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Testimony on the National Mall Plan

**Before the
National Capital Planning Commission**

December 2, 2010

**John Fondersmith, AICP, Representing
The Committee of 100 on the Federal City**

The Committee of 100 on the Federal City is pleased to comment on the *National Mall Plan* prepared by the National Park Service that is now before the Commission. 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 (1791-92) and the planning work of the McMillan Commission (1901-02). The future development and use of the National Mall is a major interest of the Committee. The Committee of 100 is one of the consulting parties in the Section 106 process related to the National Mall Plan and has been participating in the current public process of preparing the National Mall Plan for the past several years.

The Committee submitted comments (dated May 19, 2008) on the *Draft Alternatives Matrix-The National Mall* (April 2008) and comments (dated May 15, 2009) on the *National Mall Plan-Preliminary Preferred Alternative* (March 2009). The National Park Service then prepared and released the *Draft National Mall Plan/Environmental Impact Statement* (December 2009) and the Committee submitted comments on that draft (dated March 17, 2010). After the *Final National Mall Plan/Environmental Impact Statement* was released in July 2010, the Committee of 100 submitted additional comments (dated August 15, 2010) during the 30-day no-action period. On August 4, 2010 the National Park Service released a Draft Programmatic Agreement. The Committee of 100 submitted comments (dated September 3, 2010) on that Draft Programmatic Agreement.

During this same period (2008-present), the National Park Service was also undertaking studies for a number of new construction and restoration projects on the National Mall, including the West Potomac Park Levee, the Jefferson Memorial Seawall and Plaza Project, Restoration of the District of Columbia War Memorial, Rehabilitation of the Lincoln Memorial Reflecting Pool and Surrounding Area, and the Thomas Jefferson Memorial Vehicle Barrier

System. The Committee of 100 submitted comments on these individual projects and will continue to be involved in such reviews as additional projects move forward.

Finally, as you know, this Commission (NCPC) and the U.S. Commission of Fine Arts worked together to prepare the *Monumental Core Framework Plan: Connecting New Destinations with the National Mall*, which was adopted by both commissions in spring 2009. In that process, the Committee of 100 on the Federal City submitted comments on interim drafts of the Monumental Core Framework Plan (comments dated October 9, 2008) and testimony before this Commission on April 2, 2009.

We are especially concerned with connections and linkages between the surrounding city and the Monumental Core, including the National Mall. We cite this long and somewhat detailed involvement of meetings, review, comments and testimony to make the point that the Committee of 100 on the Federal City has a long and serious concern with the plan for the National Mall and the connections to adjacent areas.

Now this phase of planning for the National Mall by the National Park Service has reached a conclusion. National Park Service and Department of Interior officials signed the Record of Decision (ROD) on November 9, 2010 and the Programmatic Agreement was signed on November 8, 2010. Now, this National Mall Plan is before this Commission for action.

We note that a number of changes and modifications were made to the *Draft National Mall Plan/EIS* based in part on comments from many agencies, organizations and individuals. We are pleased that some of the comments of the Committee of 100 have been addressed in some way. We especially want to compliment the National Park Service on providing *Volume 2: Final National Mall Plan/EIS* which provides all of the comments made on the *Draft National Mall Plan/EIS* and provides responses to comments in a useful format to allow comparison.

The Committee of 100 has not agreed with all the National Park Service proposals and we still have some continuing concerns. Some major continuing concerns are summarized below. However, the preparation of the *National Mall Plan* that is before you has required a tremendous effort, balancing many legal and planning concerns and dealing with many diverse and sometimes competing suggestions. We want to express our appreciation to the National Park Service staff and consultants that have been involved over the past several years with preparing the *National Mall Plan*. We want to especially note the work of Susan Spain, the National Mall Plan Project Executive, in directing and guiding such a long and demanding process.

Continuing Issues and Concerns

The National Park Service has indicated that the National Mall Plan is a fifty-year plan, so this plan will extend into the mid-21st Century. The Committee of 100 realizes that any plan for the National Mall will evolve over such a long period. However, that evolution should be guided by a comprehensive framework. The long-range challenge is to outline a plan for the National Mall

that allows for future changes (that cannot be specifically anticipated) without imposing rigid constraints that would deaden the Mall's special character.

In preparing the National Mall Plan, the National Park Service has outlined a planning area that encompasses all of what is now defined as the National Mall, but has only done detailed planning for National Park Service lands. Planning only for the National Park Service area has a number of limitations. While the Committee of 100 understands that there has been background coordination between the National Park Service and other government agencies, this coordination is not always apparent from the material that has been provided to the public. As we have said before, **this fragmented planning for the National Mall is not acceptable when the framework is being outlined for the next 50 years. The American people deserve an overall comprehensive planning approach for the future of the National Mall. The continuing issue is that some elements of the National Mall Plan are not fully comprehensive.**

The Committee of 100 has urged the National Park Service to prepare such a comprehensive plan for the National Mall, by working with the other government agencies and institutions that have a role in the development of the area (the National Capital Planning Commission, the U.S. Commission of Fine Arts, the Architect of the Capitol, the District of Columbia government, the Smithsonian Institution, the National Gallery of Art, the U.S. Department of Agriculture, the General Services Administration, the Washington Metropolitan Area Transit Authority, etc.). It is especially important that the National Mall be integrated with adjacent areas and with District of Columbia central area planning objectives.

The Committee of 100 understands that the National Capital Planning Commission is now poised to approve this National Mall Plan, as indicated by the recommendations in the NCPC staff report. **However, we recommend that NCPC make clear that additional work is needed to achieve a truly comprehensive and understandable plan for the entire National Mall and some adjacent areas, not just the areas under the jurisdiction of the National Park Service.**

The Committee of 100 on the Federal City continues to have some concerns. In summary, major concerns include the following.

- Obtaining a **comprehensive redesign and reuse plan for the Union Square area**, at the east end of the National Mall, including lands under the jurisdiction of the National Park Service and the Architect of the Capitol. The National Mall Plan calls for further work in this area, including a possible national design completion. Addressing the parking issue along sections of Pennsylvania and Maryland Avenues will be especially important.
- We believe there should be continuing efforts to **locate some needed public facilities (restrooms, food concessions, etc) on lands under the jurisdiction of the Smithsonian Institution and the National Gallery of Art** to avoid or limit paving more areas for locating such facilities on more visible and central areas of the National Mall. This is a key example where more coordination and cooperation is needed.

- **Integration of future plans for the Smithsonian Institution and National Gallery of Art buildings and lands with National Park Service plans as part of the National Mall Plan needs to be clear.** The Committee continues to be concerned with the **future use of the Smithsonian Institution’s Arts and Industries Building** and believes that some central visitor facilities pertaining to the National Mall, and operated by the National Park Service, could be located there. We note that the National Park Service proposes visitor information at various locations throughout the National Mall. This is a sensible approach but we believe there should also be a central location where visitors who are interested could obtain more in-depth information about the history and plans for the National Mall and adjacent areas. We do not believe that the proposed “Welcome Plaza” at 12th Street is fully adequate for this need.
- Additional work is needed to **address possible effects of global warming on the National Mall** over the next 50 years. The Plan calls for further study but we believe more urgent attention and emphasis is needed.
- The Committee believes that **additional emphasis is still needed on the design and alignment of the portion of the “Washington Waterfront Walk”** (the planned 11-mile waterfront walk from Georgetown to the National Arboretum) that passes through a section of the National Mall (primarily adjacent to Ohio Drive along the Potomac River). The National Capital Planning Commission should be especially interested in the Washington Waterfront Walk, since this was one of the significant proposals in the Commission’s Legacy Plan. **NCPC should assume a lead role in advocating for and planning the “Washington Waterfront Walk”**.
- Continuing efforts are needed to **plan and develop a multi-modal transportation system that provides convenient movement options throughout the National Mall, as well as providing connections to adjacent parts of Washington. The National Mall Plan does call for such a system but greater emphasis is needed.**
- **Continued development of urban design opportunities is needed**, including new vistas and new connections to adjacent areas. The Committee is pleased that some of its urban design recommendations have been incorporated in the National Mall Plan, and hopes that review and testing of other urban design opportunities and connections will be undertaken in the future, as called for in the Programmatic Agreement.
- **Further enhancement of the landscape design and use plan for the Washington Monument Grounds is needed**, including improved connections to adjacent areas and interpretation of historic features, such as the Jefferson Stone. The connection south to the Tidal Basin and enhancing the axial view of the Jefferson Memorial is especially important. This work should include more than just updating the previously approved landscape plan for this area.

Next Steps

The Committee of 100 applauds the National Park Service for the work that has been done in bringing the *National Mall Plan* to the present stage but we still have concerns about some aspects of the final plan. However, in view of how this planning process has unfolded, we now understand that a somewhat less than comprehensive plan, including only plans for the National Park Service areas of the National Mall, is what will be approved at this time. While we wish the plan were more truly comprehensive, we understand that it is important for the National Park Service to have an approved National Mall Plan so that additional funding can be obtained for future National Mall improvements and increased maintenance for National Park Service lands...

Planning work by other key participants in or adjacent to the National Mall (Smithsonian Institution, National Gallery of Art and the Architect of the Capitol) will continue to move forward and hopefully be completed to the point where public release of their plans is possible in the near future (and the status of coordinated planning can be understood). **Finally, as planning for various projects on the National Mall move forward over the next several years, it will be possible to clarify and refine key points.**

One of the key suggestions made in the Section 106 process related to the National Mall Plan is that a National Register Nomination be prepared for the entire National Mall. The Committee of 100 on the Federal City strongly supports this proposal. We realize that this work will likely take several years but we believe it will inform, and hopefully simplify, future decisions about the development and improvement of the National Mall and relationships to adjacent areas. We suggest that this work should give special consideration to the way that the “mental image” and appreciation of the overall National Mall has changed over time, and can evolve in the future.

Increased National Mall Role for the National Capital Planning Commission

The Committee of 100 on the Federal City believes that the National Capital Planning Commission, working in coordination with the U.S. Commission of Fine Arts, should now take a more active role in continuing to work toward achieving a true comprehensive framework plan for the National Mall. As the federal government’s planning agency in the District of Columbia and the surrounding counties in Maryland and Virginia, NCPC has long been concerned with the planning and development of the Monumental Core area of Washington, D.C., including the National Mall. Since the Commission is composed of 12 members (three appointed by the President, including the Chairman, three representatives of major federal agencies, two members of Congress, and four representatives of the District of Columbia, including the Mayor and Council Chair), it should be in a position to continue work toward a unified *National Mall Plan*.

Over the past several years, NCPC, the National Park Service, the Commission of Fine Arts, the Architect of the Capitol and the District of Columbia Government have been working together on the “Planning Together for Central Washington” program. This has been a very beneficial program. It is unfortunate that the various elements of this program have proceeded on different

schedules, though perhaps that was inevitable with a program that is so complex.

As part of that work, the National Capital Planning Commission and the Commission of Fine Arts worked together to complete a major study of the area around the National Mall. That work was summarized in the report, *Monumental Core Framework Plan: Connecting New Destinations with the National Mall*. That report was approved by the National Capital Planning Commission and by the Commission of Fine Arts in the spring of 2009. NCPC and the Commission of Fine Arts are now continuing with more detailed planning for some of the *Framework Plan* areas. The Committee of 100 will continue to be involved in that process.

The Committee of 100 recommends that NCPC should now step up and undertake additional work to bring the still unresolved elements of the National Mall into a true coordinated framework. We know that the National Park Service has been working closely with the NCPC staff while preparing the *National Mall Plan* and we expect that close working relationship to continue. NCPC could also take other steps, as appropriate, including hiring consultants or convening groups of experts for advice on specific elements of the National Mall Plan. The key need is to make sure that plans of the various agencies with an interest in the National Mall are coordinated in an imaginative way and that the National Mall is linked to adjacent areas.

There is one special issue that NCPC should address that is outside the purview of the National Park Service. This is what can be termed “the view to the west” and involves the view looking west from the Capitol and other locations on the National Mall, beyond the Lincoln Memorial to the hills of Virginia. The original design for the expanded (National) Mall by the McMillan Commission envisioned an uncluttered view to the west. Unfortunately, over time, a number of somewhat obtrusive buildings have been built in Virginia within the visual continuation of the National Mall, a condition which could get worse in the future. Past efforts by the federal government to protect this view corridor have not been successful. We know this problem has various legal, political and financial issues. However, it makes little sense to spend millions of dollars to improve and enhance the National Mall, while giving no consideration to the very important “view to the west”.

The Committee of 100 on the Federal City looks forward to continuing to work with the National Park Service in planning the future of the National Mall, and with the National Capital Planning Commission and other agencies and institutions involved with the National Mall. In addition, the Committee of 100 will continue to be concerned with planning for the surrounding Monumental Core, including further planning for the nearby section of Pennsylvania Avenue which the National Park Service plans to begin in 2011. The planning and enhancement of the National Mall is work that is important to all Americans, including those of us who live and work in Washington, D.C. and in the Washington region. This current National Mall Plan prepared by the National Park Service is an important step forward, but much more needs to be done over the next few years to fully realize the full vision for “America’s front yard”.