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GEORGE R. CLARK, ESQ.

September 3, 2010

VICE-CHAIR

NANCY MACWOOD

Susan Spain, Project Executive
The National Mall Plan
National Mall and Memorial Parks
National Park Service
900 Ohio Drive, S.W.
Washington, D.C. 20024-2000

SECRETARY

RICHARD HOUGHTON

TREASURER

FRANCIS M. CLARKE, III

Dear Ms. Spain:

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Re: Comments of the Committee of 100 on the Federal City on the Draft Programmatic Agreement Regarding the National Mall Plan (8-4-2010)

The Committee of 100 on the Federal City is pleased to provide comments on the *Draft Programmatic Agreement Among the National Park Service, The District of Columbia State Historic Preservation Officer And The Advisory Council on Historic Preservation Regarding The National Mall Plan, Washington, D.C.* The National Park Service distributed the *Draft Programmatic Agreement* to consulting parties on August 4, 2010 and requested comments by September 4, 2010. We understand the Programmatic Agreement, when signed, will accompany the Record of Decision (ROD) for the National Mall Plan.

CHAIR EMERITUS

LAURA M. RICHARDS, ESQ.

The National Mall is a major interest of the Committee of 100 on the Federal City. The Committee of 100 is one of the consulting parties in the Section 106 process related to the National Mall Plan and has been participating in the public process of preparing the National Mall Plan for the past several years. We submitted initial comments (dated May 19, 2008) on the *Draft Alternatives Matrix-The National Mall* (April 2008) and comments (dated May 15, 2009) on the *National Mall Plan-Preliminary Preferred Alternative* (March 2009). Earlier this year the Committee submitted comments (dated March 17, 2010) on the *Draft National Mall Plan/Environmental Impact Statement* (December 2009) and, most recently, submitted comments (dated August 15, 2010) on the *Final National Mall Plan/Environmental Impact Statement* (July 2010) in the 30-day no action period.

We want to again express our appreciation to you, Superintendent John Piltzecker, other members of the National Park Service staff, and the consultants that have been involved over the past several years with preparing what is now the *Final National Mall Plan/Environmental Impact Statement*. While we appreciate the work that has been done, we continue to have concerns about some aspects of the National Mall Plan. We believe these concerns, and the concerns of other parties, need further attention in the future. The *Programmatic Agreement* can help provide continuing attention on some issues.

Comments of the Committee of 100 on the Draft Programmatic Agreement

Comments of the Committee of 100 on the *Draft Programmatic Agreement* are outlined below, related to the individual section and page number in the Draft document.

Context-Historic Resources (Pages 1-2)

6. Area of Potential Effect (APE): The APE is discussed in Point 6 and shown on an attached map (map not included in the email to Consulting Parties). We assume this is the APE shown on the map on page 383 of the *Final National Mall Plan*. It appears that this APE should be sufficient. However, it is possible that in further studies and discussions, a need might be found to increase the APE. Therefore the *Draft Programmatic Agreement* should be reworded to make it clear that there will be flexibility in the definition of the APE and that the now defined APE could be altered or enlarged as appropriate.

Issues and Need for Planning (Page 2)

Two very critical issues and needs for planning are **not** identified in the initial six-point list in the *Draft Programmatic Agreement*. **We suggest adding the following two points**. Draft language is shown in *italics*, following by explanatory information.

7. Whereas, the National Mall is composed of lands administered by the National Park Service (approximately xx percent of the total area of the National Mall) and the remaining area is used and administered by several other entities (Smithsonian Institution, National Gallery of Art, Architect of the Capitol, Department of Agriculture, General Services Administration, District of Columbia, Washington Metropolitan Area Transit Authority, etc.), it is essential that the plans of all the parties involved with the National Mall be integrated, coordinated and planned in a comprehensive manner and that this integration and comprehensive planning be visible and understandable in the National Mall Plan as it goes forward.

A number of concerns have been expressed during the National Mall planning process over the past several years, but the overarching concern of the Consulting Parties has been that the Final National Mall Plan only deals with lands administered by the National Park Service, which comprise xx percent of the total area of the National Mall. Note that information on the total land areas, and percentages of the lands under the jurisdiction of the various entities on the National

Mall, has not been made available. Although the Consulting Parties have been assured that plans for the various areas have been discussed and coordinated at the agency staff level, this coordination is not fully visible in the *Final National Mall Plan*. The Committee of 100 suggests that the amount and percentages of land area under the jurisdiction of the various agencies and institutions on the National Mall be clarified and made available as part of the ongoing National Register Nomination process.

While the Committee of 100 recognizes that the National Mall Plan will likely be approved in essentially the “final” form, **the Committee of 100 continues to be concerned with achieving a truly comprehensive plan for the National Mall as various additional steps go forward over the next several years.**

8. *Whereas, the National Mall is increasingly in the center of a wide variety of activities in Central Washington, both to the north, east and west, and whereas the linkages and relationships between the National Mall and nearby areas will increase in the future, it is important that future detailed planning for the National Mall continue to consider and be integrated with plans and programs for adjacent areas.*

Relationships with adjacent areas has been considered in preparing the *Final National Mall Plan* and as part of the “Planning Together for Central Washington” program involving the National Park Service, the National Capital Planning Commission, the U.S. Commission of Fine Arts, the Architect of the Capitol and the Government of the District of Columbia, especially the D.C. Office of Planning. The Committee believes it is important that the *Programmatic Agreement* recognize the increasing importance of linkages between the National Mall and adjacent areas.

Public Engagement in the National Mall Plan (pages 2-4)

Point 3 notes that the National Park Service received more than 30,000 comments, from people located in every State of the Union, in the course of the National Mall Plan process. In its previous comments on the Final National Mall Plan, the Committee of 100 noted the admirable job the National Park Service did in providing Volume 2 of the *Draft National Mall Plan/DEIS*, which provided information on a total of 401 separate comments made on the Draft and provided responses. However, an overview summary of the more than 30,000 comments has not been provided. The Committee believes that future detailed planning would benefit from having a summary of that information, in order to better understand the grouping of concerns that were noted.

Point 4 notes that “Whereas NPS learned from the public comment process that several issues of concern required further explanation.” and then goes on to summarize four major areas of concern. The Committee of 100 recommends that the phrase, “including but not limited to”, be inserted in that sentence after the word “concern” so that it will be clear that there were also other areas of concern.

Point 5.2 notes the respective planning efforts of several agencies and includes the Architect of the Capitol's *Capitol Complex Master Plan*. While the Committee understands that staff of the various agencies has seen the draft of that plan, **the draft has not yet been made public** and is still undergoing internal review. The Committee of 100 recommends that the *Programmatic Agreement* clarify that the *Capitol Complex Master Plan* has not yet been made public and is not yet final. That plan, when final, may impact some of the National Mall Plan work done to date and will clearly affect the next stage of work on the Union Square area at the east end of the National Mall.

Programmatic Agreement Stipulations (pages 4-9)

Point 1 deals with two very important issues related to revising and updating the National Mall National Register Historic District nomination. Section 1.1 calls for expanding the "Mall" nomination to include the entire area of the National Mall. Section 1.2 deals with including properties that are not included in the jurisdictional area of the National Park Service (Smithsonian Institution, National Gallery of Art, Architect of the Capitol area, and the Department of Agriculture, etc.). The White House and President's Park would also be included. This area is a special area under the jurisdiction of the National Park Service, separate from the National Mall.

Both of these points are critical to helping resolve concerns of many groups about the lack of a truly comprehensive plan for the National Mall

At the top of page 5 of the Draft Programmatic Agreement there is a reference to the "Great Cross-Axis of the National Mall". The Committee of 100 finds this terminology confusing. We suggest that this wording be revised to eliminate any confusion. Something such as the following may be clearer:

"The main east-west axis of the National Mall extends west from the Capitol grounds through the Washington Monument to the Lincoln Memorial and the great north-south cross-axis of the National Mall extends from the White House south to the Jefferson Memorial".

This wording may need more work. The main need is to eliminate any confusion about what is being suggested.

The changing image of the National Mall is an important factor in how it is perceived, both in terms of its total area, the landscape and memorial components of the National Mall, and its relationship to adjacent areas. The issue of how, when and why the old term of "The Mall" came to be called "The National Mall" also needs some study. The Committee of 100 recommends that this issue of the image and perception of "The National Mall" be part of the National Register Nomination Study.

One of the key factors in planning the future of the National Mall is the number and type of visitors in the future. The Committee of 100 strongly supports further additional efforts to refine information on visitors to the National Mall, as suggested in the National Mall Plan. The number and type of future visitors affects the need for facilities and movement paths, and for visitor orientation and interpretation needs.

Point 4 deals with Project Planning and Design and Section 4.1 deals with conceptual alternatives. Point 4.1.1.3 states: “Views and vistas will be protected as appropriate, and the condition of vegetation that defines views will be improved”.

In its comments on the *Final National Mall Plan*, the Committee of 100 suggested that some new vistas be considered, in order to better connect the National Mall with adjacent areas. We therefore suggest that the following language be added to Point 4.1.1.3:

“New views and vistas will be considered in order to better connect the National Mall with adjacent areas, or to better link different areas within the National Mall. If found appropriate, existing vegetation would be revised in order to improve the visual connections.”

The Committee of 100 on the Federal City appreciates the opportunity to comment on the *Draft Programmatic Agreement*. We hope the *Draft Programmatic Agreement* can now be revised as appropriate, completed and signed in the near future.

The Committee of 100 on the Federal City looks forward to continuing to work with the National Park Service in planning the future of the National Mall, and with the National Capital Planning Commission and other agencies and institutions involved with the National Mall.

Sincerely,

John Fondersmith

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



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