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January 29, 2010

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National Mall and Memorial Parks
National Park Service
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Washington, D.C. 20024-2000

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Dear Ms. Wheelock:

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This letter provides comments of The Committee of 100 on the Federal City on the report, *Rehabilitation of the Lincoln Memorial Reflecting Pool and Surrounding Area: Environmental Assessment* (December 2009). This report was released with a transmittal letter dated December 22, 2009 that said that comments would be accepted through January 29, 2010. The Committee of 100 has participated in past meetings on this subject, beginning with the Public Scoping Meeting at the Old Post Office on July 9, 2009. We submitted comments on the *Proposed Scope of Work for the Environmental Assessment and Section 106 Process for the Rehabilitation of the Lincoln Memorial Reflecting Pool and Surrounding Area* (comments dated August 14, 2009).

The Committee is glad to see this needed work being addressed. The Committee is currently involved in the review process for the National Mall Plan, including the Section 106 Consultation Process. We are interested in projects, such as this one, that address various problems in some way that exist with the National Mall. Deteriorating conditions involving the Lincoln Memorial Reflecting Pool and the surrounding area are a serious matter. The Committee is pleased that the National Park Service has obtained stimulus funds to address these problems and that work can move forward. However, projects that move ahead need to fit into an overall framework.

CHAIR EMERITUS

LAURA M. RICHARDS, ESQ.

Our comments address the three main areas of the EA:

The Elm Walks
The Lincoln Memorial Reflecting Pool
The Lincoln Memorial East Plaza.

Elm Walks

Upgrade Walkways and Site Furnishings: The Committee of 100 supports upgrading the “Elm Walks” walkways and site furnishings. We believe that appropriate lighting is necessary to provide security and to encourage more use of this section of the National Mall at night. Permanent lighting with a more appropriate design and location than the present ad hoc arrangement will be welcome. However, the design for improved lighting standards has not yet been presented.

The EA Report indicates (page 2-6) that “the elm walks would be resurfaced in a material that is consistent with the historic character of the cultural landscape and comparable to the adjacent walkways in the project area”. It would be useful to be more specific, if that is possible at this stage. The Committee of 100 will comment in more detail when refined proposals for the walkway material and site furnishings are presented.

The National Park Service is also moving forward with a new signage and wayfinding system. It would be useful to know how new signs will be integrated along the Elm Walks and elsewhere in the Lincoln Memorial Reflecting Pool Area.

We have previously noted that it would also be useful to know how the National Park Service perceives the life expectancy of existing trees along the Elm Walks and how they will be replaced as they die. However, this issue is not addressed in the Environmental Assessment.

Visual and Physical Links to D.C. War Memorial: As various improvement projects move forward, the National Park Service needs to do its best to ensure that these projects are related and are in compatible with overall concepts for the National Mall. The National Park Service has received stimulus funds for two projects that are essentially adjacent: 1) the Lincoln Reflecting Pool and Adjacent Areas (the subject of these comments) and 2) the restoration of the D.C. War Memorial, located south of the Reflecting Pool. The planning process for that project is also moving forward.

In previous comments on the National Mall Plan (see May 15, 2009 letter to Susan Spain, Project Executive, National Mall Plan) the Committee of 100 suggested that the National Park Service undertake feasibility studies of opening a vista along the line of 19th Street, NW, extending south of Constitution Avenue to the D.C. War Memorial, in order to better link this memorial to the city. We have not yet had any response from the National Park Service on this proposal.

We believe it is appropriate, indeed crucial, that this present ongoing design work on the Lincoln Reflecting Pool area consider both visual (vistas) and physical linkages (walkways) to the nearby D.C. War Memorial

Lincoln Memorial Reflecting Pool

This part of the project has two elements: 1) the repair of the Reflecting Pool and finding ways to reduce water usage and to keep the water relatively clean, and 2) the provision of new walkways to replace the “social paths that have developed along the north and south edges of the Reflecting Pool.

Repair Reflecting Pool and Upgrade Infrastructure: The Committee of 100 is supportive of the proposals to repair the Reflecting Pool. Four options for repairing the Reflecting Pool are outlined: Option B1, Option 2.1 (NPS Preferred Option), Option B2.2, and Option B3. However, information on the long-term life of the Reflecting Pool needs to be stated more clearly for all four options. General cost estimates should also be outlined. If the life of improvements is “100 years” for at least several options, and the general cost were known for all options, it would be easier to make a sound decision. The main point, we believe, is to build a structural system for the Reflecting Pool that can reasonably be expected to last approximately 100 years (the existing Reflecting Pool has lasted 85 years, though it is badly leaking) at an efficient capital cost and ongoing operating cost. Option 2.1, the NPS Preferred Option, seems reasonable but it is difficult to make a clear choice without having clear capital and operating cost estimates, and being able to consider environmental and sustainability issues.

Improving Water Quality in the Reflecting Pool: The goal should be to have reasonably clean water in the Reflecting Pool at a reasonable cost, once the Reflecting Pool is repaired to eliminate existing water leakage. Three options are presented (C1, C2 and C3) for providing water in the future. C1 would take water from the Potomac River and have a constant discharge into the Tidal Basin. C3 is essentially the same, except that water would be taken from the Tidal Basin, and discharged into the Potomac River. Option C2 would continue to use water from the municipal supply (WASA) which would be recirculated in the Reflecting Pool. The Pool would be emptied once a year. However, no capital and operating costs are given.

Some other approaches have been proposed for consideration. For example, the National Coalition to Save Our Mall has proposed a “self-cleaning bio-filtration system. This would be a variation of Option C2. The January 28 notice of a consulting parties meeting on February 5 indicates that a new, fourth option, will be presented at the meeting.

The Committee of 100 looks forward to having more information on cost and other factors for the various treatment options. We believe more information is needed on overall cost is needed before a decision can be made.

Upgrade Walkways: The Committee of 100 supports the proposal to provide new walkways along the Reflecting Pool to replace the “social paths or trails” which have been formed along both sides of the Reflecting Pool. However, we have some concerns. The EA report (page 2-12) indicates that the “social trails that flank the north and south sides of the Reflecting Pool along

the granite coping would be resurfaced and made into formal 14 to 16 foot wide walkways”.

Despite all the work that has been done, insufficient information is presented on how the social walkways are being created. Obviously the social walkways have been created over many years. However, it is not clear if they are being created primarily by joggers or by large numbers of people walking along the edges of the Reflecting Pool. Most likely it is a combination of different users. The material used for surfacing the new pathways must be compatible with the use of the pathways. For example, if the primary wear is from joggers, and very hard surface walkways were to be installed, it is likely that the joggers would simply shift over a few feet and run on grass and dirt outside the paved walkway. In a relatively short time, new, unattractive dirt social paths would be created along side the new paved walkways. The National Park Service needs to provide more information on the type of pavement material to be used to create the walkways, and what additional steps will be used to keep joggers and walkers on the walkways. Will the new walkways be permeable or non-permeable? If these issues are not considered, simply providing new walkways may not solve the problem.

Possible Ice Skating on the Reflecting Pool: There was a question at the July 9, 2009 scoping meeting about future ice skating on the Reflecting Pool. The response was that the present Park Service policy is to allow ice skating, under appropriate conditions, on the lake in Constitution Gardens but not on the Reflecting Pool. There was some interest in the Committee to consider ice skating on the Reflecting Pool (or a section of the Reflecting Pool). In our August 14, 2009 comment letter, we requested that the Park Service address the possibility of ice skating on the Reflecting Pool in terms of what would be needed to provide this opportunity, and the pros and cons of such a policy. The Lincoln Memorial Reflecting Pool EA response on this matter is very limited. The Park Service response is (Page 1-15) “these suggestions were outside the scope of the current project”. We understand that the stimulus money is limited, and that perhaps such “extras” cannot be considered, at least at this time. However, it would be useful to know in general terms what improvements to the Reflecting Pool would be needed if providing for ice skating were to be considered at a future time. Ideally, actions should not be taken that would preclude providing for ice skating in the future.

Lincoln Memorial East Plaza

There is clearly a need to provide permanent security barriers at the east plaza of the Lincoln Memorial, and to improve handicapped access down to the level of the Reflecting Pool. Three design concepts have been outlined, which seem to represent a good range of options. Option A3 (NPS Preferred Alternative) uses low (3 feet) retaining walls in some locations, and appears to have some visual advantages. It would be useful to see more detailed drawings of how the walls will actually appear to adults and children. We assume that all three options have reviewed and found sufficient in terms of security protection.

The Committee of 100 on the Federal City comments on the
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The Committee of 100 on the Federal City appreciates the opportunity to comment on the
*Rehabilitation of the Lincoln Memorial Reflecting Pool and Surrounding Area: Environmental
Assessment* (December 2009). Please contact us if you have any questions on these comments.

We received notice yesterday, January 28, of a consulting party meeting on this project on
Friday, February 5, 2010. I plan to attend and participate in that meeting on behalf of the
Committee of 100 on the Federal City.

Sincerely,

John Fondersmith

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on the Federal City*

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