

March 18, 2010

Ms. Susan Spain  
National Mall and National Parks  
National Park Service  
900 Ohio Drive SW  
Washington, DC 20024

ATTN: Draft National Mall Plan / Environmental Impact Statement

Dear Ms. Spain:

I am writing on behalf of the National Trust for Historic Preservation to provide comments regarding the Draft National Mall Plan / Environmental Impact Statement (“DEIS”).

The National Trust strongly supports efforts to better maintain and preserve the National Mall and to make this extraordinary civic space more accessible to the public. Consequently, the National Trust has been actively engaged in consultation with the National Park Service and other stakeholders regarding the preservation of the National Mall, which is one of our nation’s most significant historic landscapes. We have provided extensive comments during the National Park Service’s planning process, and wish to join the DC Preservation League, American Society of Landscape Architects, and others in commending the Park Service for its hard work and public outreach to prepare the Draft National Mall Plan.

**The National Mall would benefit from a comprehensive vision and planning approach.**

Unfortunately, one of the primary defects in the Draft National Mall Plan is its failure to take a comprehensive look at the National Mall as a whole and not simply at the National Park Service property. Through its planning process, we understand that the National Park Service aspires to establish “a comprehensive vision and framework to protect the historic character of the National Mall, to restore its health and beauty, to help it function better as America’s civic space, and to meet the needs of local, national, and international visitors today and tomorrow for enjoyment, education, and recreation.” [DEIS p. 8] However, the Draft National Mall Plan as written provides a conceptual framework for stewardship only of the portion of the National Mall under the jurisdiction of the National Park Service. As the Advisory Council on Historic Preservation observed in its March 17, 2010 comment letter, “The scope of the National Mall Plan is limited to the areas over which the National Park Service has control. Yet the concept and the experience for visitors of the National Mall extends beyond those boundaries.”

In our view, the successful preservation of the National Mall depends upon fully integrating the planning processes of all of the responsible agencies and entities into a long-term, big-picture vision and planning approach. The National Trust continues to support a comprehensive, long-range visionary plan for the entire National Mall and we do not believe it is possible to develop this vision solely within the National Park Service's jurisdiction. This view is supported by other notable entities as well. For example, the American Society of Landscape Architects testified on March 4, 2010, before the National Capital Planning Commission, that "there must be close coordination and cooperation among all of the institutional stakeholders. Not all of the needs of the National Mall can be met within the narrow precincts of the area consigned to the stewardship of the Park Service, and planning for the National Mall and the federal precincts cannot be done in isolation."

The National Park Service's attempts to address the limited scope of its planning process do not correct the overall deficiency of the Draft National Mall Plan. Specifically, in 2006, the National Park Service invited eighteen federal and DC stakeholder agencies to provide their views early on in the process and to "cooperate in the preparation of a National Mall plan." [DEIS p. 545] Later, the National Park Service and some of the cooperating agencies jointly developed a set of twenty-one planning principles to guide the National Mall Plan. According to the National Park Service, these planning principles "formed the basis for the plan objectives presented in the National Mall Plan." [DEIS p. 544] The second planning principle, for instance, states that "Historic and natural resources will be protected and maintained."

Importantly, the fourth planning principle states that "Cooperating agencies will coordinate planning, information, services, facilities, and programs for visitors, residents, and the local workforce." In our view, however, the Draft National Mall Plan does not indicate that the cooperating agencies have coordinated the provision of visitor facilities. As the DC Preservation League testified before the National Capital Planning Commission on March 4, 2010, the Draft National Mall Plan "requires placement of all visitor amenities on NPS property, and none on property of adjacent federal (or federally chartered) entities." The DC Preservation League's March 4<sup>th</sup> testimony continues:

From the standpoint of historic preservation, by trying to accommodate all the desired uses and amenities of the Mall on property managed by the Park Service, the Park Service

necessarily concentrates the impacts on historic properties on its own property, while limiting the options for mitigation. ... We are informed that the Park Service has worked closely with other stakeholders of the Mall. What does not appear in the preferred alternative is any sense that those stakeholders are making their own contributions to the comprehensive and optimal development of the Mall.

In short, a much more integrated planning vision is needed, which will avoid concentrating the adverse impacts exclusively on National Park Service land. If the National Park Service declines to take a more comprehensive approach to the future vision of the National Mall, at a minimum, the twenty-one planning principles that reflect the other stakeholders' concerns must be expressly incorporated into the National Mall Plan itself and be fully considered in the specific direction and implementation of the plan.

**The Draft National Mall Plan calls for too many new structures on the National Mall, which have the potential to undermine its historic integrity.**

The National Trust is concerned that the Draft National Mall Plan calls for the construction of too many new ancillary buildings on the National Mall, which is supposedly considered to be a "substantially completed work of civic art." According to the draft plan, the National Mall "must be refurbished so that (1) its treasured memorials and historic landscapes can be preserved, (2) very high levels of use can be sustained, and (3) the needs of visitors can be met." [DEIS p. 4] To meet this three-prong need, the Draft National Mall Plan sets out to provide "Various visitor and commercial amenities ... that are conveniently located and that are sized and configured to meet visitor use levels on high-volume days." [DEIS p. 7] Consequently, the National Park Service's preferred alternative proposes a considerable number of new permanent ancillary structures to be constructed within the area subject to the agency's jurisdiction on the National Mall, including the following projects:

- Union Square, new food service and restroom structures
- Smithsonian Metro Station, new visitor contact station and restroom structures
- Washington Monument grounds, new multi-purpose visitor facility
- Constitution Gardens grounds, new multi-purpose visitor facility
- Tidal Basin area, new multi-purpose visitor facility
- Lincoln Memorial grounds, new restroom structure
- Ash Woods, new stable, food service, and restroom structures

- Franklin Delano Roosevelt Memorial, new food service and restroom structures
- Thomas Jefferson Memorial grounds, new food service, retail, and restroom facility

We acknowledge that the Park Service also intends to use mobile food carts and refreshment stands as well as temporary portable restrooms during high-use seasons and special events. [DEIS p. 87] We understand that “The size and character of [Union Square] visitor facilities and amenities would be determined during design.” [DEIS p. 89] We appreciate that the Park Service intends that these new structures would be “designed to be compatible with the character of the National Mall.” [DEIS p. 86] We also certainly support that “The National Park Service would encourage partnerships between all visitor destinations along the Mall to serve visitor needs. ... NPS staff would also work with the National Gallery of Art and the Smithsonian Institution to improve access to food service and restrooms for National Mall visitors.” [DEIS pp. 89, 90]

On the other hand, it is readily apparent that the draft plan calls for the National Park Service to build its way out of the challenge of accommodating public use of the historic landscape. The National Trust shares the concern expressed by the National Coalition to Save Our Mall in its March 4, 2010 testimony before the National Capital Planning Commission that the proposed introduction of “numerous kiosks, restaurants, restroom facilities, and visitor centers on the open space could have dramatic and adverse impacts on the historic quality and landscape character of the National Mall.”

Moreover, the National Trust is concerned that the Draft National Mall Plan places too much emphasis on using permanent new structures to accommodate peak public events on the Mall, such as inaugurations and Independence Day celebrations. This is a recipe to over-build the National Mall. Indeed, one of the so-called best practices which guided the development of the preferred alternative is that the National Park Service should provide “Sufficient convenient and accessible visitor amenities (rest areas, water, food service, gift shops, and stroller and locker rentals) should be sized and configured to meet the visitation levels on high-volume days.” [DNMP p. 53] (By contrast, the cooperating agencies’ fifth planning principle states that “Facilities will be ... appropriately sized to meet a range of uses.” The planning principles do not recommend building out the National Mall to accommodate visitation levels on high-volume days.) Instead, we believe the plan should rely much more heavily on temporary infrastructure, which can be

removed when visitor use is at normal levels. Designing to accommodate the maximum-use public events with permanent new buildings would greatly exacerbate the adverse impacts of this plan on the National Mall, and would needlessly destroy too much public open space.

**The National Park Service must prioritize the list of projects in the draft plan, and should limit any new facilities to those that are necessary.**

In the National Trust's view, very special sensitivity must be used when proposing, siting, and designing any new permanent buildings anywhere on the National Mall.

First, we consider it essential that the National Park Service objectively assess and demonstrate the necessity of any new ancillary facilities as it implements this conceptual framework plan. The cooperating agencies' twenty-first planning principle states that "Business services will provide a range of necessary and appropriate commercial visitor services and products of consistent high quality at a range of prices." A visitor service proposed for the National Mall which could be appropriately provided off of the Mall would violate this principle. To its credit, the Draft National Mall Plan indicates that the National Park Service will "assess the economic feasibility, necessity, and appropriateness" of changes to existing facilities as well as for the construction of "additional food service, retail, and recreation equipment rentals." [DEIS p. 71, 83]

Second, the National Trust continues to strongly recommend that the National Park Service evaluate opportunities for locating necessary visitor amenities "behind the architectural line," in areas under the control of the Smithsonian, National Gallery, Department of Agriculture, and other entities. New ancillary facilities should be designed, programmed, and implemented within the Mall only after a thorough reconsideration of ways the National Park Service might work with other agencies to offer combined visitor services for the National Mall. For example, the National Park Service should collaborate with the Smithsonian to determine what visitor amenities could be offered through the restoration and reuse of the Arts & Industries Building. An inter-agency visitor services agreement to reuse some or all of the Arts & Industries Building in this way could reduce development on the historic landscape of the Mall and dramatically improve the visitor's experience and understanding of the National Mall's historic resources.

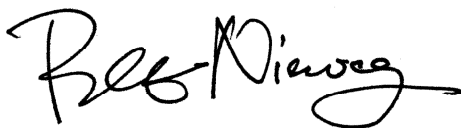
Ms. Susan Spain  
March 18, 2010  
Page 6

Third, the National Park Service should revise the Draft National Mall Plan to clearly prioritize the list of specific projects outlined in the preferred alternative. In its March 17, 2010 comments, the Advisory Council on Historic Preservation observes that the Draft National Mall Plan “functions effectively as a set of coordinated action items” and has urged the National Park Service to revise the plan to “establish a consistent approach to these projects, and in particular, identify principles and priorities for decision making on individually funded projects.” The National Trust also concurs with the National Capital Planning Commission’s February 25, 2010, staff report when it recommends that the National Park Service “Prioritize short-term and long-term projects to support progress in the implementation of the Plan.” (For example, the NCPC staff report describes the redevelopment of Union Square as “one of the linchpins” of the plan and “an early priority” for the Commission’s staff.) Although the National Park Service’s priorities for the plan’s specific projects may change over time, the National Trust believes that sharing the Park Service’s priorities during the planning process is one step to ensure that “park spaces and structures [on the National Mall] will welcome all and ... will feature the highest quality of sustainable design, construction, and maintenance”—as the cooperating agencies’ first planning principle requires.

Thank you in advance for considering the views of the National Trust for Historic Preservation regarding the Draft National Mall Plan. We look forward to participating in future consultation pursuant to Section 106 as the National Park Service’s plan is implemented, including those site-specific actions highlighted on Table 41 at page 547 of the Draft National Mall Plan.

With best regards.

Sincerely,

A handwritten signature in black ink that reads "Rob Nieweg". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Robert Nieweg  
Director and Regional Attorney  
Southern Field Office  
National Trust for Historic Preservation