

The Committee of 100

on the Federal City



April 27, 2022

Marcel C. Acosta, Executive Director
National Capital Planning Commission
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Dear Director Acosta,

The Committee of 100 on the Federal City is pleased to submit comments on the **Draft “Monumental Core Streetscape Design Guidelines: Vertical and Surface Elements” (February 2022)**. The Committee of 100 on the Federal City (abbreviated as C100 or the Committee of 100) recommendations for new or amended language are shown in *italics*.

OVERVIEW

The National Capital Planning Commission (NCPC) released the Draft “Monumental Core Streetscape Design Guidelines: Vertical and Surface Elements” on February 3, 2022 for a 120 day review period (February 8 to May 11, 2022). While NCPC compiled the final Draft report, the preparation of the report involved coordination with the National Mall Interagency Working Group (IWG) which consists of eleven federal and local agencies (including NCPC). Some of the policies and guidance in the report go back a number of years, while others are new.

Overall Structure of the Report

The report consists of two parts. The first, the main body of the report, is 80 pages in length (the last three pages are “Endnotes”). The second part of the report is Appendices (47 pages), so the total report has 127 pages.

Table of Contents of Report

The six major sections of the Report are:

1. Preface
2. Acronyms
3. Introduction
4. Vertical Elements
5. Surface Elements
6. Endnotes

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The Committee of 100 suggests reordering the Contents beginning with “Introduction” and then, followed by No. 2 “Preface” and No. 3, “Acronyms”. Some minor rewriting would probably be necessary, but the understanding of this first part of the report (1-3) would be significantly improved.

The discussion below uses the existing numbering system of the first three sections of the draft report.

1. PREFACE

The Preface notes that “The National Capital Planning Commission (NCPC), in coordination with the National Interagency Working Group (IWG), prepared the Streetscape Design Guidelines: Vertical and Surface Elements. The IWG consists of eleven federal and local agencies, including...” The eleven federal and local agencies are listed.

In addition, “The Streetscape Design Guidelines cross references federal and local policies, guidance, standards, and regulations”, including but not limited to ten Acts, Guidelines, etc.

2. ACRONYMS

Forty-four (44) Acronyms are listed.

3. INTRODUCTION

Boundary (page 5)

The sentence for “Boundary” reads: “This document addresses the geographic area defined by the Streetscape Manual Boundary, which is amended to include:

- 1) Banneker Park, a National Park Service (NPS) property.
- 2) Kennedy Center for the Performing Arts and surrounding areas, including the Virginia Avenue corridor.
- 3) E Street, NW within the 1974 Pennsylvania Avenue Plan and Monumental Core Framework Plan.”

Map 1: Streetscape Guide and Manual Boundary (page 6) shows the 1992 Boundary and the three Boundary Additions.

We welcome and support the extension of the Streetscape Manual Boundary to include Banneker Park, the Kennedy Center area, and portions of E Street, NW. These are important and relevant contiguous areas that are rightly tied into design considerations for the Monumental Core.

However, the C100 believes this map can be improved. The boundary for the addition of Banneker Park is clear. The boundaries for the “Kennedy Center and surrounding areas ...” and for “E Street, NW within the 1974 Pennsylvania Avenue Plan” are not as clear. Greater map clarity corresponding to the text would be useful. The map on page 76 makes the addition of the new boundaries clearer.

Proposed Streets

Map 1 includes several dashed lines indicating “proposed” streets but there is no description of what this means. Are these streets “proposed” but not yet approved by NCPC and the District, or have they been approved but not yet constructed? The C100 believes that some brief clarification of the status of these “proposed” streets would be useful.

Historical Information

There is no historical information in this Introduction which is important in setting the overall rationale for and context of the manual. The Committee of 100 suggests that an historical section be added in the Introduction. The following paragraph is a suggestion for such a section.

The L’Enfant Plan of 1791 and the McMillian Plan of 1901 created the preeminent American example of a comprehensive Baroque city plan with a coordinated system of radiating avenues, parks and vistas overlaid upon an orthogonal grid of streets. This defines the physical character of our nation’s capital through a symbolic and commemorative arrangement of buildings, structures, and views. The vistas and viewsheds are a key element in this draft and its ultimate execution.

Overview

In our comments we refer to this report as a “manual”. The manual is generally very clear and thorough, and the Committee of 100 commends the work of the various agencies in developing it and looks forward to its basis for future projects. We also look forward to seeing the work on Small-Scale Elements which will hopefully help to further minimize visual clutter and address security and other design issues.

While the manual is thorough and appears complete, it needs to be adaptable to change. Possibly some introductory text should suggest that amendments are likely to occur to address new uses, environmental changes, and other future requirements.

We have the following specific comments:

The term “public parking” first appears on page 8 and is used throughout the manual. In endnote 4 it is defined as “the area of public space devoted to open space, greenery, parks, or parking that lies between the property line, which may or may not coincide with the building restriction line, and the edge of the actual or planned sidewalk that is nearer to the property line, as the property line and sidewalk are shown on the records of the District. This area often includes spaces that appear to be front yards with private landscaping that create park-like settings on residential streets.”

While we recognize that this is local, longstanding term-of-art used in legislation and regulation, it is very confusing to the non-initiated within this context, i.e., talking about areas along streets. We would suggest using another term and footnoting it with the same definition and noting that the area is called “public parking” in law and regulation.

On page 6, the legend shows local streets as grey while they are actually white on the map. That should be corrected. Why are a few streets within the boundary designated “local”?

On page 9, one of the bullets refers to a “Companion Streetscape Review Guide” (CSRG) to be used for joint interest streets. Does this “Guide” exist? Clarification would be useful.

4. VERTICAL ELEMENTS

On pages 10 and 35, we suggest making the relevant elements black in the yellow shaded area so they stand out and reinforce the other side of the diagram-particularly if copied without benefit of color printing (i.e., trees and streetlights on page 10 and ground level - not planters and trash receptacles - on page 35).

Streetlights (Page 11)

The Committee of 100 suggests adoption of a goal of minimizing uplight and glare for all streetlights in the Monumental Core. Section 5-4 addresses this issue. The second and third sentences are especially important. For example, the numerous Washington Globes should be shielded/capped to reduce or eliminate upward light pollution.

Trees (Page 16)

On pages 17 (2nd and 3rd paragraphs) and 37 (under importance and Background), it would be useful to add the more general ideas that trees and landscaping are valuable assets in the built environment and mention that they can soften building facades. At the same time, it is important not to obscure the monumental architecture of the Nation’s Capital.

The District of Columbia has a goal to achieve 40 percent tree canopy target by 2032 (DC Comprehensive Plan, Environmental Protection Element, 2021, page 6-4). The Committee of 100 supports the effort to achieve that goal by planting additional rows of trees in the Monumental Core. But we urge reconsideration of locations where these trees can be added, while preserving the health of existing and future trees, without: (1) specifying the standards to be applied in making this determination, or (2) specifying the maximum number of rows suggested for each street when the standards are applied.

We urge that, in the selection and location of trees, the authorities be especially mindful of the projected root growth of the trees when they become mature, so that roots will not raise the sidewalk or multi-use trail, thereby creating a walking or biking hazard.

We also urge that proven metrics be used in evaluating recommendations to add a second or third row of street trees on other streets, and to specify the proposed number of tree rows on every street.

The Committee of 100 believes that it is important to preserve and enhance the elegance of Baroque vistas and architecture in Washington, since these are a very special characteristic of our city. The location and shape of trees should consider these broader special and important characteristics.

5. SURFACE ELEMENTS

Landscapes and Plantings (Page 36)

On page 40, we suggest that the text of L-10 be modified to say that the “lower limbs of canopy trees be trimmed to a height of 8 feet”, not the trees themselves as it currently seems to suggest.

Stormwater Management (Page 43)

Beginning on page 44 and continuing, reference is made to “stormwater management best management practices”. It seems like it might be clearer to just say “stormwater management best practices” similar to the heading on page 45. (Note BMP used as abbreviation in chart on page 46).

On page 47, suggest SM-10 be modified so the exemption only applies until the area is redesigned.

On page 50, in SM-24, the draft raises the important issue of stormwater management increasing disability access but it is not clear how it might do that. An example would be helpful. Also, it might be worth saying that it should also not impede accessibility or should minimize impacts on accessibility in how it is designed and implemented.

On page 50, SM-28 states the “internal width” of the tree box should be a minimum of 4 feet. It is not clear whether that means width from curb to sidewalk, or width parallel to street and sidewalk, or both the width and length, or 4 feet on all sides of the tree, or 2 feet on all sides of the tree?

Pavements (Page 52)

On page 58, P-23 and P-24 seem to be in conflict. P-23 suggests matching paving of medians to sidewalks, but P-24 says to use porous materials.

Pedestrian Circulation (Page 64)

On page 66, in the “Principle” introduction, add a second sentence, “In designing circulation routes, consider options for shaded bench locations that provide places for rest and facilitate interaction or independent pause.”

*On page 70 in section PC-21, add “f. **Bicycles:** Add a section about bicycles where appropriate.*

*On page 73, in the “Principle” introduction and in Section **PC-24**, revise the wording to add that bicycle circulation should not be obstructed by perimeter security elements.*

On pages 76 and 77, the term “geofenced” needs to be explained.

On page 77, in PC-32, the last bullet about the Central Business District describes where bicycles may be ridden. Should we infer that includes “on streets”?

6. ENDNOTES (Page 78) AND APPENDICES

There are three pages of Endnotes (same as footnotes but at the end of the report) and there are 47 pages of Appendices covering 11 different subjects, generally following the order of the subjects in the main part of the report.

WASHINGTON WATERFRONT WALK

Finally, the Committee of 100 strongly suggests including and giving prominence to what we call the “Washington Waterfront Walk”. Washington D.C. has waterfronts along the Potomac River, the Washington Channel and the Anacostia River and much of these areas are parklands. In 1997, the National Capital Planning Commission called for connecting these areas from Georgetown to the Thomas Jefferson Memorial grounds, then southwest along the Washington Channel, and then east and north along the Anacostia River to the National Arboretum. In the past 25 years, considerable progress has been made, especially with the Anacostia Riverwalk Trail. We note that the “Washington Waterfront Walk” is a “planning concept” name used by the Committee of 100 and that it is made up of various sections, such as the Anacostia Riverwalk Trail.

A prominent section of this overall waterfront trail from Georgetown to the Jefferson Memorial and then northeast to Maine Avenue is included within the “Monumental Core” as defined in this report. The Committee of 100 recommends giving greater prominence and priority to this key planning concept.

SUMMARY

Thank you for the opportunity to comment on this important draft. The Committee of 100 commends the extensive and impressive work of the NCPC and the National Mall Interagency Working Group. We have tried to address some issues which we believe need attention or are not clear. We look forward to hearing about other comments. We hope that NCPC can summarize the main issues raised and provide information on the next steps. We believe that this is important work, and we look forward to future adoption of the “Monumental Core Streetscape Design Guidelines: Vertical and Surface Elements”, as it may be revised based on comments from agencies, organizations and individuals. If you have questions on any of the points raised in our comments, please contact us.

Sincerely,



Kirby Vining, Chair
Committee of 100 on the Federal City

cc: Elizabeth Miller, FASLA, AICP
Director, Physical Planning Division

Meghan Dowker, Senior Planner