



National Parks Conservation Association®
Protecting Our National Parks for Future Generations®

National Headquarters

May 15, 2009

Ms. Susan Spain, Project Executive
National Mall & Memorial Parks
National Park Service
900 Ohio Drive SW
Washington, DC 20024-2000

Dear Ms. Spain:

The following comments are submitted on behalf of the National Parks Conservation Association (NPCA) and our more than 325,000 members nationwide in response to the Preferred Preliminary Alternative National Mall Plan as set forth in the *National Mall Plan Newsletter 4*. The nonpartisan NPCA is a nonprofit, advocacy organization serving as the leading voice of the American people on behalf of our national parks since 1919.

NPCA thanks the Park Service, the National Mall planning team, and planner Susan Spain for guiding us through the Section 106 process and providing an opportunity to comment on the preferred preliminary alternative. NPCA strongly agrees that the National Mall, America's premier civic space, is in dire need of reinvestment and refurbishment, both to protect the historic landscape and to enable the Mall to accommodate high use and meet (potentially even exceed) visitor expectations well into its third century. The draft, which touches upon issues of access, public safety, visitor enjoyment, wayfinding, interpretation and education, First Amendment rights, and visitor amenities, furnishes a plethora of recommendations synthesized from public comments received by the Park Service in December 2007.

The preferred preliminary alternative makes several proposals with which it is easy to agree. Consistent design in visitor facilities, signage, paving, and other elements that extend throughout the Mall would help address the Mall's current lack of a strong, coherent identity, especially if those efforts include areas of the Mall not under Park Service jurisdiction. We support Park Service efforts to use more sustainable materials and design.



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However, the preferred preliminary alternative lacks sufficient context and analysis to explain why proposed actions were chosen regarding the placement, removal, or alteration of structures and spaces, how those decisions were reached, and what (if any) alternatives were considered or may be available for consideration by the Park Service and the public. While the preferred preliminary alternative articulates an overarching vision for the National Mall as America's premier civic stage, the ensuing text does not make clear how this collection of recommendations connects to and was informed by that vision, and how the proposed actions to protect and enhance the natural, cultural, and symbolic aspects of the Mall fit into an that overarching vision.

Of fundamental importance, the preferred preliminary alternative defines the National Mall as the area between Union Square and 14th Street, bordered by Jefferson Drive to the south and Madison Drive to the north. Many participants in the Section 106 consulting party process including NPCA take issue with this definition, as the National Mall includes land held by other agencies and organizations, such as the National Gallery of Art, the Smithsonian, and the U.S. Department of Agriculture.

To resolve this issue, and to provide a solid basis for the National Mall's future, we recommend that the National Park Service produce a National Historic Landmark nomination for the National Mall. Undergoing this process would allow stakeholders for the National Mall an opportunity to craft a single, overarching narrative for the Mall, define the boundaries and characteristics that make the Mall a unique civic space, and provide a foundation for future planning efforts.

While we are aware of the various plans by other entities with a stake in the National Mall, the preferred preliminary alternative provides little information about how the Park Service and this alternative coordinate with and are informed by those plans. Our response to the draft document would be better informed by information on existing and planned coordination with the Smithsonian and other Mall entities to better accommodate the needs of visitors. For example, has there been analysis of the potential to place restrooms and information/orientation stations on the grounds of the Department of Agriculture, the National Museum of Natural History, or the currently open and under-utilized western patio of the Air and Space Museum? Even if these options have been considered and ruled out, access to that information would inform our views of the proposed preferred alternative.



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For example, the Park Service document calls for the construction of a restroom and a combination restroom and information/orientation station on the north/south walkway along the 12th Street corridor. The preferred preliminary alternative provides no analysis of why these locations are thought to be ideal, or whether alternatives have been considered that expand access to visitor services such as food and restrooms provided by these other entities. There needs to be more analysis – or existing analysis needs to be made available -- of how pedestrians and cyclists would navigate around new structures on this site, how the new structures would diminish rather than add to the congestion visitors already experience at the top of the Smithsonian Metro portal, how new structures would be sited with respect to protecting the historic, iconic sightlines that draw millions of people to the Mall each year, and alternatives that leverage resources of other Mall entities.

The preferred preliminary alternative lacks details about the size and capacity of the restrooms, nor does the document reference Park Service analysis of visitor needs. How will the Park Service balance location, function, and protecting the iconic open space and vistas of the Mall?

NPCA supports the concept of making Union Square a more accessible, hospitable, and aesthetically appealing place, but the preferred preliminary alternative does not address the potential precedent-setting nature of the proposed redesign. Can the proposed changes outlined in *Newsletter 4* be undertaken without an amendment to the Commemorative Works Act? What adverse impact (if any) might the introduction of a dedicated performance and other new or changed facilities have on the integrity of the space? Could the proposed bathrooms and other infrastructure be instead located on the parcels to the north and south of Union Square rather than on rather than on this significant anchor landscape?

Redesigning Union Square cries out for practical coordination with the Architect of the Capitol and the U.S. Botanic Garden, who own these neighboring parcels, and with whom together the best design could be achieved. The proposed redesign of Union Square underscores our concerns about lack of coordination with other agencies with a stake in the Mall. A multi-organization visitor services plan that leverages each of the Mall entities' resources would minimize construction of new structures, and better protect the Mall's resources and its meaning.



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These are the kinds of questions we have about other areas of the National Mall slated in the preferred preliminary alternative for development or redesign, including the Sylvan Theater and the eastern edge of Constitution Gardens. Again, the issue is not an opposition to change, but rather a sense that the Park Service either has not completed adequate study of alternatives and the potential impacts of those alternatives, and/or needs to make that analysis available to the public. And of fundamental importance, these changes need to be considered in the overall context of the vision for the National Mall and its meaning and use.

In a letter dated March 26, 2007, NPCA outlined several issues that we hoped any plan for the National Mall would address. Chief among our concerns were the following:

1. The plan would address the Mall's lack of a well-defined and coherent identity.
2. The plan would seek coordination among all the relevant entities, including the Smithsonian, the Department of Agriculture, and others, in all aspects of planning and enhancement. And,
3. The plan would meaningfully engage citizens from all across the country.

While the Park Service has stepped up efforts to engage a wide variety of consulting partners and citizens in the Section 106 process for the National Mall, the preferred preliminary alternative fails to provide sufficient context and analysis to help the reader form a sound opinion as to how and why the recommendations listed in the document were made. And the plan, as it exists, contributes too little to the creation of a well-defined coherent identity for the Mall and offers little in the way of coordination with other relevant agencies and institutions.

NPCA understands that by issuing a preferred preliminary alternative, the National Mall planning team's intention was to identify and begin to address controversial issues in advance of the release of the draft environmental impact statement. However, the abbreviated nature of the alternative largely thwarts this goal.



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We thank you for the opportunity to comment, and look forward to continuing to serve as a consulting partner in the Section 106 process for the National Mall.

Sincerely,

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