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March 17, 2010

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Dear Ms. Spain:

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Re: Comments of the Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Impact Statement (December 2009)

The Committee of 100 on the Federal City is pleased to comment on the *Draft National Mall Plan/Environmental Impact Statement* that the National Park Service released in December 2009 for a 90-day public comment period ending March 18, 2010.

The Committee of 100 on the Federal City has long been concerned with protecting and enhancing, in our time, the various elements of the L'Enfant Plan (1791-92) and the planning work of the McMillan Commission (1901-02). The future of the National Mall is a major interest of the Committee. The National Mall Plan that has been outlined in draft form will be a key element for the future development of the Monumental Core of Washington, D.C., our nation's capital and the hometown of Washingtonians.

CHAIR EMERITUS
AURA M. RICHARDS, ESQ.

The Committee of 100 on the Federal City has been participating in the current public process of preparing the National Mall Plan for the past several years. We submitted initial comments (dated May 19, 2008) on the *Draft Alternatives Matrix-The National Mall* (April 2008) and last year submitted comments (dated May 15, 2009) on the *National Mall Plan-Preliminary Preferred Alternative* (March 2009). The Committee of 100 is one of the consulting parties in the Section 106 process related to the National Mall Plan. For simplicity, we refer to the Committee of 100 on the Federal City as the "Committee of 100" or simply as the "Committee" in these comments.

I, John Fondersmith, and other members of the Committee of 100 have attended and participated in a number of meetings called by the National Mall and Memorial Parks staff over the past two years. We have also attended various meetings of the National Capital Planning Commission (NCPC) and the Commission of Fine Arts, and benefited from the discussion and the staff reports at those meetings. You and John Piltzecker, Superintendent, National Mall and Memorial Parks, attended the meeting of the Committee of 100 on the Federal City on January 20, 2010 and presented the *Draft National Mall Plan*. We appreciated and benefited from hearing that presentation from you.

In addition, I and other members of the Committee of 100 have participated in reviews of other ongoing projects on the National Mall over the past two years, including the Potomac Park Levee Project, the Rehabilitation of the Lincoln Memorial Reflecting Pool and Surrounding Area, the Rehabilitation and Restoration of the D.C. War Memorial, the Repair of the Thomas Jefferson Memorial Plaza and Seawalls, and the Thomas Jefferson Security Perimeter. Some of these reviews are still ongoing. While technically these are separate projects, they relate to and have informed our views on the National Mall Plan.

We want to express our appreciation to you, Superintendent John Piltzecker, other members of the National Park Service staff, and the consultants that have been involved with preparing the *Draft National Mall Plan/Environmental Impact Statement*. This has been a major and complex undertaking involving a key area in the center of the Monumental Core of Washington.

The comments of the Committee are presented below in four parts. **Part 1** outlines key overview points and big ideas. **Part 2** generally follows the format of Mall wide and specific areas used at various places in the report, including Table 7 (pages 150-243). **Part 3** indicates clarifications we recommend be included in the report to increase understanding. **Part 4** outlines the Committee's concerns with and recommendations for the next steps in preparing the National Mall Plan, including steps beyond what the National Park Service plans to do.

PART 1: OVERVIEW AND BIG IDEAS

The Opportunity

The work of the McMillan Commission (1901-02) provided a framework for the development of the National Mall in the 20th century. That framework evolved over the 20th century and was last updated by the planning work of Skidmore Owings and Merrill for the National Park Service in 1966 and 1973. The National Park Service has previously indicated that the National Mall Plan would be a fifty-year plan, so in theory this plan will extend to 2060. It will therefore set the framework for the National Mall in the remainder of the 21st century, and should be visionary and comprehensive. The Committee realizes that any plan for the National Mall will evolve over a period of 50-90 years. However, that evolution should be guided by a comprehensive framework established now.

The current planning program by the National Park Service comes at a time of increased public attention to the National Mall, in part because of well-publicized stories about the poor condition of the National Mall and because of publicity about various new projects. Photographs of an estimated 1.8 million people on the National Mall and adjacent areas for President Obama's inauguration on January 20, 2009 brought additional attention. In his inaugural address, President Obama referred to the landscape stretching before him as "this magnificent Mall". Recently, in announcing the use of stimulus funds for projects on the National Mall, Secretary of the Interior Ken Salazar said, "this is the Mall that belongs to the people of the United States of America".

The National Mall will clearly continue to be in the public eye over the next five to ten years. In addition to numerous projects that the National Park Service will undertake on the National Mall, the Martin Luther King, Jr. National Memorial will be completed and the National Museum of African American History and Culture, and the Vietnam Veterans Memorial Education Center probably will be completed in that period. A number of important projects adjacent to the National Mall are expected to be completed or underway during that period. On the north side of the National Mall (at the northwest corner of Constitution Avenue and 23rd Street, NW), the United States Institute of Peace Building is under construction and will open in early 2011. Just south of the National Mall, both the Dwight D. Eisenhower Memorial and the Veterans Disabled for Life Memorial are in the design stage and both these new memorials will likely be completed in the next five to 10 years. A site for a National Women's History Museum is proposed adjacent to the National Mall (Independence Avenue and 12th Street, SW).

The Long-Range Challenge

The long-range challenge is to outline a plan for the National Mall that allows for future changes (that cannot be specifically anticipated) without imposing rigid constraints that deaden the Mall's spirit nor destroy its capacity to inspire and surprise. The image and experience of the National Mall embraces several different elements. The overall landscape of formal and natural grounds provides the setting. A second element is the memorials and monuments, especially the three iconic memorials to George Washington, Thomas Jefferson and Abraham Lincoln. Views of these memorials, and views of the United States Capitol and the White House, are parts of the National Mall experience. The museums, galleries and sculpture gardens of the Smithsonian Institution and the National Gallery of Art are also key parts of the National Mall experience. The monuments, memorials, museums and galleries are major Mall destinations--what people come to see.

At the east end of the National Mall are lands under the jurisdiction of the Congress (Architect of the Capitol), including the U.S. Botanic Garden and the National Garden. Buildings bordering the National Mall provide a frame and some, such as the National Archives, are part of the Mall experience.

Finally, multitudes of varying outdoor events are an important part of the National Mall experience. These include demonstrations, the Smithsonian Folk Festival, Kite Day, the Boy

Scout Jamboree, the African American Family Reunion and numerous other events. Especially for Washingtonians, the National Mall is a wonderful space that may be crossed on foot or in vehicles several times a day, and in different seasons. The challenge for the National Mall is to be able to accommodate a range of activities by different groups and individuals, with multiple activities taking place at the same time. One of the challenges to Mall planners is to shift some of these activities to areas adjacent to the Mall without injuring or threatening the reality and perception of the Mall as accessible public space.

Planning Area and Approach for the National Mall

In preparing the National Mall Plan, the National Park Service has outlined a planning area that essentially encompasses all of what is defined as the National Mall, but has only done detailed planning for National Park Service lands. This Park Service area has a number of limitations. While the Committee understands that there is background coordination between the National Park Service and other government agencies, this coordination is not always apparent from the material that has been provided to the public. Several organizations have suggested that the National Mall be expanded to include at least part of the White House and President's Park area, now a separate area also administered by and planned by the National Park Service. It would seem appropriate for the Ellipse to be included in the definition of the National Mall. At the least, this area should be shown on the National Mall planning maps and documents, and the plans for that area summarized. However, the information on the *Comprehensive Design Plan for the White House and President's Park* (page 47) is very summary in nature.

The problem of seemingly uncoordinated planning for the area of the National Mall between Third Street and Fifteenth Street and Constitution and Independence Avenues is even more striking. Here the central open space of the National Mall is lined on both sides by the museums, art galleries and sculpture gardens of the Smithsonian Institution and the National Gallery Art. These facilities are an integral part of the National Mall landscape and visitor experience. It appears that these lands offer opportunities for joint use of facilities in some cases. The future use of the now closed Arts and Industries Building of the Smithsonian Institution will be a key decision. The National Gallery of Art is looking for expansion space adjacent to its present sites. Yet the future development and use of these museum and gallery sites is not fully reflected in the *National Mall Plan*. The Whitten Building of the U.S. Department of Agriculture is also part of the area of the National Mall between 12th and 14th Streets, SW. This building plays a relatively minor role in the visitor experience at present but has been mentioned as a possible museum site in the future.

Finally, at the east end of the National Mall between First and Third Streets, Union Square is included in the proposed National Mall Plan. However, the adjacent areas to the north and the south under the jurisdiction of the Architect of the Capitol are not included. This is a key area of the National Mall and a comprehensive vision should be presented. However, the Capitol Complex Plan is still undergoing internal review.

This type of fragmented planning for the National Mall is not acceptable when, in theory, the framework is being outlined for the next 50 years or more. The American people deserve an overall comprehensive planning approach for the future of the National Mall.

The Committee of 100 has urged the National Park Service to prepare such a comprehensive plan for the National Mall, by working with the other government agencies and institutions that have a role in the development of the area. These include the National Capital Planning Commission, the U.S. Commission of Fine Arts, the Architect of the Capitol, the District of Columbia government, the Smithsonian Institution, the National Gallery of Art, the U.S. Department of Agriculture, the Washington Metropolitan Area Transit Authority (WMATA), etc. The Committee understands that much background coordination has been undertaken behind the scenes, but the results are still not fully apparent in the *Draft National Mall Plan*.

Integrating the National Mall with Surrounding Areas

The Committee of 100 is especially concerned that planning for the future development and use of the National Mall be closely integrated with adjacent areas of Central Washington, including other areas under the jurisdiction of the National Park Service but with different boundaries. One of the most important features of the National Mall in the 21st century will be its increased centrality with other areas of Central Washington, a condition stressed in the *Center City Action Agenda* prepared by the D.C. Office of Planning and others (released in early 2008). This will be increasingly important as new development occurs south of the National Mall, especially on the Southwest Waterfront and to the southeast along the Anacostia River. Transportation and symbolic links with these areas will be important to how the National Mall operates.

Fortunately, the National Capital Planning Commission and the U.S. Commission of Fine Arts completed a three-year planning program last year for four key areas adjacent to the National Mall. Both agencies approved the *Monumental Core Framework Plan: Connecting New Destinations with the National Mall* last spring. Future studies will be undertaken (some are underway) to test and refine key proposals and move forward with implementation. The final National Mall Plan should more fully reference and relate to this plan, with special emphasis on those proposed developments that border or are within one or two blocks of the National Mall on the north and south. The relationships and connections with areas east of the Tidal Basin, including East Potomac Park, are also especially important.

The original planning program for the National Mall also included the Pennsylvania Avenue Historic Park, a corridor extending from the Capitol to the White House area. This is an important area, long seen as the “bridge” between the National Mall and Downtown Washington. Planning for the Pennsylvania Avenue Historic Park has been dropped from the present National Mall planning program, but will be addressed at a future time.

Integrating the National Mall with adjacent areas involves a number of factors, including various aspects of transportation, signage, general visitor information, enhancing visual connections

(vistas), and locating key land uses (retail, restaurants, hotel, entertainment, cultural, residential, as well as office) near the National Mall to the north and south, linked by convenient walking paths and various forms of transportation.

Integration with District of Columbia Objectives

The District of Columbia government and the citizens of Washington, D.C. have a major stake in the future development and use of the National Mall. This involves both the potential personal use of the National Mall by local residents as well as the major impact on the economy of the city. Although there are many other attractions in Washington, many visitors come to visit the National Mall and adjacent areas. As noted above, as major development expands south and southeast of the National Mall, it becomes even more central to the life of the city.

The District Government has a relatively limited direct role in the operation of the National Mall area, primarily related to maintaining streets that cross the Mall and providing certain services. However, many of the visitor services that necessarily support and benefit from the National Mall are now and will be located in adjacent areas (restaurants, shops, hotels, tour bus parking, etc.). It is essential that National Mall planning consider the District's role, and that the District government, civic organizations and the private sector continue be involved in the process.

Need for Additional Information

There is still background information that has not been fully provided to the public, or that needs more attention in the future. The following are some key issues and needs.

Future Visitation Numbers: Planning for the future of the National Mall, especially in terms of transportation and service facilities, requires some understanding of the numbers and timing of visitors. Over the next 40 years, the population of the United States is projected to increase from an estimated 306 million at present (2009) to an estimated 439 million in 2050. This is almost certain to increase attendance on the National Mall. It seems likely that visitation from foreign countries will also increase. Locally, the combination of an increasing population in Washington, D.C. and the Washington region will also increase visitation. It seems certain that the number of future visitors to the National Mall will considerably increase and they will use the National Mall more at night (especially if adequate transportation and security is provided and if museum hours are extended). Information on visitor projections is included on Pages 319-322 of the *Draft National Mall Plan*. It appears that additional coordination of visitor counts between the National Park Service, the museums and other attractions may be useful.

Impact of Global Warming: The issue of potential future flooding of some National Mall areas has been raised by a number of groups. This problem could become more serious if sea level changes related to global warming become more pronounced over the next 50-90 years and affect the water levels of the tidewater Potomac River (and the Anacostia River). If this is to be a problem, it could have major impacts on the long-range plan for the National Mall. Despite

requests, the National Park Service has not provided much information on this issue. The statement on the effects of climate change (page 158) is limited. This issue should be better addressed in the final plan.

Big Ideas

Although all elements of the National Mall Plan are important, the Committee believes that it is important to place special emphasis on certain big ideas, as noted below.

Restoring the National Mall: The overall quality of the National Mall experience has greatly deteriorated over the past several decades due to deferred maintenance, now estimated to be over \$400 million. This issue is to be addressed through increased federal funding (including stimulus funds at the present time) and new private sector and foundation contributions through fund raising by the Trust for the National Mall and other organizations. Catching up with past neglect will take many years. However, in time these improvements can bring the National Mall to the quality that it should have. The Committee of 100 commends the National Park Service for this overall effort to make up for past neglect and for stressing sustainable design and development in repairing and restructuring the National Mall.

Union Square: The major new initiative in the *Draft National Mall Plan* is the total redesign of Union Square and adjacent areas between 1st and 3rd Streets. The major proposed change is the replacement of the large reflecting pool, a product of the 1970s, with a new civic square west of the Grant Memorial. This new civic square will accommodate many different activities, including demonstrations. The Committee supports this major redesign of Union Square, with some caveats as noted below. However, the Committee strongly opposes any suggestion that demonstrations be restricted only to this area.

The Grant Memorial is to be restored and the adjacent landscape incorporated into the new design. The Committee of 100 is supportive of this new design approach but also has some concerns. It will be very important to have a coordinated design for the entire area between Constitution and Independence Avenues, including the two triangular areas under the jurisdiction of the Architect of the Capitol, and to eliminate the major parking areas now located along Pennsylvania and Maryland Avenues east of Third Street.

The area of the civic square must be large enough to accommodate major events but not so large that it would become almost empty space when not being used. Design must consider the environment of Washington summers and not create a space that is barren and uncomfortable. In the 1960s a large National Square was proposed between 13th and 15th streets at the west end of Pennsylvania Avenue that had the potential to be a barren space. Fortunately, the Pennsylvania Avenue Plan was revised and the open space scaled down. That kind of potential problem must be avoided in the redesign of Union Square.

This space should have the feeling of an American space, reflecting the sense of the adjacent Capitol grounds. Though built to accommodate demonstrations, the space should not be a space that projects a sense of perpetual conflict. In view of experience elsewhere, care is needed not to create a design that encourages skateboarding in this space. A relatively small building north of Union Square, in the scale of the National Botanic Garden to the south, would seem appropriate and could house a variety of visitor services as well as some special uses of its own. Properly designed, this new space and adjacent building could help bring a new festive feeling and sense of activity to this east end of the National Mall. If not well done, a new problem area might be created here. Careful design and programming will be important in creating a new vibrant civic space with national meaning.

Tidal Basin Area: The Tidal Basin area, including the Jefferson Memorial and the flowering cherry trees, is already a special place in the city and it will gain new meaning and increased visitation levels once the Martin Luther King, Jr. Memorial is completed in the next several years. The “Preferred Alternative” calls for a variety of improvements, including enhanced walkways and bicycle trails, lighting and interpretation. The Tidal Basin seawalls would be rebuilt above the water levels. The new seawalls would be built in the present Tidal Basin, slightly decreasing the size of the Tidal Basin.

The Committee is concerned that long-range opportunities may be missed at the Tidal Basin, especially in terms of connections to the Washington Monument grounds and in connections to the east to the Southwest Waterfront. Alternative B in the Draft National Mall Plan includes a new pedestrian crossing across the Tidal Basin south of Kutz Bridge. Alternative C calls for filling in part of the Tidal Basin to create more land and improve pedestrian connections from the Tidal Basin to the Washington Monument grounds. This would be especially true if a new north-south elevated walkway along the White House-Jefferson Memorial vista axis could be provided to pass over Independence Avenue and extend to the north side of the Tidal Basin. Alternative C for the Tidal Basin is, at present, not being considered. It may be that the best course in the near future is to proceed with the Preferred Alternative design for this area, but not take any actions that would preclude the major redesign suggested in Alternative C. This would provide time for further consideration of the merits of such a major transformation of the north side of the Tidal Basin.

To the east, improved connections between the Tidal Basin/Jefferson Memorial area and the Southwest Waterfront are needed. This might include connections between a future cultural building on the Liberty Loan Building site, and perhaps a pedestrian platform extension of Maryland Avenue to connect with the Tidal Basin area. The *Monumental Core Framework Plan* prepared by NCPA and the Commission of Fine Arts begins to address these issues, but is only a start. The Committee of 100 would like to see additional study of better connecting the Tidal Basin area to the north and the east. This might be a case where some improvements could be made in the relatively short-term, with more significant improvements and connections being made later, perhaps in 10-20 years or more in the future.

Washington Waterfront Walk: The Washington Waterfront Walk (WWW) is the proposed 11-mile connected waterfront walk (pedestrians, bicycles) from the Georgetown Waterfront to the National Arboretum. It is one of the key new elements that came out of the 1997 *Legacy Plan* prepared by the National Capital Planning Commission. The Draft National Mall Plan mentions new bicycle lanes and trails along the West Potomac Park Waterfront but the Washington Waterfront Walk does not receive the attention it deserves. This waterfront walk should have greater emphasis. The Committee believes this is one of the important elements of the new Central Washington that is being created in the first part of the 21st century. It is especially important that adequate connections for the Washington Waterfront Walk be provided from West Potomac Park through the Jefferson Memorial area to the Southwest Waterfront.

Transportation System: Improvements in various elements of the transportation system will be critical for improved use of the National Mall in the future, and for providing convenient connections to adjacent areas of Central Washington and beyond. The Committee is pleased to see that the *Draft National Mall Plan* calls for an improved bus transportation system, connected to the overall transportation system of the city. This will allow more convenient access to and within the National Mall than exists at present for both visitors and residents. The plan proposes to have coordination between the National Park Service and local commercial parking garages, and providing visitor valet or shuttle service between the parking garages and the National Mall (page 450). In addition, improvements are proposed for pedestrian paths and bicycle paths.

Urban Design Initiatives

The Urban Design Framework for the National Mall is discussed in the *National Mall Plan* and shown schematically on the “Urban Design Framework” map on page 45. However, in addition to the major ideas and possibilities mentioned above and elsewhere, there are a number of smaller urban design initiatives that seem to have potential for improving linkages between parts of the city and locations on the National Mall. Several are mentioned below and there are undoubtedly others that could be noted for further study. Several urban design enhancements are noted in the *Monumental Core Framework Plan* that was adopted by the National Capital Planning Commission and the U.S. Commission of Fine Arts last spring.

These ideas below need further study to see if they are desirable and feasible. Opening such vistas generally involve some tradeoffs, primarily in altering an existing landscape feature (primarily by removing or trimming trees and shrubs) to add a new enhancement by opening reciprocal vistas to and from sites within the National Mall. The Committee previously requested that the National Park Service consider these concepts in preparing the final National Mall Plan. However, they have not been addressed. We would still like these possibilities to be considered.

Maryland Avenue Vista to Tidal Basin and Beyond: The vista along Maryland Avenue from the Capitol to the southwest extends across the Jefferson Memorial North Plaza and on across the Tidal Basin and intersects the west edge of the Tidal Basin walk south of the FDR Memorial. It appears that a small plaza could be developed at this location to provide a reciprocal view back

northeast to the Capitol. On a larger scale, the Maryland Avenue vista extends on across the Potomac River to the memorial stone in the Lyndon Baines Johnson Memorial Grove, a part of Lady Bird Johnson Park (a National Park Service park). The Urban Design Framework map on page 45 does show this vista, but only as far as the Jefferson Memorial North Plaza.

Nineteenth Street Vista to D.C. World War Memorial: The D.C. War Memorial is located on the axis of 19th Street, NW, the street that leads south from Dupont Circle to Constitution Avenue. The D.C. World War Memorial is to be restored in the near future. The Committee suggests that studies be undertaken to see if a vista could be opened along the line of 19th Street, south from Constitution Avenue to the Memorial, thus visually connecting this little known memorial to the area of the city north of the National Mall (perhaps as far north as Pennsylvania Avenue). We note that the 1902 McMillan Commission Plan included a similar vista between 20th and 21st Streets, NW to connect with a northern extension of the Reflecting Pool (that extension was not built and the vista was not opened).

Virginia Avenue Vista East Toward the Washington Monument: Earlier this year, in discussions of the Potomac Park Levee Project, Lindsley Williams suggested that the vista along Virginia Avenue (which terminates at Constitution Avenue) be opened on to the southeast toward the Washington Monument. The Committee recommends that this proposal receive further study. This vista is shown on the “Urban Design Framework” map on page 45, but it is not clear how much the vista would be opened at ground level.

North-South Vista from Washington Monument Grounds to Jefferson Memorial: The north-south vista from the White House to the Jefferson Memorial already exists, one of the strong legacies of the McMillan Commission Plan (though today’s design of the area is considerably different from the 1901-02 Plan). As noted previously, the Committee has previously suggested that consideration be given to extending a pedestrian structure from the Washington Monument Grounds to the Tidal Basin, with steps descending to the north side of the Tidal Basin. If this concept proves to be feasible it could strengthen the north-south vista and provide a grade-separated pedestrian route passing over Independence Avenue between the Washington Monument grounds and the north side of the Tidal Basin. This could be a longer range improvement.

The “View to the West”

One of the key issues involving the National Mall is the “view to the west” from the U.S. Capitol and other points along the main east-west axis looking west to the Lincoln Memorial and beyond. The original design for the National Mall envisioned an uncluttered view to the west, symbolizing the future growth of the country. Unfortunately, a number of buildings in Arlington County, Virginia are visible beyond the Lincoln Memorial and mar the view west from the Capitol along the Mall. Past efforts by the National Capital Planning Commission to protect this viewshed were not fully successful.

Protection of the view to the west should be part of the National Mall Plan, though the National Park Service cannot do this. The National Capital Planning Commission should again address this issue. Hopefully, at some future time, it will be possible to remove some of the most offensive buildings (as they wear out) and restore a more appropriate background for the National Mall. No plan for the future of the National Mall should ignore the threat to the historic and special character of this space. At a time when hundreds of millions of dollars will be spent to enhance the National Mall, protection of the “view to the west” should not be neglected.

PART II: PARKWIDE AND AREA COMMENTS

Comments are provided below on “parkwide” (National Mall Actions) and on actions for different areas of the National Mall. These are listed in the order used in the Draft National Mall Plan. In some cases, a feature has been inserted that is not specifically noted in the Draft National Mall Report. In general, the comments relate to the proposal in the Preferred Alternative (Alternative A) except in cases where The Committee of 100 believes a proposal in another alternative merits comment or support.

National Mall Actions

Cultural Resources: The Committee supports the statements in the *National Mall Plan* regarding the preservation of memorials, related statuary and places of commemoration on the National Mall, and the need for some evolution of the historic landscape to reflect significant national events. We also support improving planned views and vistas, including large areas of open space that are defining features of the historic National Mall landscape. As noted in Urban Design Initiatives in Part I, the Committee recommends further study of opening some new vistas.

We understand that many trees and other landscape elements will die or need to be replaced over a 50-year or more plan period. The National Park Service should provide general information about how the landscape elements will be preserved and replanted over time.

Natural Resources: The Committee generally agrees with the statements about improving conditions for tree and turf areas. However, we question prohibiting all events under Mall trees. We believe there may be alternative methods that would allow such areas to be used, as they are in some other parks in this country and in Europe. The location of special small-scale exhibits and demonstrations under some trees is a special feature of the annual Folklife Festival that should be continued if possible.

Demonstrations, Special Events and National Celebrations: The Committee strongly supports unfettered use of the National Mall as a venue for political speech and demonstrations. However, the National Mall is used in so many different ways that some caution should be exercised in not overly promoting non-political events. As noted elsewhere, we believe development of facilities in adjacent areas could allow some non-political events to be moved off the National Mall.

Access and Circulation: This involves the design and operation of the transportation system for the National Mall, including connections for different transportation modes to surrounding areas. As noted previously, the Committee is pleased with proposals to allow for an enhanced bus transportation system to connect the National Mall with adjacent areas and tie into the regular bus system. Providing access for tour buses, including parking off the National Mall, is especially important.

Visitor Information, Education and Enjoyment: The National Park Service is proceeding ahead on a separate National Mall Wayfinding Program, now going through the approval process. The coordinated system is an improvement over the present system of wayfinding signs, which has evolved over many years. Visitor information is to be provided at various locations throughout the National Mall. An earlier concept called for a central visitor center with information on the history of the National Mall. That concept is now proposed to be dropped in favor of a decentralized approach to visitor information.

The Committee of 100 understands the concept of this decentralized approach but believes a central place where visitors could obtain National Mall history exhibit is also desirable. We continue to believe that the Arts and Industries Building, which is a property of the Smithsonian Institution, is a logical place for such a visitor center. In other words, the building would have a joint use, with most of the space being used for Smithsonian Institution exhibits and uses, and some space being used for a visitor center operated by the National Park Service. Some retail and restaurant uses might also be located there.

Passive and active recreational activities are proposed to continue at various locations on the National Mall. The Committee believes that formal and informal recreational activity is an important part of the National Mall.

Visitor Amenities: A range of visitor services (restrooms, seating, food service, etc.) is indicated throughout the National Mall, with multipurpose facilities at several locations. The human necessity for such services is evident. The Committee notes the need for such facilities while stressing that they should be designed in such a way as to not intrude on the special landscape quality of the National Mall. The Committee believes there are locations, especially in the 3rd to 14th Street section of the National Mall, where visitor facilities could be developed on property of the Smithsonian Institution (but outside Smithsonian buildings) which could serve visitors to the National Mall.

Health, Public Safety and Security: The Committee agrees that public safety on the National Mall must be ensured. This is especially important because increased visitation, and the increased adjacent development near the National Mall, will likely result in greater use during early morning and evening hours.

Park Operations: This category deals with addressing the deteriorated condition of many areas

of the National Mall, and maintaining the landscape and facilities in the future in an environmentally sustainable manner. The Committee strongly supports these actions (see previous comments in the “Big Ideas” section).

National Mall Subarea Actions

Comments are provided below by subareas of the National Mall, as used in the Draft *National Mall Plan* (see pages 194-243).

The Mall (Note that this is one subarea of the overall National Mall)

Union Square (1st to 3rd Streets): The proposal for an almost complete redesign of the Union Square area is one of the big ideas of the Draft National Mall Plan (see comments in the “Big Ideas” section of these comments).

The Mall (3rd to 14 Streets): A variety of improvements are proposed for this key section of the National Mall. While many of these seem desirable, additional information is needed about proposals to revise the walkway materials and to restrict activities in the tree space. If parking is removed from Madison and Jefferson Drives, additional attention will be needed on parking in adjacent areas with shuttle service to and from the Mall.

The Committee supports adding the words “National Mall” to the name of the Smithsonian Metrorail Station and to providing orientation information adjacent to the station entrance on the Mall. However, we question whether adequate information can be provided near the Metrorail Station without damaging the quality of that space. We believe there is still a need for a more sizeable visitor center in this central area. Space in a renovated Arts and Industries Building would be an appropriate location.

A key feature of this part of the National Mall is that it is lined with the various museums, art galleries and sculpture gardens of the Smithsonian Institution and the National Gallery of Art. The National Mall Plan should be comprehensive and note the interaction between the museum activities and the central landscape under the jurisdiction of the National Park Service.

As noted above, cooperative provision of visitor services should be explored, such as additional restrooms and food service on Smithsonian museum property (outside the buildings).

In terms of major development, the future use of the now closed Arts and Industries Building should be addressed in a comprehensive National Mall Plan. A variety of museum and visitor service uses could be located in this building when renovated. However, the Committee does not believe that this is an appropriate building location for the proposed Hispanic Museum.

Washington Monument and Grounds

The Washington Monument grounds have a central location in the entire National Mall area. The Committee supports the concept for a new visitor facility, offering a range of services, on the Sylvan Theater site. As indicated previously, the Committee recommends future consideration of a grade separated pedestrian structure from the Washington Monument grounds to the north side of the Tidal Basin. This would better connect these two areas along a symbolic spine, providing more convenient and safer pedestrian movement.

On a smaller scale, interpretive information at ground level (perhaps with special paving) should be installed to mark the location of the historic Jefferson Pier northwest of the Washington Monument.

Greater attention should be directed to completing an overall landscape plan for the Washington Monument grounds.

West Potomac Park (North of Independence Avenue)

Constitution Gardens: In Section 106 meetings the National Park Service staff has indicated that Constitution Gardens is somewhat unknown and underused. The Committee supports the proposal for a high-quality multipurpose visitor facility at the east end of Constitution Gardens near 17th Street. This facility would provide food service, retail and related activities. Careful design to achieve a festive yet dignified setting is necessary. The description of this facility could be improved in the *Final National Mall Plan*. The Committee also supports proposals for improving the lake and increasing its use. In view of the name of the area (Constitution Gardens) it may be useful to provide additional interpretive information in the area about the Constitution.

The Potomac Park Levee will be constructed near 17th Street and Constitution Avenue, extending both north and south of 17th Street.

The Committee supports the proposal for interpretive information near the old canal lockhouse, providing information on the evolution of this part of the city. While we understand that the lockhouse was previously moved from its original nearby location, we do not fully understand the rationale for the proposal to move it again. The Draft Plan talks about pedestrian safety but is not specific about why this proposal is necessary.

Vietnam Veterans Memorial: The Committee supports providing for seating and contemplation near the memorial. However, care is needed not to keep adding additional features that would detract from the special character of this memorial.

Lincoln Memorial and Grounds: The Committee generally supports the proposals for the Lincoln Memorial grounds. Additional information is needed about future use of the “Northwest Area” and future links to the Kennedy Center for the Performing Arts. In comments on the

Monumental Core Framework Plan, the Committee has raised the issue of more public access and use of Old Naval Observatory Hill as a key area adjacent to the National Mall. Additional consideration is needed of access to the north to the U.S. Institute of Peace Building (now under construction and scheduled to open in early 2011).

We note that considerable planning and design work is now underway on the Lincoln Memorial grounds around the Reflecting Pool. This should be noted in the *Final National Mall Plan*.

Korean War Veterans Memorial: The Committee supports the proposed minor improvements to walks and interpretive materials.

D.C. War Memorial: The Committee is very pleased to see that special attention is finally being given to the District of Columbia War Memorial which honors those District of Columbia residents who served in World War I. The use of stimulus funds for renovation of this memorial is especially welcome. This improvement project is especially timely since our country will soon be observing the centennial of the World War I period. Since there is no “national” World War I Memorial on the National Mall, this local D.C. memorial can symbolize that period. Interpretation could note that hundreds of such memorials were built across the United States after World War I, some more elaborate and some simpler.

New interpretation should also include recognition that residents of the District of Columbia have served their country in all its conflicts since the establishment of the District in 1791, despite being denied the benefits of full citizenship. Use of the memorial (a bandstand design) and adjacent areas for performance use can add additional activity to this area.

Ash Woods: The Committee generally supports the proposals for the Ash Woods area but notes that an overall plan is needed for this area. After the opening of the nearby Martin Luther King, Jr. Memorial, this area is likely to have a significant increase in visitor traffic. The Committee suggests that consideration be given to a full-service visitor facility (not just restrooms) in this area. The location, shielded from nearby memorials, would permit an appropriate facility. The rebuilt U.S. Park Police stables, designed so that the paddocks would be a visitor attraction, is an interesting proposal.

West Potomac Park (South of Independence Avenue)

Tidal Basin Area: See comments under “Big Ideas”.

Franklin Delano Roosevelt Memorial: The Committee supports the recommendations for the FDR Memorial and related areas.

West Potomac Riverfront Park: The Committee’s major concern in this area is the appropriate design of this section of the “Washington Waterfront Walk” (see discussion in the “Big Ideas” section). The Washington Waterfront Walk needs more attention in planning for all appropriate

sections of the National Mall, especially the alignment it follows in connecting the West Potomac Park riverfront with the Southwest Waterfront.

George Mason Memorial: The Committee supports proposed rehabilitation of the historic fountain. The George Mason Memorial, interesting in itself, is a memorial that gets relatively little attention because of its isolated location.

Thomas Jefferson Memorial and Grounds: The Committee generally supports improvements proposed for the Jefferson Memorial and grounds. We note that these are closely related to proposals for improvement of walkways around the Tidal Basin. Coordination is needed with the proposals for the Washington Channel outlined in the *Monumental Core Framework Plan*. The Committee is especially concerned with achieving an appropriate route for the Washington Waterfront Walk south of the Jefferson Memorial and on east to the Southwest Waterfront.

PART III: CLARIFICATIONS IN THE REPORT

The *Draft National Mall Plan/Environmental Impact Statement* is a lengthy and detailed document (600 pages). Steps to clarify certain points, especially key points, and to increase understanding, should be taken when possible. Comments on clarification of the Draft Plan report have been made by other agencies and groups. The Committee of 100 shares concerns about clarifying certain points where possible, especially with respect to a number of projects that are “in the pipeline” and moving forward and apparently will become a part of the National Mall landscape.

Three Authorized Projects: Three major projects on the National Mall have been authorized by the Congress and are moving ahead. The Martin Luther King, Jr. National Memorial is under construction and the National Museum of African American History and Culture and the Vietnam Veterans Memorial Visitor Center are moving through the design approval process. The location of these three major projects is left blank on some maps (Preferred Alternative Map, page 95 for example). It would aid understanding if these projects were shown and described at the appropriate location in the report.

Current National Park Service Projects: At the present time, a number of significant projects by the National Park Service are either under construction on the National Mall or moving through the planning and approval process (see Table 41 on page 547). It would be useful if these projects could be indicated on the appropriate maps and described at the appropriate place in the report.

Provide Summary Information on the White House and President’s Park: As mentioned in a previous section, The Committee of 100 on the Federal City and some other organizations have felt that National Mall should be defined somewhat more broadly, to include at least the Ellipse portion of the White House and President’s Park (now a separate unit of the National Capital Region of the National Park Service).

It is now apparent that a broader definition of the National Mall will not be included in the current National Mall Plan. We believe that linkages between the National Mall and the White House and President's Park are important to understand. Therefore, at the minimum we suggest that the *Final National Mall Plan* at least include a summary description of the existing conditions in the White House and President's Park area, and the proposals in the adopted plan for that area. The description of the plan is very summary in nature.

Other Nearby Projects: The Draft Report includes some discussion on page 359 of nearby projects that will have a significant effect on the National Mall. These description could be more detailed in order to better understand linkages and potential impacts.

Clarify Origin of "National Mall" Term: The area now called "The National Mall" was for many years simply known as "The Mall". In fact, the National Park Service now uses the term, "The Mall" to refer to the portion of the National Mall from 1st Street to 14th Street. This is somewhat confusing and the confusion is not clarified in the present *Draft National Mall Plan/Environmental Impact Statement*. The Committee of 100 suggests that this confusion be clarified and, if possible, the way and the time when the term "National Mall" came into general use be explained.

PART IV: NEXT STEPS

In conclusion, the Committee of 100 on the Federal City appreciates the opportunity to comment on the *Draft National Mall Plan/Environmental Impact Statement*. We applaud the National Park Service for the work that has been done in bringing the Draft National Mall Plan to the present stage but, as noted above, we have serious concerns about some aspects of the Draft National Mall Plan as it exists today. However, in view of how this planning process has unfolded, we now understand that a somewhat less than comprehensive plan, including only the National Park Service areas of the National Mall, is what will go forward and be presented later this year (fall 2010) for adoption by the National Capital Planning Commission. While we wish the plan were more comprehensive, we understand that it is important for the National Park Service to have an approved National Mall Plan so that additional funding can be obtained for future National Mall improvements and increased maintenance that are needed.

Next Steps by the National Park Service

As the National Park Service moves forward over the next five-six months to prepare the Final National Mall Plan/Environmental Impact Statement, the National Mall Plan staff will need to consider comments of the National Capital Planning Commission, the U.S. Commission of Fine Arts, and other reviewing agencies, including District of Columbia agencies. We hope that suggestions from the Committee of 100 on the Federal City, and many other organizations and individuals, both in Washington and across the country, will also be seriously considered and that appropriate revisions in the final plan will be made.

We suggest two other steps to aid public understanding of the process of preparing the Final National Mall Plan. First, the comments of the various agencies, organizations and groups should be made available to the public as soon as possible after the comment period closes on March 18.

Second, the final National Mall Plan that is presented to the National Capital Planning Commission for approval should include at least summary information on the comments that were considered and the reasons certain revisions were made (or not made).

The Committee of 100 on the Federal City, of course, reserves the right to testify before the National Capital Planning Commission when the Final National Mall Plan is presented to them later this year.

National Mall Projects Moving Ahead: Even while the work on preparing the final National Mall Plan for adoption moves forward, a number of important projects are either under construction or in the planning stage. Three major projects on the National Mall have been authorized by Congress. The Martin Luther King, Jr. Memorial is now under construction, the National Museum of African American History and Culture is proceeding through the planning and design stage and the Vietnam Veterans Memorial Visitors Center is also in the design review stage.

The National Park Service will continue to move forward with the planning steps for a number of specific projects on the National Mall, as previously noted. We hope that various planning and design issues on these projects can be resolved in the coming months and that these projects can move into construction either later this year or in the next several years.

National Mall National Register Nomination: One of the suggestions made in the Section 106 process related to the National Mall Plan is that a National Register Nomination be prepared for the entire National Mall. The Committee of 100 on the Federal City supports this proposal. We realize that this work will likely take several years but we believe it will inform, and hopefully simplify, future decisions about the development and improvement of the National Mall. In this work, there should be special consideration of the way that the “mental image” and appreciation of the overall National Mall has changed over time and how and when the term “National Mall” has emerged and been accepted.

Next Steps by Other Agencies

The Committee of 100 on the Federal City would still like to see a future comprehensive framework plan for the National Mall prepared, that would incorporate and integrate the National Mall Plan of the National Park Service as well as the plans of the other agencies with role in the future development of the National Mall (Smithsonian Institution, National Gallery of Art, Architect of the Capitol, Department of Agriculture, General Services Administration, District of Columbia and WMATA).

A number of these agencies have planning efforts underway relating to the National Mall that should be part of an integrated framework plan. Various planning efforts by the Smithsonian Institution are underway that need to be considered. The Office of the Architect of the Capitol has prepared the *Capitol Complex Plan* which is undergoing internal review and hopefully will be released to the public later this year. The plans of the Architect of the Capitol are especially important at the east end of the National Mall, because land under the jurisdiction of the Congress abuts Union Square. As discussed previously, a coordinated approach to replanning and redesigning the entire Union Square area is essential.

The Committee of 100 understands that the work of the National Park Service in preparing this plan has involved ongoing coordination with all these agencies. However, in the end, the National Park Service has prepared a *Draft National Mall Plan* that deals primarily only with the National Mall lands under the jurisdiction of the National Park Service. The future plans of other agencies, especially the Smithsonian Institution and the Architect of the Capitol, are not clear in the *Draft National Mall Plan/Environmental Impact Statement*.

We hope that once the National Park Service completes the Final National Mall Plan, that a summary plan report will be prepared that is easy for the public to use and understand, and also makes clear the ongoing projects on the National Mall. Such a summary report could be updated every few years and would therefore reflect the evolution of the National Mall and the progress being made in dealing with major problems.

Increased National Mall Role for the National Capital Planning Commission

The Committee of 100 on the Federal City believes that the National Capital Planning Commission (NCPC), working in coordination with the U.S. Commission of Fine Arts, is the appropriate agency to undertake the next stage of work to prepare a comprehensive framework plan for the National Mall. As the federal government's planning agency in the District of Columbia and the surrounding counties in Maryland and Virginia, NCPC has long been concerned with the planning and development of the Monumental Core area of Washington, D.C., including the National Mall at the center of the Monumental Core. Since the Commission is composed of 12 members (three appointed by the President, including the chairman, three representatives of major federal agencies, two members of Congress, and four representatives of the District of Columbia, including the Mayor and Council Chair), it should be a position to work toward a unified plan for the National Mall.

Over the past several years, NCPC, the National Park Service, the Commission of Fine Arts, the Architect of the Capitol and the District of Columbia Government have been working together on the "Planning Together for Central Washington" program. This has been a very beneficial program. It is unfortunate that the various elements have proceeded on different schedules, though perhaps that is inevitable with a program that is so complex.

As part of that work, the National Capital Planning Commission and the Commission of Fine

Arts worked together to complete the study of the area around the National Mall. That work was summarized in the report, *Monumental Core Framework Plan: Connecting New Destinations with the National Mall*. That report was approved by the National Capital Planning Commission in and by the Commission of Fine Arts in spring 2009.

The Committee of 100 believes that NCPC must now step up and undertake additional work to bring the still unresolved elements of the National Mall into a coordinated framework. The Committee of 100 will urge that NCPC undertake that work. We know that the National Park Service has been working closely with the NCPC staff while preparing the Draft National Mall Plan and we would expect that close working relationship to continue. NCPC could also take other steps, including hiring consultants or convening committees of experts for advice on specific elements of the National Mall. However, the key need is to make sure that plans of the various agencies with an interest in the Mall are coordinated in an imaginative way.

It is also that the future overall plan for the National Mall be presented in a way that is effective and understandable, both to people in Washington and to citizens across our country. We hope that NCPC will be willing to pick up this challenging assignment and carry it the next step.

We look forward to continuing to work with the National Park Service in planning the future of the National Mall. This is truly a work that is important to all Americans, including those of us who live and work in Washington, D.C. and in the Washington region.

Sincerely,

John Fondersmith

John Fondersmith, AICP
Representing the Committee of 100 on the Federal City
in the National Mall Plan Process

George R. Clark

George R. Clark, Chair
Committee of 100 on the Federal City