

Testimony by the
National Coalition to Save Our Mall
On the
PROPOSED DWIGHT D. EISENHOWER MEMORIAL
National Capital Planning Commission
September 7, 2006

The Coalition has since its founding in 2000 endeavored to protect and enhance the integrity of the National Mall, and of the L'Enfant and McMillan Plans on which is based. The positions we have taken supporting or opposing projects are founded on that principle. With regard to the Eisenhower Memorial site selection, and preferred site at Maryland Avenue, we have several points:

First, we have no problem with the concept of the memorial to President Eisenhower. Further, we appreciate that Maryland Avenue is long overdue for serious renovation and improvement and a memorial at this site could help speed that process. If this project proposed undoing decades of neglect by realizing Maryland Ave. as intended by L'Enfant and the McMillan Plan, and then locating the memorial within the available space of the restored avenue, then it would probably cause little disagreement or controversy. However, this proposal would reconfigure the site and actually “redesign” a historic L'Enfant Avenue, and it would close a portion of Maryland Avenue to traffic, effectively erasing its historic concept as an avenue, not simply a vista. The Coalition believes this approach puts the cart before the horse—and gives priority to the memorial sponsors at the expense of historic preservation. The Coalition believes that when a historic avenue—however “lacking in integrity” due to government neglect or failure to implement L'Enfant principles—is being considered for restoration, priority should be given *first* to restoring the historic idea. Memorial considerations, transportation, and modern desires for an inviting pedestrian plaza, while important, should come second.

The Coalition believes any decision on site selection is premature.

- The Coalition submitted comments on the EA, which we believe is a grossly inadequate, and we hope you have read them. We believe that a proper EA, with equal consideration of reasonable alternatives, and with serious evaluation of effects not only on the site but the broader historic context – the historic L'Enfant and McMillan Plans, Maryland Avenue, and the National Mall—could lead to a different conclusion, different finding, and a substantially different recommendation by the NCPC staff regarding the appropriateness of this site and the proposed “redesign” of it for the memorial. The closing of Maryland Avenue has already generated controversy, as seen in public comments on the EA. That, and the NCPC's designation of Maryland Avenue as a “special street” warrants, in the Coalition's view, an EIS, not an EA.
- A serious flaw in the EA with potentially grave consequences is its failure to examine impacts on the future of Maryland Avenue. According to architect Arthur Cotton Moore (recently featured in *Washingtonian* magazine and profiled in *DC Architecture*), who has been working with CSX to reopen Maryland Avenue and has already achieved a small

portion, with the area between 12th and 7th Street to be completed within the decade, 6 million square feet of potential office space will be unlocked by the redevelopment of Maryland Avenue as a L'Enfant Avenue. The question is, will the “redesign” and closing of Maryland Avenue kill that potential? We don't know. NCPC's own CSX study described in the spring 2006 bulletin will not be out until 2007. Again, there is a lot we don't know. The EA does not evaluate these questions but the answers need to be known so the sponsors and NCPC can move forward with assurance. That can not yet happen.

- The Coalition also is concerned that the EA and staff review treat Maryland Avenue in piecemeal fashion. Changes to Maryland Avenue for this memorial will permanently end the potential of achieving L'Enfant concept and conflict with ongoing plans by Moore and others to restore Maryland Avenue as a L'Enfant street. Therefore, the Coalition believes there is a need for an EIS for Maryland Ave to evaluate the competing approaches and the effects on the integrity of the L'Enfant Plan as well as the future development of this part of the city.
- We believe that as the 106 process gets underway and government agencies learn about these and other of the public's concerns regarding historic preservation issues, they may find themselves changing their views and conclusions about the appropriateness of this site for the kind of redesign proposed or the kind of memorial envisioned by the sponsors.

I will now complete my testimony with what the Coalition believes is a much bigger preservation issue. What does the Coalition mean when it says a fuller environmental study and 106 consultation may change views about the appropriateness of the proposed site? Why keep referring to the effects on the National Mall?

The NPS has issued a finding that reconfiguring the site, “redesigning” Maryland Avenue, and closing it to traffic would have no significant impact. But that is a highly questionable judgment, and in our opinion wrong. The DC State Historic Preservation Officer states in his letter to NPS Superintendent Vikki Keys that “there are divergent views on how to address the L'Enfant Plan sensitivities of the site.” That came out already in the public comments on the EA as well as at the 106 meeting held last week. Even NCPC's acceptance of the reconfiguration seems to contradict the Legacy Plan and the Capital City Framework Plan, both of which show Maryland Avenue reconstructed as a continuous L'Enfant street. The source for the “redesign” concept appears to be the Memorials and Museums Master Plan but that document provides no environmental and preservation analysis to justify the “redesign” in ways that are NOT consistent with the L'Enfant original concept. Clearly, this issue needs further discussion before accepting the site or approving any redesign.

Also, in my testimony I have mentioned affects on the National Mall. Why? The Coalition has pointed out in recent years that the National Mall lacks an agreed-upon definition. NCPC and Congress define it as the great cross-axis from the Capitol to Lincoln Memorial and White House to Jefferson Memorial. It is in general a valid description but it lack boundaries associated with the historic plans. The Coalition, however, believes that a more historically accurate definition includes the entire kite-shaped design of the McMillan Commission. And, in fact, numerous maps from the McMillan era, including the one posted on NCPC's website, show the kite-shaped plan with the title “The Mall.” I include three historical examples in my testimony from 1901-2, all three of which are published in John Reys, *Washington on View*. (See attached maps.) Given this definition, Maryland Avenue is the southern boundary of the National Mall and will be directly impacted by whatever happens on the site under consideration.

The Coalition believes that the 106 process and environmental document need to acknowledge and evaluate this relationship, which the current EA does not do.

In last Monday's Washington Post, culture critic Philip Kennicott bemoaned the speed and quality of architectural change happening on Massachusetts Avenue and concludes, "A historically enshrined city plan must inevitably be either a forgotten artifact or something sacred. L'Enfant could lose his relevance to the real life of the city. Or his early vision could suggest a new imperative -- to revere our avenues as more than just frontage on buildable lots."

We need to open a serious public discussion about what it means to preserve the L'Enfant plan and principles. This applies to Maryland Avenue and it will be applicable throughout the city as intense development occurs. The discussion should begin now, and with NCPC leadership, because this is a question for all of us who care about the integrity of the L'Enfant Plan for the capital city.

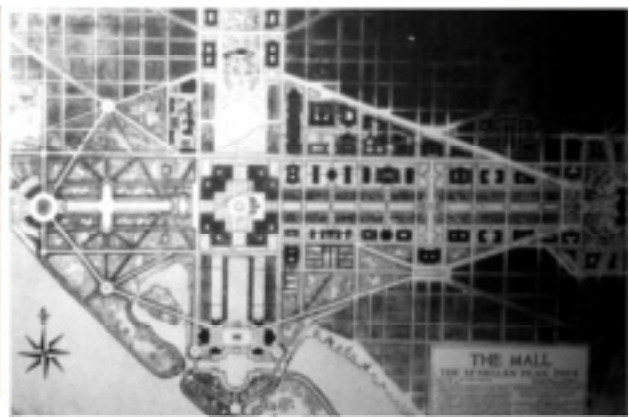
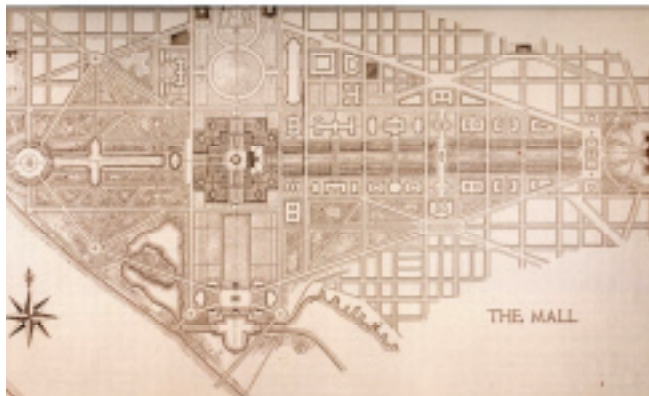
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Maryland Avenue is the southern border—the counterpart to Pennsylvania Ave.—in the McMillan Plan's Mall

Right: The McMillan Plan labeled "The Mall" published by National Geographic, 1915 (Reps, Washington on View, p.260)

Below left: Map for Century Magazine article by McMillan Commission Secretary Charles Moore, 1902, (Reps, Washington on View, p. 257)

Below right: NCPC's website showing the McMillan Plan's "Mall"



ADDITIONAL COMMENTS

(in addition to oral testimony)

ON

PROPOSED DWIGHT D. EISENHOWER MEMORIAL

Approval of Site and Design Principles

At

National Capital Planning Commission

September 7, 2006

The National Coalition to Save Our Mall (Coalition) submits the following comments to supplement our brief 5-minute testimony read at the NCPC's public meeting:

- The Environmental Assessment (EA), which your Executive Director has adopted (on behalf of the Commission) as part of her Finding of No Significant Impact is inadequate. Attached is our statement, submitted to the National Park Service July 17th, 2006, detailing the reasons why it is inadequate. A major fault is that it purports to examine alternative sites, but reviews only the Maryland Avenue site and “no action,” which NCPC's EDR notes is not an alternative given Congress's directive that the memorial be built.

What other alternatives should be considered? At the least, the EA should give equal treatment to the other sites NPS and the sponsor considered and rejected, consider alternate configurations of Maryland Ave. such as that proposed by C100 chair Don Hawkins, and study the alternative of recreating the original L'Enfant and McMillan Plan avenue with the memorial site limited to off-street areas.

- The Staff recommends that the site be approved with the caveat that the “applicant design the Memorial using the Section 106 process to meet, to the Commission's satisfaction” seven suggested design principles. We are disappointed to see staff accept the EA, accept the site, and move immediately into the next stage of mitigating adverse effects by proposing guidelines. We are well aware that this is what happened with the Vietnam Visitor Center, when Congress in effect mandated a site and NCPC had to make due with a bad situation. But the site for this memorial is not a given, and has not yet been properly studied in the EA. If Congress makes moves to intervene, NCPC should make clear that the fault lies not with process and the public but with the NPS's acceptance of a grossly inadequate environmental document.
- We do agree with the Staff's recommendation that the Commission “**not adopt the applicant's draft design guidelines**” page 2-18 of the EA. The applicant should be required to use the staff suggested design principles, endorsed by the Commission, without site location approval.
- We believe the environmental documentation needs to include an evaluation of the impact of the proposed design—however conceptual at this point in the process--on the historic resources. Such an evaluation is endorsed by the staff of CEQ. NCPC staff interprets this to mean evaluation of any design issues not the entire design impact. We disagree with this staff interpretation.
- The Staff Recommendation findings (page two of the EDR) support the fact that site approval is premature due to the historic nature of Maryland Avenue, an NCPC Special Street.

- The site location may not be appropriate, due to possible adverse impacts on the historic street, of the yet unknown memorial design and any other structural features. (The EA mentions possibly two small buildings in addition to the Memorial).
- We agree with the Commission’s designation of the intersection of Maryland Avenue with Independence Avenue as a commemorative opportunity. (Site # 3, NCPC Memorials and Museum Master Plan). However page 41 of that document states there exists an “Opportunity to redesign Maryland Avenue & Independence Avenue...” and “Amenities such as parking and visitors services, i.e., restrooms, gift shops, and parking should not be located on this site; nearby buildings should serve these uses. **This site is not appropriate for a building**”. (Emphasis added).
- The 106 process was formally initiated by the Park Service on August 9, 2006. Only one meeting has been held to date. In initiating the process with the D. C. State historic Preservation Officer, NPS stated that it has determined that **“the unification of the three parcels into a single landscaped public plaza as a site of the Memorial would have no adverse effect to the National Register qualities of the L`Enfant/McMillan plan and that the proposed design guidelines (not to be adopted by NCPC) will mitigate any potential adverse effects of the design”**.
- Again, we feel, this NPS determination pre judges the 106 process.

Our recommendations to the Commission and our assessment of the project at this time may be interpreted as trying to delay the progress of the Memorial. That is not the intent. We strongly support the concept of the Memorial. However, **we believe the 106 process should have been started at the time of the start of the EA preparation and coordinated or integrated into the EA process** so that the Commission can make informed site and design decisions based on a review of all environmental and historic concerns at the same time.

There are several other concerns we have with the documentation before you for the location action:

In the Staff Recommendation, page 10 second paragraph, it states: “As emphasized by the DC SHPO, it is worth noting that this location of Maryland Avenue SW is much altered over time, and thus lacks a consistent historical identity.” The DC SHPO also notes, however, that there are differences of opinion about restoring or redesigning Maryland Avenue. These significant historic preservation questions need to be better evaluated in the EA and in the 106 process before any site decision is made.

The same paragraph indicates twice that the L`Enfant/MaMillan maps (drawings) designated this space as an **open triangular space** even though the building opportunities around this open triangular space have provided rectilinear building arrangements. The Memorial sponsors desire to consolidate the triangular spaces which exist into a unified rectangle or public space. **Would this consolidated space be in keeping with the intent of L`Enfant and reaffirmed by McMillan?**

Finally, attached to the “Finding of No Significant Impact” (before you) is an August 4, 2006, “Summary and Analysis of Public Comments” on the Environmental Assessment. Page 2 of that document, next to last paragraph, deals with the diversion of traffic from Maryland Avenue spur onto 6th Street SW. The traffic impact of this diversion has not been adequately documented in

the EA. There are new private development proposals which may add between 6 to 7 million square feet of development, generating considerable traffic, to the western portion of Maryland Avenue, which have not been adequately assessed in the cumulative impact analysis.

Further, the following paragraph notes that “there is no historical basis for maintaining vehicular traffic” ... and “Maryland Avenue does not have an established alignment”. These are rationalizations without any factual basis or support.

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