

**National Coalition to
Save Our Mall**
Preserving Our Monument to Democracy



9507 Overlea Drive
Rockville, MD 20850
301-340-3938

P.O. Box 4709
Rockville, MD 20849

www.savethemall.org

October 10, 2008

Elizabeth Miller
Project Manager
National Capital Framework Plan
National Capital Planning Commission
401 9th Street, NW
North Lobby, Suite 500
Washington, DC 20004

FrameworkPlan@ncpc.gov

RE: National Capital Framework Plan Public Comments

Dear Ms. Miller:

The National Coalition to Save Our Mall has studied NCPC's draft National Capital Framework Plan dated July 10, 2008 in detail and with this letter provides some general observations as well as specific comments. The Coalition has participated in public consultations about the Plan for several years, first meeting with NCPC staff at their request early in the process and then attending the public informational meetings held in 2007 and 2008.

We commend the Framework Plan for many interesting and useful ideas for improving federal areas surrounding the Mall. We are pleased to see that some proposals are similar to ideas the Coalition has been promoting in recent years for Mall expansion. But we are disappointed that NCPC has so narrowed the scope of the report, and deferred to the National Park Service to plan for the critical component—the National Mall—, that its usefulness as a planning document is limited. NCPC had the opportunity through this report to seriously examine the role of memorials and museums in the nation's capital—historically, today, and into the 21st century—to advise Congress on how to deal with the ongoing problem of accommodating new memorials in meaningful ways. Instead, the Plan accepts the status quo of *ad hoc* memorial and museum development that has been threatening the integrity of the city's historic plans and national symbolism for several decades.

The Framework Plan is waiting for a long-range vision, a task that in our opinion requires a Congressionally-chartered independent Commission composed of nationally respected cultural leaders, planners, and historians with a deep understanding of the unique quality of Washington, D.C., as our nation's capital.

Let us explain what we mean about the limits of the Plan before moving into our discussion of the four areas under study.

1. **A LIMITED SCOPE.** The Framework Plan is the largest federal planning effort in years for the nation's capital, and the historic maps on p. 4 that show NCPC's Legacy Plan alongside the historic L'Enfant and McMillan plans give the impression that the Framework Plan is the new McMillan Plan for the 21st century. But the Framework Plan is no such thing. By excluding the National Mall, which is the constantly evolving heart of the Monumental Core, this plan cannot be considered in any sense an overarching vision of the city as a coherent whole, a symbol for the nation. There is no renewed vision to replace the now outmoded vision of the McMillan Plan. Instead, the Plan defers to the National Park Service, which is doing its own plan for the Mall—a plan that is different in type (management), priorities (grass, trees, visitor services), and on a different timetable that does not allow for coordination with the Framework Plan. This lack of coherent planning vision lies at the heart of the difficulties encountered in the proposals of the Framework Plan.
2. **MONUMENTS AS REAL ESTATE.** The Framework Plan is the successor to the Monuments and Memorials Master Plan and like it is intended to relieve proposed development pressure on the National Mall, which Congress in 2003 declared a “substantially completed work of civic art.” Whereas the M&M Plan was essentially focused on real estate, identifying random open sites throughout the city large enough to accommodate a significant new monument, memorial, or museum, the Framework Plan studies whole neighborhoods or precincts abutting the McMillan Mall, and proposes that by correcting some major existing infrastructure deficiencies these can become sites for memorials or museums, i.e., more “Mall-like”, as well as lively destinations for tourists and local citizens. Essentially, the Framework Plan continues to deal with monuments and memorials as real estate issues instead of looking more deeply into the role memorials have historically played in the nation's capital.

This is where the Plan falls short as a “framework” for the future. Approaching memorials and museums as real estate issues deprives the Plan of the lessons of both the L'Enfant and McMillan Plans—that monuments carefully selected for their nationally important themes and then placed geographically in meaningful thematic relationships to one another are in fact the true “Framework” for the capital. Nowhere does the Framework Plan recognize this heritage or propose which geographic locations could create new symbolic relationships and which monument themes could meaningfully improve the narrative told in the capital. With only this Plan to guide future development, new projects will continue to fill open space without any carefully thought-out, coherent narrative framework.

We understand that the current system for memorial and museum development (including the Commemorative Works Act) gives inordinate leeway to private memorial and museum sponsors in winning Congressional approval and choosing a preferred location. But rather than accept the status quo and its potentially disastrous impact on the integrity of the historic ideas that gave birth to the nation's capital, NCPC and CFA should be fulfilling their responsibility in proposing solutions, namely, a better system for choosing and locating memorials and museums that serves the nation as a whole, not simply private memorial sponsors. Congress should expect no less.

3. **HISTORIC PRESERVATION.** The Plan—whether omitting the National Mall from the Plan or treating memorials as real estate—shows at base a disregard of the historic plans that

give Washington, DC, its unique character and must be protected. What is the Framework Plan's attitude toward Washington's historic plans--the concept of Washington DC as City and Symbol, rooted in the historic L'Enfant and McMillan Plans? Not only is the Mall—the physical and symbolic core of both plans—ignored, but the Enlightenment and Beaux-Arts thinking that gave birth to our city's symbolic layout and majestic vistas is not given due consideration.

How do the proposed improvements to the four federal areas relate to the historic principles inherited from the L'Enfant and McMillan Plans—plans on the National Register—that are the honored historic framework for the Mall, the federal areas studied by NCPC, and indeed the whole city? The Plan does not say or show.

We are surprised and disappointed to see that NCPC and CFA have failed to seriously discuss historic preservation issues when it comes to this new Plan. We understand that the Section 106 may not apply to this planning effort. However, it is the mandate and responsibility of both federal agencies to uphold those historic plans and principles. Without making sure at this “framework” stage that the proposed changes are consistent with the historic plans, we could be faced—when the Section 106 finally begins once a memorial builder wants to reshape E Street—with a “done deal” that cannot be meaningfully evaluated but can only be “mitigated.” By then it's too late. Historic Preservation must be a critical component of any plan for the Monumental Core, yet we see little if any attention to it in the current plan.

4. **FEDERAL PRECINCTS AS PART OF THE CITY.** All four precincts considered in the Plan were integral parts of the historic McMillan Plan (the kite-shaped Plan that extended well beyond the Mall's cross-axis) but only portions of those areas were ever developed as major components of the Monumental Core; the most developed is the Federal Triangle. In the Plan, instead of being recognized as part of the McMillan concept and evaluated with regard to the relevancy of that concept in modern Washington, these four areas are treated as fragments, separated components unrelated to the McMillan concept or even to one another.

The line between the federal enclave as envisioned by McMillan and the city has over the years been blurred but the Framework document doesn't make clear what planning principles have guided the Plan. Is the McMillan Plan considered to be relevant at all to the Plan? How would these precincts, once made more “Mall-like,” differ from today? What are the needs of the modern city in these areas? Nowhere does the Framework Plan ask what might be good for existing city neighborhoods that are being re-planned.

Ultimately, we have serious questions about how the needs of the public—whether local residents or out-of-town visitors—have been identified, targeted, and designed for in the Plan. Washington is a walkable city and could become even moreso in the future with proper planning and development. But the connection of the four federal zones to the Mall at the center and the surrounding neighborhoods and larger city seems more a design exercise than inspired by the experience of a pedestrian moving through the city.

5. **MEMORIALS AS A URBAN REVITALIZATION TOOL.** Memorials are an important component of the Monumental Core and nation's capital as a whole but are not a reliable or proven effective premise for urban revitalization. What are the needs of the city with regard

to memorials? Often monuments can raise as many problems as they solve. For example, in recent years, Capitol Hill residents rejected a proposal to locate on a neighborhood plot the memorial to the Victims of Communism Memorial saying its presence would not serve the needs of the local community. Other already-existing memorials—the Law Enforcement Memorial at Judiciary Square, the Japanese American Memorial near Union Station—create sober, contemplative environments that discourage the kinds of activities that make for lively urban places. On October 5, 2008 The Washington Post told about a tourist family frazzled by too much to do in Washington—do we really want to send them to even more memorials scattered throughout the city?

6. WHAT DOES “MALL-LIKE” MEAN? In describing design improvements, the Plan speaks of L’Enfant’s use of views, vistas and symbolic relationships to organize the form of the city. But it never states exactly what “mall-like” means? Is it a question of design principles? Iconic quality of memorials and museums? Public open space? The Plan never explains. How are the proposed design changes for Federal Triangle mall-like? East Potomac Park? Banneker? It’s not at all clear what the guiding design principles are or that they are being applied in any organized, systematic way. If not the historic plans, what guides NCPC and CFA planners?

Recent sponsors of major new memorials seem to understand “mall-like” as being a quality of symbolic value (consistent with the historic plans, we would add) and have sought sites with a direct relationship to the Mall’s central axis and major monuments as the key to their fundraising efforts. On occasion they have sometimes accepted a site that fronts on the edges of the axis, but the problem is that most of the prime sites on the existing Mall are already taken. The off-Mall sites proposed by the M&M Plan do not fill the same need for prime sites that could be developed by expanding the National Mall because they seem to lack an understanding of the importance of thematic and geographic connection and symbolic power.

7. ANOTHER OPTION FOR CREATING “MALL-LIKE” PLACES FOR FUTURE MEMORIALS. For four years, the National Coalition to Save Our Mall has been proposing an alternative way to solve the need for new memorial sites, an approach that is rooted in the historic concepts that give Washington its unique grandeur and symbolic power. The key is Mall expansion.

The Coalition has developed criteria that we believe stand a reasonable chance of guiding future Mall expansion:

- First, Congress should formally define and expand the boundaries of the existing Mall to incorporate a significant body of additional federally owned land and designate this land as a part of the National Mall. Established residential neighborhoods should be avoided but existing federal facilities could be included.
- Second, this land needs to be seamlessly connected visually, physically, and symbolically to the existing Mall, including circulation networks that connect destinations, and don’t lead to dead ends, and a coherent idea for expanding the narrative of American history told on the Mall.
- Third, the expansion areas must have or be given an identifying thematic name and/or the capability of developing a unique iconic grandeur that embodies also the Mall’s modern function and purpose—what the Coalition calls the “Stage for Our

Democracy.” Mall expansion areas do not need to mimic stylistically the existing Mall.

In essence, our view is that now a century after the last forward-looking expansion of the Mall to meet growing needs, the nation needs Congress to act to both identify land for Mall expansion and designate an independent commission to create a vision and unified, coherent design and symbolism for the whole.

For illustrative purposes, the Coalition sponsored two examples (attached) of how the problem of Mall expansion could be solved. There are certainly other possibilities. These examples show how a design scheme that starts at the heart of the McMillan Plan and moves outward can produce a more coherent plan than tacking on fragments at the perimeter:

- The first sketch completes and extends southward the north-south axis of the McMillan Plan by reshaping landfill to create a new “mall” with sites for numerous future museums along the Potomac shoreline and prominent symbolic locations for nationally important monuments.
- The second example proposes a “Grand Avenue” (L’Enfant’s original description of the Mall) following the Potomac shoreline, creating a Capitol to Lincoln Memorial promenade with prominent sites for new kinds of memorials. We could call this the Potomac Mall to distinguish it from the McMillan Mall.

Both concepts build upon the legacies of the Mall’s historic plans, including generating iconic grandeur. Each embodies a coherent circulation system that seamlessly connects to the existing Mall. Each also provides a framework for locating monuments strategically in relationship to our iconic monuments to contribute to our understanding of the organizing principles of our democracy and the ongoing American narrative.

EVALUATION OF PRECINCT PLAN PROPOSALS

Federal Triangle

This precinct is composed entirely of federally owned and fully developed land. It is bounded by two ceremonial avenues—Pennsylvania and Constitution. It was set aside as an integral part of the federal core by the McMillan Plan of 1901-02—the kite-shaped area labeled “The Mall.”

NCPC’s stated objectives—to strengthen Pennsylvania Avenue as “America’s Main Street”, and to create a high quality federal workplace featuring a mix of amenities for both workers and visitors—are worthy goals that, if achieved, could help integrate the commercial center of the city to the Mall and add to the liveliness of both the Mall and the City.

The design improvements proposed in the precinct plan, including the further development of Pennsylvania Avenue and Freedom Plaza, the alteration or removal of the FBI building, and further redevelopment of the Old Post Office building, could certainly help move toward the stated goals. Short-term, the total restyling or demolition of the lower levels of the FBI building could have the greatest impact.

Finding ways to penetrate the monolithic Federal Triangle office blocks to allow pedestrian traffic to pass through between the Mall and the City is critical to the success of this area plan. The idea of the Federal Walk is a good one. So too is the proposal to provide interpretive signs (and maybe mini-exhibits within each building) to inform visitors of government's function. In an era when the work of the federal government is often misunderstood, opening these structures to limited public access and use might have a significant social and civic benefit. The major stumbling block—and potentially roadblock—is the issue of security. Security needs and restrictions are not addressed in the Framework Report but need to be.

Many, perhaps all, of the historic federal office structures will remain in operation for the foreseeable future. It will be important to enliven the streetscape in this precinct by converting significant portions of the lower levels of many structures to provide public and commercial uses (related to market absorption and demand), including food services, public toilets and other amenities as well as opening up the landscaped courtyards to the public.

Many of the changes outlined here are relatively low cost items and perhaps are even economically sound ventures. In today's security climate, a system for accommodating public access and use needs to be developed. If a compromise that balances both interests cannot be reached, it will continue to damage the potential of this precinct for redevelopment as an integral incorporation into the Mall.

Finally, the redevelopment and landscaping of 10th St NW as it passes through the Triangle could make a significant difference in the ambiance. This is a major public transit hub, visited daily by thousands of commuters.

Designating the Federal Triangle as a formal component of the National Mall could provide the impetus for making many of the proposed user-friendly changes. A rejuvenated Federal Triangle has much to offer the public—both visitors and locals.

The Northwest Rectangle

The McMillan street grid was never completed in this precinct and as a result this area has never developed carefully. It is the home of three of the most unfortunate post-WWII urban planning mistakes in the District: the isolated location of the Kennedy Center, more accessible to suburbanites in cars than locals on foot, and far from downtown nightlife; the ill-conceived Potomac Freeway--“the road to nowhere”; and the torturous eastern approach to the Roosevelt Bridge. These three projects taken together make the area west of 23rd Street an urban planning disaster. They also have made skeptics of neighbors who see federal planners as enemies of the local community—especially regarding areas north and east of the Kennedy Center. Public consultation should be built into all aspects of planning this area.

The Framework Plan advances three basic concepts for recovering this area:

- Decking the approach to the Roosevelt Bridge and planting it so that the green space of the Mall can extend up to the Kennedy Center, along with pedestrian paths;
- Decking over the Potomac Freeway and the E St. tunnel, creating a new approach to the Center, and providing a significant opportunity for development structures;
- Connecting and developing the E street Mall.

Because these proposals are so dependent on major infrastructure improvements, they cannot simply stand as is without a serious consideration of cost benefit. The Plan should at least provide a general ball-park estimate of costs—to federal or private interests—so it is possible to assess whether these projects are even realistically possible in the foreseeable future. If they are not realistic, then other alternatives should be proposed.

One approach to solving the cost problem might be to formally annex a portion of this land to be a component of the Mall. The “L” shaped area west of 23rd St and south of E St. and west of 25th St. and south of F St., including the Kennedy Center itself and the shoreline, seems like a portion of the NW Rectangle that has the most potential for becoming “mall-like.” Being included within the boundaries of the Mall might help to unlock funds particularly if a significant memorial were to be located here. One is reminded of the development of the Lincoln Memorial in the early twentieth century that “jump-started” the development of the whole western Mall. The development of air-rights in the Kennedy forecourt might be another funding source for a public/private partnership.

The Old Naval Observatory site is an opportunity for historic interpretation, particularly if this site were annexed into the Mall.

A missing opportunity on the E St Mall is to coordinate with George Washington University to add food service and passive recreational facilities—such as at Dupont Circle—in order to draw student life into that area, day and evening. GW has recently established a major new academic/housing building fronting on Whitman Park. The site at the corner of Virginia and 21st St might be a good location for developing much needed underground parking that would help to increase pedestrian use of this area

Some decades ago, NCPC helped locate a series of Memorials dedicated to Latin American heroes on Virginia Avenue, one of the very few attempts at “theme” memorial planning. The Pan American Union is also located at the lower end of Virginia Avenue, and the Pan American Health Organization is at the corner of 23rd St. Continuing to fill out the Latin theme where open spaces occur would make sense. The fact that this memorial theme is already established might make it possible to find financial backing for other Latin oriented cultural facilities.

The Southwest Rectangle

This precinct, which extends from Independence Avenue to the waterfront, has often appeared to be a “left-over” zone. When the south leg of the McMillan Mall cross-axis was abandoned to allow for a large Tidal Basin, the McMillan design for the precinct lost its coherence. Following destruction of the old residential areas during the Urban Renewal heyday of the 1950’s, there has never been an acceptable overall plan for this area. The razed areas have been replaced mostly by a collection of unrelated, undistinguished, structures.

There are two major infrastructure issues: The Southwest Freeway, an elevated highway structure running from east to west, bisecting the precinct and destroying a significant portion of the L’Enfant street grid, including Virginia Avenue; and the mainline CSX railroad tracks running from north to south, effectively destroying Maryland Avenue.

This precinct has many of the same qualities as the west end of the Northwest Rectangle—an urban planning mess. Yet, this area holds the key to connecting the Downtown north of the National Mall to the entire Southwest portion of the District, including the small-boat harbor in the Washington Channel, and East Potomac Park.

The Framework Plan advances four concepts for rejuvenating this area:

- Establish 10th St NW as the major corridor connecting the National Mall to the Waterfront;
- Reestablish Maryland Avenue as a grand urban boulevard connecting the Capitol to the Jefferson Memorial. This involves major work on the railroad;
- Provide new places for museums, residences;
- Relocate a new bridge across the Potomac.

Because most of these proposals are dependent on major infrastructure improvements, again a cost benefit analysis is warranted. What memorial sponsor would choose these locations without knowing who would pay for necessary improvements, how much it would cost, and how long it would take?

We believe that the redevelopment of the 10th street corridor from Independence Avenue to the Channel is a critical component of a larger vision for improving pedestrian access to East Potomac Park (see below). We therefore suggest that a 10th St corridor be studied, and incorporated into the boundaries of an expanded National Mall (between 9th and 11th Streets). While we would prefer that this happen as a component of a long range Mall Plan, the economic development pressure of the Southwest Waterfront may require that the federal government act sooner so as to not lose out to private development.

This new Mall corridor could include the demolition of all or part of the Department of Energy Building, the development of a vibrant commercial streetscape along both sides of 10th street, and the development of a transportation hub and major public parking structure at the 10th Street Overlook, including the possibility of a major memorial or museum--or both. Opening up the 10th Street corridor will require federal funds, or perhaps a public/private partnership. The odds of developing a major cultural feature at the Overlook, which has significant infrastructure expense, would be greatly enhanced if this development were seen as part of Mall expansion.

The restoration of Maryland Avenue is beginning to look feasible and has already started in the area between 12th and 14th Streets. It would be a great addition to the city. Perhaps some day, Virginia Avenue could follow. A few years ago local architect Joe Passonneau prepared a study of how that could be accomplished.

East Potomac Park

This 500+ acre precinct, 80% of which is in the 100-year flood plain, offers the largest tract of underdeveloped federally owned land abutting the Mall. Envisioned by the McMillan Plan as a recreational park, over the years it has served a number of functions from golf and picnicking to headquarters of the local branch of the National Park Service. The Coalition believes the island is another area for Mall expansion.

This is two-mile long island with access only from the northwest end. It has one continuous loop road and plentiful parking. It is a man-made landscape, built by the US Army Corps of Engineers in the late 19th Century out of fill dredged from the bottom of the Potomac River. One major impediment to development is the knot of automobile, railroad, and Metro bridges that cross it at the western end.

The Framework Plan advances three basic concepts for improving this precinct:

- Improve access from the mainland;
- Establish the park as a destination;
- Remove or reorganize the transportation barriers.

We have been told that the technical problems in tunneling the railroad would be prohibitive. Provision *was* made, though, for tunneling Metro under the Potomac at the time of original construction and could be implemented. This would allow a Metro Station to be built in East Potomac Park. In the future when the highway bridges are replaced, moving them away from the Jefferson Memorial would be logical.

We believe that the problem of the transportation knot has not yet been realistically solved in this precinct-planning document. Probably the most effective and economic idea would be to deck over significant areas and use the resulting platform as either the foundation for a useful all-weather event structure or a skillfully landscaped park. Both ideas would also extend the flood-free portion of the park.

The cross-island canal, first proposed by the Army Corps in the early 1900s, is a long overdue improvement. The Marina development shown in the plan seems to balance the development of the Southwest Waterfront.

We believe that the roadway connections to the mainland shown in the Framework Plan are insufficient and that East Potomac Park will never grow into its full potential until it ceases to be a dead-end environment. The Coalition has advanced the concept of connecting the island at its mid-point to the mainland and neighborhoods with a bridge at M Street that would in turn connect to the rejuvenated South Capitol Street. This route could become Potomac Boulevard, a grand roadway connecting the Capitol to the Lincoln Memorial and even the Kennedy Center. This would allow Potomac Park to assume a rightful active role as a major destination on the National Mall as well as connecting the Mall to the nearby local community.

A comprehensive study of long term flooding remains to be completed.

CONCLUSION

Throughout the preceding analysis we have tried to point out the difficulty of planning when the overarching scope of work is flawed. In the end the issue of what it means to be “mall-like” is hard to pin down, and even harder to apply on a piecemeal basis.

Nonetheless, the Framework Plan is a useful study embodying many good planning ideas and attempting to correct many long-term urban design deficiencies in the District. But it remains a

fragmented concept. Only when it is combined with a visionary study of the Mall itself, can it begin to shift from what is now mainly a real estate development plan into a truly iconic document worthy of the nation's capital. This will require the work of an independent planning team composed of cultural leaders and historians as well as designers.

ACHIEVING THE VISION—IMPLEMENTATION

The Framework Plan is proposed as “a tool to coordinate near-term and long-term initiatives to ultimately achieve a unified vision” (page 59). That has been the function of all of the NCPC planning documents (since 1952) including the current official Comprehensive Plan for the National Capital. And yet NCPC lacks implementation authority.

If the Commission and CFA are really serious about the various design concepts illustrated in this document, then the Commissions need to take the final alternative “Tool for Action” (page 60) and seek changes in their agencies’ authorizing legislation.

Part of the governance problem which hampers the management and growth of the Mall today is that there is not a single organization, operating under Congressional mandate, focusing solely on the Mall and its immediate surroundings and having planning, land acquisition and implementation powers. The composition of such an authority should embody the diversity of our democratic culture and individuals expert in understanding its history. The Mall belongs to the people. Item G-7 on page 61 of the report suggests the study of governance options. We believe that this study should be undertaken as soon as possible.

The Mall, and destinations and connections beyond, need a new vision and unified governance to guide planning throughout its Third Century. This next step should receive the highest priority and support from all the Federal agencies currently represented on the NCPC.

Sincerely,



GHFO/
signed

Judy Scott Feldman, Ph.D.
Chair

W. Kent Cooper, FAIA
Vice Chair

George H.F. Oberlander, AICP
Vice Chair

1 attachment

cc: Tom Luebke, Commission of Fine Arts



© Arthur Cotton Moore 2005



© W. Kent Cooper 2006