



June 13, 2013

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**Re: Comments of the Committee of 100 on the Federal City on the
Initial Updated Concepts for Pennsylvania Avenue**

Dear Ms. Spain:

The Committee of 100 on the Federal City is pleased to provide comments on the initial updated concepts for the Pennsylvania Avenue National Historic Site Plan. These comments are based on the presentation made at the Pennsylvania Avenue Environmental Assessment Scoping Meeting at the National Capital Planning Commission on Wednesday evening, May 29, 2013, and the written materials provided at that meeting.

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 (1791-1792) and the planning work of the McMillan Commission (1901-1902). The continuing development of Pennsylvania Avenue is an important part of the ongoing revitalization of the central area of Washington, D.C., both in the Monumental Core and in adjacent areas.

It now appears that we are on the verge of a very dramatic change for the center of our city. This includes the revitalization of Downtown north of Pennsylvania Avenue, a process underway for over fifty years and now nearing completion; the remaking of Pennsylvania Avenue under the initial guidance from the Pennsylvania Avenue Development Corporation; the continued development and enhancement of the National Mall by the National Park Service, the Smithsonian Institution and others; and the new plans for the area south of the National Mall, generally extending from 1st Street to 15th Street, SW, and south to the Southwest Freeway (I-395). That large area includes the Southwest Ecodistrict Plan area, prepared by the National Capital Planning Commission; the Maryland Avenue Plan area, prepared by the D.C. Office of Planning; the site of a future memorial to President Eisenhower and the site of the American Veterans Disabled for Life Memorial which is nearing construction. This area has the potential to be a major gateway to Southwest and the Southwest Waterfront where major new mixed-use development is already underway with the Hoffman-Madison Wharf. Taken

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together, these projects have the potential cumulative effect of transforming the historic commercial and federal centers of Washington.

Although some of these efforts will still take some years to realize, the result can be an exciting new image and a new activity pattern for the central area of Washington. This progress is important to the residents of Washington, D.C., the region, and the nation. Pennsylvania Avenue, at the center of this building campaign, is truly a national street, recognized across the nation and around the world, its identity embedded in the minds of many as the symbol of our independence and our government linking of the White House and the Capitol.

The Importance of Updating the Pennsylvania Avenue Plan

The National Park Service initially included planning for Pennsylvania Avenue with the preparation of an updated Plan for the National Mall (completed in 2010). However, in 2008, the National Park Service split the planning for Pennsylvania Avenue off from the National Mall Plan process. Although we understand that some background work on Pennsylvania Avenue has been undertaken over the past five years, we are not aware of any public discussion or involvement with that work nor of any information that was made available to the public until the May 29, 2013 meeting.

In recent months, in background notices, the National Park Service has spoken of preparing, in cooperation with the U.S. General Services Administration, the National Capital Planning Commission, and the District of Columbia, a master plan for the long-term vision and management of Pennsylvania Avenue. According to the National Park Service, this planning effort focuses on establishing a long-term vision plan that will ensure the continued use of Pennsylvania Avenue as the nation's "Main Street", where inaugural parades, civil rights marches, and state funerals occur, and where nationally significant people and events will be commemorated in the future.

Moving forward, it is important that what the National Park Service, and others, are actually proposing be as clear as possible. Therefore, the Committee supports the concept of preparing a long-range vision plan that will update the planning, preservation and activity concepts in the 1974 Pennsylvania Avenue Plan to address the needs and opportunities of the 21st century.

Proposed Alternatives

The background and concepts which were presented to the public on May 29, and which had been previously discussed with Federal agencies, the District government, and other organizations over the past several months, deal primarily with issues of maintenance of the streetscape and landscape along Pennsylvania Avenue and with additional steps to improve permitting for events and for simplifying the permit process to allow more activity along the Avenue, such as sidewalk cafes.

With the idea of developing alternatives in providing visitor, resident and workforce amenities and strengthening management practices along Pennsylvania Avenue, the Consulting Parties Update lists four alternatives:

- No Action: continue current management;
- Alt A: Emphasize historic grand character / no transfer of jurisdiction;

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- Alt B: Emphasize vibrant streetscape and public space / includes transfer of jurisdiction of sidewalks and other areas;
- Preferred Alt: Maintain PADC goals and historic Avenue while creating vibrant streetscape and public space; includes jurisdictional transfers or option to manage through non-profit partners.

The Committee of 100 looks forward to the upcoming public meetings as indicated in the text but is concerned that, after the presentation of the initial proposals to the public on the evening of May 29, only 15 days were provided for public comments. This is not sufficient time for citizen review of complex materials, and for formulating adequate responses. In addition, as noted previously, there has been no public discussion or involvement with that work and no information available to the public until the May 29, 2013 meeting. The Committee of 100 requests that the continuing planning work for Pennsylvania Avenue provide appropriate time for review and comment by consulting parties and the public. It is also important that materials provided to the agencies involved, and to the public, be clear and understandable in terms of text and graphics.

Comments on Preferred Alternative

A major element of the preferred alternative would be for the National Park Service to partner with a non-profit organization to carry out some of these functions. This would likely be the Downtown Business Improvement District (Downtown BID). The Downtown BID seems like the logical organization since it has the experience, expertise and staff to carry out additional responsibilities in the Pennsylvania Avenue area. In fact, all of the Pennsylvania Avenue area is within the boundaries of the Downtown BID. However, the information presented to date does not indicate how the Downtown BID will obtain the additional funding which would appear to be needed for this enhanced role. In terms of “urban housekeeping” such as emptying the trash and watering the plants the BID may be a viable option, as long as the duties are well defined. BIDs should never have a regulatory role and we assume that DDOT’s Public Space Commission, DC’s Alcoholic Beverage Regulation Administration and other agencies having jurisdiction would continue to control sidewalk use. The BIDs, as arms of the commercial property owners and their interests, do not necessarily share the long term interests of the public or necessarily make the best decisions for the civic realm. Therefore, in order to increase confidence that the BID will serve a public function on Pennsylvania Avenue more information and details are requested as to the function of the BID.

It is important to be clear on the long-term, continuing role of the National Park Service in the planning and revitalization of Pennsylvania Avenue. For reasons which are not clear, the National Park Service at present seems to be unwilling or reluctant to carry out the continued maintenance and improvement of the areas of the Pennsylvania Avenue which are under its jurisdiction. The Committee of 100 believes that realizing the vision for Pennsylvania Avenue requires both the involvement of the Federal government and the District government, as well as private property owners and organizations such as the Downtown BID. It also involves other organizations that are interested in the future use and development of Pennsylvania Avenue area, as well as future development and linkages to adjacent areas.

If the Federal government is to maintain its key role in the future of Pennsylvania Avenue, it would seem that the National Park Service is the appropriate Federal agency to continue to be most concerned with the continued maintenance and improvement of the Pennsylvania Avenue area. It appears possible,

with appropriate agreements, to have the Downtown Business Improvement District take over certain maintenance and activity functions and to improve the regulatory framework to promote more activity along the Avenue. However, based on the information that has been presented to the public thus far, the Committee of 100 has not seen credible justification for the National Park Service to withdraw from its basic jurisdictional responsibilities for areas along Pennsylvania Avenue.

The actions outlined to the public on May 29, and which clearly need more discussion and clarification, deal primarily with maintenance and activity in the Pennsylvania Avenue area. These are very important activities. However, just addressing these needs and issues is no substitute for addressing and updating the overall development plan for the Pennsylvania Avenue area.

While the Committee of 100 appreciates the “. . .need for the plan. . . to address current problems and concerns about the management and maintenance of the avenue and its connections to the city, and to better achieve the goals of the 1974 Pennsylvania Avenue Plan.”¹ and sees the Preferred Alternative as a promising public-private solution in the 21st century. In light of the concerns noted above, we support with reservations the Preferred Alternative.

Next Stages of Work on Updating the Pennsylvania Avenue Plan

The Committee of 100 on the Federal City looks forward to the next stages of work in updating the Pennsylvania Avenue Plan for the 21st Century. This will obviously involve the National Park Service, the National Capital Planning Commission and the General Services Administration, as well as other Federal entities that have a significant role and interest: U.S. Commission of Fine Arts, Smithsonian Institution, National Gallery of Art, the National Archives and other Federal agencies located along or near the Avenue and the Architect of the Capitol. The District of Columbia Government has a special involvement and interest, both since it maintains the street area of the Avenue, and because the John Wilson A. Building, Washington, D.C.'s City Hall, is located near the west end of Pennsylvania Avenue at 14th Street, NW. In addition, Pennsylvania Avenue is very important to the city in economic terms because of its “bridge” function between Downtown and the National Mall. Other organizations, both local and national, including consulting parties, as well as businesses along Pennsylvania Avenue have an interest in the future development of the area. The Newseum is an example of an important institution and visitor attraction on the Avenue that will benefit from additional development and activity along Pennsylvania Avenue

Future Opportunities for Pennsylvania Avenue

It is now clear that there are major opportunities for new development and activity along Pennsylvania Avenue that need careful planning and encouragement. On the north side of Pennsylvania Avenue, the future development of the FBI Building site (one large block or square) is the outstanding opportunity, both in terms of design and a mix of uses. The building now has four essentially dead frontages on Pennsylvania Avenue, 10th Street, E Street, and 9th Street, NW. The design and activity in these frontages in a future building complex can be very important in improving pedestrian flow and activity along Pennsylvania Avenue, as well as north-south along 9th and 10th streets and east-west along E Street. In addition, there are other buildings along the north side of Pennsylvania Avenue that may undergo renovation or redevelopment in the future. There are also a number of opportunities for adding

¹ <http://www.parkplanning.nps.gov/projectHome.cfm?projectId=47303>

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new activity in existing buildings along the Avenue, in addition to sidewalk cafes and related activity. The D.C. Office of Planning is currently suggesting zoning changes on the north side of Pennsylvania Avenue that need careful consideration of their effect on the character of the Avenue.

On the south side of Pennsylvania Avenue, the conversion of the Old Post Office into a 260 room luxury hotel by the Trump Organization is now poised to move ahead, with construction to begin in 2014 and the hotel scheduled to open in 2016. Retail and restaurant space will be an important part of the hotel. Consideration is needed of adding other uses in the Federal Triangle buildings along the south side of Pennsylvania Avenue, consistent with security requirements. And at the east end of Pennsylvania Avenue, at the foot of Capitol Hill, there is the potential to add new uses and landscape features in the area around Union Square, on lands under the jurisdiction of the Architect of the Capitol.

Planning for Pennsylvania Avenue must include consideration of new and expanded transportation services for Pennsylvania Avenue and the adjacent areas, both east-west and north-south, linking Downtown across Pennsylvania Avenue to the National Mall and on into the Southwest gateway area south of Independence Avenue.

Summary and Next Steps

While the immediate focus of the National Park Service may be on administrative steps to address maintenance and activity concerns, the Committee of 100 on the Federal City strongly urges that the larger and longer-range planning program must carry the late 20th century vision for Pennsylvania Avenue into the 21st century.

We recognize the need for Pennsylvania Avenue National Historic Site Plan at this time and the Preferred Alternative as a promising public-private solution in the 21st century, we support with reservations the Preferred Alternative in light of our concerns detailed in the text.

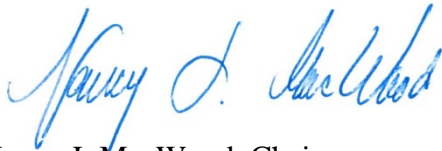
In addition the Committee of 100

- supports the concept of preparing a long-range vision plan that will assess and reaffirm the goals of the PADDC, updating the planning, preservation and activity concepts in the 1974 Pennsylvania Avenue Plan to address the needs and opportunities of the 21st century;
- requests additional and more detailed information as to the function of the BID in order to increase confidence that it will serve an appropriate role on Pennsylvania Avenue;
- believes that realizing the vision for Pennsylvania Avenue requires both the involvement of the Federal government and the District government, as well as private property owners and organizations such as the Downtown BID as well as other organizations that are interested in the future use and development of Pennsylvania Avenue;
- requests that the continuing planning work for Pennsylvania Avenue provide appropriate time for review and comment by consulting parties and the public and that materials be clear and understandable in terms of text and graphics.

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The Committee of 100 on the Federal City is ready to participate in that planning process. We are sure that many other organizations share a similar interest in this section of Pennsylvania Avenue that is so special and important to Washington, D.C. and to our country.

Sincerely,

A handwritten signature in blue ink that reads "Nancy J. MacWood". The signature is written in a cursive style with a large initial "N" and a distinct "J".

Nancy J. MacWood, Chair