

# The Committee of 100 on the Federal City



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Washington, D.C. 20004

**SUBJECT:** The Committee of 100 on the Federal City Comments on the Final Draft of the Federal Elements of the Comprehensive Plan for the National Capital

Dear Mr. Acosta:

The Committee of 100 on the Federal City (C100), founded in 1923, is the District of Columbia's oldest citizen planning organization. We are pleased to provide comments on the NCPC Executive Director's Recommendations for the Final Draft of the Federal Elements of the Comprehensive Plan for the National Capital, which NCPC authorized release on October 1, 2015 for a public comment period from October 3 to December 7, 2015. It is our understanding that after the review period is completed, NCPC staff will make any revisions they believe are needed and bring a revised final draft back to the Commission in early 2016.

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 and design work of the McMillan Commission (1901-02) and now carrying forward in the 21<sup>st</sup> Century appropriate plans and projects to continue to enhance Washington, D.C., our national capital city, the home of Washington residents and the center of the National Capital Region.

The Comprehensive Plan for the National Capital, composed of Federal Elements and District Elements, is an important guide in shaping the future development of Washington, D.C. The Committee of 100 on the Federal City is appreciative of the work that the National Capital Planning Commission, both staff and Commission members, have invested in preparing this package of the final draft Federal

Elements. The seven Elements in this final draft package have all been released for public comment over several years, and C100 has submitted comments on four of the Elements. We are pleased now to be able to look at all seven elements, together with other material, in one package, and our comments follow.

## **Introduction**

The Introduction is an excellent addition to the Federal Elements of the Comprehensive Plan. It is clear and eloquent providing a good history and context for the plan and an appropriate description of values and vision as background for the rest of the elements. It is an excellent statement on what makes planning unique for the nation's capital, the planning legacies of both the L'Enfant Plan and the McMillan Plan eras, and the guidance of NCPC's Extending the Legacy Plan for future planning.

However, C100 is concerned that the Height of Buildings Act of 1910 is not highlighted in the same manner as the L'Enfant and McMillan Plans are in the Introduction as an essential part of past, present, and future planning in the nation's capital. We believe this is especially important because of the year-long review and candid discussion that took place in 2013 focused on increasing building heights throughout the District of Columbia, and NCPC's own expression of concern about the threat of overbuilding in the Monumental Core, and by inference in areas immediately adjacent to it and elsewhere in the District of Columbia. While it is not a plan, it is a federal law and has certainly had a significant impact on the shape and development of the city—establishing its iconic skyline and providing the mechanism for protecting important views and vistas.

On page 4 it says that “Open space and parkland are as important today as when the site for the nation's capital was first selected.” In fact, they are probably more important for a variety of reasons including that there are more people living here and that the area is more built up. However, they are also more important now than at the city's founding for purposes like political expression and cultural activities, both of which should be included in the description of their value to the Federal interest.

On pages 8 and 10, we recommend that the term “smart growth” be dropped and replaced with some other phrase. While the concept is good, it has become a somewhat loaded and divisive buzz word/phrase in recent years being used by some to promote density in total disregard of historic preservation and neighborhood character. Some of its proponents use it to disparage other opinions and priorities implying that those would be “stupid growth”.

On page 12, the first paragraph says that the plan “identifies and addresses the current and future needs of federal employees and visitors . . .” The policies in the plan do address residents as well, and residents should be included in this paragraph.

## **Urban Design Element**

C100 is pleased to see this new Element in the Federal Elements of the Comprehensive Plan and the related Urban Design Technical Addendum which together address many of the key design issues of Washington, D.C. and provide a base for future study and refinement of urban design issues. The District Elements of the Comprehensive Plan already have an Urban Design Element so it is especially important that the Federal Elements also address urban design. We are pleased to see the “Planning Together” statement on page 3. C100 believes that while the federal and District aspects of urban design are somewhat different, it is essential that the two be integrated. We are also pleased that there is major attention given to the importance of the Height of Buildings Act as a key influence on the design of our city.

C100 believes it is useful to emphasize the national capital role of Washington D.C. and the various federal and national urban design interests throughout the city. Overall, the draft has excellent use of pictures and maps, though there are some maps and graphics that need some improvements in terms of captions and readability. We believe it is important to emphasize the key views and vistas which are an important part of the urban design and image of our city. This is done both in the Urban Design Element and in more detail in the Urban Design Technical Addendum. The discussion of the role of federal parks in neighborhoods as part of the livability and identity of Washington is important. We are pleased to see the point (page 8) about the importance of the monumental design of Metrorail to the image of the city, even though much of this design is underground.

More detailed discussions of various aspects of the Urban Design Element are outlined below. These C100 comments on the Urban Design Element should be read in conjunction with our comments on the Urban Design Technical Addendum.

### Plan of the City of Washington

First on page 5 and in numerous other places, the “Plan of the City of Washington” is mentioned as encompassing the L’Enfant Plan and the Senate Park Committee Plan (McMillan Commission Plan). This area is essentially the area of the original L’Enfant Plan, with addition of areas added by landfill along the Potomac and Anacostia Rivers, such as West and East Potomac Parks and areas along the west bank of the Anacostia River. C100 is very supportive of the importance of the L’Enfant Plan and the McMillan Commission Plan, both in the past and in the future. But of course, the planning and development of the area termed the “City of Washington” has continued to evolve for the past 224 years. Especially in the past century, the development of the city has been guided by the National Capital Planning Commission, the Commission of Fine Arts and the District government.

While celebrating the key roles of the L’Enfant Plan and the McMillan Commission Plan, C100 believes that it should be clear that the “Plan of the City of Washington” continues to evolve, with contributions

from NCPC and other federal agencies, the District government, the private sector, a number of Business Improvement Districts (BIDs), and citizen organizations. We note that page 6 in the Urban Design Technical Addendum includes a partial list of relatively recent plans that have influenced, and will continue to influence, the “Plan of the City of Washington”. It may be useful to be more specific about the various recent plans for this area, both federal and District.

Discussions of the L’Enfant Plan should be clearer that the Plan provided an initial overall framework but the plan area has developed within that framework in different ways over the past 224 years. The note on page 27 on closing L’Enfant Plan streets might be qualified somewhat.

It is important to keep in mind that Washington D.C is one city. There is some feeling in reading the draft Urban Design Policies that the “L’Enfant City” area is more important. While federal interests are more concentrated in the center of the city, it should be clear that there are federal interests throughout the city. It should also be clear that federal and District interests together are important and exist throughout the entire city, and that the “quality” of the entire city, as our nation’s capital and representative of our country to the world, is itself a federal interest.

#### Views and Viewsheds

The importance of vistas and viewsheds, both along streets and in other situations, is a key part of the Urban Design Element. We believe that discussion of some views and vistas can be clearer. C100 comments on this important subject are found in our comments on the Urban Design Technical Addendum. We are pleased to see the discussion of the Florida Avenue Escarpment and the Anacostia Hills as important topographic features that shape the design of the central area, and adjacent areas, of Washington.

There is major interest and attention on the “Monumental Core” in the draft. This is a defined planning area, mostly in Washington but also extending into Virginia. There is a note on page 13 about the Monumental Core possibly being expanded, but it is not clear what that means. We do believe that being clearer about the importance of this area, and its components, is important. The links to adjacent areas should also be stressed more.

#### Signage and Visual Clutter

C100 strongly agrees with the statement on page 5 about the importance of hiding or diminishing utilitarian infrastructure that has resulted in the ban on overhead streetcar and utility wires within the L’Enfant City. We would argue that the concept (including streetcar and utility wires) is equally important for the entire city, and we would like to see it expanded. We would also like to see more discussion and policies under General Urban Design Policies (pages 22 and 23) regarding the concept of hiding or diminishing utilitarian infrastructure and the problem of “visual clutter” and its negative impact on the urban environment.

Electronic signage is one element and there is a policy on the topic on page 22, but more discussion of the impacts is needed. The District of Columbia Department of Transportation released proposed new sign regulations for public comment in June 2015. NCPC is aware of these draft regulations. C100 is very concerned about the adverse impact these revised sign regulations could have on our city. Such signage in certain areas could have an adverse impact on important views from the Monumental Core and along the city's waterfronts. Increased electronic and other signage could have a serious impact on both the federal interest and the local interest.

### Waterfronts

The waterfronts of Washington are already an important urban design feature of the city, and will become even more important as waterfronts are further developed and linked together. We are pleased to see more discussion of waterfronts in this revised Urban Design Element (especially on pages 23-25) but we suggest more emphasis is needed. The creation of an overall waterfront design (varying in different locations) is very important. It is important to link waterfronts together and to make them more accessible. Much work is already underway by the National Park Service and private developers. There are various waterfront plans, including the section of the NCPC *Extending the Legacy Plan* (1997) that called for a waterfront walk from Georgetown to the Washington Arboretum. C100 calls this the "Washington Waterfront Walk". It may be that waterfronts are to get more attention in the forthcoming Parks and Open Space Element. However, C100 believes that more attention on waterfronts is needed in the Urban Design Element. Note that waterfronts receive more attention in the existing District Urban Design Element.

### The Potential of Anacostia Park

C100 is very interested in the potential of Anacostia Park. We understand that Anacostia Park will likely receive much more attention in the future Parks and Open Space Element, but we believe more attention on this area is needed in the Urban Design Element, especially since the federal government has such an important role in realizing the potential of this area. The federally controlled Anacostia Park encompasses 1,800 acres of open space and has 22 miles of linear shoreline.

C100 recommends that the Federal Elements of the Comprehensive Plan, including the Urban Design Element, give great attention to this key park area, and related areas. There should be a recommendation for implementation of the Anacostia Waterfront Plan, the 2003 Plan created by NCPC, the National Park Service and the District government, which proposed development of both sides of the Anacostia River as parkland with public access to the waterfront, cleaning up the river to permit boating, fishing and swimming, and completion of the Anacostia Riverwalk Trail (part of the overall "Washington Waterfront Walk"). Some parts of this plan have already been achieved, additional implementation is underway, and of course some sections of the Plan may need revision or updating. Decisions on the future use of the "RFK Stadium Area" will be especially important.

In addition to being part of the Anacostia Waterfront Plan work (2003), NCPC has addressed planning and environmental issues in this area in at least four plans over approximately the past 20 years. These include *Extending the Legacy: Planning America's Capital for the 21<sup>st</sup> Century* (1997), *Washington's Waterfronts-Phase I* (1999), *RFK Stadium Redevelopment Study* (2006), and *Capital Space-A Park System for the Nation's Capital* (2008). These studies are a base for more emphasis on Washington's waterfronts, especially along the Anacostia River.

We believe that more discussion of "federal campuses" in Washington D.C. is needed. The discussion on pages 38-39 would benefit from a map of federal campuses, lessons learned, and a discussion of existing and potential future federal campuses in Washington. We realize that much of the discussion in this section deals with federal campuses and land throughout the Washington Metropolitan Region, but we believe more discussion of federal campuses in Washington is needed.

### Historic Preservation

Historic Preservation background and policies are outlined in the separate Historic Preservation Element. However, we note that the role of historic preservation is very important in the urban design of Washington. The large number of historic districts (60) and the large number of contributing buildings (27,000) are an important element of the city's design quality. Some mention of the role of historic preservation in the urban design of the city would seem to be useful, while of course referencing the Historic Preservation Element for detailed descriptions and policies.

### Civic Education for Urban Design

Looking at the revised Urban Design Element, we were struck by the opportunity it opens for a wider "civic education" program about the history of the planning and development of Washington, D.C., the importance of the natural and man-made features of the city, etc. Any good planning report is a form of "civic education" but this element suggests more. For example, a guide to "Exploring the L'Enfant City", views into, out and over the city, could be outlined more in the future. NCPC may do some more design "civic education" at a future time, may do it in cooperation with other agencies or organizations, or it may be done by other organizations alone or by individuals. Despite many guidebooks and background books for Washington, there are not really guides of this type. We believe there is a need to encourage a continuing civic discussion about the overall physical form and urban design of our city, and the relationship to economic and social goals.

## **Urban Design Technical Addendum**

The Urban Design Technical Addendum is also new and provides background information for the proposed policies in the Urban Design Element. It also includes suggestions for future study. The

Technical Addendum begins with “I. Formative Contributions to Washington’s Urban Design Framework”. The first part of this section is “A. Plan of the City of Washington” which provides a summary of the L’Enfant Plan and the McMillan Commission Plan (pages 1-3). As indicated in our comments on the Urban Design Element, C100 believes that discussions of what is termed the “Plan of the City of Washington” of course draws strongly on the L’Enfant Plan and the McMillan Commission Plan, but should clarify that other plans have been important in the past and will be important in the future. Also as indicated in previous comments, C100 is pleased to see further discussion on the Height of Buildings Act and how it affects the urban design of Washington (pages 4-6).

“Part II. Viewshed Policy Framework” is the major part of the Urban Design Technical Addendum. As indicated on page 9, “NCPC prepared this section to the Technical Addendum to explain the planning approach to viewshed protections” and this background material continues for pages 9-16. A map on page 17 indicates the major vistas and viewsheds extending from within the L’Enfant City area and in some cases extending out into other sections of the city, or west or south into Arlington County. All of these are vistas and viewsheds are important. However, C100 comments below only deal with some of the vistas and viewsheds. In making these comments, we understand that the discussions in the Urban Design Technical Addendum are intended to provide a base for more detailed studies in the future.

The “Primary East-West Vista” (pages 18-19) is the key vista west from the Capitol west along the National Mall and on to the “Arlington Ridge” in Virginia. C100 believes that this important “view to the west” along the National Mall is very important and that the issues with respect to Arlington Ridge might be amplified.

The “South Capitol Viewshed” (pages 22-23) is important in itself but also in terms of the future new development both east and west of South Capitol Street, and in a future critical connection of the “Washington Waterfront Walk” through this area. As in many of the other vista corridors, this needs to involve cooperative study and actions by both NCPC and the District Office of Planning.

The “Pennsylvania Avenue, NW Viewshed” (pages 26-27) is especially important since it involves the vista from the White House area to the Capitol. Improving the visual setting and activity patterns along Pennsylvania Avenue, and extending into adjacent areas, is very important. NCPC is leading the ongoing “Pennsylvania Avenue Initiative” and some updating of this section seems desirable to indicate recent and projected planning and development actions.

The “Maryland Avenue, SW Viewshed Inventory” (pages 28-29) is especially important and challenging because, as indicated on page 28, “the sunken CSX rail line currently dominates a significant portion of the street”. Both NCPC and the DC Office of Planning have grappled with this issue in recent studies and further study and actions on this problem are necessary. C100 would also like to see a commitment for future study of how a pedestrian connection between Maryland Avenue at 14<sup>th</sup> Street, SW and the Tidal Basin can be achieved.

The “North-South Primary Vista and Viewshed” (pages 30-31) involves the view south from the White House past the Jefferson Memorial, across the Potomac River and on to the south. This is a very important viewshed. Although additional study is needed, C100 believes that some additional elaboration about potential problems for this viewshed would be useful.

The “Pennsylvania Avenue, SE Viewshed, East Capitol Street Viewshed, and Maryland Avenue, NE Viewshed” (pages 30-31) are all important as they radiate out from the L’Enfant Plan area to the southeast, east and northeast. The Pennsylvania Avenue, SE and the East Capitol Street viewshed each extend east over the Anacostia River and up and over the Anacostia Hills to the east. The Maryland Avenue, NE Viewshed passes up to the top of the hill northeast of Florida Avenue before descending to the grounds of the National Arboretum. All three of these viewsheds therefore need to be studied and treated somewhat differently than the usual relatively flat viewsheds.

C100 is very interested in the vista and viewshed of East Capitol Street from the east back toward the “L’Enfant City” and the vista of the Capitol dome. Future decisions about RFK Stadium and the future development of the “RFK campus” are very important in this respect. As indicated in the previous comments on the Urban Design Element, C100 is very interested and supportive of the concept of major park development along the Anacostia River. The East Capitol Street viewshed is an important part of that concept.

The “Inventory of Significant Vistas” (page 33) and the “Urban Design Framework/Open Space Network” map (page 34) provide a useful summation of the concepts in the Urban Design Technical Addendum.

## **Federal Workplace Element**

We commend NCPC for the specific recommendations fostering environmental stewardship, including sustainable locations, encouraging green buildings, reducing greenhouse gas emissions, and conserving and protecting water resources. We agree that prioritizing federal workplace locations in the Central Employment Area is an important goal and will contribute to realizing other environmental goals.

Based on recent experience with DC government's handling of the Walter Reed Army Medical Center (WRAMC), C100 suggests a revision in the process for disposition of excess properties with significant open space (page 15). The recommendation states that "federal agencies should work with the community to undertake plans for economic development and/or use the property or facilities for other public (including open space) and private uses." Working with the community in advance, with adequate public notice, and an opportunity to be heard, should be mandatory. After WRAMC was transferred to the DC government, the DC government pursued high-density development at the expense of preserving open space, a disappointment to many DC residents. For these reasons we believe that working with the



community in advance of any federal property disposition should be mandatory, and in addition, that any future transfers of land with significant open space must include enforceable covenants to preserve specific and quantified areas of green space in perpetuity. Alternatively, consideration should be given to transferring such excess land to the National Park Service.

### Federal Employment Levels in DC

The plan aims at giving the District at least 60 percent of the region's level of combined civilian and military federal employment. NCPC should establish separate goals for (i) civilian employees, (ii) uniformed military employees and (iii) civilian workers assigned to military installations. The latter two groups, especially uniformed employees, generally contribute less to the District's economy, not buying houses, furniture or other major items.

Nor do military installations offer a significant source of direct, non-uniformed employment for District residents. As NCPC is aware, the security requirements of installations foreclose employment opportunities to many members of the District's minority community, where unemployment is highest. Non-military, low-security employment is most likely to maximize economic benefits accruing to the District.

In a separate but related point, because many of the federal employees who work in the city live in the suburbs, the District does not reap economic benefits that correspond to its percentage of federal employment. Compare Hawaii and Alaska, where the entire impact of federal employment necessarily is felt by those states.

Therefore, C100 believes it may be appropriate to establish separate goals for military and non-military federal employment in the District to give a clearer picture of the impact of federal employment on the District's economy.

### Evaluating the Central Employment Area.

The draft Federal Workplace Element keeps the same boundaries for the Central Employment Area (CEA) as found in the 2004 Plan. C100 agrees with the current boundaries and opposes any proposal to extend the CEA boundaries to match or approximate the expanded Downtown zones contained in the new zoning code developed through the Zoning Regulations Review (ZRR) process.

The draft plan notes that "the Comprehensive Plan defines the CEA," but lacks a "specific process to review or update its boundaries," and suggests that an assessment tool be developed. If NCPC decides to create a formal assessment process for determining CEA boundaries, we suggest that the process be developed and adopted in conjunction with Federal Element Plan updates, when public attention is focused on the Plan.

The draft plan also suggests expanding the traditional role of the CEA as the priority location for government offices to include an added function: serving "as a tool to support [the District's] infrastructure needs and other reinvestment efforts." This is the context for the draft plan's proposal to establish an assessment process. Using the CEA to drive reinvestment in the District requires caution. Our principal concern is that the CEA not be used as a vehicle for an ever expanding downtown, bringing maximum heights and densities to increasing areas of the city. As noted above, the new zoning regulations designate a downtown area triple the size of the existing downtown. If NCPC gives this area the CEA imprimatur, it is likely to hasten the area's actual development at downtown heights and densities. Note: The Comprehensive Plan Glossary defines the CEA as "a legal definition used primarily by the federal government ... *and synonymous with the major concentration of federal and commercial land uses in the core of the District of Columbia.*" (Emphasis added.)

A number of neighborhoods throughout the city need reinvestment at less than downtown densities. These areas need additional housing and improved neighborhood commercial centers and to that extent are inappropriate for CEA designation. Accordingly, we urge NCPC to think carefully about what it hopes to accomplish by using the CEA to drive reinvestment. In particular, it should consider whether an enlarged CEA is likely to contribute to ongoing displacement of longtime residents, and whether the CEA is likely to lead to jobs for residents most in need of them.

As a final note, the maps and text at pages 43-44 of the 2004 Plan provide useful background for understanding the purposes of the Federal Workplace Element and the role of the CEA. Among other things, the 2004 Plan describes in some detail the D.C. City Council's prior actions to amend the CEA boundaries and NCPC's refusal to adopt the Council's most recent revisions in 1998. We ask that this important material be included in this new version of the Federal Workplace Element.

### Repurposing Federal Facilities

As discussed in the Draft Plan, when Walter Reed Army Hospital was closed under BRAC procedures, the site was divided between the District for development as a town center and the federal government as a site for embassies and chanceries. For the District, this is a more effective way of leveraging the federal presence for reinvestment than a CEA expansion. Giving the District control of St. Elizabeth's East Campus is another such instance.

The Draft Plan does not address St. Elizabeth's West Campus, despite reports that plans to consolidate the Department of Homeland Security operations at that site have been abandoned. We believe the Draft Plan's silence on that site leaves a significant hole in the plan. If no final decision has been reached, which is likely the case, then a review of options for the site's future use could be included. We urge that if there is a change in plans as much of the site as possible be dedicated to uses that do not require shutting off the site to public access and improved employment opportunities for area residents. This means no high-level security requirements. This would be consistent with proposed policy FW.A.3.3

(locating federal workplaces to support the creation of employment opportunities in economically distressed areas). Instead of the CEA designation, sites identified under F.W.A.3, criteria 3 should be identified as something like "federal opportunity areas." For the reasons discussed above, such sites should not be developed to downtown heights and densities.

## **Foreign Missions & International Organizations Element**

While foreign missions rightly belong in the capital city, it is important that they be respectful of the places they are located. This is true of ambassadors' residences and international organizations, as well as chanceries, where all the critical policies are currently focused.

### Apply Chancery Policies More Broadly

We strongly urge that the proposed Policies Related to Chancery Facilities also be applied to Ambassadors' Residences and International Organizations. The current policies for the latter two are too limited and inadequate to address the kinds of impacts such can have. The Urban Design, Historic Preservation, Open Space and Parkland, and Access policies to be applied to Chancery Facilities would also be appropriate for Ambassadors' Residences and International Organizations. This would also help emphasize the importance of ambassadors' residences and international organizations being sensitive to residential neighborhoods.

### Protecting Neighborhoods

We would like to see stronger policy statements throughout this element that explicitly reference avoidance of adverse impacts on residential neighborhoods and protection of the existing urban fabric. The most elaborated policies are articulated for chanceries, but ambassadors' residences and international organizations can have significant impacts, as well. Special functions, parking, setting up and dismantling for events, and delivery trucks have negative impacts on residential neighborhoods. In addition, as security fences and guard booths have become increasingly necessary, so has the importance of making sure that they are sensitive to neighborhoods. These activities and improvements can have significant impacts whether they are associated with chanceries, ambassadors' residences, or international organizations.

We specifically recommend that the policies on foreign missions be strengthened in regard to avoiding adverse impacts on residential neighborhoods in addition to being "sensitive to the character and use patterns of the city's neighborhoods" (p. 1 opening statement). For example, we suggest on page 1, paragraph 2) it say, "...acknowledge **and maintain** the unique characteristics of Washington's

neighborhoods.” Foreign missions (including ambassadors’ residences and international organizations) should be sympathetic to and compatible with their neighborhood.

We also suggest that some additional policy attention be given to guard booths, fences, and other security improvements. These have recently become quite contentious and some additional policy guidance would be helpful. Specifically, we believe there needs to be a stronger policy statement about having ambassadors' residences compatible with the residential neighborhood, while recognizing security requirements. Fences and other security improvements can significantly undermine the open, residential feel of a neighborhood especially when they are allowed on public space.

### Locating Chancery Facilities

The location of chanceries (which are essentially office buildings) in residential areas is undesirable. We therefore recommend that the statement on page 14 be changed from “Evaluate the availability of chancery sites in matter-of-right areas prior to considering sites within areas that are primarily residential in nature.” to “Give priority to locating chanceries in matter-of-right areas prior to considering sites within areas that are primarily residential in nature.”

It appears that the locations where chanceries will be permitted as a matter-of-right will be greatly expanded under the newly approved DC zoning regulations. A map that identifies the areas where chanceries may locate as a matter-of-right would be very helpful.

### Other Specific Recommendations

On page 12 in the second paragraph it says: “These areas should have **special building heights consideration** . . .” This vaguely alarming statement should be deleted or elaborated to explain what is meant.

On page 12 in the third paragraph, why is there a distinction being made “in areas where chancery uses are already present”? Wouldn’t new ones be expected to have similar impacts? We suggest that introductory phrase be deleted.

On page 12 in the fourth paragraph it says that “chancery functions” should be “sensitive to the character and use patterns of the city’s neighborhoods”. We recommend that this be changed to say “**chancery and** chancery functions” since they both ought to be sensitive.

On page 14, suggest rewording FM.B.4 to say “Locate chancery facilities in area where adjacent existing and proposed land use and zoning are compatible (e.g., office, commercial, and mixed use), giving special care to **avoiding residential areas and** protecting the integrity of residential areas **nearby**.”

On page 16, add “events” to FM.C.17 and strengthen the public space protection policies in FM.C.22.

## **Transportation Element**

C100 is pleased to see the continued emphasis in the Transportation Element on the close coordination of modes, the expansion of transit and non-SOV means of travel, and encouragement of transportation management plans (TMP) for smaller federal work sites. We would like to see more consideration of the need for improvements to accommodate growing commuter rail, and we suggest that more thought should be given to the impact of evolving technologies on transportation strategies, including the safety and cost factors of for-hire services. In our comments below we also note an absence of consideration of the impact of streetcar wires and the need for analysis of modern propulsion systems.

C100 appreciates inclusion of the breakdown of Federal employee commuting patterns between 1994 and 2008 (page 2), and we are encouraged to see that the decrease in commuters using single occupancy vehicles (7%) and decrease in carpooling (2%) has been made up by a nine percent increase in commuter transit. C100 strongly suggests that to better evaluate this trend, transit should be broken-out by Metrorail, Metrobus, commuter rail and Amtrak. Such a breakout will demonstrate that the smallest contributor to transit, commuter rail, has the greatest potential to carry additional commuters. Currently, MARC trains have an average weekday ridership of 36,685 and VRE has a daily average ridership of 18,000 (page 2). Current plans of MARC show that ridership will increase to 75,000 daily riders by 2040 (*MARC Growth and Investment Plan Update 2013 to 2050, September 9, 2013*). VRE projects they will be able to carry up to 50,000 weekday passenger trips by 2040 (*Virginia Railway Express System Plan 2040 Brochure, March 27, 2014, page 3*). The total amounts to 125,000 riders per day, or five times the number of commuters that the new Metrorail Silver line can carry.

Just as page 3 of the Plan states that “The federal government can support these future transit facilities and reinforce the region’s planned Regional Activity Center-based growth as developed in the MWCOG’s *Region Forward Plan*”, so also the federal government needs to support and reinforce the future transit plans of MARC and VRE, as well as the new DC Rail Plan that is now being prepared.

### Transportation Management Plans (TMP)

C100 applauds requiring specific proposed actions and timetables for TMP implementation. However, C100 recommends that NCPC tie this section more closely to Section B. Policies Related to Transportation Demand Management and Section D. Policies Related to Parking and Parking Ratios, including combining them to avoid overlap and redundancy. For example, in our comments below on parking, we describe current city plans to omit parking requirements for new developments in the expanded downtown area, as posing potential consequences for federal agencies, current TMPs, and the affected communities. This could be more clearly described and recommendations made more meaningful if these related items were discussed as one set.

### Integrated Regional Transit

We were pleased to see in the introduction under Growth of Regional Transit that the growing role of commuter rail (CR) in the region is identified. However, except for a general call to expand levels of service for CR (T.C.2), there is no further discussion of the serious impediments to new commuter rail capacity posed by rail infrastructure at capacity and the need for public-private cooperation to address the issue, especially to relieve congestion at and near the Long Bridge. The Federal government could play a very useful and constructive role in addressing this need. We also think CR should be mentioned in T.C.5.

We support the goal (T.B.4, page 5) to “Create partnerships with federal agencies and local governments that support multi-modal commuting and shorter commute times...” Currently there are only two multi-modal facilities that serve commuter rail: L’Enfant Station and Union Station. MARC has instituted reverse commute and weekend service. In the future, VRE plans to “thru-run” trains from Virginia through Union Station and on to Maryland.<sup>1</sup> The construction of commuter rail stations along the Penn, Brunswick and Camden Lines in proximity to existing Metro station would optimize the utilization of the thru-running VRE trains and reverse commuting MARC trains and provide connections between Metrorail stations.

T.C.3 mentions the Northeast Corridor and points south, but we believe that encouraging use of Amtrak should be included also in Section G on non-auto transportation and tourism. While the Maryland and Virginia communities have similar characteristics in terms of commuters who work in DC, the two-to-one difference in MARC versus VRE ridership (MARC: 36,000+, VRE: 18,000) demonstrates an infrastructure problem that needs to be addressed. Capacity constraints imposed by the Long Bridge and the SW tracks are major reasons for the difference in Maryland versus Virginia commuter rail ridership. They are bottlenecks to commuter, passenger and freight rail that cross the Potomac River. Page 12 of the draft underscores the importance of “reducing the barrier-effect of the Potomac and Anacostia Rivers.” Previous and ongoing plans assume that expansion of the Long Bridge and the provision of four tracks in SW for freight and passenger rail will accommodate freight, passenger and commuter rail. But because of the narrow width of the depression in which the tracks are located along Maryland Avenue, the three SW tracks cannot be expanded to four tracks. Separation of commuter rail and Amtrak from freight rail with a new, separate river crossing for freight would relieve these capacity constraints. In 1997 NCPC proposed a rail tunnel under the Potomac River between Virginia and Anacostia in their plan *Extending the Legacy: Planning America’s Capital for the 21st Century*. In Virginia, the tunnel was

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<sup>1</sup>In May of last year MARC and VRE announced they are planning a true regional rail partnership to thru-run MARC to L’Enfant Station and on to Virginia and to extend VRE from Union Station into Maryland (<http://www.nbcwashington.com/news/local/MARC-VRE-Discuss-Regional-Rail-Partnership-259>).

proposed to begin south of National Airport and in Anacostia, the alignment would follow the Shepherds Branch tracks.

The Comprehensive Plan should endorse DDOT's recent effort to develop a comprehensive DC Rail Plan. The rail operations in DC consist of freight (CSX and NS), passenger (Amtrak) and commuter (MARC, VRE and Amtrak Virginia<sup>2</sup>). Except for the NE Corridor, commuter and passenger rail in DC operate on tracks owned by CSX that also controls schedules and priorities. Additionally, much of Metrorail's above-ground trackage is located in or adjacent to Amtrak and CSX rights-of-way. The Rail Plan should detail heavy rail safety and hazardous cargo issues near the nation's capital and what a heavy rail accident could mean for both the safety of residents in DC and rail backups down the East Coast. The recent decision that the Federal Transit Administration takeover the safety oversight and enforcement for Metrorail means that DC needs to have similar safety oversight over heavy rail. The Comprehensive Plan should support and reinforce the development of the DC State Rail Plan.

#### Parking and Parking Ratios

We find T.D.1 and T.D.2 inconsistent and suggest they be combined.

C100 agrees with the statement in the introduction that "Federal, state, and local land use and transportation policy decisions are interconnected, and must be coordinated to develop long-term solutions for the success of the region". We also agree that the federal government is in "a unique position to provide leadership regarding transportation decisions". In that regard, we believe that the NCPC's approach to parking seems to be driven by an abstract formula that fails to take into account the potential consequences—largely unexamined by the city—of several District policies that will result in substantial changes in parking supply. The new zoning regulations omit parking requirements for new developments in the expanded downtown and thus affect any assumptions about parking for federal workers. Decisions on how much parking to provide will be left entirely to the private for-profit sector. Thus, private parking supply in the downtown area cannot be influenced by public policy. The important and growing concern over neighborhood parking in areas that are contiguous to Federal facilities needs to be addressed realistically and steps taken to provide adequate parking for federal employees so as not to exacerbate this problem. Logically, the TMPs would be the place to directly address this issue and agencies should also analyze locations with this in mind when TMPs are not required.

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<sup>2</sup>Amtrak Virginia, in partnership with the Virginia Department of Rail and Public Transportation, operates nine daily round trip trains between Washington DC and Richmond, two daily trips between Washington DC and Lynchburg, and one daily trip between Washington DC and Charlottesville (page 3-19, *Virginia Statewide Rail Plan*, November 2013).

NCPC should also look at DDOT's *Curbside Management Study* as it relates to the growing challenges of servicing businesses and offices in DC. DDOT's approach is to recognize that a range of options is needed to meet the varied needs of diverse neighborhoods and areas of the city. The report acknowledges that public space cannot accommodate the growing number of users for finite curbside space and that trade-offs will be necessary. The Zoning Commission has further complicated the potential citywide dialogue that DDOT envisions by limiting private developers' responsibility for providing off-street parking and loading to accommodate newly created demand, thus transferring the demand to the public curbside.

We agree with the recommendation T.D.5 that parking should be placed below ground. But the city's policies that require little to no parking are forcing more and more parking to the streets without data showing a decrease in demand or absolute numbers of car ownership. Realistic Federal parking policies must be accompanied by careful analysis of the implications of changes in the DC zoning regulations, and the city's response to the challenges posed in the *Curbside Management Study*.

#### Streetcar Wires

We strongly urge NCPC to include its concerns about overhead streetcar wires, perhaps in the Urban Design Element. Overhead streetcar wires are expensive and potentially unnecessary. The installation of stanchions and overhead wires on the H St./Benning Rd., NE streetcar route is unsightly and not befitting the future of this rapidly developing area. The proposed extension of the streetcar from Union Station to Georgetown will directly impact the views embedded in the L'Enfant Plan if overhead wires are used.

NCPC has long been concerned about the presence of overhead wires from streetcars, issuing a report on the topic in 2006. In a Jan. 25, 2007 (NCPC File NO. 6686) extract from the staff recommendations, the Executive Director noted:

*The Commission has a federal interest in retaining and protecting the nationally recognized and significant open vistas of the rights-of-way of the L'Enfant Plan, which is protected by listing in the National Register of Historic Places and in the D.C. Inventory of Historic Sites.*

*The recommended approval of the demonstration project does not connote the Commission's acceptance of a future streetcar system that uses an overhead contact system within the L'Enfant City and Georgetown.*

*DDOT should return to the Commission for review of every segment of a streetcar system.*

*Both the District of Columbia government and the National Capital Planning Commission share the goals of protecting the integrity of Washington's characteristic open streets and of meeting public transit service needs. These goals should be weighed together and a streetcar system should be considered as a whole before irrevocable decisions are made concerning one segment.*



DC is currently in violation of DC Code § 9-1174 that requires DDOT to file a comprehensive assessment of *Advances in Propulsion Technology* by January 1, 2014 and every three years thereafter. The city has not undertaken a detailed study of new technologies as required by the law.

In addition, DC Code § 9-1173 also requires DDOT to initiate further technical studies about the best technology fit for DC. The law on streetcar system expansion requires that, prior to the expansion or construction of aerial wire-powered streetcar transit beyond the H Street/Benning Road line, authorized pursuant to § 9-1171, the Mayor shall develop a plan for the use of aerial wires for each phase or extension of the streetcar transit system and submit the plan to the Council, along with a written report. DDOT has ignored these laws, thus leaving unrestricted any use of aerial wires.

## **Federal Environment Element**

We commend a number of policy items included in the Federal Environment Element:

Lighting and noise pollution have significant impacts on both human populations and wildlife. Scientists concur in recent studies (see Cornell Ornithology Lab) that elevated noise levels can reduce the success of nesting birds in urban areas. Noise levels at airports and similar high-decibel environments are noted by the European Union as carrying major human health risks—increased risk of heart attack and health conditions exacerbated by poor sleep environment close to airports and similar sites.

Dense urban overlighting is a major factor in bird strikes and difficulties in seasonal migration. We concur that the federal government can lead the way with reductions in night-time lighting (dusk to dawn) in individual building lighting (interior, rooftop, perimeter security and exterior uplighting) that impacts bird populations; along with retrofits and new construction that increases reductions in artificial lighting with use of daylighting as a health benefit for people.

The Federal Environment element notes the significant “interconnectedness [of federal assets] to environmental resources beyond [the District of Columbia’s] borders” and that “environmental policies within the region affect populations and ecosystems beyond those of the region itself.” C100 notes that nearby jurisdictions, for example, Montgomery County and Prince George’s County MD, are responsible for and have a significant role in ensuring the health and well-being of the city’s rivers, habitats, and wildlife, for example: management plans for Paint Branch and Northwest Branch Watersheds which are major tributaries of the Anacostia River; stream and creek restoration; abatement of nutrification and sedimentation; urban wastewater management; spread of animal and plant disease; and wildlife corridors that are contiguous with the District. We encourage strengthening relationships with Maryland and Virginia agencies and NGOs (nongovernmental organizations) as partners in achieving sustainable ecosystems throughout the region, with thorough coordination and targeted joint initiatives.

Biodiversity and wildlife habitat are integrated into the Federal Environment element as significant components for success on a regional level. The recent District of Columbia Urban Wildlife Action Plan is a well-researched compilation of the status of species from a decadal study, with identification of newly discovered species as well as species added to the endangered list. There is the strong potential for synergy between the federal government and District of Columbia's Department of Environment & Energy through cooperation and adoption of initiatives: for example, creation and expansion of meadows, use of native trees and plantings, improved management of urban parks (e.g., Farragut Square) with bird/pollinator habitat and rain gardens.

Environmental justice is identified in the Federal Environment element with the potential for disproportionate impacts on lower income or minority-population areas. We believe a policy must be considered for the entire National Capital Region. We recommend the identification and comprehensive mapping (inventory) of all actual and possible sites, buildings and current/former areas under federal jurisdiction that may pose health or other environmental impacts on populations. For example, the discovery in 1993, with cleanup still underway, of chemical weapons and toxic waste in Spring Valley from WWI bombs and chemical agents buried in 1918. That work is projected to continue to 2017.

## **Historic Preservation Element**

### Introduction

We compliment NCPC on its use of eye-catching color photography to engage readers of this Element. We suggest that instead of identifying only two—the Thomas O'Neill Building on page 7 and the view of St. Elizabeths Campus on page 8—all of them be identified.

Page 3, first column, third paragraph, line 7: "1983" should be changed to 1893.

### Historic Preservation Planning

Page 1 of the draft mentions the contributing nature of the 1910 Height of Buildings Act to historic preservation in the District of Columbia. Therefore, we believe that the final sentence on page 3, third paragraph, should be modified to demonstrate the importance of the 1910 Height of Buildings Act as a planning tool that has helped create the physical and iconic horizontal appearance of the nation's capital and its historic neighborhoods. We suggest the following modification, in italics, to that sentence:

NCPC continues to be a leader in the advocacy of coordinated urban and regional planning that accommodates the changing needs of the federal government while preserving the significant historic buildings and places and the iconic horizontal image that make the nation's capital uniquely symbolic.

### The Historic Plan of Washington, DC

We note that page 1 introduces the notion of The Plan of the City of Washington that includes the 1791 L'Enfant Plan and the 1901 McMillan Plan. The use of the word “includes” suggests that there are other plans too that come under this new title, but we did not see any specific mention of them under this new heading or elsewhere in this draft Element. Then on page 4, the word “Historic” has been added as part of this aggregation of the L'Enfant and McMillan Plans. The two plans are over 100 years apart, and while we understand that an implied rationale for introducing this new name may be based on the McMillan Plan's extension of L'Enfant's original work, we think it's going to be confusing to readers. For history's sake the two plans should not be aggregated as one.

We support the policy statements related to the importance of streets and avenues in the District of Columbia. We suggest that this is a place where the 1910 Height of Buildings Act should be acknowledged as an integral part of preservation planning, as a tool for maintaining the historic city-wide horizontal character of the nation's capital, and for helping to ensure the reciprocal viewsheds that L'Enfant created with his plan.

### Design Review

We support the 1910 Height of Buildings Act as an essential element contributing to excellence in urban design as expressed in the new Urban Design Element. Given the fact, however, that the 1791 L'Enfant Plan, in its entirety, is listed on the National Register of Historic Places, we suggest that more should be said in this Element about the importance and efficacy of working the two elements—Historic Preservation and Urban Design—together in all situations where historic preservation is concerned.

Among the present and future historic preservation challenges facing federal agencies enumerated on page 9, there is mention of the importance of maintaining visibility of the geographic ridge of the topographic bowl in which the core of the city of Washington is located. We suggest that because Section D is focused on historic preservation as part of design review for specific federal properties and/or open spaces, there is a risk that this major geographic feature may get lost. We believe the importance of the topographic bowl to the nation's capital should be strengthened by mentioning it and maintenance of sightlines to and from in Section E (page 11) where the focus is on the capital's historic image.

## **Visitors & Commemoration Element**

### Introduction

The Introduction provides a good summary orientation to this Element. However, we suggest a sharper description of the scope of this Element. While the Introduction acknowledges the range of reasons that people come to Washington, the text and policies throughout the Element are addressed almost exclusively to the needs and expectations of tourists. We suggest some rewording to indicate that “local

visitors”, both residents of Washington D.C. and of the surrounding National Capital Region, are a significant source of visitors.

We also recommended that visitor statistics be expanded and clarified to provide an overall picture of who comes to Washington and why. Of the 17.4 million domestic and 1.6 million foreign visitors (2013 statistics), approximately how many attended for what purpose? The Element overlooks an important segment of visitors to the Mall: District residents who use these spaces for active recreation, concerts, cultural activities and other purposes. This group—for whom the Mall is truly a “front yard”—merits identification as a discrete visitor group. In addition, few policies speak to the visitor experience of individual business travelers, people attending conventions and meetings, or people participating in special events on the Mall, including festivals and protests.

We are pleased to see the listing of visitor attractions, both federal and non-federal, beyond the Monumental Core in Washington, D.C. and the surrounding region.

#### Statement of Overall Goal

The somewhat ambiguous scope of this Element is reflected in its overall goal:

To provide a positive and memorable experience for all visitors to the National Capital Region in a way that showcases the institutions of American culture and democracy, supports planning goals, and enhances activities that are unique to visiting the nation’s capital.

While the goal is addressed to “all” visitors, it seems to have in mind tourist families and groups coming to visit the National Mall and Monumental Core. This approach has two drawbacks. First, it minimizes non-tourist visitors, especially those who come to Washington to petition their government, whether through marches and demonstrations, Supreme Court vigils or visits to Congress. These visitors seek access to the institutions of American democracy, not the showcasing of those institutions. Second, the goal gives short shrift to the numerous policies aimed at offering visitors a beyond-the-Mall experience and inviting them to visit the District as well as the nation’s capital. We suggest additional work for an overall goal that is clearer and more inclusive, and which incorporates facilities and landscapes as well as “activities”.

We are pleased to see the emphasis on linkages between the National Mall and the Federal Triangle and Downtown to the north and Southwest and the Southwest Waterfront to the south. We are also glad to see discussion of improving activities along Pennsylvania Avenue and the strengthening of linkages west from the White House area to the Kennedy Center.

#### Federal Policy Framework.

We applaud the inclusion of the Federal Policy Framework section that collects in one place the major planning and policy documents that implement major aspects of the visitor experience. We suggest a cross reference here to Section D, Policies Related to Commemorative Works, which contains a helpful

description of additional statutes and policies and a list of the federal agencies responsible for executing them.

This section gives a nod to the impact of the security apparatus on the quality of the visitor experience, observing that federal buildings and installations must be kept reasonably safe while remaining accessible and aesthetically pleasing. NCPC's *National Capital Urban Design and Security Plan* (2002), a key plan through which NCPC addresses perimeter security issues, provides exhaustive, granular guidance on striking the appropriate balance between reasonable security and the integrity of Washington's historic streetscapes and vistas. Visitors routinely encounter security beyond negotiating perimeter bollards, including metal detectors, bag searches and limited points of access to major Mall gatherings such as the Fourth of July concert. The *National Capital Urban Design and Security Plan Objectives and Policies* (2005) encourages use of intelligence gathering, surveillance and screening, among other measures.

We accordingly urge NCPC to adopt a policy to conduct periodic assessments of visitors' responses to security measures, asking among other things whether the measures result in long delays, are viewed as unduly intrusive and most important, whether the measures are seen as necessary. Feedback on this inescapable aspect of a visitor's experience can help federal agencies determine whether the balance between access and safety requires adjusting.

### Visitor Transportation Modes

The discussion of visitor transportation modes is useful in indicating the importance of public transit and other alternative modes of transportation. The development of transportation alternatives to passenger cars in order to reduce congestion is a goal of the federal and District governments for residents and visitors. This emphasis is an appropriate focus of transportation planning for visitors to the National Mall, the Monumental Core and some outlying sites that are adequately served by Metrorail and circulator buses. It is less appropriate when determining how to move visitors from the Monumental Core to other attractions through the city and region. Many of the attractions are neither on Metrorail lines nor on major, reliable bus routes. We suggest distinguishing Monumental Core policies from citywide and regional policies. It would be useful to be clearer about the visitor transportation issues that still need attention.

We support proposed policies VC.A.1 and VC.A.2, which collectively urge greater use of public transportation, tour buses, biking and walking for visits to principal attractions. Effective implementation of these policies requires that visitors have ready access to information on how to use transit systems and how to plan a visit that relies on public transit to reach attractions. This underscores the need for effective visitor information centers (which we discuss under Visitor Amenities and Information Services).

We question the feasibility of VC.A.3, which encourages public transit, bicycles and organized tours to access regional attractions. Some of the outlying attractions, including the National Arboretum, Kenilworth Aquatic Gardens and the Lincoln Cottage, are not easily accessible for public transportation and are out-of-distance for most walkers and bikers. Also, many of the outlying attractions do not enjoy the widespread appeal that would support commercial tour buses. We suggest omitting VC.A.3. Promoting public and sustainable transportation is a laudable goal, as is encouraging visitors to see what lies beyond the Monumental Core. When these goals are mutually exclusive, they should not be pursued in tandem.

#### Visitor Amenities and Information Services

The availability of online information and the ubiquity of smart phones enable visitors to plan their own trips to a great extent. However, we believe there is a need for a major visitor center in the Monumental Core that would help orient visitors and also provide museum quality exhibits about the history and development of Washington, D.C., as well as the region. In view of the unfortunate experience with a single visitor center at Union Station in the 1970s, we are not suggesting only one visitor center for the city. However, C100 believes a major visitor center on or adjacent to the National Mall is needed. For example, space in the renovated Smithsonian Arts & Industries Building might be a good location. Policy VC.B.4 suggests exploring the feasibility of creating such a visitors center.

Visitors on and around the Mall frequently need such basic information as where to find the nearest Metro station. We think the SAM service operated by the Downtown Business Improvement District (BID) provides a model that if adapted to the Mall and Monumental Core could help disseminate information in a user-friendly fashion. SAMs (Safety/Hospitality and Maintenance BID staff) are available to provide directions, information and assistance to pedestrians. We recommend that NCPC consider whether and how this kind of service can be provided, especially during the height of the visitor season.

Five of the eleven policies in this section – VC.B.1 - VC.B.2, VC.B.4 - VC.B.5 and VC.B.7 all deal in some way with the dissemination of visitor information at central information centers, kiosks and other places frequented by visitors. For ease of reference, we suggest grouping them together on the list and editing them to reduce redundancies.

#### Visitor Services and Special Events

We believe it would be useful to note again here the need for linkages between the Monumental Core and adjacent areas. This is especially important in view of the revitalization of much of the central area of the city and plans to revitalize other areas such as the Southwest Ecodistrict, as proposed by NCPC.

This section addresses the federal government's role, in coordination with the District of Columbia, in supporting special programs, festivals, parades, concerts, arts presentations and similar events. These kinds of events are attended by residents as well as visitors, a point that the Element should recognize.

Festivals and concerts held on the National Mall can rise to conflicts between the goals of opening up "America's front lawn" to the citizens who own it and protecting the Mall from overuse. The National Book Festival moved from the Mall to the Convention Center and the Smithsonian Folk Life Festival shrank its footprint to accommodate new NPS turf preservation rules. However, we think the access issue is important enough to be mentioned in the Element as a value to be protected.

### Commemorative Works

C100 believes the discussion and policies related to Commemorative Works are sound. The Element does an excellent job of explaining the governing authorities and implementing procedures for approving and siting commemorative works. In light of experiences with some memorials, it may be useful to indicate more strongly the issues that NCPC and the Commission of Fine Arts are dealing with for commemorative works.

We suggest a new title for the section "District Residents Who Served." Although the section has a photograph of the District's World War Memorial, the section really is about the trend in commemorative art away from individual "great man" statues and toward work that is more inclusive. The section also recognizes a related trend away from war and military subjects toward a broad range of social and cultural issues. A better title might be, "Evolving Trends in Commemorative Art." One such trend is art as a temporary installation rather than a permanent fixture. The Element mentions the traveling AIDS quilt as an example.

VC.D.5 seeks to "Ensure that new memorials located in neighborhood settings are sited and designed in a manner that is consistent, where possible, with local land uses, activities, and objectives." We suggest deleting the qualifying phrase "where possible" from this policy, because we cannot imagine a circumstance in which either a memorial, its neighborhood or visitors to the memorial would be well served by creating a jarring impact between the memorial and its environs. Opinions may vary regarding the design and location of a particular work, but we cannot believe a work will be installed for which no colorable case can be made.

In summary, C100 recognizes that providing a special experience for visitors, both local and from throughout the United States and the world, is one of the most important and challenging aspects of planning for the future development of Washington, D.C. This has important economic implications for the city and region but, even more important, is key to how visitors view our city and our country. The overview and policies outlined in this Element provide a base, but clearly continuing efforts are needed to meet this challenge.

## **Action Plan Matrix**

C100 believes this “Action Plan Matrix” is a good way to complete the Federal Elements of the Comprehensive Plan for the National Capital because it gives a sense of how the background information and policies in the Plan will be carried forward and be implemented, both in the short-term (up to five years) and, where necessary, in the long-range (five to twenty years).

The Action Plan Matrix groups Relevant Plan Elements under four topics:

- Image of the National Capital Region
- Operational Efficiency of the Federal Government
- Transportation Mobility and Accessibility
- Stewardship of Natural Resources

This is a new way of looking at how the Federal Elements will be implemented. We believe it would be useful to have a brief introduction to the “Action Plan Matrix” so that readers can first understand what is being outlined. For clarity, we suggest that the seven headings at the top of page 1 be repeated at the top of each page.

The first topic, “Image of the National Capital Region” seems somewhat broad and misleading. Almost all of the “Descriptions” deal with Washington, D.C., not the region. Something closer to what is being described, dealing with the “design framework”, may be more appropriate.

We believe it may be useful to add a fifth topic, dealing with “Understanding Washington, D.C.” or something similar. The material in the Federal Elements of the Comprehensive Plan offer many opportunities for residents of the city and region to better understand the overall urban pattern, as well as to understand and explore specific neighborhoods and planning areas. NCPC already has a broad public outreach program and that outreach and education can be carried further, both by NCPC and by others.

More specific comments are indicated below.

Page 2, number 3: Clarify what is meant by “downtown”.

Page 3, number 8: Clarify what is meant by “Study and analyze land use transition along East Capitol Street.”

Page 4, number 9: Clarify that the private sector and civic groups will also be involved in the Pennsylvania Avenue Initiative. Include some reference to looking at improvements to the Federal Triangle complex along the south side of Pennsylvania Avenue.

Page 5, number 12: Clarify the meaning of “Freeze the Footprint”.



Comments of The Committee of 100 on the Federal City  
On the Final Draft Elements of the  
Comprehensive Plan for the National Capital  
December 4, 2015

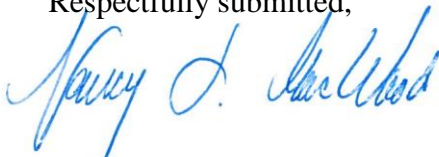
Page 8, number 17: In dealing with important matter of the CEA boundaries, add the private sector and civic groups as Action Partners.

On page 9 under Transportation Mobility and Accessibility, add new sections dealing with public transit and with pedestrian movements. C100 is especially interested in seeing more attention on the “Washington Waterfront Walk”, the eleven mile walk/bicycle path from Georgetown to the National Arboretum, along the Potomac, Washington Channel, and Anacostia waterfronts. Many sections of the system exist or are under construction, especially along the Anacostia River, but achieving now missing connections for the entire system will be critical. We assume that this important plan/project will be addressed in the Parks and Open Space Element, to be completed in 2016, but some mention of it at this point would be useful.

## Summary

In summary, the Committee of 100 on the Federal City applauds the tremendous amount of work that has been done by the NCPC staff and Commission members, and by cooperating agencies and organizations, to bring the updated Elements and related sections to this point. We appreciate the opportunity to make these final comments on the draft Federal Elements of the Comprehensive Plan for the National Capital. We look forward to seeing the draft of the eighth Element, Parks and Open Space, when that draft element is completed and made available for public review later in 2016.

Respectfully submitted,



Nancy MacWood  
Chair

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