

The Committee of 100

on the Federal City



National Capital Planning Commission

ATTN: Elizabeth Miller, Director, Physical Planning Division

401 9th Street, Suite 500

Washington, DC, 20004

February 26, 2020

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945 G Street, N.W.

Washington, D.C. 20001

202.681.0225

www.committeeof100.net

info@committeeof100.net

Subject: Monumental Core Streetscape Framework & Lighting Policy

<https://www.ncpc.gov/initiatives/moncore/>

Dear Ms. Miller:

Thank you for the opportunity to comment on the Monumental Core Streetscape Framework & Lighting Policy, updating the National Mall Streetscape Manual (1992).

I. Comments on Lighting Policy

Uplighting, correlated color temperature, intensity

The draft Lighting Policy and Framework defines a lighting hierarchy for structures, landscapes, and streetscapes, and provides general guidance on light characteristics in the National Mall and vicinity. Structures are classified as Tier 1 (e.g., White House, Capitol), Tier 2 (e.g., Union Station) and Tier 3 (e.g., Smithsonian Castle). The draft policy calls for uplighting all three tiers, increasing light pollution. For the same reason, uplighting also increases the danger to migrating birds.

<https://www.darksky.org/our-work/lighting/lighting-for-industry/fsa/> .

Uplighting should be limited to the maximum extent possible. While we appreciate the drive to uplight and emphasize Tier 1 buildings in particular, we urge the Commission to reconsider this policy. We urge the Commission to follow dark-sky principles for all lighting in the Monumental Core, and to specify fixtures approved by the International Dark-Sky Association. At a minimum, lights on federal buildings should be dimmed during bird migration season. See

<https://abcbirds.org/program/glass-collisions/bird-friendly-design>.

In addition:

■ Street lighting should be no brighter than the minimum levels recommended by national traffic-safety standards. Further reductions in nighttime lighting should be achieved with light curfews and motion-activated controls.

■ Washington Globe street lights should be replaced with fixtures that have a historic appearance but eliminate uplight and horizontal light. If the

Washington Globes are retained, they should be retrofitted with internal optical components that direct light downward to a confined distribution pattern on streets and sidewalks.

■ The staff report, p. 49, advocates “white light” to illuminate certain federal buildings. While clarification on this specification is needed, we fear it refers to a high correlated color temperature (CCT). All lighting should have a no greater CCT than warm-white 2700 Kelvin.

We agree that colored light and projected images on federal buildings should be limited in frequency and duration.

II. Comments on Key streets in the Monumental Core

Key streets in the Monumental Core: The “Street Categories” map on page 10 in the “Urban Design Streetscape Framework” draft report prepared by NCPC shows three street categories. The key “radiating & edging” streets are shown in red. The “connecting & traversing” streets are shown in pink and the local L’Enfant City streets are shown in white. The “Urban Design Streetscape Framework” draft report by NCPC indicates the locations and policies of key streets in overall terms. Eventually, there will need to be more detailed plans for these streets.

The Committee of 100 suggests four key streets that might be described in more detail in the final NCPC report. If NCPC includes discussion of key streets in the final report, other streets also might be selected for discussion.

Tenth Street, SW: Tenth Street, SW extends south from Independence Avenue to Banneker Park. There have been various studies by NCPC on ways to improve Tenth Street and these might be summarized in the report. Banneker Park is one of two areas to be added to the 1992 National Mall Streetscape Manual Boundary. Plans to improve Banneker Park should be noted. It is also important to note that Banneker Park provides the link from Tenth Street to The Wharf, the new mixed use development on the south side of Maine Avenue, SW. The Wharf has added new activity and recognition to the Southwest Waterfront. Phase 2 of The Wharf complex is now under construction.

Kennedy Center Area Streets: The Kennedy Center Area is the second of the two additions which are proposed to be added to the 1992 National Mall Streetscape Manual Boundary. The Kennedy Center is a great cultural center for the Washington area and for the nation. It is also a living memorial to President Kennedy. Unfortunately, the Kennedy Center is somewhat cut off from the rest of the city by topography and by streets and freeways which limit access. Various solutions have been suggested over the years to better connect the Kennedy Center to the adjacent city, but these have not been very successful. By adding the Kennedy Center to the 1992 National Mall Streetscape Manual Boundary, NCPC has focused attention on this area. The report should summarize the problem and the status of solutions.

Pennsylvania Avenue, NW: The section of Pennsylvania Avenue between the Treasury Building at 15th Street, NW on the west and the United States Capitol to the east is the most famous street section in Washington, DC, and certainly one of the most famous streets in the United States. It is also the most planned street in Washington. NCPC, in coordination with other federal and District agencies, is now undertaking the Pennsylvania Avenue Initiative. This report should provide some summary information on the current condition of this section of Pennsylvania Avenue, and the improvements which are being discussed.

National Mall Streets: There are a number of “radiating & edging streets” within the National Mall. These are very important in the use and perception of the National Mall and adjacent areas. There is a National Mall Master Plan. Does this new overall plan anticipate any changes to the National Mall Plan in terms of road alignment, lighting, landscape treatment or longer hours for the Smithsonian museums?

Graphic Question: The overall "Street Categories" map on page 9 shows, in solid black, the original National Gallery of Art building, the National Museum of Natural History, and the Smithsonian Castle. Why are the other Smithsonian museums and the East Building of the National Gallery of Art not shown? These are important "framing" buildings for the east section of the National Mall and are one of the main attractions of the National Mall.

Conclusion: The NCPC "Monumental Core Streetscape Framework & Lighting Policy" report is an important report. The Committee of 100 on the Federal City believes that adding some additional information and examples to the report, as indicated above, will make it more understandable and useful and that significant modifications are needed in the lighting policy

Thank you for considering our comments.

Sincerely,



Kirby Vining, Chair

cc:

National Capital Planning Commission

ATTN: Meghan Spigle Dowker
401 9th Street, Suite 500
Washington, DC, 20004