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Marcel C. Acosta, Executive Director National Capital Planning Commission 401 9<sup>th</sup> Street, NW, Suite 500N Washington, DC 20004 marcel.acosta@ncpc.gov

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945 G Street, N.W. Washington, D.C. 20001 www.committeeof100.net info@committeeof100.net

# RE: Comments on A New Vision for the Avenue

Dear Director Acosta,

The Committee of 100 on the Federal City (C100) is pleased to submit comments on the recently released concept schematics for "A New Vision for the Avenue" (Concept Plan). Conceived and developed by the National Capital Planning Commission (NCPC) and others, A New Vision focuses much needed and long overdue attention on the future of Pennsylvania Avenue in our nation's capital between the west grounds of the Capitol Building and the U.S. Treasury Building on 15<sup>th</sup> Street. The Committee of 100 finds many of the proposed concepts creative and intriguing and appreciates the Commission's leadership and focus on what is arguably our nation's most important street.

# **General Notes/Observations/Questions**

**Finding the Right Balance:** We heartily support the Concept Plan's vision for Pennsylvania Avenue – one that celebrates its civic role and spirit of democracy; creates an inspiring public realm; and modernizes infrastructure to make the Avenue a great street and an iconic destination. We suggest, however, that it should be more than a "great street," it should be a Grand Boulevard – an iconic destination akin to the Avenue des Champs-Élysées in Paris.

The subtext to that vision appears to be: 1) Supporting a social and economic "boost" for the area adjacent to that segment of the Avenue currently lacking urban and economic vitality; 2) Reducing the size of the roadway and improving the Avenue as a compelling and enlivened civic stage; and 3) Using the Avenue as an alternative to the overuse of the National Mall. Underlying all these objectives is maintaining the Avenue as an important city street and in its ceremonial role as the site of important State events such as the quadrennial Inaugural Parade.

Overuse of Events on the National Mall: Frankly, the case for eliminating or reducing citizen activities and special events on the National Mall by moving them onto Pennsylvania Avenue is not made. What is the nature and magnitude of the problem? How many "events" occur yearly? Is a significant increase anticipated? On what basis are those predictions made? Is the proposal to remove all events or only a certain number or "type"? What is the likelihood that organizers would be willing to move? What are the criteria for moving events? How has the nature of events destined for removal served as a basis for designs in the Concept Plan (numbers of people, duration, whether participants "march" or stay in place, multiple-day, evenings only, etc.). We assume all these data have informed the Concept Plan and believe making these available to those reviewing and commenting would be helpful for further

review. And they would add deeper context. We look forward to greater insight into this before the next iteration of this exciting plan.

A Related Note on National Mall Events: Experience and intuition dictate that many citizens and organizations seeking national or international attention for their "cause" or celebration in their Nation's Capital will not willingly leave the majestic National Mall for a less impactful site on Pennsylvania Avenue. The Mall setting with either the Capitol Building or Washington Monument in background is without parallel and citizens exercising their First Amendment rights will likely not willingly surrender that impact and drama for what may be seen as a site of diminished import and greater control. Under whose authority will the decision be made? Who will establish criteria? These issues invite political intervention, and we trust this matter is being factored into your strategy as this concept progresses. As we expect you know already, this has the potential for negative public relations for both NCPC and the National Park Service in these fraught times.

**Additional Background/History/Context:** The Committee of 100 believes that additional historic context is needed to understand and evaluate the new Concept Plan. Pennsylvania Avenue is, as we all know, a historic street with a rich legacy. Understanding better those events and putting them into context can inform better future directions. **Attached**, we provide some perspective to frame that context. Too, it would be useful in assessing the Concept Plan to have some relevant statistical/ planning data pertinent to the issue, e.g., size of nearby residential population and prospects for increasing it. Also, what is the current state of businesses and what additional commercial prospects might enliven the north side?

Benefits to the City: The Concept Plan addresses almost exclusively the Events venue goal – dominating the Concept Plan almost to the exclusion of potential impact on the immediate and larger city. And while the Events design exercise is understandably the more visually compelling, taking into consideration the potential effect on a major metropolis seems to have received little to no attention. Many logical questions arise and are unanswered in reviewing the document. For example, permanent or temporary closing of streets is a recurring notion throughout the Concept Plan. But how will this affect traffic, commerce, and daily use for citizens and visitors during both Event and non-Event times? The needs of a workaday city must continue to be met or improved – Event or not. The Downtown area on the north side of the Avenue is already recognized as in need of additional urban vitality, new businesses, residences, etc. It could be argued that the Concept Plan may worsen the problem. Wouldn't street closures in the area (particularly permanent) exacerbate an already problematic situation? As the Concept Plan continues to develop, we recommend better addressing these likely competing issues – striking a better balance. Large Events, one presumes, will likely occur neither daily nor weekly. The needs of the functioning city must be met day in and day out, 24 hours a day.

An Important Thought: There is not much to be done to enliven the south side of the Avenue with its predominantly governmental buildings (and security issues), though they do add monumentality to the vista. Therefore, the Concept Plan should focus mostly on the north side in terms of creating a more welcoming environment for both Event staging as well as day-to-day life. It may be that not too much can be physically done with the infrastructure of the public space that will be likely to attract more people daily. But what is done can certainly help to make it more appealing and comfortable when people are there. And this must include adequate public restrooms and rapid access all along the Avenue for police, fire, and medical services, as many have noted.

**About Our Comments:** Given the schematic/highly visual nature of the Concept Plan and the repetitive and oftentimes overlapping design iterations offered, we chose not to organize our comments by each named design concept, but rather to accept NCPC's invitation to respond to single "ideas," noting that specific design iterations are not rigid and may ultimately be intermixed. That said, as you will note from our comments, we generally favor the Urban Capital concept that recognizes the street plan and vista are key elements of the historic L'Enfant Plan, It best reflects who we are – an urban capital in which people live and work. It also recognizes that Pennsylvania Avenue is an important city street that should accommodate multiple modes of transportation, as well as a grand boulevard that hosts "State Events" such as the Inaugural Parade and funeral processions with unparalleled views of the Capital City. Noting the general and conceptual nature of the document to date and recognizing that we will likely return to this as more detailed concepts are developed, below are our comments on what we think are the larger and more significant components and issues.

# **Specific Comments**

The Baroque Street Vista: Preserving unobstructed the monumental vista down Pennsylvania Avenue between the Treasury Building and the Capitol must be NCPC's highest priority. That view is Pierre L'Enfant's signature, late 18<sup>th</sup> century design expression – instantly recognizable world-wide. It links our city with other world capitals like Berlin, Paris, London, Beijing, and Rome. Words such as "Arrival Experience" "Dignity" and "Ceremonial" are often applied to the journey up Pennsylvania Avenue towards Capitol Hill – for presidents, visitors, and local citizens alike. Obstructing the experience of seeing the Capitol Dome with dense plantings of trees would be inappropriate and an adverse impact on the historic design integrity and the vista's cultural significance. Views of the Capitol should remain clear all along the Avenue to pedestrians, tourists, shoppers, outdoor café diners, and vehicular traffic. The 1.3 mile stretch of the Avenue is arguably the city's (and our nation's) most significant urban planning expression – the classic and historic Grand Boulevard of our city. It must remain so.

"Right Sizing" the Avenue: A 2018 DDOT (District Department of Transportation) report found that declining traffic use on the Avenue makes reducing the number of traffic lanes a great opportunity for reinvention. Today, the Avenue is vastly underutilized many times of the day. We heartily concur with DDOT's finding and see the Concept Plan exercise as an opportunity to widen and "reinvent" the area between the street curb and building elevations throughout the 1.3-mile expanse – including varied paving textures and colors, visually compatible street furniture, kiosks, lighting, landscaping, pocket parks, and tree plantings. Having said that, introducing a landscape "vocabulary" more akin to a country garden expressed in some Concept Plan renderings (meandering paths, ponds, etc.) seems inappropriate and "out of place". Well-conceived and executed opportunities more in harmony with the monumental urban setting abound for multiple landscape additions in terms of plant material and street furniture and can and should be taken advantage of throughout.

Vehicular Traffic: Having said the above, *permanently* closing the Avenue (its full length or in segments) to private vehicular traffic should be eliminated as a Concept Plan idea. Once a vital transportation corridor, this length of Pennsylvania Avenue traffic was significantly enfeebled with the unfortunate 1995 closure of E Street across the Ellipse south of the White House. Further restricting the Avenue to vehicles as proposed will only diminish the vitality of the Avenue, the Monumental Core, and inevitably "reroute" traffic elsewhere causing further collateral circulation problems downtown. It is understood that the Avenue in toto (or in part) may be closed for periodic Events. However, it should remain open to vehicular traffic at all other times. There is neither the constant economic/commercial vitality on or within the multi-block area of the Avenue currently (or planned) nor the numbers of people and visitors living or recreating in proximity 24/7 to warrant a complete private vehicular traffic shutdown – particularly in non-Event hours. Further removing traffic will only exacerbate the situation. Pennsylvania Avenue must remain a working and vital urban street.

**North/South, Numbered Street Closures:** While not fully clear in all iterations, proposals to close permanently one or several north/south numbered streets crossing the Avenue figures in multiple design concepts throughout. This also should be eliminated from the Concept Plan. While temporary and brief Event-specific closures can be expected, permanent restrictions on these north/south streets anywhere along the 1.3-mile Avenue's length will further eliminate urban vitality from the immediate area contributing further to loss of economic and social vigor during non-Event times with potential collateral impact of traffic (local and commuter) elsewhere in the downtown.

Maintain the Avenue "Wall": Preserving and maintaining the continuum of building wall height and solidity facing the Avenue is an important consideration. As was emphasized in the development of NCPC's site guidelines for a possible replacement for the FBI Building, the "rhythm" of street wall is an important character-defining feature to be considered in the event of any changes. We recognize that currently that wall along Pennsylvania Avenue it is not completely uniform on the north side (building fronts and setbacks from the street) but most is within a narrow range. Considering that a new building (or multiple buildings as the case may be) will likely replace the FBI Building, whatever the design decision on the site, it is important that it contribute much more to the street life than the current building does and comply with NCPC's excellent site guidelines for those squares. We would anticipate that NCPC would develop similarly thoughtful guidelines for any other redevelopment along the Avenue.

"Rooms" as a Concept (Western End, Market Square, Eastern End): This is a wonderful, innovative, and potentially exciting concept having the potential to add a whole new dynamic, vocabulary, vitality, and rhythm to Downtown DC – whether for Events or to the daily life of the city. They offer a potential to localize smaller events without closing the Avenue in its entirety. The rooms can draw day-to-day street activity north of the Avenue to the benefit of a larger area both in terms of economy and vitality. Rooms create more intimate venues for daily, non-Event entertainment and commercial businesses. And they can serve both as a venue as well as a destination. We look forward to further design iterations. We caution, however, that development (either permanent or temporary) of these exciting concepts must not adversely affect the existing historic urban context (demolition of buildings or landscape). The C100 looks forward to further design development.

**Eastern End** – **Tunnel**: We recognize that the intersection of Constitution Avenue and Pennsylvania Avenue is complicated both in terms of pedestrian and traffic safety. However, the proposed tunneling of Constitution Avenue under Pennsylvania Avenue, while a creative idea, is not a viable solution and would be a serious mistake. Such an action would require surface air vents and closing Louisiana Avenue and 4<sup>th</sup> Street. It would also create pedestrian obstacles and generate unwanted traffic noise bouncing off the hard surface underpass walls. In addition, the tunnel's proposed location is within the city's floodplain creating a "recipe for disaster" – remembering the June 2006 flood that inundated much of Constitution Avenue near the proposed site. And importantly, a tunnel would be an unfortunate feature so close to The National Gallery of Art.

Eastern Terminus of Pennsylvania Avenue at the Capitol Grounds: We are heartened that the Concept Plan scope includes considering the future of the Avenue's terminus on (or at) the Capitol Grounds. Currently, America's grand boulevard ends ignominiously among Jersey Barriers and parking for "Hill staffers" and Botanic Garden visitors. An underground parking garage on the Capitol Grounds over which new gardens with an axial sculpture or monument would be more appropriate to the location. The Architect of the Capitol should be challenged to find a more appropriate way to address parking needs both in relation to Pennsylvania Avenue and Maryland Avenue.

Western End – Freedom Plaza and National WWI Memorial: This proposed "Room" element of the Plan is least likely to cause significant change from what currently exists. Unlike the proposed site of the other two "Rooms," much of the space and urban vitality is already there (National and Warner Theaters, two parks, White House Visitors Center, District Building, restaurants, hotels, etc.). Having said that, the issues proposed in the Concept Plan are more nuanced and challenging. Restoring the original L'Enfant Avenue alignment by cutting through Freedom Plaza is a historically satisfying idea. But doing so, destroys a significant mid-20<sup>th</sup> century urban landscape (Venturi, Rausch, Brown, Patton – 1980) along with the popular original city map pavement. Too, preserving Freedom Plaza "as is" has many fervent and vocal adherents in the local skateboarding community. What better urban vitality? Also, The National Theater is rightly concerned in preserving easy and close street access for theater goers should any proposal require street closures. In full candor, C100 is of a mixed mind between the two options. On the one hand, we like that it would reestablish the historic street pattern and bisect Freedom Plaza with the resulting spaces redesigned to be greener and more welcoming. On the other hand, it would complicate traffic patterns, make visiting the National WWI Memorial somewhat more difficult and bisects a good potential "urban room". If retained, we would support having Freedom Plaza redesigned to be at grade, incorporating skateboarding and reinstalling or recreating the L'Enfant Plan map.

## **Further Thoughts**

Governance: Once A New Vision for the Avenue is finalized and "adopted," NCPC should seek Congressional authorization and funding for a unitary, governing body akin to the Pennsylvania Avenue Development Corporation (PADC) giving the new entity not only the responsibility for accomplishing the approved vision but also the long-term responsibility (with funding) for maintaining, refreshing, and adding or changing as needed. If history is any teacher, the post Pennsylvania Avenue Development Corporation experience showed the inability of federal and local government to work together on maintenance and upkeep given competing interests, short attention spans, and transient priorities. As the Avenue is already developed now, it is unlikely to be necessary to assemble land, work with developers, and have Congressional approval of plans. Rather than creating a new entity, perhaps NCPC could be given additional authority, funding, and staff for the effort.

A Broader View: Our letter considers a select part of Pennsylvania Avenue between the Capitol and the White House only. We note for the record, the importance of other sections of the Avenue in our city — west of the White House extending to Georgetown and east of the Capitol Building southeast to the Anacostia River and across to the Maryland Line. These other sections of Pennsylvania Avenue have their own potential, problems, plans and projects worthy of attention.

Thank you for the opportunity to review and comment on this important and highly intriguing Concept Plan. We recognize that this exercise is only at the conceptual stage. We look forward to seeing more detailed iterations in the future and to continuing this dialogue affecting arguably America's most significant historic urban spaces. If you have any questions or require additional information, do not hesitate to contact us.

Sincerely,

Kirby Vining, Chair

The Committee of 100 on the Federal City

#### Attachment

- cc: •Elizabeth Miller, Director, Physical Planning Division, National Capital Planning Commission
  - •Peter May, Associate Regional Director for Lands & Planning, National Park Service
  - •Mina Wright, Office of Planning & Design Quality, Public Building Survey, General Services Administration
  - J. Brett Blanton, Architect of the Capitol
  - •John Falcicchio, Deputy Mayor for Planning and Economic Development
  - •Anita Cozart, Interim Director, DC Office of Planning
  - •Phil Mendelson, Chair, Council of the District of Columbia
  - •Thomas Luebke, FAIA, Secretary, U.S. Commission of Fine Arts
  - •Catherine Townsend, President & CEO, Trust for the National Mall
  - •Judy Scott Feldman, President, National Mall Coalition
  - •Rebecca Miller, Executive Director, DC Preservation League
  - David Maloney, DC State Historic Preservation Officer
  - •Jo-Ann Neuhaus, Executive Director, Penn Quarter Neighborhood Association
  - •Gerren G. Price, President and Chief Executive Officer, Downtown DC Business Improvement District (BID)
  - •Angela Franco, President and CEO, DC Chamber of Commerce
  - Anthony A. Williams, CEO and Executive Director, Federal City Council
  - •Karin Schierhold, Urban Planner, National Capital Planning Commission
  - •Tammy Stidham, Deputy Associate Regional Director, Lands & Planning, National Park Service
  - •Charles A. Birnbaum, Founder + President, The Cultural Landscape Foundation
  - Nord Wennerstrom, Director of Communications, The Cultural Landscape Foundation
  - Jeremy Hurlbutt, Chapter President, National Capital Area Chapter,

American Planning Association

- •Mary Fitch, AICP, Hon AIA, Executive Director, American Institute of Architects-DC
- •Peggy McGlone, Washington Post
- •Philip Kennicott, Washington Post
- •Luz Lazo, Washington Post
- •Cathleen McGuigan, Editor-in-Chief, Architectural Record

# **ATTACHMENT**

## BACKGROUND INFORMATION FOR A NEW VISION FOR THE AVENUE

#### Historical Development of Pennsylvania Avenue

The history of this section of Pennsylvania Avenue begins with the "L'Enfant Plan of 1791". President George Washington selected the site for the new capital city of the United States on the Potomac River and asked Pierre L'Enfant to prepare a plan for the city.

L'Enfant arrived in Georgetown on March 9, 1791, and the next day began riding over the site of the future city (then farmlands and woods) to review the terrain. He continued this review and prepared an imaginative plan later that year that showed a system of major diagonal avenues laid over a grid of streets. On a hill near the center of the plan was the location for the "Congress House" (now the site of the U.S. Capitol), and at the end of a major diagonal avenue extending northwest from the Congress house was the "President's House" (where what we now know as the White House is located). There were no street names, numbers, or letters on this original plan. Some modifications were made to the original plan by surveyor Andrew Elliott and a somewhat revised plan was engraved in 1792. There are avenue names and letters and numbers for the east-west and north-south streets on this plan. The avenue extending northwest from the "Congress House" to the "Presidents House" was named "Pennsylvania Avenue."

In the 230 years since 1792, the City of Washington has continued to develop and expand, and Pennsylvania Avenue has played a significant role as a transportation spine, a development corridor, and a symbolic link between the Capitol and the White House. Pennsylvania Avenue is the route of the Inaugural Parade every four years and the site of many other "State "events.

While there are many studies, books and plans about Pennsylvania Avenue in some form, there is no current history about how the Avenue has developed over time and the various events and plans that have shaped it and this area of Washington. We do want to note the book, *Washington Through Two Centuries: A History in Maps and Images*, by Joseph R. Passonneau (2004). This book has specially drawn maps to indicate the streets, buildings, and other features in Central Washington, including the Pennsylvania Avenue area in 1860, 1900, 1940, 1970 and 2000. These maps make it easy to visualize the physical changes that have occurred along Pennsylvania Avenue over those years.

The Committee of 100 suggests that the National Capital Planning Commission take steps to have a major historical study of Pennsylvania Avenue and adjacent areas undertaken. Such an historical study will be useful as the Pennsylvania Avenue Initiative continues to move forward.

## **Recent and Pending Events and Developments**

Over the past several years there have been several new developments and trends which have affected Pennsylvania Avenue, and which will affect the Avenue in the future.

**National World War I Memorial:** The open space at the west end of Pennsylvania Avenue, between 14<sup>th</sup> and 15<sup>th</sup> streets, NW was developed as a park by the Pennsylvania Avenue Development Corporation. It was named Pershing Park in 1981 and a statue of General John J. Pershing was erected. In 2015, discussions began about converting the park into the National World War I Memorial. The design evolved over several years. The Memorial was formally opened on April 16, 2021. It is important both as a memorial to the First World War, but also in providing attractive open spaces at the west end of Pennsylvania Avenue. A key feature of the memorial will be a special sculpture, titled "A Soldier's Journey." That sculpture is now being cast and will be installed in 2023 at the central space of the Memorial.

**National Children's Museum:** The National Children's Museum opened in the Ronald Reagan Center in the fall of 2021. The Museum is in the plaza on the axis of 13<sup>th</sup> Street just south of Pennsylvania Avenue. This museum should attract additional visitors as its program and location become known.

**Waldorf Astoria Hotel in the Old Post Office Building:** The Old Post Office Building, built in 1899, is located on the south side of Pennsylvania Avenue at 12<sup>th</sup> Street, NW. It is a distinctive building architecturally in terms of its Victorian design, its tall tower, and its interior atrium. The Federal government owns the land and the building. In 2012, the General Services Administration selected the Trump Organization to redevelop the building as a hotel. The Trump International Hotel opened in 2016. In May 2022, the Trump Organization sold the lease to the hotel which reopened on June 1, 2022, as a Waldorf Astoria Hotel. This new hotel operation should bring increased activity to this part of Pennsylvania Avenue.

**New Johns Hopkins University Complex:** The addition of the new Johns Hopkins University "Washington Campus" in the former Newseum Building on the northeast corner of Pennsylvania Avenue and 6<sup>th</sup> Street, NW will be an important new activity in the east end of Pennsylvania Avenue. This is an important location on Pennsylvania Avenue. The Canadian Embassy is to the east, the National Gallery of Art is to the south on Constitution Avenue, and the view of the Capitol is very prominent to the east.

Johns Hopkins University now has classes and other activities in three separate buildings in the Dupont Circle neighborhood. The Newseum opened in 2008, and though it had remarkably interesting exhibits and programs, it was not fully successful in terms of attracting visitors. Seeing an opportunity, Johns Hopkins purchased the building. Plans for modifications were approved in late 2019 and construction has been underway since 2020. The reconstructed building will have classrooms, offices and a large first floor lobby. A first-floor café will serve students, faculty, and the public. The existing north wing of the building, with residential units and a restaurant space, will remain.

Construction of the redesigned building should be completed by the summer of 2023, and classes and other activities are expected to start in the fall of 2023. This will bring students, faculty, and staff to this location, greatly increasing activity at the east end of the Avenue. It will also give Johns Hopkins University a very prominent location for its Washington educational activities on Pennsylvania Avenue.

Interest in Holding Events Along Pennsylvania Avenue: In recent years, there has been increased interest in holding various events, demonstrations, and celebrations along Pennsylvania Avenue. The demand seems to be great and growing. Since a major emphasis of "A New Vision for the Avenue" concept is to increase the number, size, and variety of activities along the Avenue in the future, some description of past uses/events of various sizes would be helpful. Also including examples of events held elsewhere that might be more suitably held on Pennsylvania Avenue would be informative; the 3-day "Something in the Water" musical event recently held on Independence Avenue comes to mind.

**Potential Changes Resulting from January 6, 2021, Riot at Capitol:** The "riot" at the Capitol on January 6, 2021, had large scale national impacts that continue to this present time and undoubtedly will continue. Concerns with security for the Capitol involve considerations of design and policy at the east end of Pennsylvania, especially at Third Street, NW where the Avenue meets the Capitol grounds. This issue is discussed further in the "U.S. Capitol Transition" section at the end of this comment paper.

**Effects of the Covid Epidemic:** There are various changes and potential changes along Pennsylvania Avenue and in adjacent areas to the north and south because of the Covid Epidemic which started to be felt in March 2020 and has continued to the present day. These impacts were largely negative and impacted especially the office and retail market and residential, entertainment and related activities. The impact has decreased in recent months, but the long-range impacts are still not clear and will not really be clear for some time, for at least several years.

The Downtown DC BID has done some studies of this issue and plans more in the future. NCPC and the District Government, in cooperation with other organizations, should cooperate in addressing the impacts the Covid Epidemic has had on the future of Pennsylvania Avenue and adjacent areas.

## The Big Unknown Potential

The single biggest potential for change along Pennsylvania Avenue would be the redevelopment of the FBI Building site. The FBI Building is located approximately halfway between the east end and the west end of Pennsylvania Avenue. The FBI Building occupies a large block of land, bordered by Pennsylvania Avenue on the south, 9<sup>th</sup> Street on the east, 10<sup>th</sup> Street on the west and E Street on the north. With its fortress like Brutalist design, the FBI has a deadening effect on activity on adjacent streets.

For several years there have been discussions of moving the FBI headquarters to a new site in a suburban location. If the FBI headquarters moves, and the existing site is made available for redevelopment, this could create a major new activation on Pennsylvania Avenue with the potential for major new office, residential, retail and restaurant development and perhaps some museum and performing arts space. The future of the FBI Building site is not under consideration in this current planning effort. However, it is something particularly important to keep in mind for the future.