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February 28, 2009

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National Park Service-National Capital Region  
1100 Ohio Drive, SW  
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Dear Mr. DeMarr:

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This letter is to provide comments of The Committee of 100 on the Federal City on the *Potomac Park Levee Project Environmental Assessment* dated January 2009. The Environmental Assessment was circulated for a 30-day comment period that will end on March 2, 2009. The Committee of 100 has had a long history of concern with the planning of Washington, D.C., including the Monumental Core of the city. The Potomac Park Levee Project is important in terms of preventing future flood damage to certain areas of Central Washington and in terms of the visual, historic and environmental impacts of the proposed levee improvements on areas of the National Mall, especially in the corridor along 17<sup>th</sup> Street, NW south of Constitution Avenue.

**CHAIR EMERITUS**

DON ALEXANDER HAWKINS

The Committee of 100 has been involved in the consultation process on the Levee Project design over the past nine months. We have submitted previous written comments dated August 22, 2008, September 10, 2008, and January 9, 2009. We had the benefit of the November 20, 2008 Staff Report to the D.C. Historic Preservation Office on earlier alternative designs. We also reviewed the information presented on the West Potomac Park Levee PEPC site (Concept Review Package), and the National Capital Planning Commission staff report dated December 31, 2008 (approved by the Commission on January 8). Members of the Committee of 100 visited the 17<sup>th</sup> Street site several times to observe mockups of the location of potential levee structures. Finally, we have reviewed the voluminous *Potomac Park Levee Project Environmental Assessment*, approximately 500 pages of text, charts, plans, maps, perspectives and drawings. It is a very significant report and, we feel, is likely to be a significant "source document" in the future.

## **Recommendation**

The Committee of 100 on the Federal City believes that the latest proposed design solution, referred to as “Option 1B” in the Environmental Assessment, is a good solution to a difficult design problem. The Environmental Assessment report indicates that Option 1B is the NPS preferred alternative (pages iv and 2-6). We have previously expressed, and want to repeat our hope, that as planning, design and construction proceeds, it will be possible to combine Phase I and II of Option 1B, so that the stone facing, the related earthwork and landscaping can all be completed as soon as the main concrete walls are completed. We understand that this is also the National Park Service position. We also want to stress our support for opening and maintaining the vista from Virginia Avenue, NW, toward the Washington Monument (actually aligned with the Jefferson Stone) as an important element of the Option 1B design.

## **Status of the Environmental Assessment Process**

We would appreciate having the status of the Environmental Assessment process clarified, and the next steps outlined as specifically as possible. Although the report which is being reviewed, by ourselves and others, is simply called an Environmental Assessment, it is our understanding that this is a Draft Environmental Assessment that has been circulated for public comment. We would appreciate information on the next steps with the Environmental Assessment process and how comments will be addressed. We recognize the critical time constraints for moving forward with the Potomac Levee Project and understand that special steps to expedite the review may be necessary, so that design and construction work can move ahead.

## **Other Flooding Issues**

We understand that this Environmental Assessment deals only with the Potomac Park Levee system. However, there are other flood risks to portions of Central Washington that should at least be mentioned in the final Environmental Assessment, or provided in other reports.

If the Potomac Park Levee areas, especially the site near 17<sup>th</sup> Street and Constitution Avenue can be considered the “front door” for flooding risk, it would seem that the “back door” for flooding would be off the Washington Channel on the west side of Fort McNair (see map on page 1-5). We assume that some actions are being taken at that location to prevent flooding through the “back door”. Although that location is not the subject of this Environmental Assessment, it would be useful to indicate what preventive actions are being taken at that location.

In addition to the flood threat that is being addressed, there is also the possibility of “interior flooding” from runoff and underground streams that would not be prevented by the actions indicated in the Environmental Assessment. It would be useful to at least indicate that possibility and other steps that are being taken to address that problem.

In addition to the danger of “normal flooding” (floodwaters coming down the Potomac River from the northwest), there has also been concern with the possible long-term rise of the water

level in the tidal Potomac River due to effects of global warming. Even a relatively small rise would pose some threat to low areas of Washington, especially East and West Potomac Parks. Such a rise could also mean that “normal flooding” could become more serious, even with limited floodwaters. The possibility of rising water levels of the tidal Potomac River (and the Anacostia River) have been raised in various questions in the context of the National Park Service planning for the National Mall and the National Capital Planning Commission work on the Framework Plan. However, no information on this serious matter has been provided. As part of the overall look at flood threats, it would be useful to have definitive information on this issue.

### **Flooding of Portions of the National Mall**

The Committee of 100 on the Federal City (and other organizations) has a strong interest in the planning, protection and future development of the National Mall. The map on page 1-5 of the Environmental Assessment indicates (in blue) the areas of the National Mall and adjacent areas that would be protected by construction of the improved Potomac Park Levee (and whatever measures are to be taken at Fort McNair). The map also makes it clear that, even with the new flood protection improvements, there would still be significant flooding of portions of the National Mall, especially in the Tidal Basin and the Reflecting Pool areas, and in nearby East Potomac Park, that are in the “Existing FEMA 100-Year Floodplain” (shown in orange on the map). The Committee of 100 requests that, in the ongoing planning work for the National Mall, more information be provided about potential damage from a “100 year flood” and current measures (and potential future measures) to mitigate that damage.

### **Factual and Editorial Concerns**

The Potomac Park Levee Environmental Assessment is an impressive document and is likely to be used as a “source document” for other future planning work. It is therefore important that facts be accurate, even when they may not in fact relate directly to the primary environmental and other assessments. As a result of our review, we believe several matters need to be clarified.

**Monumental Core/Downtown Confusion:** The Central Area of Washington, D.C. has a unique physical structure that is different from other American cities. There are numerous references to the Monumental Core (some times capitalized, sometimes not) in the Environmental Assessment report. The Monumental Core is generally defined in the footnote on page 1-2. However, there is no map. It would be useful to have a map and a better description, so that readers would have a better idea of what subareas are included in the Monumental Core definition (National Mall, Federal Triangle, etc.).

In addition, there are various references to “downtown” which give a misleading impression of the location of Downtown and the impact of potential floodwaters. At least since the Federal Triangle complex was built in the 1930s, Downtown has generally been understood to be the area north of Pennsylvania Avenue, extending to Massachusetts Avenue or M Street. The boundaries of Downtown were outlined in the *Downtown Urban Renewal Plan* and in the

*District Elements of the Comprehensive Plan for the National Capital.* As indicated by the maps in the report (page 1-5 for example), only a thin strip of land of land in “Downtown” along the north side of Pennsylvania Avenue is subject to flood effects which would be prevented by the Potomac Park Levee Project and other measures. Statements about Downtown flooding, such as on page 1-6, are not true, and are misleading. Such statements should be corrected. However, in requesting such clarifications, we do not want to minimize the adverse effects of even limited flooding. Damage from even a narrow flood area in Downtown along the north side of Pennsylvania Avenue could be significant.

**Evolution of the National Capital Planning Commission:** On page 1-9 there is a brief description of the evolution of the name of the National Capital Planning Commission. This evolution seems limited and should be checked.

**Framework Plan Timing:** The *National Capital Framework Plan*, which has been prepared by the National Capital Planning Commission, is noted on page 1-19. However, the timing of the plan should be checked. Most recently, a *Draft National Capital Framework Plan* was released on July 10, 2008 for a ninety-day public comment period. The final plan is being prepared.

**Full name for the Committee of 100 on the Federal City:** The “Committee of 100” is noted on pages 5-2 and 5-4 of the Environmental Assessment. The “Committee of 100” is generally well known. However, there are other organizations with the “Committee of 100” name. We would therefore appreciate if our organization’s full name could be used in the report: **The Committee of 100 on the Federal City.**

None of these editorial issues has a direct impact on the design of the levee walls that are being recommended in the Environmental Assessment. However, in view of the likely future use of this report, it would be useful to check these statements and make appropriate revisions. We look forward to the next steps with the Environmental Assessment process and to early action to complete design and construct the improved Potomac Park Levee Project.

Sincerely,

*John Fondersmith*

John Fondersmith, AICP

**Representing the Committee of 100 on the Federal City**

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