<u>Questionnaire respondents</u>		
	<u>Federal agency</u> (9)	<u>Local gov't</u> (4)	<u>Citizens groups</u> (2)
Very appropriate	1	0	0
Appropriate	4	1	1
Not sure	1	2	0
Inappropriate	3	1	1
Very inappropriate	0	0	0

The three Federal agency respondents who indicated that the Commission's composition was inappropriate cited the executive administration (with three ex officio Cabinet members and three Presidential appointees) and/or the District government (with two ex officio members and two mayoral appointees) as being overrepresented on NCPC. Agencies not now represented on NCPC, but mentioned as potential members, were the Architect of the Capitol and the United States Postal Service because over 180 postal facilities are located in the region.

The local government respondent who indicated that the Commission's composition was inappropriate said that local jurisdictions were not adequately represented, while the citizens group representative who indicated the Commission's composition was inappropriate saw the need for more citizen members.

Of the 14 respondents to a question on the extent to which the current composition facilitated accomplishment of NCPC functions, 13 said "to a moderate or great extent" as shown below:

<u>Response</u>	<u>Questionnaire respondents</u>		
	<u>Federal agency</u> (9)	<u>Local gov't</u> (4)	<u>Citizens groups</u> (2)
Very great extent	0	0	0
Great extent	5	1	0
Moderate extent	3	2	2
Some extent	0	1	0
Little, if any, extent	0	0	0

Present and past Commission members and others we interviewed expressed diverse opinions on Commission membership. Like the questionnaire respondents, many questioned the number of District government representatives on the Commission. They questioned whether a Federal commission responsible for Federal interests should have so many District representatives. Many also said that they believed other local jurisdictions should have greater representation because NCPC actions can affect the entire region, not just the Federal Government.

Generally, the questionnaire respondents and interviewees also questioned the need for specific professional expertise in such disciplines as architecture, design, and transportation. Currently, the legislation requires no specific qualifications for membership except that citizen appointees should have experience in city or regional planning.

The underlying theme of all comments about membership was that the Commission should comprise persons best qualified to achieve its mandate and represent those persons affected by its decisions. As one official pointed out, if NCPC's current level of authority over District government affairs remains as it is, four District representatives are appropriate. However, if NCPC authority is reduced, so too should be the number of District representatives.

NCPC OPERATIONS

The request raised a number of questions regarding NCPC operations. This appendix responds to those questions. Specifically, the information we collected indicates that:

- NCPC employed 51 full-time employees in fiscal year 1981 to carry out its mission. Since passage of the D.C. Home Rule Act in 1973, NCPC has implemented three reorganizations to adjust for reduced staff and for changes in NCPC emphasis and responsibilities.
- Staff workloads for the planning and review functions remained relatively constant until 1981, when the Commission emphasized completing the eight Federal elements of the comprehensive plan. Staff have devoted minimal time to miscellaneous functions such as task forces on improving the Potomac River waterfront.
- Currently, NCPC has no authority to review the Federal Government's use of leased space despite the regional planning implications. NCPC and GSA have discussed conditions when NCPC will be involved in leased space proposals. These conditions are included in the Federal facilities element of the comprehensive plan.
- NCPC has no authority to implement its comprehensive plans; agencies proposing development projects implement them after receiving NCPC concurrence. Furthermore, NCPC has no authority to ensure compliance with its review procedures or recommendations.
- A bill introduced in the Senate during the 97th Congress would have transferred certain functions from NCPC to the District government. The bill's objective was to give the District greater control over local planning, but it would have taken away certain approval and modification powers NCPC now has. Without such powers, actions contrary to the Federal interest could have been taken. No action was taken on this bill in the 97th Congress.
- NCPC takes adequate steps to ensure public participation in decisionmaking. It has, however, contracted with a consultant to improve citizen participation and intergovernmental liaison.

--NCPC's annual expenditures have averaged \$2.2 million in the last 4 years. (See app. VII.) Our review of a limited number of fiscal year 1981 vouchers showed that these expenditures were consistent with NCPC's procedures and mandate.

--A comparison of the missions and functions of the National Capital Commission of Canada and NCPC shows that both have similar responsibilities to protect the Federal interest in their respective National Capital Regions but different authorities to satisfy them.

These matters are discussed in more detail in the following sections.

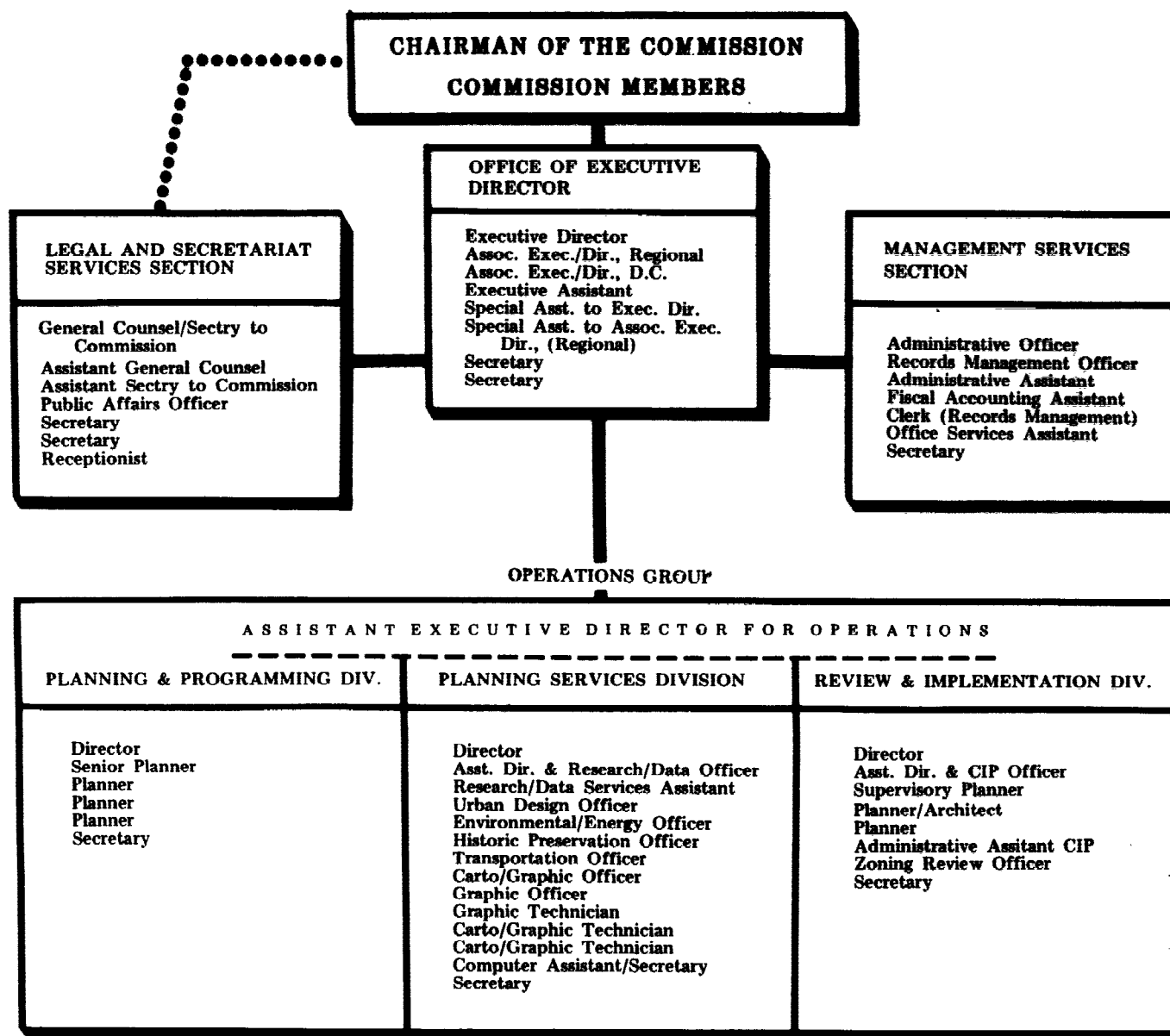
#### NCPC STAFF

NCPC staff consisted of 51 full-time employees in fiscal year 1981--one less than the authorized 52 positions. The average general schedule (GS) salary grade was GS-10.17, excluding five Senior Executive Service (SES) positions.

#### Permanent Authorized Positions

<u>Position type</u>	<u>Number</u>
SES	5
GS-15	5
GS-14	7
GS-13	2
GS-12	7
GS-11	4
GS-9	4
GS-8	4
GS-7	2
GS-6	9
GS-5	<u>3</u>
Total	<u>52</u>

Staff are organized into three operational divisions and two support sections as shown in the organization chart on the next page.





The staff's five SES appointments include the

- Executive Director,
- Associate Executive Director for Regional Affairs,
- Associate Executive Director for District Affairs,
- General Counsel/Secretary, and
- Assistant Executive Director for Operations.

The Office of Personnel Management (OPM) reviews the number of SES positions in Federal agencies every 2 years. OPM had no questions or reservations about the number of NCPC's five SES positions when it assessed the positions in 1981 and earlier in 1979. According to an OPM spokesperson, OPM assesses position classifications, agency size, and past use of SES allocations.

A comparison of the number of NCPC executives with those in 10 other independent Federal organizations in fiscal year 1980 showed that NCPC's proportion of executives to total staff was reasonable. We selected the 10 organizations and obtained statistical data on them from the fiscal year 1980 U.S. Budget. As shown in the following table, the proportion of executives to total staff varied widely, with no consistent pattern. This variance may be due to the need for a different number of executives to carry out each organization's unique mission. (See mission descriptions in app. VI.)

Comparison of Selected Independent Organizations'  
Executive Staffs and Budgets for Fiscal Year 1980

<u>Agency</u>	<u>Total staff</u>	<u>No. of executives</u>	<u>Ratio of executives to total staff</u>	<u>Average GS grade</u>	<u>Budget (note a)</u> (000 omitted)
Advisory Council on Historic Preservation	25	1	1 to 25	11.4	\$ 1,444
American Battle Monuments Commission	384 <sup>b</sup>	0	-	8.4	8,440
Appalachian Regional Commission	12	4	1 to 3	(c)	3,101
Commission on Civil Rights	285	10	1 to 28.5	10.6	11,690
Commission of Fine Arts	7	1	1 to 7	9.8	257
Consumer Product Safety Commission	871	20	1 to 43.5	10.6	43,045
Federal Election Commission	251	9	1 to 27.9	10.0	8,940
Occupational Safety and Health Review Commission	165	57	1 to 2.9	11.0	7,429
Pennsylvania Avenue Development Corporation	47	5	1 to 9.4	11.0	1,699
United States International Trade Commission	438	14	1 to 31.3	10.3	14,133
National Capital Planning Commission	52	5	1 to 10.4	10.2	2,145

<sup>a</sup>Obligated amounts.

<sup>b</sup>Includes 339 ungraded positions.

<sup>c</sup>Positions ungraded--average salary about \$31,000.

NCPC ORGANIZATION

Since passage of the D.C. Home Rule Act in 1973, NCPC has implemented three reorganizations designed to make the staff more responsive and effective. The first reorganization resulted directly from changes made to effect District home rule and the second made adjustments for reduced staff and changing responsibilities. A subcommittee of NCPC identified the need for the third staff reorganization, effective August 1982.

The Home Rule Act provided that the District's Mayor would be the central planning official for the District government and be responsible for coordinating District planning activities and for preparing and implementing District elements of the comprehensive plan. The act caused no immediate changes in NCPC staffing levels because reduced staffing needs for developing District plan elements and reviewing District development plans were offset by increased staffing needs for developing Federal elements of the plan. Also, at the District's request, NCPC continued to carry out local planning reviews of proposed District developments and projects until November 1975 even though home rule became effective July 1, 1974.

However, when the District government assumed full responsibility for this function, NCPC staff reorganized. In October 1975 the number of staff assigned to the review function was reduced from 15 to 10. At the same time, staff assigned to the planning function increased from 14 to 18. Also, staff from the technical services offices were assigned to participate, full time, on specific elements of the comprehensive plan.

In September 1979, the Executive Director reorganized the two former divisions (planning and review) into three new divisions, including planning, review, and a third division made up of technical services staff.

In 1981, the Commission established a subcommittee on staff organization and budget to maximize the organizational response to Commission priorities. After analyses and discussions, the subcommittee and the Executive Director saw the need for another reorganization. Hence, in August 1982, the Executive Director reorganized the staff into its present form. (See p. 50.) The new organization retains NCPC's three functional divisions but places an Assistant Executive Director for Operations over them, consolidates legal and public affairs services, and expands the management services section.

Because staff do not keep formal time and attendance records, they estimated the amount of time spent on each division's activities. Our analysis of their estimates shows that most time has been devoted to or has supported the comprehensive planning function.

Planning and Programming Division

The Planning and Programming Division has primary responsibility for the comprehensive plan, both preparing the Federal elements and coordinating with the District government on District elements of the plan. Six community planners and one secretary are permanently assigned to the Division. Staff members of the Planning Services Division also work on the comprehensive plan as needed, spending from 15 to 60 percent of their time on planning. (See pp. 55 and 56.) The Director, Planning and Programming Division, estimated the following functional breakdown of staff time for the division during 1981:

Functional Breakdown of Staff Time,  
Planning and Programming Division

<u>Activity</u>	<u>Percent of time</u>
Prepare Federal elements of the comprehensive plan	75
Review District elements of the comprehensive plan	5
Help Federal agencies with selection of new locations, consolidation, and master plans	5
Liaison with local and regional planning agencies, including the District and COG	5
Review State and regional plans for consistency with comprehensive plan and impact on Federal interests	<u>10</u>
Total	<u>100</u>

Source: NCPC.

Review and Implementation Division

The Review and Implementation Division is responsible for capital improvements programming, master and project plan reviews, urban renewal planning, Federal interest reviews of local plans and Federal grant applications, and coordination of Federal development planning. Five staff members are assigned to the Division on a full-time basis. Three community planners, including the Division Director and one secretary-typist, spend all their time on reviews of projects under section 5 of the 1952 Planning Act and on other review activities.

The Division's assistant director is assigned on a full-time basis to preparing the Federal Capital Improvements Program and reviewing local capital improvements programs. The Division

Director estimated the following functional breakdown of time his professional staff spend reviewing proposals.

Functional Breakdown of Professional Staff Time,  
Review and Implementation Division

<u>Activity</u>	<u>Division director</u>	<u>Assistant director</u>	<u>Planner #1</u>	<u>Planner #2</u>
Federal master and project plans	70	-	75	85
Urban renewal plans, District projects, and miscellaneous (note a)	10	-	15	5 <sup>b</sup>
Local capital improvements program and plan reviews	10 <sup>c</sup>	5	10	10
Federal Capital Improvements Program	<u>10</u>	<u>95</u>	<u>-</u>	<u>-</u>
Total	<u>100</u>	<u>100</u>	<u>100</u>	<u>100</u>

<sup>a</sup>Includes transfers of jurisdiction, street and alley closings, changes in permanent system of highways, National Park Service land agreements, and so forth.

<sup>b</sup>Includes A-95 reviews. (See footnote, p. 60.)

<sup>c</sup>Excludes urban renewal plan reviews.

Source: NCPC.

Planning Services Division

The Planning Services Division works on various portions of the planning, review, and capital improvements functions in accordance with its staff's technical skills and knowledge on an as-needed basis. The Division has specialists in

- research and data services,
- cartography/graphics,
- environment/energy,
- historic preservation,
- transportation, and
- urban design.

The Division employs a total of 16 staff members. The amount of time allocated to NCPC activities varied considerably for the technical staff. The following table shows the Division Director's estimates of the percentage of time spent on various activities during 1981.

Percentage of Time Spent by Activity in 1981,  
Planning Services Division

<u>Activity</u>	<u>Div. dir.</u>	<u>Re-search</u>	<u>Carto/graphic</u>	<u>Envir./energy</u>	<u>Hist. pres.</u>	<u>Trans.</u>	<u>Urban design</u>
No. of employees	<u>3</u>	<u>2</u>	<u>6</u>	<u>1</u>	<u>2</u>	<u>1</u>	<u>1</u>
Office of Exec. Dir.	15	15	5	10	3	5	2
Review of projects	18	-	15	45	25	30	25
Comprehensive plan	37	30	15	25	35	40	60
Special NCPC requests	2	-	5	5	3	5	-
General meetings	3	5	5	5	15	10	1
Spec. projects/studies	20	25	25	5	10	10	5
Administration	5	25	20	5	2	-	2
Other	<u>-</u>	<u>-</u>	<u>10</u>	<u>-</u>	<u>7</u>	<u>-</u>	<u>5</u>
Total	<u>100</u>	<u>100</u>	<u>100</u>	<u>100</u>	<u>100</u>	<u>100</u>	<u>100</u>

Source: NCPC.

RESPONSIVENESS TO COMMISSION MEMBERS

Most Commission members said that the staff respond well to their directives but several questioned staff responsiveness. Those who questioned responsiveness attributed it to the staff's not placing the same priority on developing Federal elements of the comprehensive plan as the Commission did.

Staff identified two factors that might cause Commission members to believe that the staff does not adequately respond to the Commission. The staff said that, first, some new Commission members have been cautious in accepting staff recommendations as objective evaluations based on professional analyses. They said that, in time, the rapport between staff and Commission members should improve.

Second, some misunderstanding arose when staff failed to respond to directions from one or two Commission members which, according to staff, appeared contrary to the Commission's total direction. Staff said that it was difficult to determine exactly what the Commission wants them to do, particularly when differences exist among Commission members. This situation should also improve because the Chairman has acknowledged the need to clarify the Commission's collective views when giving direction to staff members.

According to staff, they provide materials and brief new Commission members and alternate members on NCPC's authority, functions, and rules of procedure and on current major planning issues before NCPC as soon as possible after their appointment or designation. Staff believe that such orientations are adequate considering the limited time available to part-time Commission members with other responsibilities.

A staff analysis of Commission meetings from January through April 1982 indicated that the Commission devoted about 19 percent of its time to items requiring approval, 26 percent to review and comment, and 55 percent to other matters such as informational presentations on nonaction items, administrative matters, and organizational issues. Excluding time devoted to other matters, about 42 percent was devoted to approvals and 58 percent to review and comment.

The Chairman works 3 or 4 days a month in NCPC offices on activities directly associated with NCPC business. With other Commission members, she attends work sessions, task force meetings, and staff briefings in addition to regular Commission meetings. Her contacts with the staff are primarily with the Executive Director, but she also has numerous contacts with other staff members. The Chairman is an ex officio member of other planning agencies such as PADC and mayoral committees in the District. She spends another 3 or 4 days a month preparing for and attending meetings called by these groups.

#### NCPC FUNCTIONS

NCPC staff spend time on (1) preparing Federal elements of a comprehensive plan, (2) reviewing proposed development projects and building plans for effect on the Federal interest, and (3) preparing a 5-year Federal Capital Improvements Program. In addition, NCPC staff devote minimal time and resources to miscellaneous activities. These functions and miscellaneous activities are discussed below.

#### Comprehensive plan emphasized

After 30 years of not having a complete comprehensive plan adopted, in 1981 NCPC emphasized completing a plan by 1983. The final plan will consist of both Federal and District elements. As of March 1983, NCPC had adopted five of eight Federal elements. In September 1982, the District government circulated

for comment its comprehensive plan for the District of Columbia, incorporating a previously adopted local plan element.

#### Comprehensive planning history

In the 1960's the staff prepared two plans which were to provide policy guidance and a framework for a more detailed comprehensive plan. In 1967, the staff issued another plan--"The Proposed Comprehensive Plan for the National Capital Region"--to provide that detailed planning. NCPC adopted 4 of the 11 elements proposed in the 1967 plan, 2 of which the District needed to qualify for Federal transportation and recreation funding. NCPC never completed or adopted the remaining elements because District home rule was near and the Commission stopped pressing the staff to complete the plan, especially the local elements.

Passage of the Home Rule Act in 1973 further delayed NCPC adoption of the comprehensive plan. The act split planning responsibilities between the District and NCPC but required joint preparation of the final comprehensive plan. However, the act gave NCPC review and approval authority over District elements.

In 1981, the new Commission members changed the priority on what Federal elements should be developed. Some elements have been modified in various ways from name changes to major restructuring. For example, draft plan elements for air facilities and urban design will not be finalized, but parts of them will be included in other elements.

#### Current plan status

In 1981, the Commission began pressing itself and the staff to step up efforts to complete the comprehensive plan. This emphasis resulted in a schedule for completing all but one Federal element by December 1982. However, the final plan must include the District's local elements. The District government finished developing its plan, which is being circulated for public comment, in September 1982. The comment period was closed in April 1983. After the plan is revised, on the basis of comments received, it must be approved by the Mayor, the City Council, and NCPC before it can become part of the comprehensive plan for the National Capital Region.



The status of Federal elements is as follows:

Status of Comprehensive Plan Federal Elements

<u>Element</u>	<u>Date completed or scheduled for completion</u>
Foreign missions and international agencies	October 1977
Federal environment	February 1981
Federal goals for the National Capital	February 1982
Federal facilities	March 1983
Federal employment	March 1983
Open space and natural features	April 1983
Preservation and historic features	June 1983
Visitors and tourists	December 1983

Source: NCPC.

NCPC staff said that completion and adoption of the total comprehensive plan would help clarify the complexities of Federal interest in the region.

Review of proposed development projects

The 1952 Planning Act and related legislation gave NCPC several authorities in reviewing proposed development projects. First, NCPC has review and, in some cases, approval authority over proposed Federal development projects and building plans in the National Capital Region. Federal agencies must await NCPC's recommendation or approval before implementing their plans or projects. Second, NCPC has review authority over proposed District government projects and approval authority over District projects in the District's central area.

Third, in its efforts to protect the Federal interest, NCPC reviews private projects and plans and comments on their effects on the Federal interest. NCPC has no authority to block private development but may use persuasion to minimize what it believes is an adverse effect on the Federal interest. Fourth, NCPC has additional review responsibilities over District government actions such as zoning and urban renewal plans and over Federal

agency environmental impact statements and local government OMB Circular A-95 grant applications.<sup>1</sup>

Staff review workloads

Recent demands for the staff to review and comment on proposed Federal and District development plans have been relatively constant. Staff have experienced a large increase in the number of A-95 reviews because it took time for people to become aware of the new reporting requirements called for by OMB Circular A-95 published in 1976. Urban renewal planning and zoning case reviews have decreased. The following table shows the number of selected plan and project reviews by NCPC staff for fiscal years 1978-82.

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<sup>1</sup>A-95 requires that copies of applications for Federal assistance involving land or water use and development or construction be sent to NCPC as well as to the Metropolitan Washington Council of Governments.

Project Review Activity for Fiscal Years 1978-82

<u>Type of review</u>	<u>1978</u>	<u>1979</u>	<u>1980</u>	<u>1981</u>	<u>1982</u>
Federal master plans or master plan modifications	6	10	12	11	14
Federal site and building plans	65	60	76	65	73
District master plans and site and building plans	7	9	8	3	3
Street and alley closings	17	12	17	20	26
A-95 Federal grant applications	63	135	175	310	90(est) <sup>a</sup>
Urban renewal plan modifications	7	14	3	4	11
Sale of D.C. surplus properties	2	0	0	27	0
Transfers of jurisdiction	0	2	3	0	3
Referral reports on D.C. Board of Zoning Adjustment cases	22	3	4	3	4
Proposed D.C. zoning orders	23	24	20	12 <sup>b</sup>	15 <sup>b</sup>
Environmental impact statement preparation assists	3	5	4	8	7
Zoning cases outside D.C. in the National Capital Region	0	1	5	19	11
Local jurisdiction master plans	5	9	10	1	12

<sup>a</sup>The Department of Housing and Urban Development requirements for review of community development block grants and subdivision feasibility studies changed, leading to the decrease. Also, economic conditions depressed the housing market.

<sup>b</sup>Does not include NCPC actions authorizing staff participation at public hearings in zoning cases to identify Federal interests.

Source: NCPC.

Of the approximately 144 major Federal installations or subareas in the region, 51 have no approved master plans and none in process; 63 have approved master plans; and 30 have plans in process.

NCPC review procedures

We examined NCPC files on four proposed projects to assess NCPC's review procedures and its effect, if any, on the projects' final plans. The projects were the

- District's Prevocational Center for the Handi-  
capped,
- Chancery of Jordan,
- Vietnam Veterans Memorial, and
- Naval Surface Weapons Center Explosive Test  
Facility.

The files contained site and building plans and other documents submitted by project sponsors and staff-prepared analyses of impact on the Federal interest. NCPC's comments generally resulted in the project developers making some changes in the final site and building plans.

- The District acted favorably on NCPC recommendations that the District's Department of General Services assess the feasibility of reducing parking levels and increasing landscaping at the Prevocational Center for the Handicapped.
- The Department of State and the Jordan Embassy reacted favorably to NCPC suggestions that the Jordan Chancery plan reduce the width of the driveway and allow for additional landscaping.
- The Department of the Interior's National Park Service acted favorably on questions NCPC raised about handicapped access, safety, and drainage for the Vietnam Veterans Memorial.
- NCPC raised no issues on the explosive test facility final plans which complied with preliminary plans and the master plan for the weapons center.

We also examined NCPC's review in 1982 of a proposed local zoning change in the Clarendon area of Arlington County. NCPC's review resulted in an Arlington County Board resolution recognizing NCPC's right to comment on building heights in Arlington County which may affect the Federal interest.

#### NCPC review of Federal leased space

Despite the extent of the Federal Government's use of leased space and the important regional planning implications, NCPC has no authority to review leased space planning decisions. In 1978 (the most recent data available), 29 percent of all Federal employees in the National Capital Region used leased space. Furthermore, 125,700 employees, or 47 percent of all GSA-assigned Federal employees, were in leased space.

GSA controls the great majority of federally leased space in the region. The amount of federally leased space as a percentage of all Federal Government space in the region increased from 5 percent in 1960 to 17.5 percent in 1978. The following table demonstrates this growth:

Federally Owned and Leased Space in the  
National Capital Region in 1960 and 1978

<u>Year</u>	<u>Square feet</u> (millions)	<u>Percent</u>
1960 owned	97.7	95.0
1960 leased	<u>5.2</u>	<u>5.0</u>
Total	<u>102.9</u>	<u>100.0</u>
1978 owned	139.6	82.5
1978 leased	<u>29.6</u>	<u>17.5</u>
Total	<u>169.2</u>	<u>100.0</u>

Source: NCPC.

NCPC staff told us that Federal leasing has become a major factor influencing the geographic distribution of Federal space and employment in the region. Long-term assignment of large numbers of Federal employees to leased space outside established federally owned employment centers can significantly affect government operations and regionwide comprehensive planning efforts. The staff have recommended to the Commission that it adopt a policy to review and approve major Federal leasing proposals in the region. GSA agreed to give NCPC copies of the leasing prospectuses GSA submits to the Congress. NCPC and GSA have discussed conditions which would require NCPC review of leased space proposals. These conditions are included in the Federal facilities element of the comprehensive plan.

The Committee of 100 on the Federal City has also recommended that NCPC be given approval authority over Federal leasing decisions in the region. According to the Committee, such authority is essential for NCPC to fulfill its mandate for city and regional planning.

Joint Committee on Landmarks  
conducts similar reviews

The Joint Committee on Landmarks of the National Capital is sponsored jointly by NCPC, the Commission of Fine Arts, and the

District government. It was established in 1964 by the two Commissions to compile and maintain a current inventory of significant historic landmarks and historic districts in the District of Columbia and on Federal property in the remainder of the National Capital Region. In 1968, the District government designated the Committee as the State (sic) review committee for the National Register of Historic Places pursuant to the National Historic Preservation Act of 1966 (80 Stat. 915, et seq.). The Committee comprises 13 members appointed jointly by the three sponsors. In addition, NCPC Counsel serves as counsel to the Committee and another NCPC staff member, designated by NCPC's Executive Director, serves as secretary to the Committee.

Other Committee functions include (1) advising the sponsors of Federal and District projects which may affect designated landmarks; (2) advising the District's historic preservation officer of the effect that undertakings carried out, licensed, or financially assisted by the Federal Government may have on a property listed or eligible for listing in the National Register; and (3) recommending to the sponsors programs for preserving designated landmarks. Thus, the Joint Committee serves as an advisory review body for both the local (District) government and the two Federal Commissions.

A former Planning Commission member, who served when the Joint Committee was established, told us that one reason the sponsors established the Committee was to eliminate the need for detailed reviews by each sponsor. Under this arrangement, plans for projects requiring review by each sponsor were to be reviewed only once by the Joint Committee which would, in turn, provide its review results and recommendations to the sponsors. Not all sponsors, however, have relied on the Joint Committee's reviews. In NCPC's comments on this report, the Executive Director stated that NCPC usually relied on the Joint Committee's review of proposals without duplicating the reviews done by the Committee. The Commission of Fine Arts' Secretary told us, however, that since the Joint Committee had become an architectural review body carrying out functions similar to the Commission of Fine Arts except at the local level, and because the propriety of one advisory body seeking the advice of another is questionable, the Commission of Fine Arts performed its own reviews and did not rely on or use the information provided.

District government and Commission of Fine Arts representatives told us of problems with the Joint Committee's structure and functions. District representatives said that the Committee was not functioning well and attributed the problems, in part, to the incompatibility of the mixture of Federal and local functions the Committee is supposed to carry out. The Commission of Fine Arts' position is that the Committee should either be abolished or established as a District agency. According to the Commission's Secretary, when the District government designated the Committee to advise its local historic preservation officer under the National Historic Preservation Act of 1966, the Committee became a local architectural review committee. He said

that as a result of this designation, the Committee carries out local functions, and his organization has had doubts about the propriety of Federal agencies appointing members or providing staff support to it. Thus, the Commission of Fine Arts is no longer making membership recommendations for the Joint Committee.

#### The Federal Capital Improvements Program

NCPC annually prepares the Federal Capital Improvements Program pursuant to Section 7 of the 1952 Planning Act, as amended. This section also requires each Federal agency to send NCPC its capital improvements program for the National Capital Region.

NCPC asked about 25 Federal agencies for 1982 program data; 18 responded. According to NCPC staff, every agency with capital improvements plans responded. NCPC has prepared the Federal Capital Improvements Program as required. As adopted, it contains NCPC recommendations to OMB and participating Federal agencies on which Federal land acquisition and development proposals in the region should be considered for funding in the next 5 years. The Program's principal function is to aid in implementing

- Federal elements of the comprehensive plan,
- individual Federal agencies' long-range plans and programs in the region, and
- master plans for federally owned facilities in the region.

It also provides a means to coordinate proposed Federal projects with State and local governments in the region at an early stage so that potential adverse impacts or problems can be identified.

#### Miscellaneous activities

Commission members and staff participate on special task forces which are indirectly related to NCPC's mandated activities. Examples include task forces related to the health and survival of elm trees on the Mall and to the Potomac River waterfront. The staff reported that very little time is devoted to such task forces but that such involvement helps staff and members coordinate with other agencies in the region and protect the Federal interest.

In addition, staff review zoning cases involving private development proposals in the region. Such reviews are not directly related to NCPC's mandated functions but are seen as a way for the staff to protect the Federal interest and coordinate with local governments. The Arlington County zoning case on page 62 is an example of such a review.

IMPLEMENTATION AND ENFORCEMENT AUTHORITY

As with most planning boards in the United States, NCPC has no authority to implement the elements of its comprehensive plan. The plan provides policy guidance and direction only. A Federal agency which proposes a specific development project is responsible for implementing it after the agency obtains NCPC's decision that the project is consistent with the comprehensive plan or that the project does not adversely affect the Federal interest.

NCPC has no authority to enforce Section 5 of the 1952 Planning Act, which requires Federal agencies to submit proposed development plans or projects to NCPC for review. It relies on its own informal monitoring, on the agencies, and on OMB to ensure that Federal agencies submit required development plans. OMB Circular A-11, revised June 1981, requires Federal agencies to consult with NCPC in preparing plans and programs before they submit to OMB estimates for constructing public works in the National Capital area.

NCPC staff said that they do not have the resources to establish a formal monitoring process and that the agencies keep them well informed about development plans and activities. NCPC relies on the agencies to carry out projects as approved.

POTENTIAL EFFECT OF PROPOSED LEGISLATION  
ON NCPC FUNCTIONS

Senate bill 1433, introduced in the Senate in June 1981 (97th Cong., 1st sess.) and referred to the Committee on Governmental Affairs, would have changed NCPC responsibilities by transferring approval authority from NCPC to the District government for such things as urban renewal plans, transfers of District property, changes in the District street and highway system, and certain District street and alley closings. The bill's objective was to give the District greater control over local planning. No action was taken on the bill in the 97th Congress.

District of Columbia officials told us that they believed the functions covered in the bill are appropriate local government functions and should be transferred to the District. The bill, however, would take from NCPC certain approval and modification powers it now has over several District agencies and project areas. If NCPC loses its approval authority in these cases, agencies could take actions contrary to the Federal interest.

NCPC PUBLIC PARTICIPATION PROCEDURES

NCPC has published in the Federal Register its citizen participation procedures designed to help members of the public make their views known to NCPC on planning and related matters. NCPC has also taken steps to encourage public participation by



contracting with a consultant to improve citizen participation and intergovernmental liaison.

Pursuant to Section 4(e) of the 1952 Planning Act, NCPC's citizen participation procedures offer the public opportunities to provide oral or written input to the decisionmaking process. Specific provision is made for public input to NCPC's deliberations on Federal and District elements of the comprehensive plan; Federal, District, and other local development plans in the region; and the Federal Capital Improvements Program.

NCPC staff said that they mail agenda items to all organizations that request them and add new organizations to the mailing list either at the staff's initiative or on request from the organizations. Neighborhood citizens organizations with defined boundaries, citizens groups organized to respond to single issues, coalitions of citizens organizations, established "umbrella" citizens organizations with defined boundaries, special interest groups, and area neighborhood commissions in the District have testified before NCPC. NCPC has asked these organizations to comment only on issues that may affect the Federal interest.

Two local planning agency officials told us that NCPC could improve its public participation efforts by (1) involving local communities in the policymaking or planning processes at an earlier stage and (2) becoming more involved in local planning processes.

On December 2, 1982, NCPC adopted revised public participation procedures which request public comment on completed draft Federal elements of the comprehensive plan. They do not preclude public input at the pre-draft stage.

#### Applicability of the Administrative Procedure Act

NCPC is an agency within the meaning of the Administrative Procedure Act and therefore must comply with the Freedom of Information Act and Privacy Act provisions thereof (5 U.S.C. 552 and 5 U.S.C. 552a, respectively). NCPC takes the position that it is not subject to the Administrative Procedure Act's rule-making provisions, however, because comprehensive plan elements are not rules within the act's meaning. Thus, NCPC does not think that it has to publish proposed plan elements in the Federal Register and obtain public comment on them. As noted above, NCPC receives public comment pursuant to Section 4(e) of the 1952 Planning Act.

#### NCPC EXPENDITURES

Our review of a representative number of fiscal year 1981 NCPC vouchers revealed no improper use of funds.

NCPC, along with its budget committee, formulates general program goals and objectives for the upcoming year. The staff are then asked to estimate the resource needs--staff and dollars--to meet those goals and objectives. After review by the Chairman, Executive Director, and Assistant Executive Director for Administration, these estimates are presented to the Commission for review and approval.

NCPC obligated about \$2.4 million in fiscal year 1981. Personnel and building rental costs totaled about \$2.1 million, or 87 percent of total obligations. (See app. VII.) We reviewed 19 vouchers totaling \$108,000 and representing a variety of expense types, including awards, payroll, travel, telephone, printing and binding, contracts and consultants, and supplies. No inappropriate use of funds was discovered--that is, the expenditures were consistent with the agency's procedures and mandate.

NCPC spent \$30,000 on staff awards during fiscal year 1981: 10 employees received incentive awards which totaled \$24,000 and ranged from \$500 to \$7,250; one employee received an SES bonus of \$6,000.

During fiscal year 1981 NCPC spent \$91,000 on service contracts for experts and consultants, as follows:

- A joint mapping project with the District for \$37,250.
- A joint mapping project with COG for \$21,750.
- A contract to improve citizen participation and intergovernmental liaison for \$20,000.
- Miscellaneous data and computer services for \$12,000.

These contracts related generally to NCPC objectives. The mapping projects were to obtain base maps of the area to help NCPC review proposed projects and carry out its planning responsibilities. The citizen participation contract, which was extended in fiscal year 1982 for \$20,000, was to improve NCPC's ability to involve others in its decisionmaking process. The computer services contracts were primarily for compiling employment projections in the region.

#### COMPARISON WITH THE CANADIAN PLANNING COMMISSION

We obtained information on and compared the role, functions, and activities of NCPC with those of its counterpart in Canada, the National Capital Commission (NCC) in Ottawa. Our purpose was determine how an agency with a similar responsibility--protecting the Federal interest--met its mandate.

NCC's role and responsibilities

Canada's National Capital Act of 1958 spells out NCC's role to plan for, develop, preserve, and improve Canada's National Capital Region (NCR) to ensure that its nature and character are in accord with its national significance. The act specifies NCC's powers to acquire land, review and approve all Federal construction and development, operate and maintain Federal projects, award grants, and carry out numerous other functions to facilitate its role in NCR. NCC has no authority over Federal leased-space decisions. However, NCC meets with the appropriate Federal agency--Public Works Canada--on a regular basis to review and comment on major private sector leases, particularly lease/purchase decisions.

NCC has total authority over the location, design, and frequently, the use of Federal properties and buildings. The British North America Act (the Canadian Constitution) strictly limits Federal authority over provincial, regional, and local governments. Thus, NCC has no recourse over non-Federal construction and development in the NCR except for expropriation of the land. Expropriation is an extreme measure, but NCC has used it to achieve its goals. NCC has another means to encourage cooperation through its grants in lieu of taxes which it awards, at its discretion, to local governments.

The emphasis of NCC activities has evolved from acquiring land and developing Federal properties and historic sites (implementing the 1950 Gréber Plan--see p. 70) to encouraging Canadians to accept Ottawa as the national capital.

The national significance

The national significance, or national interest, is an undefined term relating to the image and character of Ottawa and NCR as the national capital of all Canadians. NCC has no criteria, standards, or guidance to explain the term. Unlike the United States, the national interest is what the Canadian Parliament, Cabinet, and NCC decide it is, often on a case-by-case basis. NCC actions or decisions involving the national interest must reflect the Federal Government's needs, the Canadian people's heritage, the dual Anglo-French culture, and preservation of historic buildings and sites. Mainly, the national interest is reflected in NCR's physical development, although environmental issues are of concern because of the number of parks and waterways NCC owns or controls.

The national interest is demonstrated in preserving Parliament Hill and surrounding historic buildings; in the location, design, and architecture of Federal Government office buildings; and in landscaping and maintenance of Federal parklands. In keeping with NCC's newly emphasized goal to make Ottawa the national capital, NCC officials also see national interest in easing access to the city, promoting the dual French-English culture, and sponsoring festivals and recreational events in NCR.

According to NCC officials, provincial, regional, and municipal governments and private citizens and developers do not fully agree with NCC on what the national interest is in NCR. They frequently see NCC actions as being contrary to regional, local, or private sector needs. Because NCC has no legal authority over non-Federal actions, NCC must use moral persuasion to convince municipal governments of the scope of the national interest.

### Planning

NCC or its predecessors have written comprehensive plans for NCR. The Gréber Plan of 1950 is the only one NCC has fully adopted and implemented. The Gréber Plan focused on acquiring land for Federal development. Under it, NCC bought what is now Gatineau Park, the Greenbelt, river- and canal-front property, most properties near Parliament, and key areas in downtown Ottawa. NCC officials told us that the Gréber Plan has been implemented. At the time of our review, NCC was preparing another comprehensive plan for NCR after two unsuccessful attempts.

NCC can acquire land in advance of need, resulting in acquisition of land parcels in strategic locations at relatively low cost to the taxpayer. Most acquired properties have been developed as government or recreational facilities; some have never been developed; and others have been leased out on short-term leases until future uses could be decided. The leases contain NCC-imposed conditions on the properties' use and development.

### NCC structure

NCC comprises 20 politically appointed members representing each of the 10 Provinces and the local jurisdictions near Ottawa. NCC reports to Parliament through the Minister of Public Works. The full Commission meets four or five times a year to review the budget, annual report, and policy issues. A five-member Executive Committee meets monthly and decides final details of policy issues or questions. NCC has four advisory committees (Planning, Design, Arts, and Real Property) to assist in decisionmaking. Staff must consult the advisory committees and present competing views, if such is the case, to the Executive Committee for a final decision. The NCC Chairman is a member of the Executive Committee and the Chief Executive Officer of the staff. He delegates much authority for day-to-day operations to the General Manager. NCC staff are organized functionally with five operational branches--finance and administration, public activities, development, planning, and property. In 1981 NCC had 764 employees, more than half of whom supported maintenance and construction activities.

NCC is a Crown Corporation. It receives funds primarily through parliamentary appropriations and sale or rent of properties.

Comparisons

NCC and the National Capital Planning Commission in Washington have similar responsibilities to protect the Federal interest in their national capitals. NCC has taken on the additional mission of making Ottawa the accepted national capital--a recognition Americans have long given to Washington, D.C.

Despite the similar responsibilities, each Commission has different authorities to meet them. NCPC has prepared and adopted five of eight Federal elements of a comprehensive plan for Washington, D.C., and its environs but has no authority to implement its policies. NCC has fully implemented the 1950 Gréber Plan, a comprehensive plan guiding the acquisition and development of large tracts of land in and around Ottawa. NCC is preparing another comprehensive plan for NCR.

NCC has total authority over the location, design, and, frequently, the use of Federal facilities, whereas NCPC has approval authority only over Federal or District government facilities in Washington, D.C.'s central area. NCC has no authority over non-Federal development, while NCPC reviews and comments on non-Federal developments to minimize adverse effects on the Federal interest.

MISSION DESCRIPTION OF 10 SELECTED FEDERAL COMMISSIONS

The Advisory Council on Historic Preservation provides independent advice to the President and the Congress on the national historic preservation program and protects significant historic properties threatened by Federal undertakings.

The American Battle Monuments Commission is responsible for

- maintaining memorials commemorating our Armed Forces' battle achievements since April 6, 1917;
- designing, constructing, and permanently maintaining military cemeteries and memorials on foreign soil, as well as certain memorials on American soil; and
- controlling design and providing regulations for erecting monuments, markers, and memorials in foreign countries by other U.S. citizens and organizations, public or private.

The Appalachian Regional Commission, a Federal/State agency, is responsible for

- developing comprehensive and coordinated plans and programs considering other Federal, State, and local planning in the region;
- conducting and sponsoring investigations, research, studies, and demonstration projects designed to foster regional productivity and growth;
- reviewing and studying Federal, State, and local public and private programs;
- encouraging private investment in industrial, commercial, and recreational projects; and
- serving as a focal point and coordinating unit for Appalachian programs.

The Commission on Civil Rights conducts studies of possible denials of civil rights; reports recommendations to the President and the Congress; examines civil rights issues; and prepares reports, monographs, and statements.

The Commission of Fine Arts advises the President, the Congress, and department heads on matters of architecture, sculpture, painting, and other fine arts. Its primary function is to preserve and enhance the appearance of the National Capital.

The Consumer Product Safety Commission collects and analyzes data and conducts enforcement and information campaigns addressing burn, electrical, chemical, children's recreational products, power equipment, and household product hazards.

The Federal Election Commission monitors compliance with laws relative to limitations on campaign expenditures and political contributions to provide for public financing of Presidential nominating conventions and Presidential primary elections and for other purposes related to Federal elections.

The Occupational Safety and Health Review Commission adjudicates contested enforcement actions of the Secretary of Labor. It holds fact-finding hearings and issues orders affirming, modifying, or vacating the Secretary's enforcement actions.

The Pennsylvania Avenue Development Corporation uses Federal funds to upgrade the Pennsylvania Avenue Development Area in Washington, D.C., with public improvement projects such as

- repaving and landscaping the avenue and adjacent areas,
- preserving designated historical landmarks, and
- developing a residential community and other people-oriented uses.

The United States International Trade Commission conducts investigations and, where appropriate, determines and recommends or takes action in cases where

- serious injury to industries may warrant increased duties;
- imported goods sold at less than fair value may injure industry;
- foreign governments, organizations, or individuals may have subsidized imports into the United States;
- unfair competition in the importation or sale of foreign articles may injure industry or restrain and monopolize trade and commerce in the United States; or
- imported agricultural products may materially interfere with certain Department of Agriculture programs.

The Commission advises the President and the Congress on probable economic effects of any duties and other trade barriers considered in proposed foreign trade agreements.

NATIONAL CAPITAL PLANNING COMMISSIONEXPENDITURES FOR FISCAL YEARS 1979 to 1983

<u>Item</u>	1979 ( <u>actual</u> )	1980 ( <u>actual</u> )	1981 ( <u>actual</u> )	1982 ( <u>actual</u> )	1983 ( <u>est.</u> )
----- (000 omitted) -----					
Personnel compensation	\$1,444	\$1,610	\$1,717	\$1,735	\$1,777
Personnel benefits	129	142	150	157	160
Travel	9	11	10	7	10
Standard level user charges (note a)	171	171	222	221	225
Other rent, utilities	49	54	54	64	55
Printing and reproduction	91	42	70	32	70
Other services	73	143	78	77	77
Supplies and materials	20	24	26	24	25
Equipment	<u>28</u>	<u>31</u>	<u>5</u>	<u>51</u>	<u>5</u>
Total expenditures	<u>2,014</u>	<u>2,228</u>	<u>2,332</u>	<u>2,368</u>	<u>2,404</u>
Change in selected resources (note b)	<u>-4</u>	<u>-83</u>	<u>58</u>	<u>10</u>	<u>-</u>
Total obligations	<u>\$2,010</u>	<u>\$2,145</u>	<u>\$2,390</u>	<u>\$2,378</u>	<u>\$2,404</u>

<sup>a</sup>Building rental.

<sup>b</sup>Adjustment between funds obligated and funds expended which can include funds obligated in prior years.

Source: NCPC.



### SUMMARY OF FEDERAL AGENCY QUESTIONNAIRE RESPONSES

We sent the following questionnaire to ten Federal agencies. We received completed questionnaires from nine Federal agencies. Not all respondents answered all questions; some respondents answered some questions twice.

#### Part I. Determining and Protecting the Federal Interest

While NCPC is charged with planning for and protecting the Federal interest in the National Capital Region and with preserving the area's natural and historic features, some have raised the issue as to just what the Federal interest is and who should be responsible for protecting it.

1. To what extent do you believe each of the following should be involved in defining the Federal interest in the National Capital? (Check one box in each row.)

		Very great extent	Great extent	Moderate extent	Some extent	Little, if any, extent
a. The Congress	3		3		3	
b. The White House	2	1	2	1	3	
c. Office of Management and Budget		1	2	3	3	
d. General Services Administration	1	1	3	3	1	
e. National Capital Planning Commission	6	2	1			
f. Other Federal agencies	2	1	3	1	1	
g. Regional planning agencies	1	4	1	1	2	
h. DC government	1	3	3	1	1	
i. State governments	1		4	1	3	
j. Local governments	1		4	2	2	
k. Citizens groups	1	1	2	1	3	
l. Others; specify: <u>(note a)</u>		1				

<sup>a</sup>One respondent specified the Architect of the Capitol.

2. To what extent do you believe each of the following should be included in the Federal interest in the National Capital?  
(Check one box in each row.)

	Very great extent	Great extent	Moderate extent	Some extent	Little, if any, extent
a. Architecture of buildings	2	4		3	
b. Locations of buildings	3	3	1	2	
c. Size/mass of buildings	2	4		3	
d. Historic preservation	4	2	3		
e. Transportation facilities and services	2	3	2	1	1
f. Economic and population forecasting and trend analysis	1	1	4	2	1
g. Employment trends	1	1	3	1	3
h. Educational facilities		1	1	3	4
i. Health, welfare, and safety services		1	4	2	2
j. Environmental resources, conservation, and protection	1	3	3	1	1
k. Tourism	1		3	4	1
l. Land use and zoning	3	4	2		
m. Natural features	3	2	2	2	
n. International missions	3		3	3	
o. Housing		4	1	1	3
p. Others; specify: _____		1 <sup>a</sup>	1 <sup>b</sup>		

<sup>a</sup>Architect of the Capitol.

<sup>b</sup>Location of the workforce and flow.

3. Please provide any other comments on what you believe the Federal interest should be in the National Capital.

--Maintain high-quality environment as center of national government and cultural resource.

--Comprehensive plan will identify those areas where aesthetic intrusion of development will impact on the Federal interest.

4. Although NCPC is now charged with planning for and protecting the Federal interest, questions exist as to whether others should also be involved in planning for and protecting it. To what extent do you believe each of the following should be involved with planning for and protecting the Federal interest? (Check one box in each row.)

	Very great extent	Great extent	Moderate extent	Some extent	Little, if any, extent
a. The Congress	1	1	3	2	2
b. The White House		2	2	2	3
c. Office of Management and Budget		1	2	4	2
d. General Services Administration	1	1	3	3	1
e. National Capital Planning Commission	7	1	1		
f. Other Federal agencies		2	2	3	2
g. Regional planning agencies		3	2	3	1
h. DC government		5	2	2	
i. State governments			3	3	3
j. Local governments			4	4	1
k. Citizens groups		1	3	1	4
l. Others; specify: <u>(note a)</u>		1			

<sup>a</sup>One respondent specified the Architect of the Capitol.

5. Below is a table showing many of the functions carried out by the NCPC. Please indicate in the appropriate box how important you believe that function is in helping the NCPC to protect the Federal interest? (Check one box in each row.)

	Extremely important	Very important	Important	Slightly important	Little, if any, importance	Do not know
a. Preparation and adoption of the Federal elements of the comprehensive plan for the National Capital.	6	2	1			
b. Review and approval of the District elements of the comprehensive plan for the National Capital.	4	2	3			
c. Review and comment on plans, such as master plans or general land use plans, prepared by other State, regional, and local planning bodies.	2	4	2	1		
d. Review and comment on individual projects, such as a building plan or other public improvement in the vicinity of a Federal installation, in local jurisdictions.	2	2	3	1	1	
e. Preparation of the annual Federal Capital Improvements Program.	2	3	3			1
f. Review of Federal agency master plans for major installations.	2	3	2	1		1
g. Review and approval of Federal agency site and building plans.	2	1	3	1	2	
h. Review of projects using Federal funds pursuant to OMB Circular A-95.	2	3	2	1		1
i. Review and approval of proposed zoning changes in the District of Columbia.	1	3	3		1	1
j. Other; specify: _____						

6. Overall, how effective or ineffective do you believe the NCPC has been in carrying out its functions?

☒ Very effective.

☒ Somewhat effective.

☐ Neither effective nor ineffective.

☐ Somewhat ineffective.

☐ Very ineffective.

☐ Don't know.

Note: One respondent in answering question 6 ranked the Commission very effective on functions e. through i. from question 5 and somewhat effective on functions a. through d.

Additional comments:

--If three jurisdictions independently planned and developed without regard for impact on District of Columbia, the District's character would be quite different. The Commission has had an impact through its control of building heights, density, and type of structures built. Only through the planning of an agency like the Commission, which establishes a central plan incorporating the needs and objectives of Federal and local governments without political compromise, can we maintain a city that is functional and supportive of its diverse elements.

Part II. Comprehensive Planning

The National Capital Planning Act of 1952, as amended, directed NCPC to prepare and adopt Federal elements of a comprehensive plan for the National Capital. To date, three Federal elements of the plan have been adopted. This series of questions asks, first, about the need for comprehensive planning in the area (questions 7 through 9) and second, about what you believe NCPC's role should be in comprehensive planning (questions 10 through 14.)

7. To what extent is there a need for a comprehensive plan in the National Capital Region? (Check one.)

☒ Very great extent.

☐ Great extent.

☐ Moderate extent.

☐ Some extent.

☐ Very little extent.

8. To what extent should the following issues be included in a comprehensive plan for the National Capital? (Check one box in each row.)

	Very Great extent	Great extent	Moderate extent	Some extent	Little, if any, extent
a. Architecture of buildings	3	1	2	1	1
b. Locations of buildings	4	2	2		1
c. Size/mass of buildings	1	4	3		1
d. Historic preservation	3	3	3		
e. Transportation facilities and services	3	2	3	1	
f. Economic and population forecasting and trend analysis		2	4	3	
g. Employment trends		2	3	4	
h. Educational facilities		1	3	3	2
i. Health, welfare, and safety services		2	2	4	1
j. Environmental resources, conservation, and protection	3	2	3	1	
k. Tourism	1	3	1	5	
l. Land use and zoning	3	4	1		
m. Natural features	3	4	1	1	
n. International missions	3	1	1	3	1
o. Housing			4	3	2
p. Others; specify: _____					

9. Do you believe there is a need for a comprehensive plan specifically for the Federal interest in the National Capital?

☒ Yes. Go to question 10.

☐ No. Please provide any additional comments you have on comprehensive planning in the space provided at the end of this section and go to question 15.

10. While NCPC is charged with developing the Federal elements of a comprehensive plan for the National Capital, some believe others should assist in preparing the plan or should prepare the plan rather than NCPC. To what extent do you believe each of the following should have a role in preparing such a comprehensive plan for the Federal Government? (Check one box in each row.)

		Very great extent	Great extent	Moderate extent	Some extent	Little, if any, extent
a. The Congress	2		2	2	3	
b. The White House	1	1	1	3	3	
c. Office of Management and Budget			2	3	4	
d. General Services Administration		2	2	2	3	
e. National Capital Planning Commission	6	2	1			
f. Commission of Fine Arts	1	1	4	1	2	
g. Regional planning agencies		3	2	4		
h. DC government	1	4	3		1	
i. State governments		1	2	2	4	
j. Local governments		1	4	2	2	
k. Citizens groups			4	3	2	
l. Others; specify: _____						



11. How important is it for each of the following areas to be included in a comprehensive plan developed by the NCPC? (Check one box in each row.)

	Extremely important	Very important	Important	Slightly important	Little, if any, importance	Do not know
a. The monumental core in the District of Columbia	6	1	1			
b. The area included in the original L'Enfant plan for the City of Washington	4	2	2			
c. The District of Columbia only	2	3	2	1		
d. The National Capital Region as defined by the Planning Act	4	3	1	1		
e. The Standard Metropolitan Statistical Area (SMSA)	1	1	3	2		1
f. Other; specify: _____						

12. How important is it for each of the following to be included in the Federal elements of a comprehensive plan for the National Capital Region? (Check one box in each row.)

	Extremely important	Very important	Important	Slightly important	Little, if any, importance
a. Federal property only	5	2	1		
b. Federal property and District government property	2	2	2	2	
c. Federal, District, and local government property (note a)	3	2	2	2	
d. Public and private property	1	1	2	4	1
e. Other; specify: _____					

<sup>a</sup>One respondent stated that it was important in open space and historic preservation to put Federal property in perspective.

13. To what extent should the following issues be included in the Federal elements of a comprehensive plan for the National Capital? (Check one box in each row.)

	Very great extent	Great extent	Moderate extent	Some extent	Little, if any, extent
a. Architecture of buildings	3	1	3	1	1
b. Locations of buildings	3	3	2		1
c. Size/mass of buildings		6	1		1
d. Historic preservation	3	4	1	1	
e. Transportation facilities and services	1	2	4	2	
f. Economic and population forecasting and trend analysis	1		3	5	
g. Employment trends		1	2	5	1
h. Educational facilities		1	1	3	4
i. Health, welfare, and safety services		1	4	1	3
j. Environmental resources, conservation, and protection	3	1	5		
k. Tourism		2		5	2
l. Land use and zoning	3	4	2		
m. Natural features	3	3	3		
n. International missions	2		3	2	2
o. Housing			3	2	4
p. Others; specify: _____					

Note: One respondent indicated building architecture, location, and size/mass (items a. through c. above) should be issues only as they may affect important vistas.

14. If you believe NCPC should not prepare the Federal elements of a comprehensive plan, what primary role should it have in comprehensive planning for the National Capital? (Check one.)

☒ Not applicable. I believe NCPC should prepare the plan.

☐ None. I do not believe the NCPC should play any role.

☐ Oversight of the plan developed by another organization or agency.

☐ Oversight of portions of the plan affecting the Federal interest.

☐ Coordination of Federal agencies responsible for portions of the plan.

☐ Other; specify: (note a).

<sup>a</sup>One respondent said that the Commission is currently responsible for coordination (Federal and other), preparation, and issuance.

Additional comments:

No responses given.

Part III. Composition of the NCPC

This series of questions deals with the make-up of the NCPC and how the make-up facilitates NCPC's accomplishing its mandate.

Membership consists of (ex officio) the Secretary of the Interior; the Secretary of Defense; the Administrator, General Services Administration; the Mayor of the District of Columbia; the Chairman of the D.C. Council; the Chairman of the Senate Committee on Governmental Affairs and the Chairman of the House Committee on the District of Columbia; three citizens appointed by the President (at least one each from Maryland and Virginia); and two citizens appointed by the Mayor.

15. How appropriate do you believe the present composition of the NCPC is? (Check one.)

☒ Very appropriate.

☒ Appropriate.

☐ Not sure.

☒ Inappropriate. (note a)

☐ Very inappropriate.

<sup>a</sup>One respondent indicated the Commission was too large.

16. List the groups, jurisdictions, etc., if any, that you feel are over represented on the NCPC.

--The administration (cabinet representatives).

--D.C. government.

--Secretary of the Department of Defense; Mayor or Council Chairman and citizens appointed by Mayor.

17. List the groups, jurisdictions, etc., if any, that you feel are under represented on the NCPC.

--Regional planners; American Institute of Architects.

--Architect of the Capitol.

--United States Postal Service, with 180 facilities in the National Capital Region, does not have representation.

18. In general, to what extent does the current composition of NCPC facilitate the carrying out of its functions? (Check one.)

☐ Very great extent.

☒ Great extent.

☒ Moderate extent.

☐ Some extent.

☐ Little, if any, extent.

Additional comments:

--Since Cabinet members have no planning experience, there is little they can contribute. Without their input, the Commission is left with appointees of the D.C. Mayor and the President. These do not show strong experience in planning. The Commission falls short in experience and training for jobs they are required to accomplish.

--Commission effectiveness depends more on sitting members than on composition.

--Commission is very heavily weighted to the District of Columbia and very little in suburban areas.

--Some have suggested that the Commission should be totally restructured to elevate the decisionmaking to the White House. The members would be nationally recognized professionals and the White House involvement would assure that all Federal programs protected the Federal interest. I believe this concept would be worth exploring. Would not recommend changing composition unless major change is undertaken.

Part IV. Master Planning and the Federal Capital Improvements Program

As the central planning agency for the Federal Government, the NCPC, among other things, (1) reviews and makes recommendations on land acquisitions, master plans, and both preliminary and final site and building plans proposed by Federal agencies in the National Capital Region and (2) recommends a multiyear Federal Capital Improvements Program. These questions deal with your agency's master planning and coordination with NCPC.

19. Identify your major installations in the National Capital Region for which you prepare or prepared a master plan, give date of preparation, and date submitted to the NCPC. (If not submitted to NCPC, write NS.)

<u>Installation</u>	<u>Date prepared</u>	<u>Date submitted to NCPC</u>
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- One agency did not respond to question.
- One agency referred us to the Commission's list of their master plans.
- All others indicated preparation and submission of one or more master plans to the Commission between 1974 and 1982.

20. Identify your major installations in the National Capital Region for which you have not prepared a master plan and indicate reason why. (Fill in installation name and check the reason which best applies.)

Installation	Not an agency requirement	Not an agency priority	Changes in agency plans or policy make it difficult to develop plan	In process	Not needed	Other; specify
One agency identified two major installations for which master plans were in process.				2		
One agency identified one major installation for which a master plan was in process				1		
One agency identified one major installation for which a master plan was not needed.					1	

21. Check the box which best describes the master planning process in your agency. (Check one.)

☒ Done primarily by full-time, agency personnel.

☐ Done primarily by agency personnel on a part-time basis.

☐ Done primarily full-time under contract.

☐ Done primarily by contractors as needed.

☐ Other; specify: \_\_\_\_\_.

22. Does your agency have its own requirements for master planning?

☒ Yes. Go to question 23.

☐ No. Go to question 27.

23. NCPC procedures and criteria for the submission of master plans by Federal departments and agencies state that the master plan should be an integrated series of documents that show the present composition of the installation and the plan for its orderly development over the next 20 years. To what extent do NCPC's requirements for master plans differ from your agency's requirements for its own plans in each of the following? (Check one box in each row.)

	Very great extent	Great extent	Moderate extent	Some extent	Little, if any, extent
a. Format	2	1		1	
b. Timeframe	2	1		1	
c. Geographic area	1		1	2	
d. Size of installation	1			3	
e. Amount of detail required	1			3	
f. Other; specify: <u>(note a)</u>	1				

<sup>a</sup>One respondent specified 5 years as opposed to 20 years.

24. On the average, please estimate the additional staff days a year, if any, you need to prepare and submit master plans to NCPC. If you prepare master plans only at NCPC's request, please indicate that and the amount of time required.

/2/ No extra time required.

/2/ Extra time required. Estimate of additional staff days a year (note a).

/1/ Master plans prepared only as a result of NCPC request. Estimate of staff days a year (note b).

<sup>a</sup>One respondent stated that the estimate of additional staff varies greatly as size of plans vary. The other respondent estimated 14 days.

<sup>b</sup>Response given was a \$200,000 consultant contract.



25. Identify any other Federal agencies or offices (either within or outside of your agency) to which you submit or have submitted master plans.

--Commission of Fine Arts.

--Submit to other agencies on a case-by-case basis if planning affects another agency installation.

26. Identify any additional Federal agencies or offices (either within or outside of your agency) which you provide with information developed during the master planning process.

--Nature of facility determines extent of coordination.

--Neighboring or impacted agencies.

27. How much do you agree or disagree with the following statements? (Check one box for each statement.)

	Totally agree	Agree	Neither agree nor disagree	Disagree	Totally disagree
a. NCPC should review Federal agency master plans.	5	3	1		
b. NCPC's review of Federal agency master plans improves coordination among Federal agencies.	3	3	2	1	
c. NCPC's review of Federal agency master plans improves coordination between the Federal Government and State and local governments.	2	4	2	1	
d. NCPC's review supports the orderly development of the Federal Government in the National Capital Region.	3	6			
e. NCPC's review duplicates reviews of other Federal agencies such as GSA and OMB.			2	3	4
f. NCPC provides your agency with feedback on the master plans submitted.	5	4			

Please provide additional comments on the master planning process, especially if you disagree with any of the above statements.

--Reviews by the Office of Management and Budget and the General Services Administration are more specific than the Commission's reviews.

--Master planning review is adequate for land planning projects. Detailed working drawing review is unnecessary for a regional planning agency.

28. The NCPC recommends a 5-year program of public works projects for the Federal Government, that is the Federal Capital Improvements Program, and reviews it annually with the agencies concerned. To this end, each Federal agency is required to submit a copy of its advance program of capital improvements in the National Capital Region to the NCPC.

Do you prepare a capital improvements program for your agency?

☒ 9 Yes. Go to question 29.

☐ No. Go to question 33.

29. Do you submit your agency's capital improvements program information to NCPC?

☒ 8 Yes. Please estimate amount of staff days annually required to prepare submission to NCPC--(note a).  
Go to question 30.

☐ 1 No. Go to question 33.

<sup>a</sup>No responses given.

30. Please indicate, for the agencies listed, whether you submit the same, similar, or different capital improvement information as you provide to NCPC. (Check as many as apply.)

	Same	Differs in timeframe	Differs in format	Differs in amount of detail	Differs in amount of graphic area	Differs in other aspects; specify	Do not submit
OMB (note a)		4	4	4	2	1	
GSA	1		1	2			1
Other offices within your department	1	2	2	3	1	1	1
Others; specify: _____							

<sup>a</sup>One respondent stated that OMB requires repair project information.

31. Please indicate, for the agencies listed, the amount of staff days annually needed to prepare capital improvements information.

<u>Agencies</u>	<u>Staff days annually</u>
OMB	--From 2 days to 1 year
GSA	--From 0 to 10 days
Other offices within your department	--One agency included its estimate in its response for OMB. One agency, one work year.
Other; specify: _____	

32. How does consultation between your agency and the NCPC on your capital improvements program generally take place? (Check as many as apply.)

☒ Formal written communication.

☒ Informal conversations over the telephone.

☒ Meetings between agency and NCPC staffs.

☐ No consultation takes place.

☐ Other; specify: \_\_\_\_\_.

33. To what extent do you use the Federal Capital Improvements Program (FCIP) developed by NCPC? (Check one.)

☐ Not aware of it. Go to question 35.

☒ Aware of it, but do not use. Go to question 35.

☒ Use it some.

☐ Use it extensively.

34. Describe how you have used the FCIP.

--Determine potential impact of proposals on our resources and to reference scope and cost.

--Information on what other agencies are planning in the National Capital area.

--Distributes it to affected operating administrations for guidance in facilities planning.

--Review to determine if other agencies' activities will impact on own agency location.

--Impact on own agency's proposed or existing sites.

--Consider as department develops long-range plans for housing its staff in the Washington Metropolitan area.

35. If you submit a capital improvements program to NCPC, which of the following statements best reflects your agency's actions or viewpoints with respect to NCPC comments on your capital improvements program submission? (Check one.)

☒ Changes must be made to obtain NCPC concurrence.

☐ Comments have little impact. Final decisions are made by OMB or the Congress.

☒ Comments are advisory only. Changes NCPC suggests are accommodated to the extent feasible, but agency makes final determination. (note a)

☐ Comments have no effect on what the agency does.

☐ Other; specify: (note b).

<sup>a</sup>One respondent indicated approval required for one project in Washington.

<sup>b</sup>One respondent indicated his agency had been able to reach accommodation with NCPC on comments made.

36. To what extent does the Federal Capital Improvements Program improve coordination between the Federal Government and State and local jurisdictions?

☒ 4 Very great extent.

☒ 2 Great extent.

☒ 1 Moderate extent.

☒ 2 Some extent.

☐ Very little extent.

Please explain your answer.

--We deal through the Commission when going to other agencies.

--Appears to facilitate coordination, but extent is unknown.

--Without the Commission, contact between Federal and local government would not occur until one entity required the assistance or approval of another.

--Effect clearinghouse function for agency.

--Commission seeks to coordinate between jurisdictions.

Additional comments:

--This is an important program in that those most impacted by Federal development decisions are able to participate at earliest possible stage.

Part V. NCPC Review of Federal Agency Site and Building Plans

The Planning Act requires each Federal agency to advise and consult with the NCPC in the preparation of plans for proposed developments and projects in the National Capital Region in preliminary and successive stages. In this regard, the NCPC has established procedures setting forth requirements for submission of the general location and site and building plans for proposed developments and projects.

37. Identify any developments or projects for which you submitted site and building plans to the NCPC in the last 3 years. (If none, write "none" and go to question 45.)

Agencies identified from none to numerous projects.

--Two agencies had none.    --Two agencies had 3.  
--Two agencies had 1.        --One agency had 7.  
--One agency had 2.        --One agency responded numerous.

38. On the average, how many submissions did you make to NCPC for each project? (note a) (Fill in appropriate number.)

<sup>a</sup>Two respondents indicated one submission; three  
respondents indicated two submissions; three  
respondents indicated three submissions.

39. Which one of the following statements best reflects your opinion about the number of project reviews required by NCPC?

☒ The NCPC requires only that number of reviews needed to plan for and protect the Federal interest.

☒ The NCPC requires more reviews than are necessary to plan for and protect the Federal interest.

☐ The NCPC does not require a sufficient number of reviews to plan for and protect the Federal interest.

☐ NCPC project reviews do not help to plan for and protect the Federal interest and should not be required.

40. Overall, what impact, if any, has the NCPC's review and comment process had on the time it takes to develop the projects? (Check one and enter number of months where appropriate.)

☒ 4 No impact.

☐ Project dropped.

☒ 3 Delayed development, on the average, by about (note a) months.

☐ Sped up development, on the average, by about \_\_\_\_\_ months.

☒ 1 Do not know.

<sup>a</sup>One respondent indicated 2 months; one respondent indicated 4 months; one respondent did not answer.

41. Overall, what impact, if any, has the NCPC's review and comment process had on project costs? (Check one and enter percentage where appropriate.)

☒ 4 No impact.

☐ Project dropped.

☒ 1 Increased project costs on the average by (note a)%.

☐ Reduced projects costs on the average by \_\_\_\_\_%.

☒ 3 Do not know.

<sup>a</sup>Response of 3 percent given.



42. Overall, what impact, if any, has NCPC's review and comment process had on the project design? (Check one.) (note a)

☐ Greatly improved.

☒ Improved.

☒ No impact.

☐ Made worse.

☐ Made much worse.

☐ Project dropped.

<sup>a</sup>One respondent indicated the impact was too variable to quantify.

43. Overall, what impact, if any, has NCPC's review and comment process had on the project location? (Check one.)

☒ No impact.

☒ Project dropped.

☒ Changed location; describe: (note a).

<sup>a</sup>Respondent said that NCPC approved site not preferred by agency.

44. We would like some specific information on NCPC's review and comments on your site and building plans. Please complete the table below for the three most recent projects NCPC has reviewed and commented on.

Project #1

Describe the project.

--Seven agencies responded.

Describe any adverse impact on the Federal interest which NCPC indicated. (Write in "none" if NCPC found none.)

--Two agencies had proposed projects which had adverse environmental impacts identified (traffic, transportation, pollutants, noise).

Describe what changes, if any, were made in the project as a result of NCPC's comments. (Write in "none" if no changes were made.)

--In one project, the number of spaces in parking garage was reduced.

--In a second project, changes were suggested to improve water run-off after heavy rains.

--In a third project, Commission comments led the agency to request modification of comprehensive plan element.

--In a fourth project, agency indicated that all adverse impacts identified by the Commission were mitigated.

Project #2

Describe the project.

--Four agencies responded.

Describe any adverse impact on the Federal interest which NCPC indicated. (Write in "none" if NCPC found none.)

--One project indicated potential destruction of Indian artifacts.

--A second project indicated potential adverse impact on transportation facility.

Describe what changes, if any, were made in the project as result of NCPC's comments. (Write in "none" if no changes were made.)

No responses given.

Project #3

Describe the project.

No responses given.

Describe any adverse impact on the Federal interest which NCPC indicated. (Write in "none" if NCPC found none.)

No responses given

Describe what changes, if any, were made in the project as result of NCPC's comments. (Write in "none" if no changes were made.)

No responses given.

45. Please check the statement below which best completes the following sentence. In general, NCPC's reviews and comments on plans and projects

☒ Are consistent with and limited to those elements that have an impact on the Federal interest.

☒ Cover many elements, including those that have an impact on the Federal interest and those that don't.

☐ Are not relevant or necessary to protect the Federal interest.

46. Please indicate if you are required to submit the same, similar, or different data to other agencies, such as OMB or GSA, for review? (Check any that apply.) (note a)

	Same	Similar	Different	Estimate of staff time used if similar or different submissions are required
OMB		3	2	Negligible; 2 to 10 days
GSA		1	1	Negligible; 10 days
Department Head		2		Negligible; 10 days
Other; specify: (Note b)	1			100 days

<sup>a</sup>Five of nine agencies responded to this question. Respondents of three agencies indicated either it was not applicable or that plans were not submitted to any of the above.

<sup>b</sup>One respondent specified environmental review agencies.

47. Indicate your agreement or disagreement with each of the following sentences. (Check one box in each row.)

	Totally agree	Agree	Neither agree nor disagree	Disagree	Totally disagree
a. NCPC reviews of Federal developments and projects address legitimate Federal planning issues.		9			
b. NCPC reviews of Federal developments and projects address issues related to the Federal interest.		8	1		
c. NCPC reviews of Federal developments and projects must be complied with. (note a)		3	2	3	
d. NCPC reviews of Federal developments and projects duplicate that of other Federal agencies.		1	2	2	4
e. NCPC reviews of Federal developments and projects result in better projects.	1	4	4		

<sup>a</sup>One respondent indicated that the answer to this question depends on whether the project is inside or outside the District of Columbia.

48. To what extent is the NCPC involved in the preparation and review of environmental impact assessments and/or statements required for your agency's proposed projects? (Check one box in each row.)

	Very great extent	Great extent	Moderate extent	Some extent	Little, if any, extent	Do not know
Preparation (note a)	1		1	5	1	
Review	2	1	2	2		1

<sup>a</sup>One respondent indicated that the Commission was the coordinating agency for preparation of the environmental impact statement.

49. To what extent do you believe the NCPC's role with respect to environmental impact statements is useful and proper?  
(Check one box and provide brief explanation.)

☒ Very great extent.

☐ Great extent.

☐ Moderate extent.

☐ Some extent.

☐ Little, if any, extent.

☐ Don't know.

Explain:

No responses given.

50. Office of Management and Budget Circular A-95 requires Federal agencies having responsibility for the planning and construction of buildings and installations in the National Capital Region to consult with Governors, State and areawide clearing houses, and locally elected officials in cooperation with the NCPC. Please indicate your level of agreement with each of the following sentences.

	<div>Totally agree</div> <div>Agree</div> <div>Neither agree nor disagree</div> <div>Disagree</div> <div>Totally disagree</div>				
a. The NCPC review does not duplicate reviews done by other clearinghouse agencies.	2	2	2	1	
b. The review helps NCPC plan for and protect the Federal interest.	3	3	1		
c. After advising applicants of potential adverse impact on the Federal interest, NCPC staff works with applicants to minimize the impact.	2	3	2		
d. This NCPC review results in better coordination among all jurisdictions involved.	2	3	2		

Additional comments on NCPC's A-95 review process, especially if you disagree with any of the above statements.

No responses given.

Additional comments:

No responses given.

### SUMMARY OF LOCAL GOVERNMENT QUESTIONNAIRE RESPONSES

We sent the following questionnaire to five local governments. We received completed questionnaires from four local governments. Not all respondents answered all questions. Some respondents answered some questions twice.

#### Part I. Determining and Protecting the Federal Interest

While NCPC is charged with planning for and protecting the Federal interest in the National Capital Region and with preserving the area's natural and historic features, some have raised the issue as to just what the Federal interest is and who should be responsible for protecting it.

1. To what extent do you believe each of the following should be involved in defining the Federal interest in the National Capital? (Check one box in each row.)

	<div>Very great extent</div> <div>Great extent</div> <div>Moderate extent</div> <div>Some extent</div> <div>Little, if any, extent</div>				
a. The Congress	1		1	2	
b. The White House			1	2	1
c. Office of Management and Budget		1		2	1
d. General Services Administration		1	1	1	1
e. National Capital Planning Commission	1	2		1	
f. Other Federal agencies		1	1	1	1
g. Regional planning agencies	1			2	1
h. DC government		3		1	
i. State governments				3	1
j. Local governments		2	1	1	
k. Citizens groups		1	2		1
l. Others; specify: _____					



2. To what extent do you believe each of the following should be included in the Federal interest in the National Capital? (Check one box in each row.)

	Very great extent	Great extent	Moderate extent	Some extent	Little, if any, extent
a. Architecture of buildings	1	2	1		
b. Locations of buildings	1	2	1		
c. Size/mass of buildings	1	3			
d. Historic preservation	1	2	1		
e. Transportation facilities and services		2	2		
f. Economic and population forecasting and trend analysis	1		2	1	
g. Employment trends	1		1	1	1
h. Educational facilities				2	2
i. Health, welfare, and safety services			2	1	1
j. Environmental resources, conservation, and protection		2	1	1	
k. Tourism			4		
l. Land use and zoning			2	2	
m. Natural features		2		1	1
n. International missions		2	1	1	
o. Housing			2	1	1
p. Others; specify: (note a)	1				

<sup>a</sup>One respondent specified civil defense.

3. Please provide any other comments on what you believe the Federal interest should be in the National Capital.

--Preservation and protection of Federal property, international mission, tourism, defense and strategic installations, and providing an adequate budget.

--Economic development of the region.

--Creating an aura or atmosphere indigenous of capital city, not detailed decisions regarding land use and zoning best left to local governments.

--Big role in coordinating Federal projects, but stay out of local land use planning.

4. Although NCPC is now charged with planning for and protecting the Federal interest, questions exist as to whether others should also be involved in planning for and protecting it. To what extent do you believe each of the following should be involved with planning for and protecting the Federal interest? (Check one box in each row.)

	<div>Very Great extent</div> <div>Great extent</div> <div>Moderate extent</div> <div>Some extent</div> <div>Little, if any, extent</div>				
a. The Congress			2	2	
b. The White House				3	1
c. Office of Management and Budget		1		2	1
d. General Services Administration		2		1	1
e. National Capital Planning Commission	1	2		1	
f. Other Federal agencies		1	1	1	1
g. Regional planning agencies	1	1		1	1
h. DC government		3	1		
i. State governments			1	2	1
j. Local governments		2	2		
k. Citizens groups		1	2	1	
l. Others; specify: _____					

5. Below is a table showing many of the functions carried out by the NCPC. Please indicate in the appropriate box how important you believe that function is in helping the NCPC to protect the Federal interest? (Check one box in each row.)

	Extremely important	Very important	Important	Slightly important	Little, if any, importance	Do not know
a. Preparation and adoption of the Federal elements of the comprehensive plan for the National Capital.	2	2				
b. Review and approval of the District elements of the comprehensive plan for the National Capital.	1	1	2			
c. Review and comment on plans, such as master plans or general land use plans, prepared by other State, regional, and local planning bodies.			2	1	1	
d. Review and comment on individual projects, such as a building plan or other public improvements in the vicinity of a Federal installation, in local jurisdictions.			3	1		
e. Preparation of the annual Federal Capital Improvements Program.	2		2			
f. Review of Federal agency master plans for major installations.	2		2			
g. Review and approval of Federal agency site and building plans.	2	1	1			
h. Review of projects using Federal funds pursuant to OMB Circular A-95.		1	2			
i. Review and approval of proposed zoning changes in the District of Columbia.			2	1	1	
j. Other; specify: _____						

6. Overall, how effective or ineffective do you believe the NCPC has been in carrying out its functions?

☒ Very effective.

☒ Somewhat effective.

☐ Neither effective nor ineffective.

☐ Somewhat ineffective.

☐ Very ineffective.

☒ Don't know. (note a).

<sup>a</sup>The respondent added that his exposure was limited to A-95, agendas, and occasional review of Federal projects.

Additional comments:

--Planning and protecting are two separate functions; all agencies have a responsibility to protect, but not all have a responsibility to plan. Good planning, however, requires that the plans involve everyone affected by the plan. Also, responsibility must be shared, but not divided so as to be inefficient. Some one must have last say--probably legislators who vote money.

--The Commission should continue coordinating Federal projects--in fact, act as clearinghouse for projects and provide for public input. However, the Commission should stay out of local planning.

Part II. Comprehensive Planning

The National Capital Planning Act of 1952, as amended, directed NCPC to prepare and adopt Federal elements of a comprehensive plan for the National Capital. To date, three Federal elements of the plan have been adopted. This series of questions asks, first, about the need for comprehensive planning in the area (questions 7 through 9) and second, about what you believe NCPC's role should be in comprehensive planning (questions 10 through 14).

7. To what extent is there a need for a comprehensive plan in the National Capital Region? (Check one.)

☒ 2 Very great extent.

☒ 1 Great extent.

☒ 1 Moderate extent

☐ Some extent.

☐ Very little extent.

8. To what extent should the following issues be included in a comprehensive plan for the National Capital? (Check one box in each row.)

	<div>Very great extent</div> <div>Great extent</div> <div>Moderate extent</div> <div>Some extent</div> <div>Little, if any, extent</div>				
a. Architecture of buildings	2	2			
b. Locations of buildings	2	1	1		
c. Size/mass of buildings	2	2			
d. Historic preservation	2	2			
e. Transportation facilities and services	1		2	1	
f. Economic and population forecasting and trend analysis	1		1	2	
g. Employment trends	1	1			2
h. Educational facilities					4
i. Health, welfare, and safety services			2	1	1
j. Environmental resources, conservation, and protection		2	1	1	
k. Tourism			3	1	
l. Land use and zoning	1		2	1	
m. Natural features		2	2		
n. International missions		2	2		
o. Housing			1	3	
p. Others; specify: <u>(note a)</u>		1			

<sup>a</sup>One respondent specified civil defense.

9. Do you believe there is a need for a comprehensive plan specifically for the Federal interest in the National Capital?

☒ Yes. Go to question 10.

☐ No. Please provide any additional comments you have on comprehensive planning in the space provided at the end of this section and go to question 15.

10. While NCPC is charged with developing the Federal elements of a comprehensive plan for the National Capital, some believe others should assist in preparing the plan or should prepare the plan rather than NCPC. To what extent do you believe each of the following should have a role in preparing such a comprehensive plan for the Federal Government? (Check one box in each row.)

	<div>Very Great extent</div> <div>Great extent</div> <div>Moderate extent</div> <div>Some extent</div> <div>Little, if any, extent</div>				
a. The Congress			1	3	
b. The White House				2	2
c. Office of Management and Budget				3	1
d. General Services Administration				4	
e. National Capital Planning Commission	2	2			
f. Commission of Fine Arts		1	2	1	
g. Regional planning agencies	1		1	1	1
h. DC government	1	2		1	
i. State governments			1	1	2
j. Local governments	1	1	1		1
k. Citizens groups		2	1		1
l. Others; specify: _____					

11. How important is it for each of the following areas to be included in a comprehensive plan developed by the NCPC? (Check one box in each row.)

	Extremely important	Very important	Important	Slightly important	Little, if any, importance	Do not know
a. The monumental core in the District of Columbia	3	1				
b. The area included in the original L'Enfant plan for the City of Washington	3	1				
c. The District of Columbia only	1	2		1		
d. The National Capital Region as defined by the Planning Act			1	1	1	
e. The Standard Metropolitan Statistical Area (SMSA)				3	1	
f. Other; specify: _____						

12. How important is it for each of the following to be included in the Federal elements of a comprehensive plan for the National Capital Region? (Check one box in each row.)

	Extremely important	Very important	Important	Slightly important	Little, if any, importance
a. Federal property only	2	1	1		
b. Federal property and District government property		2	1	1	
c. Federal, District, and local government property		1	1	1	1
d. Public and private property		1	1	2	1
e. Other; specify: _____					



13. To what extent should the following issues be included in the Federal elements of a comprehensive plan for the National Capital? (Check one box in each row.)

	<div>Very Great extent</div> <div>Great extent</div> <div>Moderate extent</div> <div>Some extent</div> <div>Little, if any, extent</div>				
a. Architecture of buildings	3	1			
b. Locations of buildings	3	1			
c. Size/mass of buildings	3	1			
d. Historic preservation	3	1			
e. Transportation facilities and services		2	1	1	
f. Economic and population forecasting and trend analysis	1		1	2	
g. Employment trends	1		1		2
h. Educational facilities			1	1	2
i. Health, welfare, and safety services			1	3	
j. Environmental resources, conservation, and protection	1	1	1	1	
k. Tourism			3		
l. Land use and zoning	1	1		2	
m. Natural features	1	1	1		
n. International missions		2	1		
o. Housing			1	3	
p. Others; specify: <u>(note a)</u>		1			

<sup>a</sup>One respondent specified civil defense.

14. If you believe NCPC should not prepare the Federal elements of a comprehensive plan, what primary role should it have in comprehensive planning for the National Capital? (Check one.)

☒ Not applicable. I believe NCPC should prepare the plan.

☐ None. I do not believe the NCPC should play any role.

☐ Oversight of the plan developed by another organization or agency.

☐ Oversight of portions of the plan affecting the Federal interest.

☒ Coordination of Federal agencies responsible for portions of the plan.

☐ Other; specify: \_\_\_\_\_.

Additional comments:

--Questions fail to address the issue of how the planning function (regardless of who does it) is going to work smoothly with all necessary participants and the unbalanced power wielded by various participants.

Part III. Composition of the NCPC

This series of questions deals with the makeup of the NCPC and how the makeup facilitates NCPC's accomplishing its mandate.

Membership consists of (ex officio) the Secretary of the Interior; the Secretary of Defense; the Administrator, General Services Administration; the Mayor of the District of Columbia; the Chairman of the D.C. Council; the Chairman of the Senate Committee on Governmental Affairs and the Chairman of the House Committee on the District of Columbia; three citizens appointed by the President (at least one each from Maryland and Virginia); and two citizens appointed by the Mayor.

15. How appropriate do you believe the present composition of the NCPC is? (Check one.)

☐ Very appropriate.

☒ Appropriate.

☒ Not sure.

☒ Inappropriate.

☐ Very inappropriate.

16. List the groups, jurisdictions, etc., if any, that you feel are over represented on the NCPC.

--Federal Government.

--Local jurisdictions.

17. List the groups, jurisdictions, etc., if any, that you feel are under represented on the NCPC.

--Local governments.

--Maryland suburbs have twice the land area and eventually greater population than Virginia.  
Each suburban county should be represented.

--Locals appear to have no role.

--Not adequate to have three political appointees representing Virginia and Maryland.

18. In general, to what extent does the current composition of NCPC facilitate the carrying out of its functions?  
(Check one.)

☐ Very great extent.

☒ Great extent.

☒ Moderate extent. (Note a)

☒ Some extent.

☐ Little, if any, extent.

<sup>a</sup>Not in a position to judge.

Additional comments:

--Attendees don't reflect those noted as members.

Part IV. Federal Capital Improvements Program

NCPC is the central planning agency for the Federal Government in the National Capital Region and as such, reviews Federal construction plans and recommends a Federal Capital Improvements Program (FCIP) to the Congress each year. The next few questions deal with these activities.

19. To what extent has NCPC kept you informed about Federal construction in your community? (Check one.)

☒ 2 Very great extent.

☒ 1 Great extent.

☒ 1 Some extent.

☐ Little extent.

☐ Not at all. Go to question 21.

20. What means does NCPC primarily use to keep you informed? (Check one.)

☒ 2 Notices of monthly NCPC meetings and accompanying agenda items.

☒ 1 Federal Capital Improvements Program.

☐ Other written communication.

☐ Meetings in the community prior to formal Commission action.

☐ Verbal communication.

☒ 1 Others; specify;  (note a) .

<sup>a</sup>This respondent specified all of the above.

21. How satisfied are you with NCPC's procedures for keeping agencies or organizations such as yours informed about Federal construction in your area? (Check one.)

☒ Very satisfied.

☒ Satisfied.

☒ Neither satisfied nor dissatisfied.

☐ Dissatisfied.

☐ Very dissatisfied.

22. To what extent do Federal agencies other than NCPC keep you informed about Federal construction in your community? (Check one.)

☐ Very great extent.

☐ Great extent.

☒ Some extent. (note a)

☐ Little extent.

☒ Not at all. Go to question 24.

<sup>a</sup>One respondent added that the extent varies with each agency and would be uniformly poor but for the Commission.

23. What means do the other Federal agencies primarily use to keep you informed? (Check one.)

☒ Written communication.

☒ Word of mouth/informal phone calls.

☒ Other; specify: (note a).

<sup>a</sup>One respondent said other Federal agencies don't until the last minute or not at all.

24. To what extent do you use NCPC's Federal Capital Improvements Program? (Check one.)

☐ None, not even aware of it. Provide any additional comments you may have at the end of this section and go to question 26.

☒ 1 Aware of it, but do not use. Provide any additional comments you may have at the end of this section and go to question 26.

☐ 3 To some extent.

☐ Use it extensively.

25. Describe how you have used the FCIP.

--Early warning of projects to come into local jurisdiction.

--During construction of Post Office, was kept aware of progress.

Additional comments:

No response given.

Part V. NCPC Review and Comment Process

NCPC reviews and comments on local jurisdictions' plans and projects for their effect on the Federal activities and interest. These questions deal with this process and NCPC's coordination with local jurisdictions and communities.

26. To your knowledge, how many plans or projects in your jurisdiction has NCPC reviewed and commented on in the last 5 years?

(note a) number (If none, enter "zero" and go to question 30.)

<sup>a</sup>Responses given were 2, 5, and 40.

27. Overall, what impact, if any, has the NCPC's review and comment process had on the time it takes to develop the projects? (Check one and enter number of months where appropriate.)

☒ No impact.

☐ Project dropped.

☐ Delayed development on the average, by about \_\_\_\_ months.

☐ Sped up development, on the average, by about \_\_\_\_ months.

☐ Don't know.

28. Overall, what impact, if any, has the NCPC's review and comment process had on project costs? (Check one and enter percentage where appropriate.)

☒ No impact.

☐ Project dropped.

☐ Increased project costs on the average by \_\_\_\_%.

☐ Reduced projects costs on the average by \_\_\_\_%.

☐ Don't know.



29. Overall, what effect, if any, has NCPC's review and comment process had on the project design? (Check one.)

☐ Greatly improved.

☒ Improved.

☒ No effect.

☐ Made worse.

☐ Made much worse.

☐ Project dropped.

30. In general, which of the following statements best describes your agency's reaction to NCPC's review and comment process. (Check one.)

☐ The process does not adequately cover the Federal interest.

☒ The process is consistent with and limited to those elements that have an impact on the Federal interest.

☐ The process covers many elements, including those that have an impact on the Federal interest and those that do not.

☒ The process is not relevant or necessary to protect the Federal interest.

31. We would like some specific information on NCPC's review and comments on your site and building plans. Please complete the table below for the three most recent projects NCPC has reviewed and commented on.

Project #1

Describe the project.

--Three plan reviews and one project review were described.

Describe any adverse impact on the Federal interest which NCPC indicated. (Write in "none" if NCPC found none.)

--One project cited highway capacity problem.

--A second project cited flood plain problem and need for solution.

--Two projects, none.

Describe what changes, if any, were made in the project as a result of NCPC's comments. (Write in "none" if no changes were made.)

--One project, none to date.

--Two projects, none.

### Project #2

Describe the project.

--One plan review and two project reviews were described.

Describe any adverse impact on the Federal interest which NCPC indicated. (Write in "none" if NCPC found none.)

--One project expressed concern regarding up-grading of Federal highway and subway route alignment endorsed locally.

--One project endorsed local position on building heights.

--One project, none.

Describe what changes, if any, were made in the project as a result of NCPC's comments. (Write in "none" if no changes were made.)

--Commission effected negotiations.

--Building height limits established.

--One project, none to date.

### Project #3

Describe the project.

--One plan review was described.

Describe any adverse impact on the Federal interest which NCPC indicated. (Write in "none" if NCPC found none.)

--One project opposed development proposal.

Describe what changes, if any, were made in the project as a result of NCPC's comments. (Write in "none" if no changes were made.)

--One project, none to date.

32. Office of Management and Budget Circular A-95 requires that copies of applications for Federal assistance involving land or water use and development or construction in the National Capital Region be sent to the NCPC in addition to the Washington Metropolitan Area Council of Governments and the appropriate State clearinghouse. Please indicate your level of agreement with each of the following statements.

	Totally agree					Agree					Neither agree nor disagree					Disagree					Totally disagree				
a. The NCPC review does not duplicate reviews done by other clearinghouse agencies.			1							3															
b. The review helps NCPC plan for and protect the Federal interest.	1	3																							
c. After advising applicants of potential adverse impact on the Federal interest, NCPC staff works with applicants to minimize the impact.	1	2	1																						
d. This NCPC review results in better coordination among all jurisdictions involved.				3						1															

Additional comments on NCPC's A-95 review process, especially if you disagree with any of the above statements.

--Whole process seems ineffective, while some local defects have been caught, locals get no feedback regarding how Federal actions may have been altered. With reduced Federal funding, many advantages of review are lost.

SUMMARY OF CITIZENS GROUP QUESTIONNAIRE RESPONSES

We sent the following questionnaire to five citizens groups. We received completed questionnaires from two citizens groups. Not all respondents answered all questions. Some respondents answered some questions twice.

Part I. Determining and Protecting the Federal Interest

While NCPC is charged with planning for and protecting the Federal interest in the National Capital Region and with preserving the area's natural and historic features, some have raised the issue as to just what the Federal interest is and who should be responsible for protecting it.

1. To what extent do you believe each of the following should be involved in defining the Federal interest in the National Capital? (Check one box in each row.)

		Very great extent	Great extent	Moderate extent	Some extent	Little, if any, extent
a. The Congress	2					
b. The White House	1	1				
c. Office of Management and Budget			2			
d. General Services Administration		1	1			
e. National Capital Planning Commission	2					
f. Other Federal agencies				2		
g. Regional planning agencies				2		
h. DC government			1		1	
i. State governments					2	
j. Local governments				1	1	
k. Citizens groups	1				1	
l. Others; specify: _____						

2. To what extent do you believe each of the following should be included in the Federal interest in the National Capital? (Check one box in each row.)

	<div>Very great extent</div> <div>Great extent</div> <div>Moderate extent</div> <div>Some extent</div> <div>Little, if any, extent</div>				
a. Architecture of buildings	1	1			
b. Locations of buildings	1	1			
c. Size/mass of buildings	1	1			
d. Historic preservation	1	1			
e. Transportation facilities and services	2				
f. Economic and population forecasting and trend analysis		1	1		
g. Employment trends		1			
h. Educational facilities		1	1		
i. Health, welfare, and safety services			1	1	
j. Environmental resources, conservation, and protection		1		1	
k. Tourism			1	1	
l. Land use and zoning	1	1			
m. Natural features	1	1			
n. International missions	2				
o. Housing			2		
p. Others; specify: _____					

3. Please provide any other comments on what you believe the Federal interest should be in the National Capital.

--Rigorously maintaining congressional constitutional responsibility for District of Columbia and prevent its illegal erosion beyond "Home Rule."

4. Although NCPC is now charged with planning for and protecting the Federal interest, questions exist as to whether others should also be involved in planning for and protecting it. To what extent do you believe each of the following should be involved with planning for and protecting the Federal interest? (Check one box in each row.)

	<div>Very Great extent</div> <div>Great extent</div> <div>Moderate extent</div> <div>Some extent</div> <div>Little, if any, extent</div>				
a. The Congress	1	1			
b. The White House		2			
c. Office of Management and Budget			1	1	
d. General Services Administration			1	1	
e. National Capital Planning Commission	2				
f. Other Federal agencies				2	
g. Regional planning agencies				1	1
h. DC government			1		1
i. State governments					2
j. Local governments				1	1
k. Citizens groups	1				1
l. Others; specify: _____					

5. Below is a table showing many of the functions carried out by the NCPC. Please indicate in the appropriate box how important you believe that function is in helping the NCPC to protect the Federal interest? (Check one box in each row.)

	Extremely important	Very important	Important	Slightly important	Little, if any, importance	Do not know
a. Preparation and adoption of the Federal elements of the comprehensive plan for the National Capital.	2					
b. Review and approval of the District elements of the comprehensive plan for the National Capital.		2				
c. Review and comment on plans, such as master plans or general land use plans, prepared by other State, regional, and local planning bodies.	1	1				
d. Review and comment on individual projects, such as a building plan or other public improvements in the vicinity of a Federal installation, in local jurisdictions.		2				
e. Preparation of the annual Federal Capital Improvements Program.	2					
f. Review of Federal agency master plans for major installations.		2				
g. Review and approval of Federal agency site and building plans.	1	1				
h. Review of projects using Federal funds pursuant to OMB Circular A-95.		1		1		
i. Review and approval of proposed zoning changes in the District of Columbia.	2					
j. Other; specify: _____						

6. Overall, how effective or ineffective do you believe the NCPC has been in carrying out its functions?

☐ Very effective.

☐ Somewhat effective.

☐ Neither effective nor ineffective.

☒ Somewhat ineffective.

☐ Very ineffective.

☒ Don't know.

Additional comments:

--Planning is nebulous. The more individuals and groups involved, the more diverse and formless the results. Whatever agency receives the authority, it should have power, subject only to Congress and White House veto.



Part II. Comprehensive Planning

The National Capital Planning Act of 1952, as amended, directed NCPC to prepare and adopt Federal elements of a comprehensive plan for the National Capital. To date, three Federal elements of the plan have been adopted. This series of questions asks, first, about the need for comprehensive planning in the area (questions 7 through 9) and second, about what you believe NCPC's role should be in comprehensive planning (questions 10 through 14).

7. To what extent is there a need for a comprehensive plan in the National Capital Region? (Check one.)

☒ Very great extent.

☒ Great extent.

☐ Moderate extent.

☐ Some extent.

☐ Very little extent.

8. To what extent should the following issues be included in a comprehensive plan for the National Capital? (Check one box in each row.)

		Very great extent	Great extent	Moderate extent	Some extent	Little, if any, extent
a. Architecture of buildings	1	1				
b. Locations of buildings	2					
c. Size/mass of buildings	1	1				
d. Historic preservation	2					
e. Transportation facilities and services	2					
f. Economic and population forecasting and trend analysis		2				
g. Employment trends		2				
h. Educational facilities		1		1		
i. Health, welfare, and safety services			2			
j. Environmental resources, conservation and protection	1		1			
k. Tourism		1	1			
l. Land use and zoning	2					
m. Natural features	2					
n. International missions	2					
o. Housing		2				
p. Others; specify: _____						

9. Do you believe there is a need for a comprehensive plan specifically for the Federal interest in the National Capital?

☒ Yes. Go to question 10.

☐ No. Please provide any additional comments you have on comprehensive planning in the space provided at the end of this section and go to question 15.

10. While NCPC is charged with developing the Federal elements of a comprehensive plan for the National Capital, some believe others should assist in preparing the plan or should prepare the plan rather than NCPC. To what extent do you believe each of the following should have a role in preparing such a comprehensive plan for the Federal Government? (Check one box in each row.)

			Very great extent	Great extent	Moderate extent	Some extent	Little, if any, extent
a. The Congress	2						
b. The White House	1	1					
c. Office of Management and Budget			2				
d. General Services Administration			2				
e. National Capital Planning Commission	2						
f. Commission of Fine Arts	1	1					
g. Regional planning agencies			1	1			
h. DC government			1			1	
i. State governments						2	
j. Local governments				1	1		
k. Citizens groups	1					1	
l. Others; specify: _____							

11. How important is it for each of the following areas to be included in a comprehensive plan developed by the NCPC? (Check one box in each row.)

		Extremely important	Very important	Important	Slightly important	Little, if any, importance	Do not know
a. The monumental core in the District of Columbia	1						
b. The area included in the original L'Enfant plan for the City of Washington	1						
c. The District of Columbia only	1						
d. The National Capital Region as defined by the Planning Act	1						
e. The Standard Metropolitan Statistical Area (SMSA)	1						
f. Other; specify: _____							

12. How important is it for each of the following to be included in the Federal elements of a comprehensive plan for the National Capital Region? (Check one box in each row.)

		Extremely important	Very important	Important	Slightly important	Little, if any, importance
a. Federal property only	1					
b. Federal property and District government property	1					
c. Federal, District, and local government property	1					
d. Public and private property		1				
e. Other; specify: _____						

13. To what extent should the following issues be included in the Federal elements of a comprehensive plan for the National Capital? (Check one box in each row.)

	Very great extent	Great extent	Moderate extent	Some extent	Little, if any, extent
a. Architecture of buildings.	1	1			
b. Locations of buildings.	2				
c. Size/mass of buildings.	2				
d. Historic preservation.	2				
e. Transportation facilities and services.	2				
f. Economic and population forecasting and trend analysis.		2			
g. Employment trends.		2			
h. Educational facilities.		1	1		
i. Health, welfare, and safety services.			2		
j. Environmental resources, conservation, and protection.	1		1		
k. Tourism.		1	1		
l. Land use and zoning.	2				
m. Natural features.	2				
n. International missions.	2				
o. Housing.			2		
p. Others; specify: _____.					

14. If you believe NCPC should not prepare the Federal elements of a comprehensive plan, what primary role should it have in comprehensive planning for the National Capital? (Check one.)

- ☒ Not applicable. I believe NCPC should prepare the plan. (Note a)
- ☐ None. I do not believe the NCPC should play any role.
- ☐ Oversight of the plan developed by another organization or agency.
- ☐ Oversight of portions of the plan affecting the Federal interest.
- ☐ Coordination of Federal agencies responsible for portions of the plan.
- ☐ Other; specify: \_\_\_\_\_.

<sup>a</sup>One respondent added that NCPC should prepare the plan under closer supervision of the Congress.

Additional comments:

No response given.

Part III. Composition of the NCPC

This series of questions deals with the makeup of the NCPC and how the makeup facilitates NCPC's accomplishing its mandate.

Membership consists of (ex officio) the Secretary of the Interior; the Secretary of Defense; the Administrator, General Services Administration; the Mayor of the District of Columbia; the Chairman of the D.C. Council; the Chairman of the Senate Committee on Governmental Affairs and the Chairman of the House Committee on the District of Columbia; three citizens appointed by the President (at least one each from Maryland and Virginia); and two citizens appointed by the Mayor.

15. How appropriate do you believe the present composition of the NCPC is? (Check one.)

☐ Very appropriate.

☒ Appropriate.

☐ Not sure.

☒ Inappropriate.

☐ Very inappropriate.

16. List the groups, jurisdictions, etc., if any, that you feel are over represented on the NCPC.

--Mayor's office directly and through appointments.

17. List the groups, jurisdictions, etc., if any, that you feel are under represented on the NCPC.

--Citizens groups should be represented; could replace mayoral appointees.

18. In general, to what extent does the current composition of NCPC facilitate the carrying out of its functions? (Check one.)

☐ Very great extent.

☐ Great extent.

☒ Moderate extent.

☐ Some extent.

☐ Little, if any, extent.

## Additional comments:

- Commission actions are largely passive. React to development rather than planning. Thus, its role is moderate. Also, some conflict of interest because representatives take into account only their own parent agencies rather than comprehensive Federal needs.



Part IV. Federal Capital Improvements Program

NCPC is the central planning agency for the Federal Government in the National Capital Region and as such, reviews Federal construction plans and recommends a Federal Capital Improvements Program (FCIP) to the Congress each year. The next few questions deal with these activities.

19. To what extent has NCPC kept you informed about Federal construction in your community? (Check one.)

☐ Very great extent.

☐ Great extent.

☒ Some extent.

☒ Little extent.

☐ Not at all. Go to question 21.

20. What means does NCPC primarily use to keep you informed? (Check one.)

☒ Notices of monthly NCPC meetings and accompanying agenda items. (note a)

☒ Federal Capital Improvements Program. (note b)

☐ Other written communication.

☐ Meetings in the community prior to formal Commission action.

☐ Verbal communication.

☐ Others; specify: \_\_\_\_\_.

<sup>a</sup>One respondent indicated notices were received occasionally and were often tardy.

<sup>b</sup>Respondent indicated the Program was received too late.

21. How satisfied are you with NCPC's procedures for keeping agencies or organizations such as yours informed about Federal construction in your area? (Check one.)

☐ Very satisfied.

☒ Satisfied.

☐ Neither satisfied nor dissatisfied.

☒ Dissatisfied.

☐ Very dissatisfied.

22. To what extent do Federal agencies other than NCPC keep you informed about Federal construction in your community? (Check one.)

☐ Very great extent.

☐ Great extent.

☐ Some extent.

☐ Little extent.

☒ Not at all. Go to question 24.

23. What means do the other Federal agencies primarily use to keep you informed? (Check one.)

☐ Written communication.

☐ Word of mouth/informal phone calls.

☐ Other; specify: \_\_\_\_\_.

24. To what extent do you use NCPC's Federal Capital Improvements Program? (Check one.)

☐ None, not even aware of it. Provide any additional comments you may have at the end of this section and go to question 26.

☒ Aware of it, but do not use. Provide any additional comments you may have at the end of this section and go to question 26.

☒ To some extent.

☐ Use it extensively.

25. Describe how you have used the FCIP.

--In preparing organization position, primarily on zoning issues.

Additional comments:

No response given.

Part V. NCPC Coordination with Citizen Groups and Organizations

The National Capital Planning Act of 1952, as amended, requires the NCPC to consult with organizations and groups interested in the development of the National Capital Region. Much of this is done through presentations by the groups and organizations at NCPC meetings.

26. How many presentations have you made to the NCPC in the last 3 years? (note a) (Fill in appropriate number. Write "zero" if none.)

<sup>a</sup>One respondent indicated "zero" and the other indicated 8.

27. What was your subject area in the most recent presentation?

--All subjects including zoning, international missions, Metro routes, and historic interests.

28. Why did you make this presentation? (Check all that apply.)

- ☒ To discuss the impact of a Federal proposal on the community.
- ☒ To discuss the impact of a community project on the Federal interest.
- ☒ To raise attention to a neighborhood problem.
- ☒ To get redress from a local government decision.
- ☒ Other; specify: (note a).

<sup>a</sup>Respondent said presentations are made to have a basis for presentations before Congress.

29. Describe the results or effect of this presentation.

--Sometimes successful. Generally, problem is that Commission members do not respond to the community. There is no dialogue.

30. What do you think of the procedures NCPC has adopted to guide presentations by local citizen groups or organizations at its meetings? (Check any that apply.)

☐ Not familiar with procedures.

☒ Time consuming.

☒ Too involved/confusing.

☒ Appropriate.

☒ Other; specify: (note a).

<sup>a</sup>Respondent said no dialogue exists.

31. How satisfied are you with NCPC's coordination with citizens groups, and organizations as yours?

☐ Very satisfied.

☒ Satisfied.

☐ Neither satisfied nor dissatisfied.

☒ Dissatisfied.

☐ Very dissatisfied.

Additional comments:

No response given.

31. How satisfied are you with NCPC's coordination with citizens groups, and organizations as yours?

☐ Very satisfied.

☒ Satisfied.

☐ Neither satisfied nor dissatisfied.

☒ Dissatisfied.

☐ Very dissatisfied.

Additional comments:

No response given.

RESPONSE TO QUESTION NO. 4

METROPOLITAN WASHINGTON COUNCIL OF GOVERNMENTS  
1875 EYE STREET, N.W.  
Washington, D.C. 20006

**RESOLUTION ADOPTING COG/NCPC "PRINCIPLES AND PROCESS  
FOR IDENTIFYING FEDERAL INTERESTS IN THE NATIONAL CAPITAL REGION"**

WHEREAS, on January 14, 1981, the Board of Directors of the Metropolitan Washington Council of Governments (Council) adopted Resolution R1-81, authorizing the creation of an Ad Hoc Committee of interested local government members of Council's Board of Directors, representatives of the executive branches of the States of Maryland and Virginia and representatives of the National Capital Planning Commission (NCPC), for the purpose of attempting to define the federal interest for planning for the future development of the Washington Metropolitan Area; and

WHEREAS, the Ad Hoc Committee met over the course of several months and successfully negotiated, among its members, a statement of "Principles and Process for Identifying Federal Interests in the National Capital Region (Statement of Principles);" and

WHEREAS, the Council's Board of Directors, at its June 9, 1982 meeting, authorized the submission of the Ad Hoc Committee's document to the participating local governments in Council, for their review and comment; and

WHEREAS, several local governments either reviewed and endorsed the Statement of Principles or suggested non-substantive modifications which have been included in the document,

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE METROPOLITAN WASHINGTON COUNCIL OF GOVERNMENTS THAT:

1. Council's Board of Directors hereby adopts the Statement of Principles, "Principles and Process for Identifying Federal Interests in the National Capital Region," and directs the staff and Council's policy committees and urges the Air Quality Planning Committee and Transportation Planning Board to follow the policies and principles and procedures set forth in the document prepared by the Ad Hoc Committee.

2. Council's Board of Directors concurs with the recommendation of Prince George's County to immediately begin negotiations with NCPC to develop a procedure for resolving any local/federal disagreements that may arise in implementing the Ad Hoc Committee's Statement of Principles.

I hereby certify that the above is a true and correct copy of a resolution adopted by the Board of Directors of the Metropolitan Washington Council of Governments at its meeting of

September 8, 1982

Doreen H. Smith  
Secretary, Board of Directors

A-00-02

November 10, 1982

METROPOLITAN WASHINGTON COUNCIL OF GOVERNMENTS  
1875 Eye Street, N.W.  
Washington, D.C. 20006

RESOLUTION ADOPTING PROCEDURES FOR RESOLVING FUTURE  
PLANNING ISSUES THAT MAY ARISE BETWEEN LOCAL AND FEDERAL  
AGENCIES IN THE NATIONAL CAPITAL REGION

WHEREAS, on September 8, 1982, the Board of Directors adopted the Statement of Principles, "Principles and Process for Identifying Federal Interests in the National Capital Region" and directed the staff and the Council's Policy Committees and urged the Air Quality Planning Committee and Transportation Planning Board to follow the policies and principles and procedures set forth in the Document; and

WHEREAS, Council's Board of Directors concurred with the recommendation of Prince George's County to immediately begin negotiations with NCPC to develop a procedure for resolving any local/federal disagreements that may arise in implementating the Document; and

WHEREAS, the Council's staff, in conjunction with NCPC staff, has prepared a draft of such procedures,

NOW, THEREFORE, BE IT RESOLVED, THAT THE BOARD OF DIRECTORS OF THE METROPOLITAN WASHINGTON COUNCIL OF GOVERNMENTS ADOPTS THE FOLLOWING PROCEDURES:

1. The Commission and COG staffs will identify potential planning or development issues arising from proposals developed by a federal agency, the Commission, a local government agency and/or the Council of Governments (COG).
2. Upon identifying a potential planning or development issue, the Commission and COG staffs will assess the following questions as applicable:
  - a. Is the issue a result of a major federal proposal having substantial local or regional impact.
  - b. Is the issue a result of a major local or regional proposal having substantial

impact on the federal establishment and/or concerns.

- c. Who are the appropriate parties to be involved in efforts to resolve the identified issue(s).
3. In determining the appropriate parties under 2(c) above, the following general criteria should be used:
  - a. If the proposal involves a localized impact in only one jurisdiction, then the Commission, the affected federal agency, if any, and the affected local government will be involved. In this case, COG would not generally be involved unless requested.
  - b. If the proposal involves a wider impact affecting more than one jurisdiction, then the affected federal agency, the local jurisdictions affected, the Commission, other affected federal agencies, if any, and COG would be involved.
  - c. If a proposal involves a possible difference with the Metropolitan Policy Guide then the affected federal agency, the Commission, the local jurisdictions affected and COG would be involved.
4. As applicable, the Commission and/or the COG staff will arrange a joint meeting or meetings with the affected federal agency, the affected local jurisdiction, COG, and other interested parties with the objective of resolving the issue or issues to the mutual satisfaction of all concerned. If complete agreement is not possible, every effort should be made to minimize the differences as much as possible. A joint staff memorandum summarizing the issues discussed and the areas of agreement and/or disagreement shall be prepared reflecting the viewpoints of the parties involved and will be shared with all participants.
5. If the issue is resolved, the agreement will be reflected in a revised or amended proposal prior to any further action thereon by the appropriate responsible federal agency, the local body having jurisdiction over the matter or COG.
6. If the issue is only partially resolved or is unresolved, the joint staff memoranda will be made available for consideration by the fed-



eral or local body having approval and/or recommendatory authority and all parties will be afforded an opportunity to present their views prior to any final decision on the proposal.

7. Where appropriate, proposed policies, plans and programs will be reviewed by one or more of COG's policy committees. Any joint staff memoranda representing the views of the parties involved in any issue will be included in the COG staff report on the regional impact of such proposals and on their consistency with the Metropolitan Policy Guide.
8. After following the procedures described above and, prior to implementing a proposal that may conflict with the development policies of an affected federal agency, local government and/or COG, the affected parties shall be notified of the proposed action to be taken and the rationale for not following the comments and suggestions received as part of the intergovernmental review.
9. The sponsoring federal agency, local government agency, COG or the Commission will give potentially affected agencies prompt notice about a proposed policy, plan, program or development proposal in the region and give such agencies adequate time to evaluate the impact, if any, on their activities and/or interests. The sponsoring agency will, to the extent practicable, give other affected agencies that are concerned about a proposal adequate time to try to resolve any issue or issues.

NATIONAL CAPITAL PLANNING COMMISSION  
WASHINGTON, D.C. 20576

RESPONSE TO QUESTION NO. 4

NCPC File No. 0604C

RESOLUTION ENDORSING THE DRAFT DOCUMENT  
"PRINCIPLES AND PROCESS FOR IDENTIFYING  
FEDERAL INTERESTS IN THE NATIONAL CAPITAL REGION"

September 16, 1982

- WHEREAS, an Ad Hoc Committee jointly representing the members of the Metropolitan Washington Council of Governments (COG) and the National Capital Planning Commission (NCPC) has recently considered their respective responsibilities and particularly the problems of identifying Federal interests in the National Capital Region;
- WHEREAS, the Ad Hoc Committee has agreed upon a draft document "Principles and Process for Identifying Federal Interests in the National Capital Region", dated June 2, 1982;
- WHEREAS, the draft document recognizes that the Intergovernmental Cooperation Act of 1968 and other recent Federal legislation, as well as the National Capital Planning Act of 1952, govern operation of the two bodies;
- WHEREAS, the draft document contains principles for identifying Federal interests in the development of the Washington Metropolitan area and clarifies the respective responsibilities of COG, its local government members and the Commission in planning and development decision-making in the Region;
- WHEREAS, the COG Board of Directors on June 9, 1982 authorized the circulation of the draft document and several of its local government members did review and endorse the draft document and suggested some non-substantive modifications in the text which have been incorporated in a revised document, dated August 17, 1982;
- WHEREAS, On September 8, 1982, the COG Board of Directors adopted the modified "Principles and Process for Identifying Federal Interests in the National Capital Region" recommended by the Ad Hoc Committee and also authorized further negotiations with the Commission in order to agree upon procedures for resolving future planning issues that may arise between local and Federal agencies that have initiated some proposed policy, plan or program in the region;
- WHEREAS, the Commission desires to cooperate with COG and its local government members and to improve the process for intergovernmental cooperation in the National Capital Region.

BE IT RESOLVED, that the National Capital Planning Commission:

1. adopts the modified draft document "Principles and Process for Identifying Federal Interests in the National Capital Region" and will implement those recommendations that relate to the Commission's activities as the central planning agency for the Federal government in the National Capital Region, and
2. agrees to work with COG to establish a procedure to be used in the future for resolving planning issues that may arise between local and Federal agencies in the Region.

## NATIONAL CAPITAL PLANNING COMMISSION

WASHINGTON, D.C. 20576

NCPC File No. 0604C

PROCEDURES FOR RESOLVING PLANNING ISSUES BETWEEN LOCAL  
AND FEDERAL AGENCIES IN THE NATIONAL CAPITAL REGIONExecutive Director's Recommendation

November 18, 1982

The Executive Director recommends that the Commission adopt the attached resolution endorsing proposed procedures for resolving planning issues that may arise between local and Federal agencies in the National Capital Region.

\* \* \*

Description of Resolution

The resolution has been drafted in response to the action taken by the Commission on September 16, 1982 adopting "Principles and Process for Identifying Federal Interests in the National Capital Region" and agreeing "to work with COG to establish a procedure to be used in the future for resolving planning issues that may arise between local and Federal agencies in the Region".

The Board of Directors of the Metropolitan Washington Council of Governments (COG) adopted a similar resolution on September 8, 1982 as a result of a recommendation from Lawrence J. Hogan, County Executive of Prince George's County. In his letter of July 8, 1982 commenting on the draft document prepared by the COG/NCPC Ad Hoc Committee, Mr. Hogan noted that "the National Capital Planning Commission and COG will attempt to resolve planning issues or difficulties that may arise between local and federal agencies that have initiated some proposed policy, plan or program in the region. Without question, this intent must be translated into a definitive, enforceable procedure to ensure protection of both local and Federal interests. To us, this provision is the key to success of the draft agreement and a clear, stepwise process for resolving differences must be drafted to the satisfaction of both federal and local interests".

The resolution was prepared in consultation with the COG staff. A parallel resolution was adopted by COG's Board of Directors at its meeting on November 10, 1982. (copy enclosed)

The adoption of the resolution would complete the actions required by the Commission to establish procedures for the implementation of the COG/NCPC Ad Hoc Committee's recommendations in the National Capital Region.

NATIONAL CAPITAL PLANNING COMMISSION  
WASHINGTON, D.C. 20576

NCPC File No 0604C

RESOLUTION ENDORSING PROPOSED PROCEDURES  
FOR RESOLVING PLANNING ISSUES THAT MAY ARISE BETWEEN  
LOCAL AND FEDERAL AGENCIES IN THE NATIONAL CAPITAL REGION

November 18, 1982

WHEREAS, the Commission, on September 16, 1982, adopted "Principles and Process for Identifying Federal Interests in the National Capital Region" and agreed to implement those recommendations that relate to the Commission's activities as the central planning agency for the Federal government in the National Capital Region;

WHEREAS, the Commission agreed to continue working with the Metropolitan Washington Council of Governments (COG) to establish procedures for resolving issues that may arise between local and Federal agencies in the Region in connection with the review of master, systems, and project plans and proposals;

WHEREAS, the staffs of the Commission and COG prepared a draft of such procedures and the Board of Directors of the Council of Governments endorsed the procedures at its meeting on November 10, 1982.

BE IT RESOLVED, that the Commission adopts the following procedures:

1. The Commission and COG staffs will identify potential planning or development issues arising from proposals developed by Federal agencies, including the Commission, local government agencies and/or COG.
2. Upon identifying a potential planning or development issue, the Commission and COG staffs will assess the following, as applicable:

- a. Is it a major Federal proposal having a substantial local or regional impact?
  - b. Is it a major local or regional proposal having a substantial impact on the Federal establishment and/or concerns?
  - c. Who are the appropriate parties to be involved in efforts to resolve the identified issue.
3. In determining the appropriate parties under 2(c) above, the following general criteria will be used:
- a. If the proposal involves a localized issue in only one jurisdiction, the Commission, other affected Federal agency, if any, and the affected local government will be involved. In this case, COG will not generally be involved, unless requested.
  - b. If the proposal involves a wider issue affecting more than one jurisdiction, the local jurisdictions affected, the Commission, other affected Federal agencies, if any, and COG will be involved.
  - c. If a proposal involves a possible difference with COG's Metropolitan Policy Guide, the affected Federal agency, the Commission, the local jurisdictions affected, and COG will be involved.

4. As applicable, the Commission and/or the COG staff will arrange a meeting or meetings with the affected Federal agency, the affected local jurisdiction, COG, and other interested parties with the objective of resolving the issue or issues to the mutual satisfaction of all concerned. If complete agreement is not possible, every effort will be made to minimize the differences as much as possible. A joint memorandum summarizing the issues discussed and the areas of agreement and/or disagreement will be prepared reflecting the viewpoints of the parties involved and will be shared with all participants.

5. If the issue is resolved, the agreement will be reflected in a revised proposal prior to any further action thereon by the appropriate responsible Federal agency, the local body having jurisdiction over the matter, or COG.

6. If the issue is only partially resolved or is unresolved, the memoranda will be made available for consideration by the Federal or local body having approval and/or recommendatory authority and all parties will be afforded an opportunity to present their views prior to any final decision on the proposal.

7. Where appropriate, proposed policies, plans and programs will be reviewed by one or more of COG's policy committees. Any joint memorandum representing the view of the parties involved in any issue will be included in the COG staff report on the regional impact of such proposals and on their consistency with the Metropolitan Policy Guide.

8. After following the procedures outlined above and prior to implementing a proposal that may conflict with the development policies of the Commission, any other affected Federal agency, local government and/or COG, the affected party shall be notified of the proposed action to be taken and the rationale for not following the comments and suggestions received as part of the intergovernmental review.
9. The sponsoring Federal agency, local government agency, COG or the Commission will give potentially affected agencies prompt notice about a proposed policy, plan, program or development proposal in the region and give such agencies adequate time to evaluate the impact, if any, on their activities and/or interests. The sponsoring agency will, to the extent practicable, give other affected agencies that are concerned about a proposal adequate time to try to resolve any issue or issues.



NATIONAL CAPITAL PLANNING COMMISSION  
WASHINGTON, D.C. 20576

In Reply Refer To:  
NCPC File No. 2215

**MAR 22 1983**

Mr. J. Dexter Peach  
Director, Resources, Community  
and Economic Development Division  
United States General Accounting Office  
Washington, D.C. 20548

Dear Mr. Peach:

The Commission welcomes the evaluation of its mission, role, and functions set forth in the draft of the proposed report prepared by the staff of the General Accounting Office entitled "Role, Functions, and Operations of the National Capital Planning Commission". We believe that this kind of assessment of our agency serves to strengthen and enhance our effectiveness.

We find the report a reasonably accurate description of the operations of the Commission. Our staff, in a separate letter, offers some detailed comments and corrections which the Commission has reviewed and agreed to.

Because the Commission has so much to gain from this evaluation, we believe that the report might have been improved had the Commission been allowed to review and comment on the questions which GAO pursued, and had the report contained more GAO analysis and conclusions. In the absence of such analysis and Commission input, the report does not provide guidance on how the mission of the Commission might be better accomplished. Instead, the report is a collection of opinions of those interviewed, many of whom indicate that they have limited knowledge of the role and activities of the Commission. There is no indication that the researchers attempted to validate the responses provided in the interviews or questionnaires. Nevertheless, the study supports the conclusions that there are Federal interests in the National Capital Region and that there is a need for a Federal mechanism to protect those interests. There is general agreement that there should be a broadly representative Federal body responsible for making Federal interest decisions. NCPC's mission could not be accomplished with objectivity by another Federal agency with a narrower mission.

In the past, there has been considerable misunderstanding by regional and local planning bodies of the role of NCPC in the National Capital Region. Much of this misunderstanding resulted from the Commission's concern about the impact of building heights in Arlington County on the skyline and vistas of the Nation's Capital. In May, 1982, the Arlington County Board acknowledged the Commission's concern and agreed on a new policy regarding building heights in Arlington that will assure consideration of their impact on the Federal Mall and Monumental Area.

[GAO COMMENT: On p. 62 we note the agreement between the Arlington County Board and NCPC on the issue of building heights in Arlington County.]

Further misunderstanding should be avoided by the COG-NCPC agreement on the principles and process for identifying Federal interests in the National Capital Region. The agreement is an important accomplishment in improving

intergovernmental relations and development coordination. It is important to note that the GAO study was being conducted while negotiations leading to the agreement were underway. Therefore, many of the responses in the study from local and regional planning officials do not reflect the results of these negotiations.

In the last ten years over 22 million square feet of new office space has been introduced on the private rental market in the District of Columbia. This fact alone supports the argument that a major task of the Commission will continue to be the protection, from public and private encroachment, of the natural and historic features of the Nation's Capital generally characterized by low density development, green open space, limited building heights, a horizontal skyline, and broad avenues and vistas.

The comparison of the role of the NCPC with that of the National Capital Commission of Ottawa, Canada is an appropriate one because there are no other planning bodies in the United States with the same kinds of jurisdiction and responsibility as the NCPC. There are, however, several distinctions between the two bodies. The Canadian Commission has, in addition to planning responsibilities, functions related to open space and public buildings similar to those of the National Park Service and GSA in our Nation's Capital.


[GAO COMMENT: These or similar differences in the role and functions of the United States and Canadian commissions are on pp. 69 to 71.]

There is considerable attention in the report to the composition of the NCPC. Through the years there has been much discussion of, and many proposals for, modifying the composition of the Commission. We think that several basic principles are universally accepted: the Commission should be an independent Federal body with Presidential appointees and Federal agency representation, as well as representatives of the government of the District of Columbia because of the unique role of the Commission and the concentration of Federal property in the city. The comments from the American Planning Association and the Advisory Commission on Intergovernmental Relations that "planning bodies are encouraged to involve those affected by plans in establishing planning goals" does not necessarily lead to the conclusion that those people affected should be members of the planning body. Who on the Commission represents the views of citizens from other parts of the nation on the character of their Nation's Capital and its environs? Thoughtful consideration of national interest, balance, broad representation, and expertise should be a part of any recommendations for changes in the composition of the Commission.

[GAO COMMENT: The report contained the various opinions on the Commission's composition that government and non-government officials discussed with us. We agree with the Commission's Chairman that national interest, balance, broad representation, and expertise should also be considered if changes in the Commission's composition are made.]

Lastly, we think it is an important finding that, despite the extensive use of leased space by the Federal government in the National Capital Region, NCPC does not have authority to review GSA leased space proposals for the leasing of space by the Federal government. You will note that the Comprehensive Plan element on Federal Facilities includes a reference to the need for such authority. This issue should be explored legislatively and administratively.

Sincerely,



Glen T. Urquhart  
Chairman

NATIONAL CAPITAL PLANNING COMMISSION  
WASHINGTON, D.C. 20576

In Reply Refer To:  
NCPC File No. 2215

MAR 22 1983

Mr. J. Dexter Peach  
Director, Resources, Community  
and Economic Development Division  
United States General Accounting Office  
Washington, D.C. 20548

Dear Mr. Peach:

Thank you for the opportunity to review the draft of a proposed report, prepared by the staff of the General Accounting Office, entitled "Role, Functions, and Operations of the National Capital Planning Commission".

Your letter of February 24, the draft report, this letter, and the attached comments were reviewed by the Commission as a whole at its meeting on March 17, 1983.

In response to your request, we provide the following additional information:

1. the Commission's current organization chart (attached);
2. a statement on the current status of Federal elements of the Comprehensive Plan for the National Capital (attached);
3. the Commission's actual expenditures for Fiscal Year 1982, from its single appropriations account, were \$2,377,900.
4. the resolutions adopted by the Metropolitan Washington Council of Governments (COG) and the Commission on September 8 and 16, 1982, respectively, adopting "Principles and Process for Identifying Federal Interests in the National Capital Region" (attached);
5. examples of matters considered in the 55% of Commission meeting time from January through April 1982 spent on information presentations on non-action items and on administrative and organizational matters. About 31% of this category (17% of the total Commission time) was spent on items that became action items at subsequent meetings (attached); and
6. a statement on the National Park Service's and the Federal Aviation Administration's reasons for proposing major developments on sites under their jurisdiction with no approved master plan (attached).

In general, except for the comments noted below, we believe the proposed report is accurate in regard to the factual aspects of the Commission's operations. It is obvious that some of those interviewed are not fully aware of the Commission's activities in the Region and that our outreach program needs to be continued.

The Commission is, of course, aware of the difficulties involved in defining Federal interests in the National Capital Region. We believe, as indicated in the comments, that the adoption of five Federal elements of the Comprehensive Plan for the National Capital, the recent circulation of a proposed sixth element for public review and comment, the nearing completion of a proposed seventh element represent a significant effort by the Commission to identify and describe Federal concerns and interests in the future growth and development of the National Capital Region.

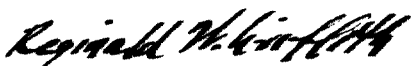
We also believe that the COG/NCPC agreement on "Principles and Process for Identifying Federal Interests in the National Capital Region" represents a useful framework for more effective intergovernmental cooperation in planning in the Washington Metropolitan area.

In spite of the difficulties in defining the Federal interest in the District of Columbia and in the Region, the Commission believes that it has very effectively carried out its responsibilities under the National Capital Planning Act of 1952, as amended.

We are enclosing our comments of the draft report. They are presented in accordance with the outline and the page numbering used in the draft transmittal letter and the draft report. The numbering of our comments should, of course, be revised when published to conform to the page numbering in the printed version of the report.

Thank you again for the opportunity to review the proposed report.

Sincerely,



Reginald W. Griffith  
Executive Director

Enclosures

[GAO COMMENT: For the most part, we revised the report to reflect the Executive Director's additional information and technical comments included as enclosures to this letter but not reproduced in this report.]

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
EXECUTIVE OFFICE

OFFICE OF THE CITY ADMINISTRATOR

ELIJAH B. ROGERS  
CITY ADMINISTRATOR  
1350 E STREET, N.W. — ROOM 507  
WASHINGTON, D.C. 20004

MAR 2 3 1983

Mr. William J. Anderson  
Director, U.S. General  
Accounting Office  
Washington, D.C. 20548Re: Draft Report: Role, Functions, and Operations  
of the National Capital Planning Commission

Dear Mr. Anderson:

The draft report, referenced above and dated February 24, 1983, has been reviewed by the appropriate District of Columbia officials. We find the proposed report to be a generally accurate description of the National Capital Planning Commission (NCPC), its functions and operation.

Because the nature of the report is based upon opinions, guided by a GAO questionnaire, and offers no specific recommendations, it is unnecessary to respond at length on it. There are, however, four areas on which the Office of Planning staff commented:

1. District of Columbia Representation of NCPC

The District of Columbia representatives comprise four of the twelve Commission members: the Mayor (or his alternate), the Chairman of the City Council (or his alternate), and two citizen members appointed by the Mayor. This level of District representation was determined by the Congress in 1973, when it passed the District of Columbia Self-Government and Governmental Reorganization Act. The Congress gave careful consideration to the appropriate balance of Federal, District, and other representation in its recognition of the dual nature of the District, which is the seat of the National Government and the home of our 630,000 residents. Although

linked and affected by the federal establishment, the District of Columbia local community has a distinct self-interest which should be represented on NCPC. The Office of Planning believes that the current level of District representation on NCPC is still appropriate and it should be continued.

## 2. Suburban and Other Representation on NCPC

Three of the twelve Commission members are appointees of the President, who by law must include, from among his three, at least one resident each from Virginia and Maryland; the third member could be from the suburbs, or from the nation-at-large. The District has no objection to the current level of representation, which is two from Virginia and one from Maryland. We believe that it is appropriate that the residents of surrounding jurisdictions be represented on NCPC, and we see no justification for increasing the level.

## 3. Regional and Local Governmental Relations

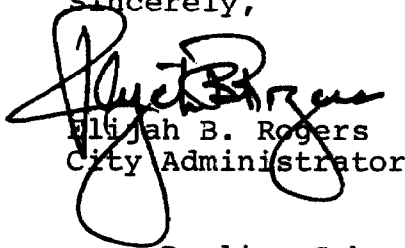
As the draft report states, there was some historical tension between NCPC and area jurisdictions. However, during 1982, NCPC negotiated a formal agreement to identify federal interests in the region and to improve coordination of planning activities. The District encouraged these negotiations at the time, and it fully supports the "Principles and Process for Identifying Federal interests in the National Capital Region," that both the Council on Government and the NCPC adopted in September 1982.

## 4. Federal Interest Definition

In the opinion of the District of Columbia officials, based upon years of dealing with the Federal interest, including an initial effort to define the federal interest, the NCPC position is substantially correct. However, certain parameters and principles should be determined to make the situation manageable. This, in effect, has been done in the COG/NCPC agreement, "Principles and Process for Identifying Federal Interests in the National Capital Region," which the District fully supports.

We believe that the COG/NCPC agreement must be given full opportunity to prove itself, and we are willing to participate in joint and on-going planning efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "Elijah B. Rogers", is written over the typed name and title.

Elijah B. Rogers  
City Administrator

cc: Pauline Schneider  
John McCoy  
Ivanhoe Donaldson  
Gladys Mack





metropolitan washington  
**COUNCIL OF GOVERNMENTS**

1875 Eye Street, N.W., Suite 200, Washington, D.C. 20006 223-6800

March 24, 1983

Mr. J. Dexter Peach, Director  
Resources, Community and Economic Development Division  
U.S. General Accounting Office  
Washington, D.C. 20548

Dear Mr. Peach:

In your letter of February 24, 1983, you transmitted for our review and comment a draft report entitled, "Role, Functions, and Operations of the National Capital Planning Commission." This report is being prepared for Senators Eagleton, Mathias, Stevens and Warner.

The proposed report addresses five policy areas pertaining to the National Capital Planning Commission's mission, legal base, operations and decision-making process. Apparently, the core issue of concern to the Senators is what is NCPC's responsibility for determining the "federal interest" in carrying out its statutory responsibilities. This question is not considered directly, however. Because your staff could not find in NCPC's statutory authority or legislative history any definition of the term, the report only responds to those questions "requiring the collection of factual data."

The proposed report is well crafted; it documents thoroughly the laws, policies and practices of NCPC in carrying out its responsibilities. At the same time, we have reservations on some of the conclusions reached in the draft that interpret and analyze this information.

The following are points in the draft that, in our opinion, should be given further consideration:

1. Federal Interest - As we noted above, the transmittal letter to the report indicates that through agreement among the concerned Senators' staffs, the General Accounting Office would not respond to the policy question concerning NCPC's authority and need to determine the "federal interest" in carrying out its statutory responsibilities. In our opinion, this is the central issue. Many of the questions raised over NCPC's role and responsibility in the Washington Metropolitan Area have revolved around this point. As the report indicates, the local governments working through the Council of Governments believe it is the paramount issue. To that end,

they have developed jointly with NCPC a set of principles that establishes reasonable parameters on the application of this term to the planning and review activities of NCPC in the region.

We believe this joint statement of principles is very important and should be given greater attention in the draft report. Moreover, GAO's views on whether these parameters might be the basis for Congress' assessing the need to statutorily promulgate these or similar parameters in the NCPC legislation would be useful. As you know, the Commission's membership changes with time. A legislative statement on this issue would add stability to the developmental decision-making process in the region. We urge GAO to give serious consideration to this question and, if possible, support the incorporation of such principles into NCPC's enabling statute.

On a more technical basis, we must take exception to one of the findings in Appendix I of the draft. On page 1, it states that there is no Congressional statement defining the term "federal interest" for the purposes of the NCPC legislation. But, on this point, the draft cites a legislative report prepared in conjunction with the District of Columbia Self-Government Act. As you indicate, this was a staff report published by Congress. It is treated as part of the legislative history of the District of Columbia Self-Government Act, however. Because of its nature as a staff report, it has questionable standing in interpreting the Home Rule legislation, including the part dealing with the revisions to the NCPC Act clarifying the respective responsibilities of the Commission and the Mayor/Council in planning and zoning matters.

The staff report cited apparently indicates the "federal interest" on this issue was considered in relationship to the 1973 Home Rule legislation but, an appropriate definition for the term was not found. From this, your draft on page 5 concludes, "Because the Congress was unsure about how to adequately define the Federal interest, however, it gave the Commission considerable discretion in defining the term."

We question this conclusion. First of all, our examination of the House and Senate Reports on the "Home Rule" Act does not indicate that the "federal interest" question was an issue considered by the Committees. These reports are the primary indicators of the legislative intent.

Second, the literal language in the NCPC Act, including the 1973 amendment, does not support the conclusion that the Commission has broad discretion to define the "federal interest." The 1973 amendments to Section 2 of the NCPC Act provides that NCPC is to examine the impact of certain planning and zoning proposals of the D.C. Government on the "interests or functions of the federal establishment in the National Capital." Having this limited review and approval authority is hardly a mandate to define, without limits, the federal interest on all issues before the Commission. Accordingly, we do not believe there is any legislative language or history that gives NCPC a blank check on this question. Rather, in addressing this federal interest question, we believe the GAO report should emphasize the statements of purpose contained in Section 1 of the NCPC Act. It emphasizes that the general objective of the Act is to enable NCPC to plan for the development of the federal establishment in a manner consistent with the needs of the federal government and "with due regard for the rights and prerogatives of the adjoining states and local governments to exercise control appropriate to their functions..." In our opinion, this shows the intent of Congress to have a collaborative effort, especially in relationship to planning for areas within the District and the region where the federal presence was only incidental. This policy should be reinforced by further Congressional emphasis if necessary. Such a restatement would help to clarify the respective roles and responsibilities of Federal, state, regional and local agencies on planning and developmental matters in the region.

[GAO COMMENT: The legislative staff report cited on p. 1 is a multi-volume compendium of the legislative history--committee reports, mark-ups, hearings, etc.--and other relevant materials concerning the Home Rule legislation. We revised the report to state that the legislative history to the Home Rule Act indicates the Congress' concern with protecting the Federal interest by allowing NCPC to veto District planning if it would adversely affect the Federal interest. We added that the Home Rule Act was not aimed at altering NCPC's responsibility for the Federal interest in the National Capital Region's planning and development. In the letters to the Senators, we also supported the COG/NCPC efforts to establish principles and procedures for resolving issues of Federal interest in the National Capital Region.]

2. Comprehensive Planning For the Region - Throughout the several appendices to the draft report, there are references to survey responses and interviews of federal and local officials on their understanding of NCPC's comprehensive planning role in regional matters. This is an important question and, one about which our local officials continue to be concerned.

The development by NCPC of comprehensive plans that purport to establish policies that extend beyond its authority to plan for certain areas within the District of Columbia and the federal property in the region is unnecessary. Instead of doing such comprehensive planning, we believe that NCPC should simply assess the possible impact of regional and local planning proposals on the operation of the federal establishment in the region. Production of a comprehensive plan for these areas not under federal control or ownership, is duplicative and unnecessary.

3. Comment and Review - The report states that NCPC conducts reviews and comments on federal grant proposals of state and local governments subject to the A-95 process. It should be noted that the A-95 Circular will be terminated as of April 30, and it is being reconstituted for the region in negotiations among COG, the states and the District of Columbia Government. It is our understanding that the Office of Management and Budget has found that NCPC does not come within the purview of the President's Executive Order that replaces the A-95 process. This will impact on the Commission's current review and comment responsibilities.

We appreciate the opportunity to comment on the draft report and will be happy to answer any further questions that our comments may raise.

Sincerely yours,



Walter A. Scheiber  
Executive Director



EXECUTIVE OFFICE OF THE PRESIDENT  
OFFICE OF MANAGEMENT AND BUDGET  
WASHINGTON, D.C. 20503

MAR 28 1983

Mr. William J. Anderson  
Director, General Government  
Division  
U.S. General Accounting Office  
Washington, D.C. 20548

Dear Mr. Anderson:

Thank you for the opportunity to comment on your proposed report to Senators Eagleton, Mathias, Stevens, and Warner entitled "Role, Functions, and Operations of the National Capital Planning Commission."

In November, 1981 the Senators asked you to evaluate the NCPC's mission and functions. Your draft report concludes that "without a definition of the Federal interest, GAO could not determine the Commission's effectiveness in carrying out its legislative mandate." In spite of that conclusion we found that the draft does provide factual information which should prove useful to the Congress.

We have two technical comments on your draft report. First, when presenting factual budget and personnel information regarding the Commission, we suggest you use FY 1982 numbers which were published in the President's FY 1984 Budget, rather than the FY 1981 numbers in your draft report.

Our second comment refers to the statement on page 9 of Appendix I that "OMB officials said that the [Federal Capital Improvements] Program was not useful to them because it was not published in time for the appropriations process..." The process to which the OMB staff were referring is the executive branch budget formulation which occurs each fall, not the Congressional appropriations process. We have encouraged the Commission staff to expedite the preparation of the Program so that its publication date fits better with the fall budget review process.

Thank you again for the opportunity to review and comment on the draft report.

Sincerely,

A handwritten signature in black ink, appearing to read "J. R. Wright, Jr.", written over a horizontal line.

Joseph R. Wright, Jr.  
Deputy Director

[GAO COMMENT: We revised the report to reflect OMB's technical comments.]



National Capital Commission  
Commission de la Capitale nationale

March 8, 1983

Ms. Barbara Schmitt  
United States General Accounting Office  
Washington Regional Office  
Washington, D.C. 20548  
U.S.A.

Dear Ms. *Barbara* Schmitt:

Thank you for sending part of your draft report on the National Capital Commission. It appears that your visit to Ottawa this past fall enabled you to assess clearly the environment in which we work.

In general, I think that your summary of the role of the Commission, its powers, responsibilities and organization, was very well done. The few comments I would like to make should not in any way change the character or intent of what you have written.

My comments are as follows:

1. Page 69, NCC's role and responsibilities

- a. 2nd paragraph.  
The National Capital Act article (1) provides that NCC "...coordinate the development of public lands...". The Commission meets with Public Works Canada on a regular basis to review and comment on major private sector leases, particularly lease/purchase decisions.
- b. You perhaps should note that NCC does not pay property taxes, but makes, at its discretion, grants-in-lieu of taxes to local municipalities. We do not, for example, pay grants for park and parkway lands as these are provided by NCC, thus relieving the local municipality of the financial burden.

2. Page 70, the National significance

Paragraph 1.

I would suggest that this line be revised to read:  
"...keeping with NCC newly emphasized goal to make Ottawa the National...".

161 Laurier Ave. West  
Ottawa-Hull  
Canada  
K1P 6J6

161, avenue Laurier ouest  
Ottawa-Hull  
Canada  
K1P 6J6

... 2  
**Canada**

3. Page 70, Planning


You may wish to add a line stating that the NCC can acquire land in advance of need. This has resulted in the acquisition of land parcels in strategic locations at a relatively low cost to the taxpayer, even though these parcels may not be used for 20 to 30 years.

4. Page 71, Comparisons

You should be aware that Public Works Canada, contracts for, builds, and maintains office space for many, but not all, federal departments and agencies. NCC acquires the land, does the development planning and has total authority over location design and land use of federal facilities and works of fine art, including monuments and statuary. There is the possibility to appeal NCC decisions to the federal Cabinet, although this route has seldom been used.

Again, thank you for remembering to send the draft. I am looking forward with interest to seeing your final report. If I can provide any additional information or advice, please let me know.

Yours sincerely,

  
D.C. Symons  
Assistant Director  
Intergovernment Relations

[GAO COMMENT: We revised the report to reflect these comments. We changed the page references to correspond to the final report.]







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