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## CONSULTING PARTIES

Comment	Letter 12. American Society of Landscape Architects	Response
	 <p style="text-align: center;">Statement of Nancy C. Somerville, Hon. ASLA, Hon. AIA Representing the American Society of Landscape Architects</p> <p style="text-align: center;">On The Draft National Mall Plan</p> <p style="text-align: center;">Before the National Capital Planning Commission</p> <p style="text-align: center;">March 4, 2010</p> <p>AMERICAN SOCIETY OF LANDSCAPE ARCHITECTS 636 EYE STREET, NW WASHINGTON, DC 20001-1736</p> <p>www.asla.org 1.888.999.ASLA T 202.898.2444 F 202.898.1185</p>	<p>[EDITOR'S NOTE: On March 4, 2010, Nancy C. Somerville provided testimony to the National Capital Planning Commission on the <i>Draft National Mall Plan / Environmental Impact Statement</i> on behalf of the American Society of Landscape Architects.]</p>

Comment	Letter 12. American Society of Landscape Architects (cont.)	Response
<p>A</p> <p>B</p>	<p>Chairman Bryant and Members of the National Capital Planning Commission, thank you for this opportunity to comment on the National Park Service's Draft National Mall Plan. My name is Nancy Somerville. I am the Executive Vice President and Chief Executive Officer of the American Society of Landscape Architects (ASLA), and I speak on behalf of ASLA.</p> <p>The American Society of Landscape Architects strongly supports the overarching goals and objectives of the National Park Service's Preferred Alternative in the National Mall Plan. Without adequate funding for maintenance, and with no major renovation for more than 30 years, the National Mall has fallen into a critical state of disrepair—in spite of the best efforts and committed stewardship of the National Park Service. As an international symbol and the nation's front yard, the Mall is currently an embarrassment. It merits immediate and serious attention, all necessary funding, and the involvement of the best designers, planners, and technical experts.</p> <p>In March of last year, ASLA convened a Blue Ribbon Panel of design professionals representing landscape architecture, architecture, and planning to review the National Park Service's Preliminary Preferred Alternative. The panel's report, published last April, was shared with NCPC, the Commission of Fine Arts, and the National Park Service. My statement today incorporates many of the panel's recommendations.</p> <p>First of all, to restore the National Mall as a place of pride, adequate funding and an overall vision are critical. The focus of the National Mall Plan is, understandably, primarily on maintenance, and design of the important elements and spaces on and around the Mall is still to come. Going forward, however, repairs and improvements must not be piecemeal, but must proceed as part of an overall vision and comprehensive design.</p> <p>In addition, there must be close coordination and cooperation among all of the institutional stakeholders. Not all of the needs of the National Mall can be met within the narrow precincts of the area consigned to the stewardship of the Park Service, and planning for the National Mall and the federal precincts cannot be done in isolation. Along those lines, we applaud the work done by NCPC and the Park Service to coordinate the Framework Plan and the National Mall Plan. As planning proceeds, we urge even closer coordination between your two agencies, as well as the Smithsonian, the Architect of the Capitol, and the D.C. government. NCPC's Framework Plan appropriately recognizes that residents' and visitors' experience of the city is not defined by jurisdictional boundaries. So, too, planning for the National Mall must not be constrained by artificial boundaries.</p> <p>The proposed redesign of Union Square is a case in point. We support many of the concepts underlying the plan's recommendations for this critical area, which is not only a bridge between the Capitol grounds and the Mall, but also lies at the intersection of major connections to the city. ASLA believes strongly that the importance of this site merits an international urban design competition. Such a competition should encompass the entire area, incorporating not just the square but stretching from Constitution Avenue to Independence Avenue to fully integrate the square with the Capitol grounds and provide natural connectivity to the U.S. Botanic Gardens.</p> <p>There are many aspects of the National Park Service Plan and the Preferred Alternative that deserve special praise. Chief among them is the commitment to sustainability, including the application of standards defined by the Sustainable Sites Initiative. ASLA is one of the founding</p> <p style="text-align: right;">Page 2 of 4</p>	<p>A. The proposed plan constitutes a comprehensive vision for the National Mall. The purpose of a vision plan is to provide a coordinated and comprehensive written program for future action to protect America's national parks, and they are prepared with public involvement and environmental analysis in accordance with the National Environmental Policy Act. The proposed plan provides a cohesive framework for future management by addressing physical development needs as well as resource protection, the civic forum, circulation, visitor enjoyment, and park operations.</p> <p>B. We agree, as does the Architect of the Capitol (see comment 2.2B).</p>

Comment	Letter 12. American Society of Landscape Architects (cont.)	Response
	<p>partners of the Sustainable Sites Initiative™ (SITES™), which is the first national rating system for sustainable landscapes. Through the use of sustainable practices for this iconic landscape, the National Mall can become a model of sustainable design for millions of visitors each year.</p> <p>The importance of environmental stewardship—and of valuing the natural resources that make up the Mall—cannot be overstated. As we are all aware, Washington faces serious environmental issues. Urban stormwater runoff contributes to the pollution of the surrounding watershed and to flooding. The trees and other natural vegetation that clean the air and mitigate the urban heat island effect are themselves suffering from the degraded air. Although the city contains a wealth of parks and green spaces, many, like the National Mall, have unhealthy, compacted soils that inhibit root growth and cannot absorb stormwater. ASLA applauds the Park Service's plans for protecting the Elm Panels and for assembling a team of expert consultants to develop a plan to address the soil and turf issues.</p> <p>Other elements of the National Mall Plan that deserve particular praise include the following:</p> <ul style="list-style-type: none"> <li>▪ Removal of the Sylvan Theater and temporary visitor services tent, and reuse of the site for centralized visitor services. As part of this effort, the landscape plan that was part of the Olin Partnership design for the Washington Monument grounds should be fully funded and completed.</li> <li>▪ Reconstruction of the Tidal Basin seawall, already underway, and widening of the walkways.</li> <li>▪ Integration of bike trails around the Tidal Basin and throughout the Mall.</li> <li>▪ Elevation of Constitution Gardens to, in the words of the Park Service, "a rejuvenated garden and destination for relaxation and enjoyment."</li> <li>▪ Renovation of water features, including ending the use of potable water.</li> </ul> <p>We also note several areas of concern.</p> <ul style="list-style-type: none"> <li>D ▪ Development of individual interpretive centers for memorials. ASLA fully endorses Congress's declaration of no new construction on the National Mall beyond what has already been approved. In keeping with that goal, ASLA opposes the creation of individual interpretive centers for memorials. While well intended, these interpretive centers fragment the Mall and diminish the way the memorials and monuments were intended to be experienced. Instead, we support the concept of a central visitors' center—possibly housed in the Arts and Industries Building or in the Smithsonian's Castle building, which already serves as a central visitors' center for the Smithsonian's 17 museums.</li> <li>E ▪ Excessive and intrusive signage. Signage plans need additional careful review, with consideration given to 21<sup>st</sup> century along with 20<sup>th</sup> century solutions.</li> <li>F ▪ Pathways and paving. While the paving system for the entire National Mall area needs a redesign, we are concerned about selecting a "one-size-fits-all" uniform solution for the 26 miles of pedestrian paths within the area. In particular, additional thought should be given to</li> </ul>	<p>C. We agree, and an action has been added that calls for updating and implementing the 2003 Olin landscape plan.</p> <p>D. None of the alternatives in the <i>Draft Environmental Impact Statement</i> proposes interpretive centers for individual memorials. Most memorials have small staffed information areas, but these are different from what is normally included in a visitor center, such as exhibits, audio-visual programs, and theater space. As described on page 130, the National Park Service does not believe that the National Mall needs a central visitor center, but we do believe that a welcome plaza, better pedestrian guide signs, and readily available information at all facilities (including electronically available information) would improve the visitor experience.</p> <p>E. Coordinated graphic information within major tourist/natural or cultural destinations (or campuses) is a necessity to aid in wayfinding, avoid congestion, and provide needed information. Signs should be kept to the minimum. Text should be limited, and pictograms and symbols should be used when possible. These are best practices identified by tourist organizations, highly visited destinations, and campus designers. A pedestrian wayfinding sign project is underway (see DEIS, p. 361). The coordinated sign plan has been reviewed and approved by the U.S. Commission of Fine Arts and the National Capital Planning Commission, and first phases are scheduled to be installed in the summer of 2010.</p> <p>F. It was not the intent to use a single paving material in all areas of the National Mall, and the text has been revised to clarify this (DEIS, pp. 166, 178, 206). The text has been changed to refer to a coordinated palette of paving materials that would be suitable for various uses.</p>

Comment	Letter 12. American Society of Landscape Architects (cont.)	Response
G	<p>retaining the historic gravel on the Mall itself, a feature that is an integral part of its current design in keeping with other major parks around the world, is permeable, is low-heat and has low reflectivity, and which encourages more relaxed strolling. Although the gravel pathways create maintenance challenges, there are major parks around the world that have been able to maintain some form of soft walkway successfully in conjunction with the hard surfaces that are better able to accommodate wheelchairs, strollers, maintenance vehicles, etc. In addition, we do not support the concept of paving over the 12th Street corridor.</p> <p>In closing, there is much more to celebrate than to criticize in the National Mall Plan. The National Park Service should be commended for its thoroughness, its diligence, and its commitment to stewardship. A renewed and healthy National Mall, a redesigned Union Square that takes full advantage of its pivotal location, and the other projects that will come out of the vision of the National Mall Plan, have the opportunity to add to the extraordinary legacy of planning and design that shaped our nation's capital. It is incumbent on all of us to ensure that the potential of this plan is fully realized.</p> <p>Thank you for the opportunity to comment and to contribute to the future of the National Mall. ASLA stands ready to provide support and assistance to further develop the vision.</p>	<p>G. The National Park Service is highly interested in sustainable approaches to paving materials. There are many ways to approach sustainability. For example, at the National Mall paving can be sustainably used to maximize rainwater capture for reuse in irrigation. The current gravel walkways are neither permeable nor easy to maintain, given the high level of use and the vehicle weights that must be supported. Also, many gravel walkways are not accessible, and snow cannot be easily removed. Also see response 8D to the U.S. Commission of Fine Arts and the discussion of gravel walkways under "Summary of Comments and Responses" (beginning on page 12).</p>

Comment	Letter 13. The Committee of 100 on the Federal City	Response
	<div data-bbox="583 240 861 415" data-label="Image"> </div> <p data-bbox="289 444 449 483"><b>CHAIR</b> GEORGE R. CLARK, ESQ.</p> <p data-bbox="289 509 449 548"><b>VICE-CHAIR</b> NANCY MACWOOD</p> <p data-bbox="289 574 449 613"><b>SECRETARY</b> RICHARD HOUGHTON</p> <p data-bbox="289 639 449 678"><b>TREASURER</b> FRANCIS M. CLARKE, III</p> <p data-bbox="289 704 449 1029"><b>TRUSTEES</b> W. KENT COOPER, FAIA BILL CREWS CARROLL GREEN KEVIN LOCKE MEG MAGUIRE HON. JAMES E. NATHANSON LORETTA NEUMANN CHARLES J. ROBERTSON MARY PAT ROWAN LANCE SALONIA RICHARD WESTBROOK EVELYN WRIN JOHN YAGO BARBARA ZARTMAN</p> <p data-bbox="289 1055 449 1094"><b>CHAIR EMERITUS</b> LAURA M. RICHARDS, ESQ.</p> <p data-bbox="508 451 634 474">March 17, 2010</p> <p data-bbox="508 509 764 643">Susan Spain, Project Executive The National Mall Plan National Mall &amp; Memorial Parks National Park Service 900 Ohio Drive, S.W. Washington, D.C. 20024-2000</p> <p data-bbox="508 685 634 708">Dear Ms. Spain:</p> <p data-bbox="508 753 1100 795"><b>Re: Comments of the Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Impact Statement (December 2009)</b></p> <p data-bbox="508 818 1108 902">The Committee of 100 on the Federal City is pleased to comment on the <i>Draft National Mall Plan/Environmental Impact Statement</i> that the National Park Service released in December 2009 for a 90-day public comment period ending March 18, 2010.</p> <p data-bbox="508 925 1108 1078">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 of the National Mall is a major interest of the Committee. The National Mall Plan that has been outlined in draft form will be a key element for the future development of the Monumental Core of Washington, D.C., our nation's capital and the hometown of Washingtonians.</p> <p data-bbox="508 1101 1108 1295">The Committee of 100 on the Federal City has been participating in the current public process of preparing the National Mall Plan for the past several years. We submitted initial comments (dated May 19, 2008) on the <i>Draft Alternatives Matrix-The National Mall</i> (April 2008) and last year submitted comments (dated May 15, 2009) on the <i>National Mall Plan-Preliminary Preferred Alternative</i> (March 2009). The Committee of 100 is one of the consulting parties in the Section 106 process related to the National Mall Plan. For simplicity, we refer to the Committee of 100 on the Federal City as the "Committee of 100" or simply as the "Committee" in these comments.</p> <p data-bbox="508 1318 974 1386">1317 G STREET, NORTHWEST WASHINGTON, D.C. 20005-3102 202-628-8030 FAX: 202-628-8031 EMAIL: THECOMM100@AOL.COM • WEBSITE: HTTP://WWW.COMMITTEEOf100.NET</p>	

Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
	<p>Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 2</p> <p>I, John Fondersmith, and other members of the Committee of 100 have attended and participated in a number of meetings called by the National Mall and Memorial Parks staff over the past two years. We have also attended various meetings of the National Capital Planning Commission (NCPC) and the Commission of Fine Arts, and benefited from the discussion and the staff reports at those meetings. You and John Piltzecker, Superintendent, National Mall and Memorial Parks, attended the meeting of the Committee of 100 on the Federal City on January 20, 2010 and presented the <i>Draft National Mall Plan</i>. We appreciated and benefited from hearing that presentation from you.</p> <p>In addition, I and other members of the Committee of 100 have participated in reviews of other ongoing projects on the National Mall over the past two years, including the Potomac Park Levee Project, the Rehabilitation of the Lincoln Memorial Reflecting Pool and Surrounding Area, the Rehabilitation and Restoration of the D.C. War Memorial, the Repair of the Thomas Jefferson Memorial Plaza and Seawalls, and the Thomas Jefferson Security Perimeter. Some of these reviews are still ongoing. While technically these are separate projects, they relate to and have informed our views on the National Mall Plan.</p> <p>We want to express our appreciation to you, Superintendent John Piltzecker, other members of the National Park Service staff, and the consultants that have been involved with preparing the <i>Draft National Mall Plan/Environmental Impact Statement</i>. This has been a major and complex undertaking involving a key area in the center of the Monumental Core of Washington.</p> <p>The comments of the Committee are presented below in four parts. <b>Part 1</b> outlines key overview points and big ideas. <b>Part 2</b> generally follows the format of Mall wide and specific areas used at various places in the report, including Table 7 (pages 150-243). <b>Part 3</b> indicates clarifications we recommend be included in the report to increase understanding. <b>Part 4</b> outlines the Committee's concerns with and recommendations for the next steps in preparing the National Mall Plan, including steps beyond what the National Park Service plans to do.</p> <p><b>PART 1: OVERVIEW AND BIG IDEAS</b></p> <p><b>The Opportunity</b></p> <p>The work of the McMillan Commission (1901-02) provided a framework for the development of the National Mall in the 20<sup>th</sup> century. That framework evolved over the 20<sup>th</sup> century and was last updated by the planning work of Skidmore Owings and Merrill for the National Park Service in 1966 and 1973. The National Park Service has previously indicated that the National Mall Plan would be a fifty-year plan, so in theory this plan will extend to 2060. It will therefore set the framework for the National Mall in the remainder of the 21<sup>st</sup> century, and should be visionary and comprehensive. The Committee realizes that any plan for the National Mall will evolve over a period of 50-90 years. However, that evolution should be guided by a comprehensive framework established now.</p>	

Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
	<p>Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 3</p> <p>The current planning program by the National Park Service comes at a time of increased public attention to the National Mall, in part because of well-publicized stories about the poor condition of the National Mall and because of publicity about various new projects. Photographs of an estimated 1.8 million people on the National Mall and adjacent areas for President Obama's inauguration on January 20, 2009 brought additional attention. In his inaugural address, President Obama referred to the landscape stretching before him as "this magnificent Mall". Recently, in announcing the use of stimulus funds for projects on the National Mall, Secretary of the Interior Ken Salazar said, "this is the Mall that belongs to the people of the United States of America".</p> <p>The National Mall will clearly continue to be in the public eye over the next five to ten years. In addition to numerous projects that the National Park Service will undertake on the National Mall, the Martin Luther King, Jr. National Memorial will be completed and the National Museum of African American History and Culture, and the Vietnam Veterans Memorial Education Center probably will be completed in that period. A number of important projects adjacent to the National Mall are expected to be completed or underway during that period. On the north side of the National Mall (at the northwest corner of Constitution Avenue and 23<sup>rd</sup> Street, NW), the United States Institute of Peace Building is under construction and will open in early 2011. Just south of the National Mall, both the Dwight D. Eisenhower Memorial and the Veterans Disabled for Life Memorial are in the design stage and both these new memorials will likely be completed in the next five to 10 years. A site for a National Women's History Museum is proposed adjacent to the National Mall (Independence Avenue and 12<sup>th</sup> Street, SW).</p> <p><b>The Long-Range Challenge</b></p> <p>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 deaden the Mall's spirit nor destroy its capacity to inspire and surprise. The image and experience of the National Mall embraces several different elements. The overall landscape of formal and natural grounds provides the setting. A second element is the memorials and monuments, especially the three iconic memorials to George Washington, Thomas Jefferson and Abraham Lincoln. Views of these memorials, and views of the United States Capitol and the White House, are parts of the National Mall experience. The museums, galleries and sculpture gardens of the Smithsonian Institution and the National Gallery of Art are also key parts of the National Mall experience. The monuments, memorials, museums and galleries are major Mall destinations--what people come to see.</p> <p>At the east end of the National Mall are lands under the jurisdiction of the Congress (Architect of the Capitol), including the U.S. Botanic Garden and the National Garden. Buildings bordering the National Mall provide a frame and some, such as the National Archives, are part of the Mall experience.</p> <p>Finally, multitudes of varying outdoor events are an important part of the National Mall experience. These include demonstrations, the Smithsonian Folk Festival, Kite Day, the Boy</p>	



Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
<p>A</p>	<p>Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 4</p> <p>Scout Jamboree, the African American Family Reunion and numerous other events. Especially for Washingtonians, the National Mall is a wonderful space that may be crossed on foot or in vehicles several times a day, and in different seasons. The challenge for the National Mall is to be able to accommodate a range of activities by different groups and individuals, with multiple activities taking place at the same time. One of the challenges to Mall planners is to shift some of these activities to areas adjacent to the Mall without injuring or threatening the reality and perception of the Mall as accessible public space.</p> <p><b>Planning Area and Approach for the National Mall</b></p> <p>In preparing the National Mall Plan, the National Park Service has outlined a planning area that essentially encompasses all of what is defined as the National Mall, but has only done detailed planning for National Park Service lands. This Park Service area has a number of limitations. While the Committee understands that there is 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. Several organizations have suggested that the National Mall be expanded to include at least part of the White House and President's Park area, now a separate area also administered by and planned by the National Park Service. It would seem appropriate for the Ellipse to be included in the definition of the National Mall. At the least, this area should be shown on the National Mall planning maps and documents, and the plans for that area summarized. However, the information on the <i>Comprehensive Design Plan for the White House and President's Park</i> (page 47) is very summary in nature.</p>	<p>A. Because the National Park Service has no control over adjacent areas that are managed by other entities, extra effort has been undertaken to work closely with cooperating agencies, as well as planning offices and agencies, to ensure that plans are coordinated, complementary, and cohesive for the areas covered in the McMillan plan.</p> <p>The proposed plan is a vision plan for the National Mall, which includes all areas except those occupied by the Smithsonian Institution, the National Gallery of Art, and the U.S. Department of Agriculture. Nevertheless, the plan presents a vision for the entire area and is compatible with other vision plans for this area, including the NCPC <i>Extending the Legacy</i> (1997) for Washington, D.C., the <i>Center City Action Agenda</i> (District of Columbia 2008), the NCPC <i>Memorials and Museums Master Plan</i> (2001), and the NCPC <i>Monumental Core Framework Plan</i> (2009). The NCPC <i>Legacy</i> plan is the successor to earlier plans, such as the L'Enfant and McMillan plans (see DEIS, p. 42), and other plans are all compatible with the <i>Legacy</i> plan. The National Park Service considers the National Mall plan to be one of the implementing plans for the <i>Legacy</i> plan.</p>
<p>B</p>	<p>The problem of seemingly uncoordinated planning for the area of the National Mall between Third Street and Fifteenth Street and Constitution and Independence Avenues is even more striking. Here the central open space of the National Mall is lined on both sides by the museums, art galleries and sculpture gardens of the Smithsonian Institution and the National Gallery Art. These facilities are an integral part of the National Mall landscape and visitor experience. It appears that these lands offer opportunities for joint use of facilities in some cases. The future use of the now closed Arts and Industries Building of the Smithsonian Institution will be a key decision. The National Gallery of Art is looking for expansion space adjacent to its present sites. Yet the future development and use of these museum and gallery sites is not fully reflected in the <i>National Mall Plan</i>. The Whitten Building of the U.S. Department of Agriculture is also part of the area of the National Mall between 12<sup>th</sup> and 14<sup>th</sup> Streets, SW. This building plays a relatively minor role in the visitor experience at present but has been mentioned as a possible museum site in the future.</p>	<p>B. Most facilities are not expected to change. Several of these facilities were addressed in the <i>Monumental Core Framework Plan</i>. The National Park Service worked with the National Gallery of Art on the listing of projects shown on the Recent, Ongoing, and Future Cumulative Projects map (DEIS, p. 359).</p>
<p>C</p>	<p>Finally, at the east end of the National Mall between First and Third Streets, Union Square is included in the proposed National Mall Plan. However, the adjacent areas to the north and the south under the jurisdiction of the Architect of the Capitol are not included. This is a key area of the National Mall and a comprehensive vision should be presented. However, the Capitol Complex Plan is still undergoing internal review.</p>	<p>C. The National Park Service and the Architect of the Capitol agree that a comprehensive vision for Union Square is needed, and that a design competition is a compelling idea. Please see letter 2.2.</p>

Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
	<p>Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 5</p> <p><b>This type of fragmented planning for the National Mall is not acceptable when, in theory, the framework is being outlined for the next 50 years or more. The American people deserve an overall comprehensive planning approach for the future of the National Mall.</b></p> <p>D 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. These include 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 Washington Metropolitan Area Transit Authority (WMATA), etc. The Committee understands that much background coordination has been undertaken behind the scenes, but the results are still not fully apparent in the <i>Draft National Mall Plan</i>.</p> <p><b>Integrating the National Mall with Surrounding Areas</b></p> <p>E The Committee of 100 is especially concerned that planning for the future development and use of the National Mall be closely integrated with adjacent areas of Central Washington, including other areas under the jurisdiction of the National Park Service but with different boundaries. One of the most important features of the National Mall in the 21<sup>st</sup> century will be its increased centrality with other areas of Central Washington, a condition stressed in the <i>Center City Action Agenda</i> prepared by the D.C. Office of Planning and others (released in early 2008). This will be increasingly important as new development occurs south of the National Mall, especially on the Southwest Waterfront and to the southeast along the Anacostia River. Transportation and symbolic links with these areas will be important to how the National Mall operates.</p> <p>Fortunately, the National Capital Planning Commission and the U.S. Commission of Fine Arts completed a three-year planning program last year for four key areas adjacent to the National Mall. Both agencies approved the <i>Monumental Core Framework Plan: Connecting New Destinations with the National Mall</i> last spring. Future studies will be undertaken (some are underway) to test and refine key proposals and move forward with implementation. The final National Mall Plan should more fully reference and relate to this plan, with special emphasis on those proposed developments that border or are within one or two blocks of the National Mall on the north and south. The relationships and connections with areas east of the Tidal Basin, including East Potomac Park, are also especially important.</p> <p>The original planning program for the National Mall also included the Pennsylvania Avenue Historic Park, a corridor extending from the Capitol to the White House area. This is an important area, long seen as the “bridge” between the National Mall and Downtown Washington. Planning for the Pennsylvania Avenue Historic Park has been dropped from the present National Mall planning program, but will be addressed at a future time.</p> <p>Integrating the National Mall with adjacent areas involves a number of factors, including various aspects of transportation, signage, general visitor information, enhancing visual connections</p>	<p>D. See response A to your letter. As stated on pages 544–46 of the <i>Draft Environmental Impact Statement</i>, cooperating agencies participated in several multiday workshops to help develop planning principles, preliminary alternatives, and the preferred alternative, in addition to providing extensive comments during internal reviews of the draft document before its publication. Most cooperating agencies chose not to participate in consulting party meetings under section 106 of the National Historic Preservation Act.</p> <p>While consulting parties may represent specific constituents, meetings with cooperating agencies and those with consulting parties for section 106 consultations were kept separate to avoid a perception that some groups might have more influence than general citizens.</p> <p>E. We share your concern that planning and development be integrated and that transportation and symbolic links be incorporated in planning efforts. This is why the National Park Service, the National Capital Planning Commission, the Architect of the Capitol, the U.S. Commission of Fine Arts, and the District of Columbia worked together on the brochure <i>Planning Together for Central Washington</i>, which explains common priorities and objectives.</p>

Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
<p>F</p> <p>G</p>	<p>Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 6</p> <p>(vistas), and locating key land uses (retail, restaurants, hotel, entertainment, cultural, residential, as well as office) near the National Mall to the north and south, linked by convenient walking paths and various forms of transportation.</p> <p><b>Integration with District of Columbia Objectives</b></p> <p>The District of Columbia government and the citizens of Washington, D.C. have a major stake in the future development and use of the National Mall. This involves both the potential personal use of the National Mall by local residents as well as the major impact on the economy of the city. Although there are many other attractions in Washington, many visitors come to visit the National Mall and adjacent areas. As noted above, as major development expands south and southeast of the National Mall, it becomes even more central to the life of the city.</p> <p>The District Government has a relatively limited direct role in the operation of the National Mall area, primarily related to maintaining streets that cross the Mall and providing certain services. However, many of the visitor services that necessarily support and benefit from the National Mall are now and will be located in adjacent areas (restaurants, shops, hotels, tour bus parking, etc.). It is essential that National Mall planning consider the District's role, and that the District government, civic organizations and the private sector continue be involved in the process.</p> <p><b>Need for Additional Information</b></p> <p>There is still background information that has not been fully provided to the public, or that needs more attention in the future. The following are some key issues and needs.</p> <p><b>Future Visitation Numbers:</b> Planning for the future of the National Mall, especially in terms of transportation and service facilities, requires some understanding of the numbers and timing of visitors. Over the next 40 years, the population of the United States is projected to increase from an estimated 306 million at present (2009) to an estimated 439 million in 2050. This is almost certain to increase attendance on the National Mall. It seems likely that visitation from foreign countries will also increase. Locally, the combination of an increasing population in Washington, D.C. and the Washington region will also increase visitation. It seems certain that the number of future visitors to the National Mall will considerably increase and they will use the National Mall more at night (especially if adequate transportation and security is provided and if museum hours are extended). Information on visitor projections is included on Pages 319-322 of the <i>Draft National Mall Plan</i>. It appears that additional coordination of visitor counts between the National Park Service, the museums and other attractions may be useful.</p> <p><b>Impact of Global Warming:</b> The issue of potential future flooding of some National Mall areas has been raised by a number of groups. This problem could become more serious if sea level changes related to global warming become more pronounced over the next 50-90 years and affect the water levels of the tidewater Potomac River (and the Anacostia River). If this is to be a problem, it could have major impacts on the long-range plan for the National Mall. Despite</p>	<p>F. We agree, and the National Park Service has worked closely with the city to incorporate their plans and goals.</p> <p>G. The visitation projections shown in the <i>Draft Environmental Impact Statement</i> (pp. 321-22) take into account three different projections of future visitation based on historic trendlines. Future visits are projected to increase by 25 million to 43 million visits annually over the next 20 years. These projections are adequate for this level of vision planning. The National Park Service and others will continue to examine visitation numbers and projections, as well as gather information about visitors. The Park Service is continually refining its data gathering techniques because of the unique open nature of the National Mall, which makes it nearly impossible to count every visitor or participant in permitted activities.</p>

Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
<p>H</p> <p>I</p> <p>J</p>	<p>Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 7</p> <p>requests, the National Park Service has not provided much information on this issue. The statement on the effects of climate change (page 158) is limited. This issue should be better addressed in the final plan.</p> <p><b>Big Ideas</b></p> <p>Although all elements of the National Mall Plan are important, the Committee believes that it is important to place special emphasis on certain big ideas, as noted below.</p> <p><u>Restoring the National Mall:</u> The overall quality of the National Mall experience has greatly deteriorated over the past several decades due to deferred maintenance, now estimated to be over \$400 million. This issue is to be addressed through increased federal funding (including stimulus funds at the present time) and new private sector and foundation contributions through fund raising by the Trust for the National Mall and other organizations. Catching up with past neglect will take many years. However, in time these improvements can bring the National Mall to the quality that it should have. The Committee of 100 commends the National Park Service for this overall effort to make up for past neglect and for stressing sustainable design and development in repairing and restructuring the National Mall.</p> <p><u>Union Square:</u> The major new initiative in the <i>Draft National Mall Plan</i> is the total redesign of Union Square and adjacent areas between 1<sup>st</sup> and 3<sup>rd</sup> Streets. The major proposed change is the replacement of the large reflecting pool, a product of the 1970s, with a new civic square west of the Grant Memorial. This new civic square will accommodate many different activities, including demonstrations. The Committee supports this major redesign of Union Square, with some caveats as noted below. However, the Committee strongly opposes any suggestion that demonstrations be restricted only to this area.</p> <p>The Grant Memorial is to be restored and the adjacent landscape incorporated into the new design. The Committee of 100 is supportive of this new design approach but also has some concerns. It will be very important to have a coordinated design for the entire area between Constitution and Independence Avenues, including the two triangular areas under the jurisdiction of the Architect of the Capitol, and to eliminate the major parking areas now located along Pennsylvania and Maryland Avenues east of Third Street.</p> <p>The area of the civic square must be large enough to accommodate major events but not so large that it would become almost empty space when not being used. Design must consider the environment of Washington summers and not create a space that is barren and uncomfortable. In the 1960s a large National Square was proposed between 13<sup>th</sup> and 15<sup>th</sup> streets at the west end of Pennsylvania Avenue that had the potential to be a barren space. Fortunately, the Pennsylvania Avenue Plan was revised and the open space scaled down. That kind of potential problem must be avoided in the redesign of Union Square.</p>	<p>H. A more extensive discussion may be found on pages 39–40 of the <i>Draft Environmental Impact Statement</i>. Please also see the discussion of climate change under “Summary of Comments and Responses” (page 16).</p> <p>I. We agree that the National Mall as an important venue for political speech and that demonstrations should not be restricted into any one area. As has been repeatedly stressed in this planning process, the National Park Service does not propose limiting First Amendment rights or restricting demonstrations to specific areas of the National Mall. Rather, First Amendment gatherings will be enhanced by the plan, and demonstrations will continue to occur throughout the National Mall, as they do today and in accordance with the regulations at 36 CFR 7.96 (see DEIS, pp. 16–18). Indeed, the importance of First Amendment demonstrations is repeatedly emphasized throughout the document; for example, see pages vi, viii, 10, 70, 160, and 303–5. As stated in the “Summary” on page vi, “The National Mall is the most prominent space in our country for the demonstration of First Amendment rights, and that is an essential purpose of the National Mall. Consistent with the First Amendment and federal regulations, demonstrations will continue to be fully accommodated on a first-come, first-served basis throughout the National Mall.”</p> <p>J. See response C to your letter and letter 2.2.</p>

Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
<p>K</p>	<p>Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 8</p> <p>This space should have the feeling of an American space, reflecting the sense of the adjacent Capitol grounds. Though built to accommodate demonstrations, the space should not be a space that projects a sense of perpetual conflict. In view of experience elsewhere, care is needed not to create a design that encourages skateboarding in this space. A relatively small building north of Union Square, in the scale of the National Botanic Garden to the south, would seem appropriate and could house a variety of visitor services as well as some special uses of its own. Properly designed, this new space and adjacent building could help bring a new festive feeling and sense of activity to this east end of the National Mall. If not well done, a new problem area might be created here. Careful design and programming will be important in creating a new vibrant civic space with national meaning.</p> <p><b>Tidal Basin Area:</b> The Tidal Basin area, including the Jefferson Memorial and the flowering cherry trees, is already a special place in the city and it will gain new meaning and increased visitation levels once the Martin Luther King, Jr. Memorial is completed in the next several years. The "Preferred Alternative" calls for a variety of improvements, including enhanced walkways and bicycle trails, lighting and interpretation. The Tidal Basin seawalls would be rebuilt above the water levels. The new seawalls would be built in the present Tidal Basin, slightly decreasing the size of the Tidal Basin.</p> <p>L</p> <p>The Committee is concerned that long-range opportunities may be missed at the Tidal Basin, especially in terms of connections to the Washington Monument grounds and in connections to the east to the Southwest Waterfront. Alternative B in the Draft National Mall Plan includes a new pedestrian crossing across the Tidal Basin south of Kutz Bridge. Alternative C calls for filling in part of the Tidal Basin to create more land and improve pedestrian connections from the Tidal Basin to the Washington Monument grounds. This would be especially true if a new north-south elevated walkway along the White House-Jefferson Memorial vista axis could be provided to pass over Independence Avenue and extend to the north side of the Tidal Basin. Alternative C for the Tidal Basin is, at present, not being considered. It may be that the best course in the near future is to proceed with the Preferred Alternative design for this area, but not take any actions that would preclude the major redesign suggested in Alternative C. This would provide time for further consideration of the merits of such a major transformation of the north side of the Tidal Basin.</p> <p>M</p> <p>To the east, improved connections between the Tidal Basin/Jefferson Memorial area and the Southwest Waterfront are needed. This might include connections between a future cultural building on the Liberty Loan Building site, and perhaps a pedestrian platform extension of Maryland Avenue to connect with the Tidal Basin area. The <i>Monumental Core Framework Plan</i> prepared by NCPC and the Commission of Fine Arts begins to address these issues, but is only a start. The Committee of 100 would like to see additional study of better connecting the Tidal Basin area to the north and the east. This might be a case where some improvements could be made in the relatively short-term, with more significant improvements and connections being made later, perhaps in 10-20 years or more in the future.</p>	<p>K. We agree that Union Square could be a vibrant new civic space with national meaning and a sense of activity. Also see letter 2.2.</p> <p>L. We appreciate your interest in taking a bolder step at the Tidal Basin, such as filling the basin's north portion or elevating walkways. While there has not been much consultation about the Tidal Basin under section 106 of the National Historic Preservation Act, there was a negative public response when newsletter 3 was issued, since the Tidal Basin is listed as a contributing feature in the East and West Potomac Parks Historic District, and the alternative C proposal was not carried into the preferred alternative. It is not clear whether you are proposing a bridge or a deck over Independence Avenue to provide access. Decking over Independence, while an attractive concept, would have huge ramifications because the roadway would need to be sunk sufficiently to accommodate double-decker buses and would require special engineering considerations due to a high water table. An enclosed roadway would prevent sightseeing buses and other drivers from enjoying the north-south vistas.</p> <p>A pedestrian bridge was included in alternative B to provide pedestrian access to underground parking south of Independence, and this would achieve the goals you mention. Such a bridge would also present engineering challenges and would be costly. The bridge would need to be high enough to allow double-decker bus traffic on all lanes in both directions. Since Independence Avenue is a divided road, the bridge span would be long. The bridge would need to be accessible for all people, including those with disabilities, so ramps would be very long, potentially up to 300 feet on each side. Also, access to the bridge and ramps would need to be convenient to the primary east-west walking patterns, possibly with two ramps on each side. Therefore, it is highly likely that pedestrian use patterns would not be as direct or convenient as on-grade crossings. The visual impact of a bridge would dominate the avenue, and ramps could intrude into the north-south vista.</p> <p>An alternative to a bridge or a deck would be improved crosswalks, which are considered under the preferred alternative. Waiting areas and walkway widths would be enlarged, and crosswalk timing would be extended for more pedestrian safety and equity with vehicle traffic. This approach would also support city and regional transportation goals (such as encouraging walking as a healthy alternative, reducing congestion, improving quality of life, and reducing pollution). These actions would incorporate good urban design principles and practices, including traffic calming, travel demand management, and transit-oriented development (onsite transit stops, coordination with visitor facilities, and multimodal access).</p> <p>Decking over Independence Avenue and constructing a pedestrian bridge were considered but dismissed for the following reasons. Both options would duplicate lower cost or less environmentally damaging solutions, and they would have too great an environmental impact. It is also unlikely that given the extent of funding needs for the National Mall that either of these projects would be a priority or economically feasible. This discussion has been added to the final document under "Alternatives: Actions Considered but Dismissed."</p> <p>M. The NCPC <i>Monumental Core Framework Plan</i>, the proposed National Mall plan, and D.C. pedestrian and bicycle plans together have defined a cohesive vision for improved pedestrian and bicycle access and connections for the areas you mention. The City of Alexandria, Virginia, has stressed an interest in improved pedestrian and bicycle connections over Potomac River bridges as well. The Ohio Drive roadwork project, which is underway, is one step in this direction. The 14th Street bridge corridor would also address these issues. As you note, other actions will take a much longer time.</p>

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<p>N</p>	<p>Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 9</p> <p><u>Washington Waterfront Walk</u>: The Washington Waterfront Walk (WWW) is the proposed 11-mile connected waterfront walk (pedestrians, bicycles) from the Georgetown Waterfront to the National Arboretum. It is one of the key new elements that came out of the 1997 <i>Legacy Plan</i> prepared by the National Capital Planning Commission. The Draft National Mall Plan mentions new bicycle lanes and trails along the West Potomac Park Waterfront but the Washington Waterfront Walk does not receive the attention it deserves. This waterfront walk should have greater emphasis. The Committee believes this is one of the important elements of the new Central Washington that is being created in the first part of the 21st century. It is especially important that adequate connections for the Washington Waterfront Walk be provided from West Potomac Park through the Jefferson Memorial area to the Southwest Waterfront.</p> <p><u>Transportation System</u>: Improvements in various elements of the transportation system will be critical for improved use of the National Mall in the future, and for providing convenient connections to adjacent areas of Central Washington and beyond. The Committee is pleased to see that the <i>Draft National Mall Plan</i> calls for an improved bus transportation system, connected to the overall transportation system of the city. This will allow more convenient access to and within the National Mall than exists at present for both visitors and residents. The plan proposes to have coordination between the National Park Service and local commercial parking garages, and providing visitor valet or shuttle service between the parking garages and the National Mall (page 450). In addition, improvements are proposed for pedestrian paths and bicycle paths.</p> <p><b>Urban Design Initiatives</b></p> <p>The Urban Design Framework for the National Mall is discussed in the <i>National Mall Plan</i> and shown schematically on the "Urban Design Framework" map on page 45. However, in addition to the major ideas and possibilities mentioned above and elsewhere, there are a number of smaller urban design initiatives that seem to have potential for improving linkages between parts of the city and locations on the National Mall. Several are mentioned below and there are undoubtedly others that could be noted for further study. Several urban design enhancements are noted in the <i>Monumental Core Framework Plan</i> that was adopted by the National Capital Planning Commission and the U.S. Commission of Fine Arts last spring.</p> <p>These ideas below need further study to see if they are desirable and feasible. Opening such vistas generally involve some tradeoffs, primarily in altering an existing landscape feature (primarily by removing or trimming trees and shrubs) to add a new enhancement by opening reciprocal vistas to and from sites within the National Mall. The Committee previously requested that the National Park Service consider these concepts in preparing the final National Mall Plan. However, they have not been addressed. We would still like these possibilities to be considered.</p> <p><u>Maryland Avenue Vista to Tidal Basin and Beyond</u>: The vista along Maryland Avenue from the Capitol to the southwest extends across the Jefferson Memorial North Plaza and on across the Tidal Basin and intersects the west edge of the Tidal Basin walk south of the FDR Memorial. It appears that a small plaza could be developed at this location to provide a reciprocal view back</p>	<p>N. The Washington Waterfront Walk has been added as one of the connections for pedestrian and bicycle trails (DEIS, p. 240, row 24.3). Currently, the city's Anacostia Initiative stresses a continuous pedestrian walk extending to the National Mall and East Potomac Park.</p> <p>O. The vista has been extended on the Urban Design Framework map.</p>
<p>O</p>		

Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
P	<p>Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 10</p> <p>northeast to the Capitol. On a larger scale, the Maryland Avenue vista extends on across the Potomac River to the memorial stone in the Lyndon Baines Johnson Memorial Grove, a part of Lady Bird Johnson Park (a National Park Service park). The Urban Design Framework map on page 45 does show this vista, but only as far as the Jefferson Memorial North Plaza.</p> <p><u>Nineteenth Street Vista to D.C. World War Memorial:</u> The D.C. War Memorial is located on the axis of 19<sup>th</sup> Street, NW, the street that leads south from Dupont Circle to Constitution Avenue. The D.C. World War Memorial is to be restored in the near future. The Committee suggests that studies be undertaken to see if a vista could be opened along the line of 19<sup>th</sup> Street, south from Constitution Avenue to the Memorial, thus visually connecting this little known memorial to the area of the city north of the National Mall (perhaps as far north as Pennsylvania Avenue). We note that the 1902 McMillan Commission Plan included a similar vista between 20<sup>th</sup> and 21<sup>st</sup> Streets, NW to connect with a northern extension of the Reflecting Pool (that extension was not built and the vista was not opened).</p>	P. This vista has been extended on the Urban Design Framework map.
Q	<p><u>Virginia Avenue Vista East Toward the Washington Monument:</u> Earlier this year, in discussions of the Potomac Park Levee Project, Lindsley Williams suggested that the vista along Virginia Avenue (which terminates at Constitution Avenue) be opened on to the southeast toward the Washington Monument. The Committee recommends that this proposal receive further study. This vista is shown on the “Urban Design Framework” map on page 45, but it is not clear how much the vista would be opened at ground level.</p>	Q. Very little is likely to be opened from a ground level, because like Indiana Avenue, the view is blocked by buildings.
R	<p><u>North-South Vista from Washington Monument Grounds to Jefferson Memorial:</u> The north-south vista from the White House to the Jefferson Memorial already exists, one of the strong legacies of the McMillan Commission Plan (though today’s design of the area is considerably different from the 1901-02 Plan). As noted previously, the Committee has previously suggested that consideration be given to extending a pedestrian structure from the Washington Monument Grounds to the Tidal Basin, with steps descending to the north side of the Tidal Basin. If this concept proves to be feasible it could strengthen the north-south vista and provide a grade-separated pedestrian route passing over Independence Avenue between the Washington Monument grounds and the north side of the Tidal Basin. This could be a longer range improvement.</p>	R. We agree about the importance of strengthening pedestrian awareness of the north-south vista.
S	<p><b>The “View to the West”</b></p> <p>One of the key issues involving the National Mall is the “view to the west” from the U.S. Capitol and other points along the main east-west axis looking west to the Lincoln Memorial and beyond. The original design for the National Mall envisioned an uncluttered view to the west, symbolizing the future growth of the country. Unfortunately, a number of buildings in Arlington County, Virginia are visible beyond the Lincoln Memorial and mar the view west from the Capitol along the Mall. Past efforts by the National Capital Planning Commission to protect this viewshed were not fully successful.</p>	S. We agree that the view to the west is important and has been degraded.

Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
<p>T</p> <p>U</p>	<p>Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 11</p> <p>Protection of the view to the west should be part of the National Mall Plan, though the National Park Service cannot do this. The National Capital Planning Commission should again address this issue. Hopefully, at some future time, it will be possible to remove some of the most offensive buildings (as they wear out) and restore a more appropriate background for the National Mall. No plan for the future of the National Mall should ignore the threat to the historic and special character of this space. At a time when hundreds of millions of dollars will be spent to enhance the National Mall, protection of the “view to the west” should not be neglected.</p> <p><b>PART II: PARKWIDE AND AREA COMMENTS</b></p> <p>Comments are provided below on “parkwide” (National Mall Actions) and on actions for different areas of the National Mall. These are listed in the order used in the Draft National Mall Plan. In some cases, a feature has been inserted that is not specifically noted in the Draft National Mall Report. In general, the comments relate to the proposal in the Preferred Alternative (Alternative A) except in cases where The Committee of 100 believes a proposal in another alternative merits comment or support.</p> <p><b>National Mall Actions</b></p> <p><b>Cultural Resources:</b> The Committee supports the statements in the <i>National Mall Plan</i> regarding the preservation of memorials, related statuary and places of commemoration on the National Mall, and the need for some evolution of the historic landscape to reflect significant national events. We also support improving planned views and vistas, including large areas of open space that are defining features of the historic National Mall landscape. As noted in Urban Design Initiatives in Part I, the Committee recommends further study of opening some new vistas.</p> <p>We understand that many trees and other landscape elements will die or need to be replaced over a 50-year or more plan period. The National Park Service should provide general information about how the landscape elements will be preserved and replanted over time.</p> <p><b>Natural Resources:</b> The Committee generally agrees with the statements about improving conditions for tree and turf areas. However, we question prohibiting all events under Mall trees. We believe there may be alternative methods that would allow such areas to be used, as they are in some other parks in this country and in Europe. The location of special small-scale exhibits and demonstrations under some trees is a special feature of the annual Folklife Festival that should be continued if possible.</p> <p><b>Demonstrations, Special Events and National Celebrations:</b> The Committee strongly supports unfettered use of the National Mall as a venue for political speech and demonstrations. However, the National Mall is used in so many different ways that some caution should be exercised in not overly promoting non-political events. As noted elsewhere, we believe development of facilities in adjacent areas could allow some non-political events to be moved off the National Mall.</p>	<p>T. Row 2.2 on page 152 on the <i>Draft Environmental Impact Statement</i> states that cultural landscapes are managed in accordance with the <i>Secretary of the Interior’s Standards for the Treatment of Historic Properties, with Guidelines for the Treatment of Cultural Landscapes</i>. Cultural resource plans set the goals for treating vegetation, so this is addressed by area.</p> <p>U. NPS studies and best practices such as the Sustainable Sites Initiative™ do not support your beliefs. High compaction levels do not promote healthy tree growth. Please see the discussion of elm trees under “Summary of Comments and Responses” (page 17).</p>



Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
<p>V</p> <p>W</p>	<p>Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 12</p> <p><b>Access and Circulation:</b> This involves the design and operation of the transportation system for the National Mall, including connections for different transportation modes to surrounding areas. As noted previously, the Committee is pleased with proposals to allow for an enhanced bus transportation system to connect the National Mall with adjacent areas and tie into the regular bus system. Providing access for tour buses, including parking off the National Mall, is especially important.</p> <p><b>Visitor Information, Education and Enjoyment:</b> The National Park Service is proceeding ahead on a separate National Mall Wayfinding Program, now going through the approval process. The coordinated system is an improvement over the present system of wayfinding signs, which has evolved over many years. Visitor information is to be provided at various locations throughout the National Mall. An earlier concept called for a central visitor center with information on the history of the National Mall. That concept is now proposed to be dropped in favor of a decentralized approach to visitor information.</p> <p>The Committee of 100 understands the concept of this decentralized approach but believes a central place where visitors could obtain National Mall history exhibit is also desirable. We continue to believe that the Arts and Industries Building, which is a property of the Smithsonian Institution, is a logical place for such a visitor center. In other words, the building would have a joint use, with most of the space being used for Smithsonian Institution exhibits and uses, and some space being used for a visitor center operated by the National Park Service. Some retail and restaurant uses might also be located there.</p> <p>Passive and active recreational activities are proposed to continue at various locations on the National Mall. The Committee believes that formal and informal recreational activity is an important part of the National Mall.</p> <p><b>Visitor Amenities:</b> A range of visitor services (restrooms, seating, food service, etc.) is indicated throughout the National Mall, with multipurpose facilities at several locations. The human necessity for such services is evident. The Committee notes the need for such facilities while stressing that they should be designed in such a way as to not intrude on the special landscape quality of the National Mall. The Committee believes there are locations, especially in the 3<sup>rd</sup> to 14<sup>th</sup> Street section of the National Mall, where visitor facilities could be developed on property of the Smithsonian Institution (but outside Smithsonian buildings) which could serve visitors to the National Mall.</p> <p><b>Health, Public Safety and Security:</b> The Committee agrees that public safety on the National Mall must be ensured. This is especially important because increased visitation, and the increased adjacent development near the National Mall, will likely result in greater use during early morning and evening hours.</p> <p><b>Park Operations:</b> This category deals with addressing the deteriorated condition of many areas</p>	<p>V. Wayside exhibits should address the history of the National Mall. See response H to letter 14.2 from the D.C. Preservation League about another proposal for the Arts and Industries Building.</p> <p>W. We agree that needed facilities should not intrude on the special quality of the National Mall. As stated in the <i>Draft Environmental Impact Statement</i> (pp. 90 and 210), the National Park Service would continue to explore the ability of adjacent museums to provide new access to existing or proposed facilities. Please see the discussion of facilities under “Summary of Comments and Responses” beginning on page 11 for more information.</p>

Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
<p>X</p> <p>Y</p> <p>Z</p> <p>aa</p>	<p>Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 13</p> <p>of the National Mall, and maintaining the landscape and facilities in the future in an environmentally sustainable manner. The Committee strongly supports these actions (see previous comments in the “Big Ideas” section).</p> <p><b>National Mall Subarea Actions</b></p> <p>Comments are provided below by subareas of the National Mall, as used in the Draft <i>National Mall Plan</i> (see pages 194-243).</p> <p><b>The Mall</b> (Note that this is one subarea of the overall National Mall)</p> <p><b>Union Square (1<sup>st</sup> to 3<sup>rd</sup> Streets):</b> The proposal for an almost complete redesign of the Union Square area is one of the big ideas of the Draft National Mall Plan (see comments in the “Big Ideas” section of these comments).</p> <p><b>The Mall (3<sup>rd</sup> to 14 Streets):</b> A variety of improvements are proposed for this key section of the National Mall. While many of these seem desirable, additional information is needed about proposals to revise the walkway materials and to restrict activities in the tree space. If parking is removed from Madison and Jefferson Drives, additional attention will be needed on parking in adjacent areas with shuttle service to and from the Mall.</p> <p>The Committee supports adding the words “National Mall” to the name of the Smithsonian Metrorail Station and to providing orientation information adjacent to the station entrance on the Mall. However, we question whether adequate information can be provided near the Metrorail Station without damaging the quality of that space. We believe there is still a need for a more sizeable visitor center in this central area. Space in a renovated Arts and Industries Building would be an appropriate location.</p> <p>A key feature of this part of the National Mall is that it is lined with the various museums, art galleries and sculpture gardens of the Smithsonian Institution and the National Gallery of Art. The National Mall Plan should be comprehensive and note the interaction between the museum activities and the central landscape under the jurisdiction of the National Park Service.</p> <p>As noted above, cooperative provision of visitor services should be explored, such as additional restrooms and food service on Smithsonian museum property (outside the buildings).</p> <p>In terms of major development, the future use of the now closed Arts and Industries Building should be addressed in a comprehensive National Mall Plan. A variety of museum and visitor service uses could be located in this building when renovated. However, the Committee does not believe that this is an appropriate building location for the proposed Hispanic Museum.</p>	<p>X. Parking on Madison and Jefferson drives is not proposed to be removed over the short- to mid-term (10–15 years). Free parking would be changed to metered parking, as proposed in the <i>Visitor Transportation Study</i>. A long-term goal is the removal of private vehicle parking to improve traffic flow and better accommodate bicycling, visitor transit, and pedestrians (DEIS, pp. 90 and 204).</p> <p>Y. As explained in appendix D of the <i>Draft Environmental Impact Statement</i> (pp. 574–75), outdoor welcome and orientation spaces have been found to be very effective in meeting the needs of visitors. As stated on page 44, the Arts and Industries Building is undergoing repair and preservation work, and the Smithsonian Institution has been asked not to make a final decision about the building’s use until a site assessment by the National Museum of the American Latino Commission has been completed.</p> <p>Z. We believe this has been adequately described.</p> <p>aa. Please see response Y to your letter. We recognize that facilities in adjacent museums can help meet the needs of visitors. During the planning effort information about public facilities on and adjacent to the National Mall was gathered and is shown in Tables 20 and 21 (see DEIS, pp. 333–36). Also see response W to your letter. The National Park Service will continue to explore the ability of adjacent museums to provide new access to existing facilities.</p>

Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
	<p>Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 14</p> <p><b>Washington Monument and Grounds</b></p> <p>The Washington Monument grounds have a central location in the entire National Mall area. The Committee supports the concept for a new visitor facility, offering a range of services, on the Sylvan Theater site. As indicated previously, the Committee recommends future consideration of a grade separated pedestrian structure from the Washington Monument grounds to the north side of the Tidal Basin. This would better connect these two areas along a symbolic spine, providing more convenient and safer pedestrian movement.</p> <p>On a smaller scale, interpretive information at ground level (perhaps with special paving) should be installed to mark the location of the historic Jefferson Pier northwest of the Washington Monument.</p> <p>Greater attention should directed to completing an overall landscape plan for the Washington Monument grounds.</p> <p><b>West Potomac Park (North of Independence Avenue)</b></p> <p><b>Constitution Gardens:</b> In Section 106 meetings the National Park Service staff has indicated that Constitution Gardens is somewhat unknown and underused. The Committee supports the proposal for a high-quality multipurpose visitor facility at the east end of Constitution Gardens near 17<sup>th</sup> Street. This facility would provide food service, retail and related activities. Careful design to achieve a festive yet dignified setting is necessary. The description of this facility could be improved in the <i>Final National Mall Plan</i>. The Committee also supports proposals for improving the lake and increasing its use. In view of the name of the area (Constitution Gardens) it may be useful to provide additional interpretive information in the area about the Constitution.</p> <p>The Potomac Park Levee will be constructed near 17<sup>th</sup> Street and Constitution Avenue, extending both north and south of 17<sup>th</sup> Street.</p> <p>The Committee supports the proposal for interpretive information near the old canal lockhouse, providing information on the evolution of this part of the city. While we understand that the lockhouse was previously moved from its original nearby location, we do not fully understand the rationale for the proposal to move it again. The Draft Plan talks about pedestrian safety but is not specific about why this proposal is necessary.</p> <p><b>Vietnam Veterans Memorial:</b> The Committee supports providing for seating and contemplation near the memorial. However, care is needed not to keep adding additional features that would detract from the special character of this memorial.</p> <p><b>Lincoln Memorial and Grounds:</b> The Committee generally supports the proposals for the Lincoln Memorial grounds. Additional information is needed about future use of the “Northwest Area” and future links to the Kennedy Center for the Performing Arts. In comments on the</p>	<p>bb. The pier marker is regularly interpreted in programs given by park rangers on the Washington Monument grounds.</p> <p>cc. Information about updating and implementing the Olin Partnership landscape plan for the Washington Monument grounds has been added under “Purpose of and Need for the Plan: Scope of this Document — Opportunities, Problems, and Challenges” (DEIS, p 29), the preferred alternative (p. 91), and the alternatives matrix (p. 210, row 13.1).</p> <p>dd. The goal of the plan is to provide sufficient guidance for future design teams without being too prescriptive.</p> <p>ee. We agree.</p> <p>ff. The reason for possibly moving the Lockkeeper’s House again is because it is very close to the southwest corner of the intersection of 17th Street and Constitution Avenue, which makes sightlines for right-hand turning movements onto 17th Street difficult, especially for buses. Also, the related pedestrian waiting area is small, and the visibility of pedestrians is affected by the location of the structure. The condition of the Lockkeeper’s House has been studied, and such a move would be feasible. The structure’s orientation to the original canal would be kept (DEIS, p. 378), and actions would be coordinated with the Potomac Park levee plan (DEIS, pp. 92 and 216).</p> <p>gg. We agree.</p> <p>hh. This was addressed by a coordinated plan. Please see the NCPC <i>Monumental Core Framework Plan</i> for more information.</p>

Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
	<p>Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 15</p> <p><b>ii</b> Monumental Core Framework Plan, the Committee has raised the issue of more public access and use of Old Naval Observatory Hill as a key area adjacent to the National Mall. Additional consideration is needed of access to the north to the U.S. Institute of Peace Building (now under construction and scheduled to open in early 2011).</p> <p><b>jj</b> We note that considerable planning and design work is now underway on the Lincoln Memorial grounds around the Reflecting Pool. This should be noted in the <i>Final National Mall Plan</i>.</p> <p><b>Korean War Veterans Memorial:</b> The Committee supports the proposed minor improvements to walks and interpretive materials.</p> <p><b>D.C. War Memorial:</b> The Committee is very pleased to see that special attention is finally being given to the District of Columbia War Memorial which honors those District of Columbia residents who served in World War I. The use of stimulus funds for renovation of this memorial is especially welcome. This improvement project is especially timely since our country will soon be observing the centennial of the World War I period. Since there is no “national” World War I Memorial on the National Mall, this local D.C. memorial can symbolize that period. Interpretation could note that hundreds of such memorials were built across the United States after World War I, some more elaborate and some simpler.</p> <p><b>ll</b> New interpretation should also include recognition that residents of the District of Columbia have served their country in all its conflicts since the establishment of the District in 1791, despite being denied the benefits of full citizenship. Use of the memorial (a bandstand design) and adjacent areas for performance use can add additional activity to this area.</p> <p><b>mm</b> <b>Ash Woods:</b> The Committee generally supports the proposals for the Ash Woods area but notes that an overall plan is needed for this area. After the opening of the nearby Martin Luther King, Jr. Memorial, this area is likely to have a significant increase in visitor traffic. The Committee suggests that consideration be given to a full-service visitor facility (not just restrooms) in this area. The location, shielded from nearby memorials, would permit an appropriate facility. The rebuilt U.S. Park Police stables, designed so that the paddocks would be a visitor attraction, is an interesting proposal.</p> <p><b>West Potomac Park (South of Independence Avenue)</b></p> <p><b>Tidal Basin Area:</b> See comments under “Big Ideas”.</p> <p><b>Franklin Delano Roosevelt Memorial:</b> The Committee supports the recommendations for the FDR Memorial and related areas.</p> <p><b>nn</b> <b>West Potomac Riverfront Park:</b> The Committee’s major concern in this area is the appropriate design of this section of the “Washington Waterfront Walk” (see discussion in the “Big Ideas” section). The Washington Waterfront Walk needs more attention in planning for all appropriate</p>	<p><b>ii.</b> The preferred alternative talks about improved crosswalks and timing, which would affect the intersection of 23rd Street and Constitution Avenue and would improve access to the U.S. Institute of Peace. Other pedestrian issues are discussed in the <i>Monumental Core Framework Plan</i>.</p> <p><b>jj.</b> The ongoing project for the Lincoln Memorial Reflecting Pool and grounds is being funded through the American Recovery and Reinvestment Act, and it was discussed as a cumulative project throughout the plan. Status updates have been provided in the final document and as described in this volume under “Summary of Comments and Responses” (page 26).</p> <p><b>kk.</b> Several bills have been introduced in Congress to revise the statutory purpose of the D.C. War Memorial. The National Park Service supports the mandates of the Commemorative Works Act as amended.</p> <p><b>ll.</b> Wayside exhibits are periodically updated, and your ideas can be considered in future interpretive efforts.</p> <p><b>mm.</b> We agree that Ash Woods use will increase. Your proposal is consistent with normal design processes.</p> <p><b>nn.</b> See response N to your letter.</p>

Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
	<p>Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 16</p> <p>sections of the National Mall, especially the alignment it follows in connecting the West Potomac Park riverfront with the Southwest Waterfront.</p> <p><b>George Mason Memorial:</b> The Committee supports proposed rehabilitation of the historic fountain. The George Mason Memorial, interesting in itself, is a memorial that gets relatively little attention because of its isolated location.</p> <p><b>Thomas Jefferson Memorial and Grounds:</b> The Committee generally supports improvements proposed for the Jefferson Memorial and grounds. We note that these are closely related to proposals for improvement of walkways around the Tidal Basin. Coordination is needed with the proposals for the Washington Channel outlined in the <i>Monumental Core Framework Plan</i>. The Committee is especially concerned with achieving an appropriate route for the Washington Waterfront Walk south of the Jefferson Memorial and on east to the Southwest Waterfront.</p> <p><b>PART III: CLARIFICATIONS IN THE REPORT</b></p> <p>The <i>Draft National Mall Plan/Environmental Impact Statement</i> is a lengthy and detailed document (600 pages). Steps to clarify certain points, especially key points, and to increase understanding, should be taken when possible. Comments on clarification of the Draft Plan report have been made by other agencies and groups. The Committee of 100 shares concerns about clarifying certain points where possible, especially with respect to a number of projects that are “in the pipeline” and moving forward and apparently will become a part of the National Mall landscape.</p> <p><u>Three Authorized Projects:</u> Three major projects on the National Mall have been authorized by the Congress and are moving ahead. The Martin Luther King, Jr. National Memorial is under construction and the National Museum of African American History and Culture and the Vietnam Veterans Memorial Visitor Center are moving through the design approval process. The location of these three major projects is left blank on some maps (Preferred Alternative Map, page 95 for example). It would aid understanding if these projects were shown and described at the appropriate location in the report.</p> <p><u>Current National Park Service Projects:</u> At the present time, a number of significant projects by the National Park Service are either under construction on the National Mall or moving through the planning and approval process (see Table 41 on page 547). It would be useful if these projects could be indicated on the appropriate maps and described at the appropriate place in the report.</p> <p><u>Provide Summary Information on the White House and President’s Park:</u> As mentioned in a previous section, The Committee of 100 on the Federal City and some other organizations have felt that National Mall should be defined somewhat more broadly, to include at least the Ellipse portion of the White House and President’s Park (now a separate unit of the National Capital Region of the National Park Service).</p>	<p>oo. Coordinated circulation is vital and is part of the preferred alternative.</p> <p>pp. Ongoing projects have been added as an inset map on each alternative plan map.</p> <p>qq. A listing of priorities for these projects and a development map might accompany a programmatic agreement with the Advisory Council on Historic Preservation and the D.C. Historic Preservation Office.</p> <p>rr. The White House and President’s Park were addressed in the <i>Draft Environmental Impact Statement</i> on page 47.</p>


Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
<p>ss</p> <p>tt</p> <p>uuu</p>	<p>Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 17</p> <p>It is now apparent that a broader definition of the National Mall will not be included in the current National Mall Plan. We believe that linkages between the National Mall and the White House and President's Park are important to understand. Therefore, at the minimum we suggest that the <i>Final National Mall Plan</i> at least include a summary description of the existing conditions in the White House and President's Park area, and the proposals in the adopted plan for that area. The description of the plan is very summary in nature.</p> <p><u>Other Nearby Projects:</u> The Draft Report includes some discussion on page 359 of nearby projects that will have a significant effect on the National Mall. These description could be more detailed in order to better understand linkages and potential impacts.</p> <p><u>Clarify Origin of "National Mall" Term:</u> The area now called "The National Mall" was for many years simply known as "The Mall". In fact, the National Park Service now uses the term, "The Mall" to refer to the portion of the National Mall from 1<sup>st</sup> Street to 14<sup>th</sup> Street. This is somewhat confusing and the confusion is not clarified in the present <i>Draft National Mall Plan/Environmental Impact Statement</i>. The Committee of 100 suggests that this confusion be clarified and, if possible, the way and the time when the term "National Mall" came into general use be explained.</p> <p><b>PART IV: NEXT STEPS</b></p> <p>In conclusion, the Committee of 100 on the Federal City appreciates the opportunity to comment on the <i>Draft National Mall Plan/Environmental Impact Statement</i>. We applaud the National Park Service for the work that has been done in bringing the Draft National Mall Plan to the present stage but, as noted above, we have serious concerns about some aspects of the Draft National Mall Plan as it exists today. However, in view of how this planning process has unfolded, we now understand that a somewhat less than comprehensive plan, including only the National Park Service areas of the National Mall, is what will go forward and be presented later this year (fall 2010) for adoption by the National Capital Planning Commission. While we wish the plan were more 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 that are needed.</p> <p><u>Next Steps by the National Park Service</u></p> <p>As the National Park Service moves forward over the next five-six months to prepare the Final National Mall Plan/Environmental Impact Statement, the National Mall Plan staff will need to consider comments of the National Capital Planning Commission, the U.S. Commission of Fine Arts, and other reviewing agencies, including District of Columbia agencies. We hope that suggestions from the Committee of 100 on the Federal City, and many other organizations and individuals, both in Washington and across the country, will also be seriously considered and that appropriate revisions in the final plan will be made.</p>	<p>ss. We believe that including additional information about these projects is not needed for the National Mall plan and would unnecessarily add to the length of the document. The text explains the relationships between these projects to a sufficient degree to consider cumulative impacts.</p> <p>tt. Since the terms 'Mall' and 'National Mall' have been used interchangeably, the <i>Draft Environmental Impact Statement</i> sought to carefully define and consistently use the terms. On page 4 the National Mall is defined to include three specific areas: the Mall, which extends from the grounds of the U.S. Capitol to the grounds of the Washington Monument (basically 1st to 14th streets); the Washington Monument grounds; and West Potomac Park, which is the setting for the Lincoln and Thomas Jefferson memorials, along with many other memorials. As described on page 252, the first use of the term 'Mall' was on a map in 1802. In the glossary on page 582 the Mall is defined the same way as the Mall System in the McMillan plan. The broader definition of the National Mall is again defined on page 582 and is consistent with the definition on page 4.</p> <p>uuu. We agree.</p>

Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
<p>vv</p> <p>ww</p> <p>xx</p>	<p>Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 18</p> <p>We suggest two other steps to aid public understanding of the process of preparing the Final National Mall Plan. First, the comments of the various agencies, organizations and groups should be made available to the public as soon as possible after the comment period closes on March 18.</p> <p>Second, the final National Mall Plan that is presented to the National Capital Planning Commission for approval should include at least summary information on the comments that were considered and the reasons certain revisions were made (or not made).</p> <p>The Committee of 100 on the Federal City, of course, reserves the right to testify before the National Capital Planning Commission when the Final National Mall Plan is presented to them later this year.</p> <p><b>National Mall Projects Moving Ahead:</b> Even while the work on preparing the final National Mall Plan for adoption moves forward, a number of important projects are either under construction or in the planning stage. Three major projects on the National Mall have been authorized by Congress. The Martin Luther King, Jr. Memorial is now under construction, the National Museum of African American History and Culture is proceeding through the planning and design stage and the Vietnam Veterans Memorial Visitors Center is also in the design review stage.</p> <p>The National Park Service will continue to move forward with the planning steps for a number of specific projects on the National Mall, as previously noted. We hope that various planning and design issues on these projects can be resolved in the coming months and that these projects can move into construction either later this year or in the next several years.</p> <p><b>National Mall National Register Nomination:</b> One of the 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 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. In this work, there should be special consideration of the way that the “mental image” and appreciation of the overall National Mall has changed over time and how and when the term “National Mall” has emerged and been accepted.</p> <p><b>Next Steps by Other Agencies</b></p> <p>The Committee of 100 on the Federal City would still like to see a future comprehensive framework plan for the National Mall prepared, that would incorporate and integrate the National Mall Plan of the National Park Service as well as the plans of the other agencies with role in the future development of the National Mall (Smithsonian Institution, National Gallery of Art, Architect of the Capitol, Department of Agriculture, General Services Administration, District of Columbia and WMATA).</p>	<p>vv. The purpose of the <i>Final Environmental Impact Statement</i> is to respond to comments. The final document contains a summary of responses to comment topics, all comments received and NPS responses to substantive comments, a listing of all commenters and topics of interest, and data from online responses. The earliest possible time for this to occur is when the final document is published.</p> <p>ww. Please see the previous response.</p> <p>xx. We agree.</p>

Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
	<p>Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 19</p> <p>A number of these agencies have planning efforts underway relating to the National Mall that should be part of an integrated framework plan. Various planning efforts by the Smithsonian Institution are underway that need to be considered. The Office of the Architect of the Capitol has prepared the <i>Capitol Complex Plan</i> which is undergoing internal review and hopefully will be released to the public later this year. The plans of the Architect of the Capitol are especially important at the east end of the National Mall, because land under the jurisdiction of the Congress abuts Union Square. As discussed previously, a coordinated approach to replanning and redesigning the entire Union Square area is essential.</p> <p>The Committee of 100 understands that the work of the National Park Service in preparing this plan has involved ongoing coordination with all these agencies. However, in the end, the National Park Service has prepared a <i>Draft National Mall Plan</i> that deals primarily only with the National Mall lands under the jurisdiction of the National Park Service. The future plans of other agencies, especially the Smithsonian Institution and the Architect of the Capitol, are not clear in the <i>Draft National Mall Plan/Environmental Impact Statement</i>.</p> <p>We hope that once the National Park Service completes the Final National Mall Plan, that a summary plan report will be prepared that is easy for the public to use and understand, and also makes clear the ongoing projects on the National Mall. Such a summary report could be updated every few years and would therefore reflect the evolution of the National Mall and the progress being made in dealing with major problems.</p> <p><b><u>Increased National Mall Role for the National Capital Planning Commission</u></b></p> <p>The Committee of 100 on the Federal City believes that the National Capital Planning Commission (NCPC), working in coordination with the U.S. Commission of Fine Arts, is the appropriate agency to undertake the next stage of work to prepare a 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 at the center of the Monumental Core. 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 a position to work toward a unified plan for the National Mall.</p> <p>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 have proceeded on different schedules, though perhaps that is inevitable with a program that is so complex.</p> <p>As part of that work, the National Capital Planning Commission and the Commission of Fine</p>	<p>yy. Information about past, present, and reasonably foreseeable plans and projects was requested from the management entities of surrounding areas. They are described in the <i>Draft Environmental Impact Statement</i> in two areas: in "Purpose of and Need for the Plan" under "Interrelationships to Other Plans" (pp. 42-48) and in "Environmental Consequences" under "Methodology for Impact Analysis: Cumulative Impacts" (pp. 357-64). Also see letters 2.1 and 2.2 from the Architect of the Capitol and letter 7 from the Smithsonian Institution.</p> <p>As stated on pages 544-46 of the <i>Draft Environmental Impact Statement</i>, cooperating agencies participated in several multiday workshops to help develop planning principles, preliminary alternatives, and the preferred alternative, in addition to providing extensive comments during internal reviews of the draft document before its publication. Most cooperating agencies chose not to participate in consulting party meetings under section 106 of the National Historic Preservation Act.</p> <p>zz. It is our intention to prepare a summary plan once a record of decision has been signed.</p>




Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
	<p>Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 20</p> <p>Arts worked together to complete the study of the area around the National Mall. That work was summarized in the report, <i>Monumental Core Framework Plan: Connecting New Destinations with the National Mall</i>. That report was approved by the National Capital Planning Commission in and by the Commission of Fine Arts in spring 2009.</p> <p>The Committee of 100 believes that NCPC must now step up and undertake additional work to bring the still unresolved elements of the National Mall into a coordinated framework. The Committee of 100 will urge that NCPC undertake that work. We know that the National Park Service has been working closely with the NCPC staff while preparing the Draft National Mall Plan and we would expect that close working relationship to continue. NCPC could also take other steps, including hiring consultants or convening committees of experts for advice on specific elements of the National Mall. However, the key need is to make sure that plans of the various agencies with an interest in the Mall are coordinated in an imaginative way.</p> <p>It is also that the future overall plan for the National Mall be presented in a way that is effective and understandable, both to people in Washington and to citizens across our country. We hope that NCPC will be willing to pick up this challenging assignment and carry it the next step.</p> <p>We look forward to continuing to work with the National Park Service in planning the future of the National Mall. This is truly a work that is important to all Americans, including those of us who live and work in Washington, D.C. and in the Washington region.</p> <p>Sincerely,</p> <p><i>John Fondersmith</i></p> <p>John Fondersmith, AICP Representing the Committee of 100 on the Federal City in the National Mall Plan Process</p> <p><i>George R. Clark</i></p> <p>George R. Clark, Chair Committee of 100 on the Federal City</p>	

Comment	Letter 14.1. D.C. Preservation League	Response
	 <p>DC PRESERVATION LEAGUE</p> <p>401 F St, NW, ROOM 324 WASHINGTON, DC 20001</p> <p>TEL: 202/783-5144 FAX: 202/783-5596</p> <p>John D. Bellingham, FCIQB, AIC, CEnv President</p> <p>John Sandor Vice President</p> <p>Laura Vowell Treasurer</p> <p>James A. Smalles, P.E. Secretary</p> <p>Sean C. Cahill John F. Clark, Esq. Melissa Cohen, AIA Edward D. Dunsion, AIA Jeffrey Harris Steve Hooff Barbara Laurie, AIA Donald Beckman Myer, FAIA Kate M. Olson, Esq. Andrew Potts, Esq. Andrew Rollman, AIA, LEED AP D. Peter Sefton Ronald D. Staley, Hon. AIA, FAPT Chuck Wagner</p> <p>Rebecca A. Miller Executive Director</p> <p>Amanda McDonald Events and Administrative Manager</p> <p><i>The mission of the DC Preservation League is to preserve, protect, and enhance the historic and built environment of Washington, DC, through advocacy and education.</i></p> <p style="text-align: center;"><b>Testimony of the D.C. Preservation League before the National Capital Planning Commission on the National Park Service Draft National Mall Plan/Environmental Impact Statement</b></p> <p style="text-align: center;"><b>March 4, 2010</b></p> <p>My name is Edwin Fountain. I am a past president and trustee of the DC Preservation League ("DCPL"), and the League's delegate to the Section 106 proceedings conducted by the Park Service with respect to the National Mall Plan. DCPL is the leading non-profit organization dedicated to preservation of historic resources in the Nation's capital. We appreciate the opportunity to provide these comments as part of the ongoing review of the National Mall Plan.</p> <p>At the outset, DCPL commends the efforts of NPS staff for the hours of work and devotion to the Mall that they have obviously dedicated to the development of the preferred alternative and the Section 106 process; for their patience and professionalism in wrangling so many consulting parties who are equally passionate about the past and future of this invaluable, and incomparable, historic national resource; and for the care they have taken to reconcile the many competing purposes of the Mall so as to continue to serve the needs of all the Mall's constituencies.</p> <p>The Park Service has shown an obvious and commendable regard for preservation of historic resources, and the material adverse impacts on sites of historical significance are relatively few and minor. Consequently, DCPL finds much to commend and little to critique in the particulars of the preferred alternative. I will set forth our chief comments, and then I will address a larger issue that goes beyond the purview of the document before us, but which provides critical context for properly assessing the National Mall Plan.</p> <p><b>Comments on the preliminary preferred alternative</b></p> <p>As an initial matter, DCPL understands that the preferred alternative merely sets forth broader contours of an integrated plan for the Mall, that the Section 106 review conducted to date is only the first stage of an ongoing review, and that as specific components are implemented -- e.g., re-design of Union Square -- each of those "sub-undertakings" will be subject to further review and comment. DCPL's comments today are subject to those understandings.</p>	<p>[EDITOR'S NOTE: On March 4, 2010, Edwin Fountain, representing the D.C. Preservation League, provided testimony to the National Capital Planning Commission on the <i>Draft National Mall Plan / Environmental Impact Statement</i>.]</p>

Comment	Letter 14.1. D.C. Preservation League (cont.)	Response
A	<p>Where features of the preliminary preferred alternative plan are not addressed, DCPL supports or at least has no objection to those features.</p> <p><u>Union Square</u></p> <ul style="list-style-type: none"> <li>We concur with the retention of Union Square as a Civil War memorial space, with the Grant Memorial as its primary feature. With a <i>de facto</i> 20th-century “war memorial park” now situated around the Lincoln Reflecting Pool, it is appropriate that the Civil War also be commemorated on the Mall. For the same reason, the Grant Memorial should remain as a counterpart on the Mall to the Lincoln Memorial, as they were the central figures in the greatest cataclysm in the country’s history.</li> <li>The elements of the reflecting pool and the broad, paved plaza, however, lack historical significance, and may be removed or reconceived, consistent with the purposes and uses outlined in the preferred alternative plan.</li> <li>We are concerned, however, with the placement of amenities within the tree areas of this space. Unlike the elm panels along the Mall proper, which are extensive enough that they can accommodate physical structures with relatively little visual or other impact, the presence of buildings in these sites on Union Square could have a much more significant effect. We anticipate that this concern will be addressed as the Park Service proceeds to more detailed planning.</li> </ul>	<p>A. You are correct that the placement of amenities will be addressed as more specific design and construction documents are prepared. The protection of trees has been identified as one of the design criteria (DEIS, p. 88). Responses 2.1 and 2.2 also address design criteria and coordination with the Architect of the Capitol.</p>
B	<p><u>National Mall (between 3rd and 14th Streets)</u></p> <ul style="list-style-type: none"> <li>We are likewise concerned with the notion of a paved area for events between the National Gallery of Art Sculpture Garden and center grass panels, and staging space on the 12th Street axis and over the 12th Street tunnel entry north of Madison Drive. Such hard-surface, utilitarian spaces are at odds with the fundamental nature of this portion of the Mall, and should be minimized and softened as much as possible. With respect to infrastructure supporting large-scale events, we urge the Park Service to consider more mobile facilities that can be removed from these areas when not in use.</li> </ul>	<p>B. We agree that a utilitarian space over the 12th Street tunnel should be softened as much as possible. Currently, the National Park Service uses mobile facilities for national celebrations. However, the frequent placement of temporary structures on the Mall often results in a conglomeration of trailers that resembles a construction zone. This situation generates heartfelt complaints about visits being less enjoyable than expected. We have proposed more active monitoring of resources and events, and event sponsors could benefit from a small flexible office space.</p>
C	<p><u>Washington Monument and grounds</u></p> <ul style="list-style-type: none"> <li>We have no objection to the proposed redevelopment of the Sylvan Theatre site.</li> </ul> <p><u>Constitution Gardens</u></p> <ul style="list-style-type: none"> <li>We have no objection to the proposed redevelopment of the area at the east end of Constitution Gardens -- with the important caveat that any such development and use should not encroach visually or aurally on nearby World War II and Vietnam War memorials. We concur with prior comments from the National Trust and the Committee of 100 that architectural features here should be “festive yet dignified,” and could be distinctive to this area of the Mall, while referential to other facilities on the Mall.</li> </ul>	<p>C. We agree that proposed facilities should not encroach on nearby memorials, and these comments provide criteria for design.</p>

Comment	Letter 14.1. D.C. Preservation League (cont.)	Response
D	<ul style="list-style-type: none"> <li>The reference in the plan to relocating the Lock Keeper's House away from its current location is somewhat indeterminate. As the Lock Keeper's House is no longer in its original location, we have no objection to additional re-location, so long as it preserves its basic spatial orientation to the siting of the historic canal.</li> </ul> <p>The remaining features of the preferred alternative plan indicate no material adverse effects to historic properties.</p> <p>Those are DCPL's comments on the particular features of the preferred alternative. DCPL does wish to raise with this Commission a larger concern, reflecting the fact that the preferred alternative is overly narrow with respect to the metes and bounds of the overall planning area.</p> <p>This is because the preferred alternative is limited to areas within the jurisdiction of the National Park Service. We understand that the Park Service can only plan for what the Park Service controls. But the lines on a map demarking the Park Service's jurisdiction are not visible to visitors to the Mall, and they likewise should not define the scope of such a significant planning process.</p> <p>To begin with, planning for the usage and aesthetic design of the Mall within the vacuum of Park Service jurisdiction foregoes consistency of design among Park Service and adjacent properties.</p>	D. We agree, and retaining this spatial orientation is discussed in the <i>Draft Environmental Impact Statement</i> on page 378.
E	<p>More significantly, it requires placement of all visitor amenities on NPS property, and none on property of adjacent federal (or federally-chartered) entities. From the standpoint of historic preservation, by trying to accommodate all the desired uses and amenities of the Mall on property managed by the Park Service, the Park Service necessarily concentrates the impacts on historic properties on its own property, while limiting the options for mitigation.</p> <p>What the preferred alternative lacks is any inter-agency planning to coordinate uses and effects among the Mall and its adjacent properties. Two examples -- both reflected in the concerns we stated earlier -- illustrate this clearly:</p>	E. The placement of all visitor amenities on NPS property is not required. The plan recognizes that facilities in adjacent museums also meet the needs of visitors. Public facilities on and adjacent to the National Mall are listed in Tables 20 and 21 in the <i>Draft Environmental Impact Statement</i> (pp. 333-36).  As stated in <i>Draft Environmental Impact Statement</i> on pages 90 and 210, the National Park Service will continue to explore the ability of adjacent museums to provide new access to existing or proposed facilities. Please see the discussion of facilities under "Summary of Comments and Responses" beginning on page 11 for more information.
F	<ul style="list-style-type: none"> <li>First, with respect to the development of infrastructure in Union Square, the U.S. Botanical Garden and Architect of the Capitol should be involved to develop an amenity plan that serves Union Square and the adjoining north-south parcels in a coordinated way, so as to reduce impacts on all three sites.</li> </ul>	F. See letters 2.1 and 2.2 from the Architect of the Capitol. In letter 2.2 they concur with your comment.
G	<ul style="list-style-type: none"> <li>Second, the development of fixed, hard-surface utility areas to support large events on the Mall should likewise be the subject of inter-agency discussions to determine if such facilities can be located off of Park Service property, so as to reduce or eliminate impact on the Mall grounds proper.</li> </ul> <p>Other participants in the Section 106 review process have expressed similar concerns, and have called for a third-century plan for the National Mall. And that is a worthy goal, for today's plans become tomorrow's history. Any planning effort must look forward, not merely backward, and create something that 100 years from will itself be deemed worthy of preservation. That requires planning for the Mall to occur in a larger context than is presented here.</p>	G. These topics have been and will continue to be part of ongoing interagency discussions. The development of additional paved areas for event infrastructure would be carefully designed to be worthy of the planning and design history of the National Mall, as well as its vital and visible civic role.

Comment	Letter 14.1. D.C. Preservation League (cont.)	Response
H	<p>This Commission does not need to hear that advice from us, for the <u>Extending the Legacy</u> plan and <u>Monumental Core Framework</u> plans are clearly intended to provide the basis for the evolution of the Mall in the 21st century. Those plans, taken together, may well receive from our successors the same reverence that we give the L'Enfant and McMillan plans today.</p> <p>But what the Park Service's current effort appears to demonstrate is the pitfalls of implementing such a plan on an agency-by-agency basis. We are informed that the Park Service has worked closely with the other stakeholders of the Mall. What does not appear in the preferred alternative is any sense that those other stakeholders are making their own contributions to the comprehensive and optimal development of the Mall.</p> <p>It is too much to expect one agency, or even a committee of agencies, to successfully implement any 21st-century plan for the Mall and the monumental core. The challenge before this Commission is to secure for its plans the political weight necessary to implement those plans on an inter-agency, inter-jurisdictional basis. Without that political weight, any plan runs a considerable risk of being implemented haphazardly, intermittently, and incompletely -- and worst, incoherently.</p> <p>For these reasons, as with the L'Enfant and McMillan plans, such a plan needs the imprimatur of nation's highest leaders. It needs to be commissioned or endorsed by Congress or the President, and it needs to be identified with individuals of national significance. Ten years ago it could have known as the Moynihan Plan; today it could be the namesake of some equally eminent national figure.</p> <p>The National Mall Plan may well be a worthy step in implementing the plans this Commission has made for the future development of the capital. But we urge the Commission to consider how to elevate those plans, so that all interested agencies and jurisdictions implement them on a more coordinated basis.</p> <p>DCPL appreciates the opportunity to comment to you on the preferred alternative plan, and looks forward to further Section 106 participation.</p> <p>Edwin L. Fountain Past President, DC Preservation League</p>	<p>H. Cooperating agencies have contributed extensively and have participated in more than 11 workshops. Other stakeholders, such as consulting parties, have contributed substantially to the development of the range of alternatives and the development of the preferred alternative.</p>

Comment	Letter 14.2. D.C. Preservation League	Response
	 <p>DC. PRESERVATION LEAGUE</p> <p>401 F St, NW, ROOM 324 WASHINGTON, DC 20001</p> <p>TEL: 202/783-5144 FAX: 202/783-5596</p> <p>John D. Bellingham, FCIQB, AIC, CEnv President</p> <p>John Sandoe Vice President</p> <p>Laura Vowell Treasurer</p> <p>James A. Smalles, P.E. Secretary</p> <p>Sean C. Cahill John F. Clark, Esq. Melissa Cohen, AIA Edward D. Dunson, AIA Jeffrey Harris Steve Houff Barbara Laurie, AIA Donald Beckman Myer, FAIA Kate M. Olson, Esq. Andrew Poms, Esq. Andrew Rollman, AIA, LEED AP D. Peter Sefton Ronald D. Staley, Hon. AIA, FAPT Chuck Wagner</p> <p>Rebecca A. Miller Executive Director</p> <p>Amanda McDonald Events and Administrative Manager</p> <p><i>The mission of the DC Preservation League is to preserve, protect, and enhance the historic and built environment of Washington, DC, through advocacy and education.</i></p> <p style="text-align: center;"><b>Comments of the D.C. Preservation League to the National Park Service on the Draft National Mall Plan/Environmental Impact Statement</b></p> <p style="text-align: center;"><b>March 18, 2010</b></p> <p>The D.C. Preservation League ("DCPL"), the leading non-profit organization dedicated to preservation of historic resources in the Nation's capital, appreciates the opportunity to provide these comments as part of the ongoing review of the National Mall Plan.</p> <p>At the outset, DCPL commends the efforts of NPS staff for the hours of work and devotion to the Mall that they have obviously dedicated to the development of the preferred alternative and the Section 106 process; for their patience and professionalism in wrangling so many consulting parties who are equally passionate about the past and future of this invaluable, and incomparable, historic national resource; and for the care they have taken to reconcile the many competing purposes of the Mall so as to continue to serve the needs of all the Mall's constituencies.</p> <p>The Park Service has shown an obvious and commendable regard for preservation of historic resources, and the material adverse impacts on sites of historical significance are relatively few and minor. Consequently, DCPL finds much to commend and little to critique in the particulars of the preferred alternative. This submission will set forth our chief comments, but then address a larger issue that goes beyond the purview of the draft plan, but which provides critical context for properly assessing the National Mall Plan.</p> <p><b>Comments on the preliminary preferred alternative</b></p> <p>As an initial matter, DCPL understands that the preferred alternative merely sets forth broader contours of an integrated plan for the Mall, that the Section 106 review conducted to date is only the first stage of an ongoing review, and that as specific components are implemented -- e.g., re-design of Union Square -- each of those "sub-undertakings" will be subject to further review and comment. DCPL's comments today are subject to those understandings.</p>	

Comment	Letter 14.2. D.C. Preservation League (cont.)	Response
A	<p>Where features of the preliminary preferred alternative plan are not addressed, DCPL supports or at least has no objection to those features.</p> <p><u>Union Square</u></p> <ul style="list-style-type: none"> <li>We concur with the retention of Union Square as a Civil War memorial space, with the Grant Memorial as its primary feature. With a <i>de facto</i> 20th-century “war memorial park” now situated around the Lincoln Reflecting Pool, it is appropriate that the Civil War also be commemorated on the Mall. For the same reason, the Grant Memorial should remain as a counterpart on the Mall to the Lincoln Memorial, as they were the central figures in the greatest cataclysm in the country’s history.</li> <li>The elements of the reflecting pool and the broad, paved plaza, however, lack historical significance, and may be removed or reconceived, consistent with the purposes and uses outlined in the preferred alternative plan.</li> <li>We are concerned, however, with the placement of amenities within the tree areas of this space. Unlike the elm panels along the Mall proper, which are extensive enough that they can accommodate physical structures with relatively little visual or other impact, the presence of buildings in these sites on Union Square could have a much more significant effect. We anticipate that this concern will be addressed as the Park Service proceeds to more detailed planning.</li> </ul>	A. Please see response to 14.1A.
B	<p><u>National Mall (between 3rd and 14th Streets)</u></p> <ul style="list-style-type: none"> <li>We are likewise concerned with the notion of a paved area for events between the National Gallery of Art Sculpture Garden and center grass panels, and staging space on the 12th Street axis and over the 12th Street tunnel entry north of Madison Drive. Such hard-surface, utilitarian spaces are at odds with the fundamental nature of this portion of the Mall, and should be minimized and softened as much as possible. With respect to infrastructure supporting large-scale events, we urge the Park Service to consider more mobile facilities that can be removed from these areas when not in use.</li> </ul>	B. Please see response to 14.1B.
C	<p><u>Washington Monument and grounds</u></p> <ul style="list-style-type: none"> <li>We have no objection to the proposed redevelopment of the Sylvan Theatre site.</li> </ul> <p><u>Constitution Gardens</u></p> <ul style="list-style-type: none"> <li>We have no objection to the proposed redevelopment of the area at the east end of Constitution Gardens -- with the important caveat that any such development and use should not encroach visually or aurally on nearby World War II and Vietnam War memorials. We concur with prior comments from the National Trust and the Committee of 100 that architectural features here should be “festive yet dignified,” and could be distinctive to this area of the Mall, while referential to other facilities on the Mall.</li> </ul>	C. Please see response to 14.1C.

Comment	Letter 14.2. D.C. Preservation League (cont.)	Response
D	<ul style="list-style-type: none"> <li>The reference in the plan to relocating the Lock Keeper's House away from its current location is somewhat indeterminate. As the Lock Keeper's House is no longer in its original location, we have no objection to additional re-location, so long as it preserves its basic spatial orientation to the siting of the historic canal.</li> </ul> <p>The remaining features of the preferred alternative plan indicate no material adverse effects to historic properties.</p> <p><b>Comments on comprehensive forward planning for the National Mall.</b></p> <p>Those are DCPL's comments on the particular features of the preferred alternative. DCPL does wish to raise with a larger concern, reflecting the fact that the preferred alternative is overly narrow with respect to the metes and bounds of the overall planning area, and with respect to the scope of the planning effort itself.</p> <p>The preferred alternative is limited to areas within the jurisdiction of the National Park Service. Indeed, the document specifically -- and with some circularity -- "define[s] the National Mall to include three specific areas over which the agency has legal jurisdiction." Draft National Mall Plan/EIS at 125. We understand that the Park Service can only plan for what the Park Service controls. But the lines on a map demarking the Park Service's jurisdiction are not visible to visitors to the Mall, and do not limit visitors' conception of the Mall, and they likewise should not define the scope of such a significant planning process.</p>	D. We agree. Please see response 14.1D.
E	<p>To begin with, planning for the usage and aesthetic design of the Mall within the vacuum of Park Service jurisdiction foregoes consistency of design among Park Service and adjacent properties.</p> <p>More significantly, it requires placement of all visitor amenities on NPS property, and none on property of adjacent federal (or federally-chartered) entities. From the standpoint of historic preservation, by trying to accommodate all the desired uses and amenities of the Mall on property managed by the Park Service, the Park Service necessarily concentrates the impacts on historic properties on its own property, while limiting the options for mitigation.</p> <p>What the preferred alternative does not reflect is any inter-agency coordination of uses and effects among the Mall and its adjacent properties. Three examples -- two of them reflected in the concerns we stated earlier -- illustrate this clearly:</p>	E. Please see response 14.1E.
F	<ul style="list-style-type: none"> <li>First, with respect to the development of infrastructure in Union Square, the U.S. Botanical Garden and Architect of the Capitol should be involved to develop an amenity plan that serves Union Square and the adjoining north-south parcels in a coordinated way, so as to reduce impacts on all three sites.</li> </ul>	F. Please see response 14.1F.
G	<ul style="list-style-type: none"> <li>Second, the development of fixed, hard-surface utility areas to support large events on the Mall should likewise be the subject of inter-agency discussions to determine if such facilities can be located off of Park Service property, so as to reduce or eliminate impact on the Mall grounds proper.</li> </ul>	G. Please see response 14.1G.



Comment	Letter 14.2. D.C. Preservation League (cont.)	Response
<p>H</p> <p>I</p> <p>J</p>	<ul style="list-style-type: none"> <li>• Third, the Smithsonian Arts &amp; Industries Building is obviously a potential resource for location of amenities, visitor welcome facilities, or event management infrastructure that otherwise the preferred alternative plan proposes to locate on the Mall's open space.</li> </ul> <p>Other participants in the Section 106 review process have expressed similar concerns, and have called for a planning commission for the National Mall, similar to the McMillan Commission. The Park Service rejects that proposal, on the grounds that "it would necessarily supersede the purview of" the Commission of Fine Arts and the National Capital Planning Commission. Draft National Mall Plan/EIS at 127. Well, precisely. What the Park Service's current effort appears to demonstrate is the pitfalls of implementing plans on an agency-by-agency basis. We are informed that the Park Service has worked closely with the other stakeholders of the Mall. What does not appear in the preferred alternative is any sense that those other stakeholders are making their own contributions to the comprehensive and optimal development of the Mall.</p> <p>It is too much to expect one agency, or even a committee of agencies, to successfully implement any plan for the Mall and the monumental core. What distinguishes the McMillan Commission from the NCPC is that the former was directly commissioned by, and thereby carried the authority of, the nation's highest political leaders. The re-shaping of the Mall that occurred in the 20th century could not have occurred without the weight of Congressional and Presidential support behind its fundamental concepts. Similarly, any plan today requires greater authority to be successfully implemented on an inter-agency, inter-jurisdictional basis. Without similar political authority and momentum behind it, the NCPC plan runs a considerable risk of being implemented haphazardly, intermittently, and incompletely -- and worst, incoherently.</p> <p>Similarly, proponents of a Mall planning commission have called for a third-century plan for the Mall. And that is a worthy goal, for today's plans become tomorrow's history. Any planning effort must look forward, not merely backward, and create something that 100 years from will itself be deemed worthy of preservation. That requires planning for the Mall to occur in a larger context than is presented here.</p> <p>The draft plan rejects the need for a third-century plan, deferring to the National Capital Planning Commission's <u>Extending the Legacy</u> and <u>Monumental Core Framework</u> plans. Draft National Mall Plan/EIS at 126-27. Perhaps those plans, taken together, will one day receive from our successors the same reverence that we give the L'Enfant and McMillan plans today.</p> <p>But again, what distinguishes the L'Enfant and McMillan plans from the NCPC plans is that the McMillan Commission deliberately set out to re-envision the Mall, while the NCPC takes the Mall as a static, "substantially completed work of civic art," as set forth in the Commemorative Works Act, 40 U.S.C. § 202(a)(1). NCPC and NPS are of course bound to start from that premise, dictated to them by Congress. But while that Congressional finding, which was an important response to the impending profusion of new monuments, memorials and museums on the Mall, it forecloses the continuing long-term growth and evolution of the Mall</p> <p>The very purpose of a third-century commission (in addition to overcoming the frictions inherent in any inter-agency, inter-jurisdictional process) is to re-visit the question answered by the Commemorative Works Act. It is with considerable trepidation that we suggest asking the</p>	<p>H. The Arts and Industries Building may well be a resource for visitor amenities. While it may have limitations to achieving museum standards, your suggestion for event management creatively expands on the concept of visitor amenities. With its open character it could potentially be used for numerous educational and cultural functions and performances, and thus it could take pressure off the Mall.</p> <p>As stated on page 24 of the <i>Draft Environmental Impact Statement</i>, the Arts and Industries Building is undergoing repair and preservation work, and the Smithsonian Institution has been asked that no permanent decision be made about the building's use until a site assessment by the National Museum of the American Latino Commission has been completed.</p> <p>I. Please see response 14.1H.</p> <p>J. We agree with your point that planning must look forward and not just back, and we agree that the National Mall will continue to evolve.</p> <p>Change is a constant and despite landmark plans for Washington, D.C., it was clear by the beginning of the 21st century that the National Mall was never designed for present levels of civic use, tourism, recreation, and cultural activities. When this planning effort began, memorial proposals being considered in Congress or proposed by various groups frequently mentioned the need to be on the National Mall. It was clear that the continuation of present conditions would be unsustainable, along with degraded natural resources, aging infrastructure, congestion, and unmet visitor needs.</p> <p>The National Mall is our nation's primary civic space, a beloved symbol of our country, and a commemorative landscape, with possibly the highest concentration of museums in the world. High use levels will continue and demands on the civic space will be enormous. However, the National Mall is different from most of the world's other great civic spaces, which are most frequently hard-surface plazas and squares that are relatively easy to maintain. The National Mall is a designed landscape whose primary characteristics include turf and trees, and these natural components require far more care.</p> <p>The bold proposals in the National Mall plan include re-envisioning Union Square, increasing civic uses in a manner that retains the visual appearance of a continuous landscape, rethinking single-purpose visitor facilities and better dispersing them, and focusing on improved multimodal circulation with more pleasant pedestrian and bicycling opportunities. These visions respect the past while preparing for the future. As such they are bound to generate some controversy. Reconciling competing needs and constituencies can be a challenge. The National Park Service cares for America's national parks, including the National Mall, and the proposed plan is fundamental to our responsibility. Its purpose is to provide a coordinated and comprehensive written program for future action prepared with public involvement and NEPA environmental analysis.</p> <p>Defining a great American civic space within a designed landscape may seem like an oxymoron, but it truly represents the importance of land and citizens together as a national story. The National Mall plan is a chapter in an ongoing story of our nation's capital.</p>

Comment	Letter 14.2. D.C. Preservation League (cont.)	Response
<p>J (cont.)</p>	<p>question, "How should the Mall change (if at all)?" given the narrow interest-group considerations that would inevitably come to the fore. (As the Park Service correctly recognizes, such a commission would "creat[e] another advocacy or grievance forum." Draft National Mall Plan/EIS at 127.) And it may well be that the answer to such a question would be a call to more fully implement the McMillan plan or other plans that have gone before.</p> <p>But the irony of historic preservation is that all buildings and places that are now deemed historic themselves were built on some other "historic" site, and many of them were controversial at the time they were built. We believe the question is worth asking.</p> <p>We recognize that such long-term visioning is beyond the purview of the Mall planning and improvement effort that the Park Service has undertaken. But just as it is not the Park Service's place to create such a plan on its own, nor is the Park Service's place to reject it on its own. We urge the National Park Service, along with all other stakeholders and supporters of the National Mall, to continue to address the question whether the Mall should be deemed "completed."</p> <p>DCPL appreciates the opportunity to comment on the preferred alternative plan, and looks forward to further Section 106 participation.</p> <p>Edwin L. Fountain Past President, DC Preservation League DCPL representative to Section 106 proceedings on the National Mall Plan</p>	



Business Improvement District

STATEMENT REGARDING THE NATIONAL MALL PLAN  
 To the National Capital Planning Commission  
 From Richard H. Bradley, Executive Director, Downtown Business Improvement District,  
 Washington DC  
 Thursday, March 4, 2010

Mr. Chairman and Commission Members:

The Downtown Business Improvement District is pleased to offer testimony in enthusiastic support the draft of the National Park Service's National Mall Plan.

The Downtown BID is a private non-profit organization that provides hospitality, maintenance and beautification services, as well as capital improvements, resources and research to help diversify the economy and enhance the Downtown experience for all. This special district, where property owners have agreed to tax themselves to fund services, encompasses a 138-block area of approximately 825 properties from Massachusetts Avenue on the north to Constitution Avenue on the south, and from Louisiana Avenue on the east to 16th Street on the west.

The Downtown BID is a Section 106 consulting party to the National Mall Plan initiative. As such, NPS has encouraged us to be involved in the plan every step of the way. We have participated to the best of our ability. We feel that the plan readies for action much of what the Downtown BID sees as being needed at the National Mall, i.e.:

1. The National Mall Plan promotes a *world-class landscape* that will tell in an improved manner the story of America to visitors from all over the world. The plan protects the historic landscape of the McMillan Plan. NPS rightly cites the condition of turf and the viability of American elm trees to be critical problems and identifies corrective measures. The National Mall would become more user friendly, with more restrooms, better facilities for food and drink, better situated ranger locations and improved wayfinding signage.
2. At the same time, the National Mall Plan helps to create a *high-quality local greenspace* that serves local residents and workers and ties together the center city--Downtown and Foggy Bottom on the north with the Haines Point and Southwest DC on the south, the U.S. Capitol on the east with the Lincoln Memorial on the west. Flood control improvements (some of which predate the National Mall Plan) would help ensure that parts of the National Mall would not be underwater so often, so roads and playing fields would be usable. A wide range of ecological improvements would complement Mayor Fenty's efforts to "green" the city and private developers' efforts to "green" Downtown along with the U.S. General Services Administration and the Downtown BID. In particular, replacing the currently used potable water in the Reflecting Pool, Constitution Gardens Lake and Union Square Pool with Potomac River water is a great ecological improvement.

[EDITOR'S NOTE: On March 4, 2010, Richard Bradley of the Downtown D.C. Business Improvement District provided testimony to the National Capital Planning Commission on the *Draft National Mall Plan / Environmental Impact Statement.*]

Comment	Letter 15. Downtown DC Business Improvement District (cont.)	Response
<p>A</p> <p>B</p> <p>C</p>	<p>3. The National Mall Plan suggests multiple forms of <i>public transportation</i> to make the various locations on the National Mall accessible to the public—including low-income and physically handicapped persons—through frequent, affordable public transit. The Downtown BID urges NPS to move ahead promptly with improvements to public transportation and would urge using increased National Mall parking revenues to help pay for such improvements. We also propose that NPS redouble efforts to partner with the city to invest in infrastructure for improved tour bus parking.</p> <p>4. The National Mall Plan supports <i>special events</i> being held more frequently on lesser-used Mall spaces. Improvements to the Union Square area—including a well-designed hardscape—will help limit the turf damage that discretionary special events and mandatory First Amendment demonstrations bring. We urge NPS to invest in their “uptown parks”—e.g., Pershing Park, Freedom Plaza, John Marshall Park, Franklin Square, and McPherson Square—so these public spaces can host more special events and better serve our center city. . We look forward to working with NPS on a future planning initiative to make Pennsylvania Avenue—including its parks—truly one of America’s great streets.</p> <p>The Downtown BID commends NPS for considering the Downtown BID’s opinions , and, more importantly, the opinions of other city stakeholders’ through the recommendations of the Center City Action Agenda, CapitalSpace and the Monumental Core Framework Plan in drawing up its draft National Mall Plan.</p> <p>The Downtown BID is pleased that basic consumer research was an ingredient of the National Mall Plan; we would recommend improved and continual research on the number, origin and type of users of the National Mall.</p> <p>Although the details of a number of National Mall Plan recommendations undoubtedly can be debated, the many proposed major projects and programs are solid. There is no doubt they will result in a much-improved National Mall. Now is the time to finalize this draft National Mall Plan and move ahead on the long road of implementing the plan.</p> <p>Each significant project and program will require a plan in its own right; the Downtown BID participated over the past year in just such a plan for wayfinding signage. It is in these individual plans that important details should be addressed.</p> <p>More importantly, each project and program will require significant <i>funding</i>. The Downtown BID commends the efforts of the Trust for the National Mall. We note that substantial and consistent funding will need to be provided by Congress over the next decade to implement the plan, lest it become another forsaken list of wishes.</p> <p>Thank you for your attention. I would be glad to answer any questions.</p>	<p>A. Thank you for your ongoing interest and support for the uptown parks.</p> <p>B. We too look forward to resuming planning for Pennsylvania Avenue.</p> <p>C. The planning team has worked with city and federal agencies to ensure coordination and compatibility between the plans you describe.</p>

Comment	Letter 16. Eisenhower Memorial Commission	Response
	<p><b>Statement by Daniel J. Feil FAIA In behalf of the Eisenhower Memorial Commission Regarding the Draft National Mall Plan</b></p> <p><b>Before the National Capital Planning Commission On March 4, 2010</b></p> <p>My name is Daniel Feil. I am Executive Architect for the Eisenhower Memorial Commission. On behalf of the Eisenhower Memorial Commission, I appreciate the opportunity to address NCPC this afternoon.</p> <p>The Eisenhower Memorial Commission was invited to be a Consulting Party under the National Historic Preservation Act Section 106 process. Development of the Draft National Mall Plan by the National Park Service required the coordination of existing plans, numerous federal and local agencies and many interest groups, over a long period of time. My Commission commends the thoroughness of the Plan and the openness of the process led by the National Park Service which produced it.</p> <p>The approved four [4] acre site for the Eisenhower Memorial is located just south of The National Mall, across from Independence Avenue, between 4<sup>th</sup> and 6<sup>th</sup> Streets, SW. It will occupy one of the “top twenty” memorial sites identified in the <i>Memorials and Museums Master Plan</i> adopted by NCPC and the Commission of Fine Arts in 2001. The Draft National Mall Plan greatly advances the opportunities for improvements to its subject area, which will be the Eisenhower Memorial’s immediate neighbor to the north. The Eisenhower Memorial Commission fully supports the Plan’s efforts to provide a framework for restoration, refurbishment, design and development, with its keen awareness of historic resource management.</p> <p>The Draft Plan addresses vistas which begin and end within the National Mall, even if their trajectory goes outside the National Mall boundaries. Vista C is one such designated “Important Vista”. It is depicted on the Important Vistas graphic on page 268 of the Draft National Mall Plan / Environmental Impact Statement as well as on the Urban Design Framework graphic on page 45 of the same volume. The Eisenhower Memorial Commission agrees that this vista is an important feature of the L’Enfant Plan and it is committed to respecting the vista as the Eisenhower Memorial design is developed. This commitment was made as part of the Site Approval process and is repeated here relative to the Draft National Mall Plan.</p> <p>The Eisenhower Memorial Commission appreciates being included in the process that produced the Draft National Mall Plan and the Plan’s respect for previous decisions by NCPC and CFA.</p> <p>Thank you.</p>	<p>[EDITOR’S NOTE: On March 4, 2010, Daniel Feil of the Eisenhower Memorial Commission provided testimony to the National Capital Planning Commission on the <i>Draft National Mall Plan / Environmental Impact Statement</i>.]</p>


Comment	Letter 17. Guest Services, Inc.	Response
	<div data-bbox="512 297 852 418" data-label="Image"> </div> <p data-bbox="317 461 443 482">March 18, 2010</p> <p data-bbox="317 500 579 581">National Mall and Memorial Parks Attn: National Mall Plan 900 Ohio Drive, SW Washington, DC 20024</p> <p data-bbox="317 599 520 620">To Whom It May Concern:</p> <p data-bbox="317 639 1041 680">Guest Services, Inc. has been the Concessionaire on the National Mall and Memorial Parks for many years and we have worked with the National Park Service on many projects.</p> <p data-bbox="317 698 1010 758">Our most recent projects were the building of two facilities near the Lincoln Memorial. Both facilities operate with Geo-Thermal systems that help reduce refrigerates used, energy reduction, and water conservation.</p> <p data-bbox="317 776 1052 857">It has been an honor being a consulting party member to this Section 106 Environmental Impact Statement for the National Mall. The historic information, the knowledge, the opinions, the passion, and the concern that we have witnessed during these meetings has enlightened us to the process the National Park Service puts into its planning.</p> <p data-bbox="317 875 1041 956">Guest Services supports the Preferred Alternative Plan. We find the plan provides the National Park Service with the flexibility that is going to be needed in the future and allows for the best possible protection of the natural and cultural resources, while addressing the needs of the growing number of visitors to the National Mall.</p> <p data-bbox="317 974 1037 1015">The future holds a balancing act of managing the natural resource, our first amendment rights, our cultural resources, and infrastructure planning that reaches years beyond our time.</p> <p data-bbox="317 1032 1050 1053">Thank you for the opportunity to express our views during the meetings and our choice of plans.</p> <p data-bbox="317 1089 396 1110">Sincerely,</p> <p data-bbox="317 1149 722 1190">Daniel A. Maillet Director of Construction/Environmental Management</p> <p data-bbox="317 1312 648 1333">3305 Prosperity Avenue Fairfax, VA 22031</p> <p data-bbox="932 1312 1041 1333">703.849.9300</p>	

Comment	Letter 18. Guild of Professional Tour Guides	Response
A	<p>March 10, 2010</p> <p>National Mall and Memorial Parks  ATTN: National Mall Plan  900 Ohio Dr. SW  Washington, DC 20024</p> <p>Gentlemen,</p> <p>The Guild of Professional Tour Guides has reviewed the "Draft National Mall Plan/Environmental Impact Statement" of December 2009. We are extremely gratified that many additional water fountains and rest rooms are included in the Plan.</p> <p>We have one minor comment/recommendation. On page 92 and page 216, mention is made concerning possible relocation of the Lock Keeper's House. We recommend that it be retained in its present location as it is inextricably linked with the operation of the Washington Canal. To move it to a different location would detract from its historical context. If there is sufficient reason to move, relocate it to the west and keep its present proximity to Constitution Ave. unchanged.</p> <p>Sincerely,</p> <p>James W. Heegeman  President</p>	<p>A. The plan includes the criteria you and section 106 consulting parties discussed for the Lockkeeper's House; see page 378 of the <i>Draft Environmental Impact Statement</i>.</p>

Comment	Letter 19.1. National Coalition to Save Our Mall	Response
<p>A</p> <p>B</p> <p>C</p>	<p style="text-align: center;"><b>Testimony by the National Coalition to Save Our Mall before the National Capital Planning Commission on the National Park Service National Mall Plan March 4, 2010</b></p> <p>Good morning, Chairman Bryant and Commissioners. I am Judy Scott Feldman, chair and president of the nonprofit citizens organization, National Coalition to Save Our Mall. The Coalition has been a strong supporter of the Park Service's Mall planning efforts. In commenting on the Plan, one of our main interests has been to maintain and enhance the symbolic quality of the Mall.</p> <p>In 2005, Park Service and NCPC representatives testified before Congress they would work together on a new Mall master plan, but this plan has evolved into a more modest, Park Service-centered project. As the Park Service now states, it focuses only on National Park Service portions of the Mall. It is not a vision for the entire Mall that gives equal weight to the interests of the Smithsonian, Architect of the Capital, National Gallery and other institutions on the Mall. It consists of a set of broad "concepts" to guide future development. Is this what the NCPC believes this plan should be?</p> <p>Because of its limited and conceptual quality, and the absence of any designs or plans to show what physical impact these improvements will have on the Mall, the public can only at this point comment on whether these are good ideas. Many of them seem to be – improve the grass, repair monuments and walkways. Other proposals are more troubling, such as hard paving the gravel walkways and new large plazas, and introducing numerous kiosks, restaurants, restroom facilities, and visitor centers on the open space that could have dramatic and adverse impacts on the historic quality and landscape character of the National Mall. Does NCPC feel that this plan will assist them in evaluating all the smaller scale plans that will follow?</p> <p>Our concern is that because this is not a plan but only concepts, what happens next is critical. The NCPC Staff Report supports Park Service plans to move forward to develop these concepts, but there are several important missing steps that need to be taken and which might make reviewing future projects a more meaningful process.</p> <p>We offer the following recommendations:</p> <ol style="list-style-type: none"> <li>1. NCPC should work with the Park Service to come up with a name that more accurately represents the Park Service-centered scope, purpose, and goals of the plan: maybe the "National Park Service Concept Plan for its holdings on the National Mall."</li> <li>2. NCPC should advise Congress of the need immediately to start work on an independent, inter-disciplinary visionary Mall Plan that includes all stakeholders and robust public input. Why is this important? Because the visionary plan would look beyond basic maintenance to long-range future opportunities such as Mall expansion. Instead of accepting the 2003 security plan for the Washington Monument grounds as the new master plan, as the NCPC Staff Report recommends, consideration could be given to finding a way to make the Monument grounds truly the centerpiece of the Mall and the City it was intended to be.</li> </ol>	<p>[Editor's Note: On March 4, 2010, Judy Scott Feldman of the National Coalition to Save Our Mall provided testimony to the National Capital Planning Commission on the <i>Draft National Mall Plan / Environmental Impact Statement</i>.]</p> <p>A. The proposed plan meets the requirements of the National Capital Planning Commission (see letters 6.1 and 6.2).</p> <p>B. The planning agency determines the title. The proposed National Mall plan is a vision plan, comparable with a general management plan that the National Park Service prepares for all units of the national park system. This title is appropriate.</p> <p>C. Please see the description in the <i>Draft Environmental Impact Statement</i> on pages 126–27.</p>



Comment	Letter 19.1. National Coalition to Save Our Mall	Response
<p>D</p> <p>E</p> <p>F</p> <p>G</p> <p>H</p>	<p>3. NCPC should assist the Park Service in developing, in concert with each and all Mall stakeholders, Mall-wide standards, principles, and guidelines. Why is this important? Because consolidating planning would maximize continuity across jurisdictions and benefits to the American public, and at the same time minimize duplication and adverse impacts on the sensitive landscape. For example, new visitor centers and restroom facilities could be located to the sides, in or near existing museum buildings, instead of on the open space. The American public experiences the Mall as one continuous space; it must not be treated as collection of separate jurisdictions.</p> <p>These Mall-wide plans should include a landscape restoration plan, a visitor services plan, guidelines for components such as pools, water sources, lighting, and a low-cost circulation plan. The public <i>still</i> has no knowledge of anything going on in developing low-cost circulation and transportation – as distinct from the Park Service exclusive tour bus sightseeing concession – even though for years the public and District have been clamoring for this basic human need. These studies must be developed in a transparent and open public process.</p> <p>4. NCPC should direct the Park Service to make certain all project plans conform with the standards developed above as well as any principles that come out of the visionary plan. Why is this important? Because, as we have learned through the ongoing Lincoln Memorial Reflecting Pool project, when contractors have no clear direction, they can only guess as to which choices of water treatment, lighting, and paving materials will be compatible with future development of <i>other</i> areas of the Mall. Decisions made now for this and any single project will have far-reaching implications for the entire Mall.</p> <p>5. Finally, NCPC should remind the National Park Service that public consultation needs to be a continuing component of the planning process and not, for example as stated in the Plan on p. 372, limited to consultation with the federal and DC review agencies. Public comments urging the Park Service to give due attention to the Mall’s symbolic quality have not yet made it into the Plan.</p> <p>In closing, the NCPC has stated in the past that the Park Service Plan together with NCPC’s Framework Plan would constitute the long-term vision for the future of the National Mall. Does this Planning Commission still feel this is true?</p> <p>I am happy to take any questions from Commissioners.</p> <p>For the National Coalition to Save Our Mall:</p> <p>Judy Scott Feldman, Ph.D.  Chair and President  9507 Overlea Drive  Rockville, MD 20850  301-340-3938 / <a href="mailto:jfeldman@savethemall.org">jfeldman@savethemall.org</a></p>	<p>D. The National Capital Planning Commission has worked with the National Park Service as a cooperating agency. As stated on pages 544–46 of the <i>Draft Environmental Impact Statement</i>, the Park Service has worked and will continue to work with agencies with a presence on or interest in the National Mall. The National Mall plan treats the area as one continuous space. Cooperating agencies participated in several multiday workshops to help develop planning principles, preliminary alternatives, and the preferred alternative, in addition to providing extensive comments during internal reviews of the draft document before its publication. They provided information about their facilities, as well as ongoing and future projects.</p> <p>E. The <i>Visitor Transportation Study</i>, begun in 2003, is referenced on pages 44 and 47 of the <i>Draft Environmental Impact Statement</i>, as well as page 146, and it was established as an element common to every alternative, including the preferred alternative. The <i>Visitor Transportation Study</i> was prepared with public input, as required by the National Environmental Policy Act. The “Finding of No Significant Impact” was signed February 5, 2010.</p> <p>F. Current NPS projects, such as the Lincoln Memorial Reflecting Pool, are common to every alternative and were addressed as cumulative actions. Plans for these projects were developed to be consistent with the direction being proposed in the National Mall plan.</p> <p>G. The National Mall’s symbolic quality is addressed extensively in the “Purpose of and Need for the Plan” under the “Foundation for Planning and Management” (DEIS pp. 9–19). It is further discussed on pages 83 and 150 (row 1.2) for the preferred alternative.</p> <p>H. Please see letter 6.2 from the National Capital Planning Commission, dated March 18, 2010, which states that the “document will be sufficient for NCPC’s use in complying with the National Environmental Policy Act.” Both the National Park Service and the National Capital Planning Commission have worked together to ensure coordinated and cohesive plans for the monumental core, including the National Mall.</p>

Comment	Letter 19.2. National Coalition to Save Our Mall	Response
<p>A</p> <p>B</p> <p>C</p>	<div data-bbox="533 282 890 396" style="text-align: center;">  <p><b>National Coalition to Save Our Mall</b>  <i>Preserving Our Monument to Democracy</i>  <i>an organized voice for the public on Mall matters</i></p> </div> <p>March 18, 2010</p> <p>Ms. Susan Spain  Project Executive, The National Mall Plan  National Mall &amp; Memorial Parks  900 Ohio Drive  Washington, DC 20024</p> <p>Dear Ms. Spain:</p> <p>The National Coalition to Save Our Mall, a nonprofit citizens organization and voice for the public on Mall matters seeking long-range, visionary planning for the Mall for the 21<sup>st</sup> century, welcomes this opportunity to comment on the National Park Service National Mall Plan and Draft Environmental Impact Statement. The Coalition has been a strong supporter of the Park Service's Mall planning efforts and has actively participated since 2006 in the public consultation process. A main interest of the Coalition has been to support and enhance the symbolic quality of the Mall, which has continually evolved from the original concept in the 1791 L'Enfant Plan and the McMillan Plan of 1902 to the present day to meet the changing needs of American democracy and the American public.</p> <p>In 2005, NPS and representatives of the National Capital Planning Commission and Commission of Fine Arts testified to Congress that they would undertake a new master plan for the Mall. However, the new NPS Plan is not that comprehensive, long-range, visionary plan. It focuses only on NPS lands and interests, not the entire Mall and larger needs of the Smithsonian, National Gallery, Architect of the Capitol, District of Columbia, and the American people who share stewardship of the open space and historic legacy inherited from the L'Enfant and McMillan Plans.</p> <p>The NPS Plan together with the NCPC and CFA Monumental Core Framework Plan, contrary to agency assertions, cannot be considered to constitute the new Mall vision for the 21<sup>st</sup> century. NCPC's plan looks at areas surrounding the Mall but not the Mall itself. The NPS Preferred Alternative focuses only on NPS lands and basic maintenance and restoration of natural resources. The symbolic quality of the National Mall and its larger cultural value to all Americans is not addressed at all. In our opinion, only an independent National Mall Commission of prominent Americans can rise above the fragmented mentality and status quo thinking that now dominates planning for the National Mall and Washington's Monumental Core.</p> <p>NPS has been saying that failure to complete this plan has been holding up all maintenance projects and fundraising efforts (Plan, p. 125). But these claims are irrelevant and false. Even before the Mall Plan and Draft EIS were released in December 2009, the NPS had already begun actively planning and implementing major projects including the Tidal Basin seawall repair and the Lincoln Memorial Reflecting Pool rehabilitation project. A Mall Plan was never needed for basic maintenance. Indeed, NPS already has hired consultants to implement turf grass improvements.</p>	<p>A. The proposed plan is a vision plan for lands on the National Mall under the jurisdiction of the National Park Service, with the exception of land on which the buildings of Smithsonian Institution, the National Gallery of Art, and the U.S. Department of Agriculture are located. However, the plan presents a vision for the entire area that is consistent with the other vision plans for this area, such as the NCPC <i>Extending the Legacy</i> (1997) for Washington, D.C., the <i>Center City Action Agenda</i> (District of Columbia 2008), the <i>NCPC Memorials and Museums Master Plan</i> (2001), and the <i>NCPC Monumental Core Framework Plan</i> (2009). The NCPC <i>Legacy</i> plan is the successor to earlier plans, such as the L'Enfant and McMillan plans (see DEIS, p. 42), and other plans are all compatible with the <i>Legacy</i> plan. The National Park Service considers the National Mall plan to be one of the implementing plans for the <i>Legacy</i> plan.</p> <p>B. Because the National Park Service has no control over areas beyond its boundaries, the planning team worked closely with cooperating agencies as well as planning offices and agencies to ensure that planning would be coordinated, complementary, and cohesive for the areas covered in the McMillan plan. Regarding the symbolic quality of the National Mall, please see response 19.1G.</p> <p>C. When this planning effort began, memorial proposals being considered in Congress or proposed by various groups frequently mentioned the need to be on the National Mall. It was clear that the continuation of present conditions would be unsustainable, along with degraded natural resources, aging infrastructure, congestion, and unmet visitor needs. When planning began, there was more than \$450 million in deferred maintenance.</p> <p>The proposed National Mall plan includes actions that are vastly more than a maintenance repair plan. Because the National Mall is our nation's primary civic space, a beloved symbol of our country, and a commemorative landscape, with possibly the highest concentration of museums in the world, high use levels will continue and demands on the civic space will be enormous. However, the National Mall is different from most of the world's other great civic spaces, which are most frequently hard-surface plazas and squares that are not as easy to damage. The National Mall is a designed landscape whose primary characteristics include turf and trees, and these natural components require far more care.</p>

Comment	Letter 19.2. National Coalition to Save Our Mall (cont.)	Response
	<p style="text-align: right;">NPS National Mall Plan Comments by the National Coalition to Save Our Mall March 18, 2010 Page 2</p> <p>We would like to make the following observations and recommendations to improve the Plan and Draft EIS and make this document more useful for future planning.</p> <p>D 1. The Plan should be given a new title to reflect its NPS-centered, jurisdictional scope and goals, something like A Concept Plan for National Park Service Holdings on the National Mall.</p> <p>E 2. Even within the limited scope of a NPS jurisdiction plan, the Plan and Draft EIS should included additional Alternatives to support the interests of the Smithsonian museums, Capitol grounds, White House grounds, National Gallery of Art, USDA, District and the public who share stewardship of this nationally significant symbolic landscape. The Plan cannot simply ignore or dismiss outright without serious discussion, as it does on pp. 125-131, alternatives proposed by the public and other Mall constituencies that do not meet NPS interests. A typical example is the conflict over use of the under-tree areas, with the Smithsonian wanting to use those areas for the Folklife Festival and the NPS banning such use.</p> <p>F 3. The Plan and Draft EIS should acknowledge that NPS lands and “cultural landscapes” are part of the larger concept of the National Mall as a unified whole. Because there is no official, statutory definition of the National Mall, NPS should work with other Mall institutions and historians to develop an agreed-upon definition. Key to that definition must be the L’Enfant Plan of 1791 and the McMillan Plan of 1901-2 which are the historic blueprints for the Mall. The Coalition’s February 1, 2010 letter to the Advisory Council on Historic Preservation outlines the problems and issues to be resolved.</p> <p>G 4. The Plan should establish design guidelines and principles to ensure unified planning across all NPS lands. NPS should work with other Mall institutions and in the public consultation process to integrate those guidelines into Mall-wide principles for the entire National Mall. All major ongoing projects, including the Lincoln Memorial Reflecting Pool rehabilitation, should be developed within those guidelines.</p> <p>H 5. Development of the NPS Plan over the past three years has demonstrated the inadequacy and weakness of the NEPA and Section 106 process to produce a Plan that respects the integrity of the National Mall as a unified symbolic landscape. Recent enthusiastic support for the plan by the federal review agencies, U.S. Commission of Fine Arts and National Capital Planning Commission, even before the public comment period is completed and Commissioners have an opportunity to hear what the public is saying about the plan, further proves that the public process is not working as intended. There is no evidence in the Plan or Draft EIS to show NPS ever seriously considered public input and alternatives that do not serve NPS purposes and priorities. This is another reason to rename this plan. And it further points to the need for an independent Mall Commission to prepare a comprehensive, visionary plan for the entire Mall.</p> <p>In our further comments we explain these main points. We make recommendations to make this document useful for any future planning for the National Mall.</p> <p style="text-align: center;">National Coalition to Save Our Mall P. O. Box 4709 Rockville, MD 20849 301-340-3936 jfoldman@savethemall.org www.savethemall.org</p>	<p>D. Please see response 19.1B.</p> <p>E. The planning team has worked closely with cooperating parties in the development of the plan to ensure that their interests were taken into account. For example, please see letters from the Architect of the Capitol (2.1, 2.2), the Smithsonian Institution (7), and the Washington Metropolitan Area Transit Authority (11). Also see response 7B regarding additional study to determine impacts of intensive use under the elm trees on the Mall.</p> <p>F. Throughout planning we have recognized that the National Mall is part of a larger whole that was addressed in historic plans. As discussed in NHPA section 106 consultations, an update of the National Mall’s nomination to the National Register of Historic Places would be prepared. The programmatic agreement with the Advisory Council on Historic Preservation the D.C. Historic Preservation Office would cover this topic as part of mitigation.</p> <p>G. Ongoing projects are compatible with the National Mall plan and the principles outlined in newsletter 2. The principles have been updated and added to the final document as appendix F. These principles formed the basis for plan objectives. Also see table 6 in the <i>Draft Environmental Impact Statement</i>, pages 140–45, for how well each alternative meets the plan objectives. The programmatic agreement could address how guidelines would be developed for individual projects.</p> <p>H. Please see letter 6.2 from the National Capital Planning Commission, dated March 18, 2010, which states that the “document will be sufficient for NCPC’s use in complying with the National Environmental Policy Act.”</p> <p>We disagree that “the public process is not working as intended.” The NEPA and NHPA section 106 processes are different, as explained during various meetings with consulting parties, which included the National Coalition to Save Our Mall. All groups were asked to present alternatives during the NEPA alternatives development portion of the process. The coalition did not submit any proposals, instead stating that it would use the 106 process. However, the purpose of the 106 process is to identify and to assist in avoiding, minimizing, and mitigating impacts of proposed actions on historic resources, not to develop alternatives. As stated in the <i>Draft Environmental Impact Statement</i> (pp. 51, 543–48), public comments were actively solicited throughout the planning process to develop the preliminary range of alternatives, as well as the preferred alternative. The preferred alternative includes at least eight ideas from each alternative presented in newsletter 3.</p>

Comment	Letter 19.2. National Coalition to Save Our Mall (cont.)	Response
	<p style="text-align: center;">NPS National Mall Plan Comments by the National Coalition to Save Our Mall March 18, 2010 Page 3</p> <p><b>I. 1. The title should be changed to reflect its NPS-centric focus and conceptual character</b></p> <p>What would a National Mall Plan worthy of that title look like? The National Mall is our country's most symbolic landscape and civic space at the center of American democracy, the legacy of two historic plans, the L'Enfant and McMillan Plans. A truly comprehensive, long-range, visionary "National Mall Plan" would require a multi-jurisdictional and multi-disciplinary effort, involving all constituencies including the Architect of the Capitol, White House, Smithsonian, District residents, and others. Such a plan would include a physical master plan, design principles, a landscape plan, a circulation plan, and clear sustainability goals and practices to support unified, coherent development across the entire Mall.</p> <p>A National Mall master plan would address urgent problems and needs including new locations for future museums such as the Latino American Museum, which is currently seeking a location "on the Mall"; low-cost circulation the public, District officials, and business interests have been clamoring for for years; and a flood plan to address problems associated with large portions of the Mall being on landfill and in the 100 year flood plain and worsening conditions due to climate change. It would anticipate long-range future needs by building upon on the historic plans to meet modern needs and anticipate long-range needs of the American public, including expansion areas to provide for the inevitable growth of public activities well into the future.</p> <p><u>A jurisdiction plan, not a Mall master plan</u> This Plan, instead, is NPS-centric; focuses only on NPS portions of the Mall; is concept-based instead of a physical master plan; maintenance focused; and emphasizes improvements to the status quo but not long-range future concerns.</p> <p>NPS has chosen to place its attention on NPS lands and on important practical matters such as improving the turf grass, repairing crumbling pathways and monuments, and upgrading visitor services. This is understandable given strong reaction in Congress and the national media to the Mall's deplorable, run-down physical condition of the open space under NPS stewardship. We also understand from NPS spokesmen that completing this jurisdiction Plan will allow NPS to move forward to develop these concepts into real projects as soon as possible.</p> <p><u>A concept plan, not a decision-making document</u> This Plan is essentially a wish-list of "written concepts" of goals and discrete projects – improvements to turf grass, visitor services at Constitution Gardens, Union Square, and the Washington Monument, as well as rehabilitation of memorials. These individual projects only will be further developed into actual designs, involving separate NEPA and Section 106 public consultations, when Park Service and private funding becomes available. Many of these projects are good ideas – improve the grass, repair monuments and walkways. Other are more troubling, such as hard paving the gravel walkways and new large plazas, and introducing numerous kiosks, restaurants, restroom facilities, and visitor centers on the open space that could have dramatic and adverse impacts on the historic quality and landscape character of the National Mall. (We do not understand how NPS justifies the addition of two new visitors in the face of the 2003</p> <p style="text-align: center;">National Coalition to Save Our Mall P. O. Box 4709 Rockville, MD 20849 301-340-3838 jfeldman@savethemall.org www.savethemall.org</p>	<p>I. Please see response 19.1B.</p> <p>J. As previously stated, multiple planning efforts have been coordinated with various agencies and commissions, and those efforts have addressed your comments. These include NCPC's <i>Extending the Legacy</i> (the overall vision plan), the <i>Memorials and Museums Master Plan</i>, the <i>Monumental Core Framework Plan</i>, the D.C. <i>City Center Action Agenda</i>, the NPS <i>Visitor Transportation Study</i>, and the Potomac Park levee, as well as the proposed National Mall plan.</p> <p>K. We disagree that the National Mall plan is a jurisdiction plan with limited purpose and a maintenance focus. Also, please see response 14.2J.</p> <p>L. The approved National Mall plan will function as an overarching decision-making document. The National Park Service uses a tiered approach to planning, as described during various meetings with consulting parties, with broad vision-oriented documents followed by design and construction documents (see DEIS, pp. iii and 3-4). The approved National Mall plan will be the top level NPS document, and we consider this plan to be an implementation plan for the NCPC <i>Legacy</i> plan, which addresses the broader vision for Washington, D.C., and is the successor to earlier plans, such as the McMillan and L'Enfant plans. The National Park Service proposes visitor contact facilities, not visitor centers.</p>

Comment	Letter 19.2. National Coalition to Save Our Mall (cont.)	Response
	<p style="text-align: right;">NPS National Mall Plan Comments by the National Coalition to Save Our Mall March 18, 2010 Page 4</p> <p>Congressional moratorium on visitor centers on the Mall.) The next steps of design development will be critical. These concepts must be fully and publicly vetted and scientifically evaluated within the larger context of the entire Mall, and any necessary changes or revisions made, before moving forward to final review agency approval.</p> <p><b>M</b> <u>Need to incorporate a Mall circulation plan</u> As NPS planning directives point out, circulation planning is a critical planning tool. Identifying a variety of transit and circulation options, from interpretive sightseeing service to basic low-cost shuttle, and establishing a network of routes to, across, and around the Mall's two-mile length will also determine pedestrian patterns and appropriate locations for visitor service such as food, restrooms, parking, and so on. The NPS sightseeing bus service proposed in the NPS Plan and Draft EIS is not adequate. We are alarmed to see the February 2010 Finding of No Significant Impact decision by NPS rejects any low-cost option and instead chooses only an expanded tourmobile-type sightseeing service. It is not enough for NPS to simply coordinate with District planners, Metro, and Circulator to allow those low-cost options around the Mall periphery. Visitors have been demanding for years those kind of options on the Mall itself. NPS should immediately open a public discussion about additional alternatives for Mall circulation including on the Mall's inner streets, Madison and Jefferson Drives. This should be a priority.</p> <p style="text-align: center;"><b>2. Expand Alternatives studied to include the interests of other Mall stakeholders</b></p> <p><b>N</b> The Plan and Draft EIS show no evidence that comments and alternatives proposed by the Smithsonian and other Mall institutions, or by the public, during countless hours of consultation meetings, were taken seriously. On the contrary, the NPS Preferred Alternative and its almost exclusively NPS-centric focus, is little changed from the proposals first advanced by the NPS in 2007. The National Coalition to Save Our Mall repeatedly requested that consideration be given to solutions that preserve, restore, and build upon the historic legacy of the L'Enfant and McMillan Plans, to no avail. However, the historic legacy must be respected. And the Mall's larger context as a cherished place the American public experiences as a unified whole requires consideration of additional alternatives. Only once those alternatives are identified and evaluated with data and scientific analysis against the NPS Preferred Alternative can this be considered a decision-making document. Such alternatives include the following:</p> <p><b>O</b> <b>UNION SQUARE</b> There is near universal agreement that this pool is a failure and a barrier that needs to be redesigned while also protecting its modern role as popular, highly symbolic site for First Amendment demonstrations. We are concerned about NPS intentions to turn this critical parcel of the Mall at the intersection of Capitol grounds and greensward to the west into a lively urban space, a concept at odds with the historic plans. Consideration should be given to an alternative based in the McMillan Plan concept, which would call for smaller water elements and more paved plaza without however changing this areas quality as an integral component of the overall Mall landscape.</p> <p style="text-align: center;">National Coalition to Save Our Mall P. O. Box 4709 Rockville, MD 20849 301-340-3038 jfeldman@savethemall.org www.savethemall.org</p>	<p><b>M.</b> The 2006 <i>Visitor Transportation Study</i> discussed various circulation options for the National Mall, and the <i>Draft National Mall Plan / Environmental Impact Statement</i> stated that all alternatives would be consistent with the proposed transportation service (DEIS, p. 47). The cumulative impact analysis under "Environmental Consequences: Access and Circulation" further explained the interrelationships between the two documents (see DEIS, pp. 448–49). Circulation maps were prepared to show interrelationships between the National Mall and the District of Columbia. We believe this analysis is adequate.</p> <p>The "Access and Circulation" section of "Environmental Consequences" (DEIS, pp. 441–67) includes ideas, suggestions, recommendations, and revisions based on comments from the Washington Metropolitan Area Transit Authority, the D.C. Department of Transportation, the D.C. Office of Planning, the National Capital Planning Commission, and the U.S. Commission of Fine Arts. This section discusses cumulative circulation projects by others, as well as transportation goals and policies within Washington, D.C., (DEIS, p. 442) and relevant NPS policies (p. 443). Some minor revisions of text have been made based on WMATA comments on the <i>Draft Environmental Impact Statement</i> (see letter 11).</p> <p><b>N.</b> The <i>Draft Environmental Impact Statement</i> was prepared with extensive involvement by agencies and the public (see pp. 543–48). As stated throughout the document, the preferred alternative builds on the historic legacy of the L'Enfant and McMillan plans. As noted on the inside front cover of the draft document, nearly 30,000 Americans and others provided ideas, statements of concern, and helpful comments. All of these comments were taken into consideration as alternatives were developed and refined and the environmental impacts analyzed.</p> <p><b>O.</b> As stated in the <i>Draft Environmental Impact Statement</i> on pages 88 and 194 (row 10.2), the vision for Union Square would fulfill the McMillan plan purpose to connect the U.S. Capitol grounds and the Mall.</p>

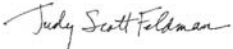
Comment	Letter 19.2. National Coalition to Save Our Mall (cont.)	Response
	<p style="text-align: right;">NPS National Mall Plan Comments by the National Coalition to Save Our Mall March 18, 2010 Page 5</p>	
P	<p>Another alternative is to coordinate with the Architect of the Capitol and Botanic Garden to move any new restroom or visitor service structure off the central Mall vista to the side panels. The Coalition believes that consideration should be given to transferring jurisdiction for this panel from NPS back to the AOC. This would allow AOC, which includes this parcel in its own master plan for the Capitol grounds, to design a unified ensemble between 1<sup>st</sup> and 3<sup>rd</sup> Streets and Pennsylvania and Maryland Avenues. The Botanic Garden could apply the principles now being established with its Sustainable Landscape Initiative here, making this prominent Mall focal area a model of forward-looking sustainable planning.</p>	<p>P. Please see letter 2.2 from the Architect of the Capitol.</p>
Q	<p><b>THE MALL</b> Instead of replacing the gravel pathways with hard paving, and adding large new plazas at 12<sup>th</sup> Street and elsewhere, sustainable alternatives and permeable surfaces should be considered. These alternatives could be developed in consultation with the Botanic Garden and ASLA Sustainable Landscape Initiative as well as other experts. NPS favors solutions that give preference to natural resources over public use, and has instituted a ban on public events under the elm trees. Additional alternatives could include a plan to retrofit the under-tree areas to accommodate public use that has grown in recent decades and will continue to grow in the future. New sustainable techniques using permeable paving, and used successfully for centuries in Europe and in many urban parks in the United States, would allow the trees to be used as intended, as shade trees for human protection and comfort, while also creating new kinds of spaces to accommodate the Mall's evolving role for cultural and educational activities on the open space. The Smithsonian depends on this kind of alternative in order to carry out its educational and cultural role on the Mall.</p>	<p>Q. The National Mall plan supports the Sustainable Sites Initiatives™. However, like different design solutions responding to the same criteria, there are many different ways to achieve sustainability. On the Mall the plan recommends capturing, storing, and reusing rainwater for irrigation. For a discussion about permeable paving, see response 8D to the U.S. Commission of Fine Arts and the discussion of gravel walkways under "Summary of Comments and Responses" beginning on page 12. As discussed in the <i>Draft Environmental Impact Statement</i> on pages 128–29, proposals to remove grass under elms were rejected for a number of reasons.</p>
R	<p>Additional alternatives for restroom and food facilities could be developed through inter-agency collaboration. Instead of the Preferred Alternative that locates these structures on the open space, they could be located to the sides, in or near existing buildings. For years there has been talk of a single National Mall Welcome Center inside the Smithsonian's centrally located Arts &amp; Industries Building. That alternative would minimize adverse impacts on the Mall's open space.</p>	<p>R. As stated in the <i>Draft Environmental Impact Statement</i> on pages 90 and 210 (row 11.7), the National Park Service would work with the National Gallery of Art and the Smithsonian Institution to improve access to existing and proposed facilities. Please see the discussion of facilities under "Summary of Comments and Responses" beginning on page 11 for more information. With regard to the Arts and Industries Building, the National Museum of the American Latino Commission has requested that no actions be taken at this building until a site has been selected for that museum (see DEIS, p. 44). For another idea suggested by the D.C. Preservation League, see 14.2H.</p>
S T	<p><b>WASHINGTON MONUMENT</b> This area now slated for three major construction projects – the 17<sup>th</sup> Street flood levee, the Smithsonian African American Museum, and redevelopment of the Sylvan Theater site with a multi-purpose structure – lacks a master plan. Rather than accept the status quo and turn the 2003 security plan into the master plan, additional alternatives are needed to put these three projects into a larger, unified design whole. The concept of a continuous Mall shaded promenade was never realized here, and is not part of the 2003 plan, but should be a focus for creating a welcoming human environment.</p>	<p>S. The park has an approved <i>Development Concept Plan</i> for the Washington Monument grounds, and that is the plan that will be implemented. As requested by the National Capital Planning Commission, the approved Olin landscape plan for the Washington Monument grounds would be updated and implemented to take into account ongoing and proposed projects (the Sylvan Theater area, the National Museum of African American History and Culture, and the Potomac Park levee). Text has been added about the Olin landscape plan on pages 29, 91, and 210 (row 13.1).</p>
U	<p>One alternative would be to reevaluate the McMillan concept for what the 1902 plan considered the centerpiece of the Mall design and "gem of the Mall system" or consider other design alternatives that achieved that important design goal for the Mall as a whole. Within that larger context, the location and purpose of any Sylvan Theater redevelopment should be fully reconsidered. Is that site, chosen in 1917 for an outdoor theater but now next to heavily trafficked roads and off main pedestrian routes or low-cost transit, still the best location for a visitor center,</p> <p style="text-align: center;">National Coalition to Save Our Mall P. O. Box 4709 Rockville, MD 20849 301-340-3338 jfeldman@savethemall.org www.savethemall.org</p>	<p>T. There are shaded opportunities to walk along both Independence and Constitution avenues.</p> <p>U. A visitor center is not being proposed. See the definitions of 'visitor center' and 'visitor facilities' on page 584 of the <i>Draft Environmental Impact Statement</i>, as well as the discussion of a central visitor center on page 130 and the discussion of visitor facilities in appendix D (pp. 571–75). Regarding the Sylvan Theater location, it was the general consensus at the NHPA section 106 consultation meeting on April 12, 2009, that visitor facilities would be appropriate in this area. Visitor use patterns were considered in selecting this site, and changes in use patterns are anticipated.</p>

Comment	Letter 19.2. National Coalition to Save Our Mall (cont.)	Response
	<p style="text-align: right;">NPS National Mall Plan Comments by the National Coalition to Save Our Mall March 18, 2010 Page 6</p> <p>performance space, restrooms and so on? Probably not. With completion of the African American Museum in 2013, pedestrian movement will shift to the north. The Plan needs to consider the additional alternatives that anticipate future pedestrian use patterns.</p> <p><b>LINCOLN MEMORIAL/ WEST POTOMAC PARK</b></p> <p>As stated above, the ongoing Lincoln Memorial Reflecting Pool rehabilitation project needs to be considered within the larger Mall context, including decisions about paving materials, lighting, and park furniture. NPS proposes locating a new water pumping and filtration structure (24 x 60 feet) next to the jumble of buildings and stables south of the Pool. However, the Coalition believes NPS should first consider a different alternative: relocate the stables, which are old and unsightly and draw cars and trucks onto the open space, more to the west or other areas, in order to open up the vista and open space from the Pool toward the forthcoming MLK Memorial, Tidal Basin, and Potomac River. A different location should be found for the large, visually intrusive, and potentially noisy pumping structure.</p> <p>In addition to these highlights, the Coalition believes that all aspects of the Preferred Alternative will benefit from this kind of broader contextual thinking that includes the interests of all Mall stakeholders and recognition of the historic plans that must be respected in any planning effort.</p> <p style="text-align: center;"><b>3. Identify the cultural resources as integral parts of the larger National Mall and the historic L'Enfant and McMillan Plans</b></p> <p>A problem that arises time and time again for National Mall plans and projects is the confusing and inconsistent way the federal government defines the National Mall. This issue has particular significance for this NPS Plan and must be resolved before actions are taken based on the Plan that could destroy the essential unity of the Mall as a designed symbolic landscape.</p> <p><u>Jurisdiction-based definitions</u></p> <p>A fundamental flaw of the Plan as a useful planning document is its failure to acknowledge the unique quality of the Mall and its roots in the L'Enfant and McMillan Plans. Instead, the NPS Plan treats the Mall lands as parcels within a larger NPS administrative unit called National Mall &amp; Memorial Parks whose "memorial parks" include Dupont Circle and Farragut Square park.</p> <p>The foundation of this jurisdiction-based thinking is the Foundation Statement itself. This basic planning document identifies the "park" and its "purpose" not as the National Mall but as "National Mall &amp; Memorial Parks," which is an administrative unit of the Park Service encompassing central Washington within which the Mall cultural landscape units are only a part. Instead of recognizing the Mall's purpose as civic stage and symbol of American identity, the Statement identifies the purpose as to <i>manage</i> these lands.</p> <p>This NPS Plan further subdivides these NPS parcels into separate, NPS-designated "cultural landscapes" – The Mall, Washington Monument, Union Square, and so on. Based on this</p> <p style="text-align: center;">National Coalition to Save Our Mall P. O. Box 4709 Rockville, MD 20849 301-340-3936 jfeldman@saveourmall.org www.saveourmall.org</p>	<p>V. The concepts for the Lincoln Memorial Reflecting Pool are compatible with the National Mall plan.</p> <p>W. The relocation of the stables was not considered in the planning process because a decision on maintaining the current location had already been made (letter of August 24, 2006, and accompanying report from Secretary of the Interior Dirk Kempthorne to Chairman Pete Domenici, Committee on Energy and Natural Resources, United States Senate). The horse patrols are part of an immediate response crowd control measure, and they are available to respond to spontaneous incidents, provide security and response for the White House, and provide immediate supplemental law enforcement. The plan proposes to reduce the impact of United States Park Police operations (parking and access) on visitors while increasing education about horse patrols and the Park Police. Facilities would be replaced with those of a more appropriate character. Because this issue has already been addressed, it was not included in the considered but dismissed topics.</p> <p>X. The plan is built on the L'Enfant and McMillan plans, and the preservation of the overarching visions of these plans is fundamental to the proposed National Mall plan. This has been acknowledged in newsletters, background papers that were posted on the plan website (<a href="http://www.nps.gov/nationalmallplan">www.nps.gov/nationalmallplan</a>), public meetings and presentations, as well as the <i>Draft Environmental Impact Statement</i> (for example, see pp. 10, 11, 14, 21, 28, 42, 72, 83, 150, 251–59). Nevertheless, change on the National Mall is a constant and despite landmark plans for Washington, D.C., it was clear by the beginning of the 21st century that the National Mall was never designed for present levels of civic use, tourism, recreation, and cultural activities.</p> <p>Y. The National Coalition to Save Our Mall appears to be confusing different portions of the foundational elements for the National Mall plan. The elements that pertain specifically to the National Mall are described in the <i>Draft Environmental Impact Statement</i> beginning on page 9. These statements were developed at a Foundation Workshop for the National Mall and Memorial Parks (which, as you state, is the NPS administrative entity responsible for the National Mall), but they focus specifically on the National Mall. As explained on page 9, the overarching statements that pertain to the National Mall and Memorial Parks are presented in appendix A. The significance statements on page 10 articulate the importance of the National Mall as a civic stage and symbol of American identity. The statements of purpose and significance are integral to the foundation statement for the National Mall.</p> <p>Z. The National Mall has evolved since 1791, and the construction of memorials to commemorate heroes and significant events has occurred at different points in time to honor and recognize the history of our nation. This has resulted in individual historic landscapes. The National Park Service has proposed updating the National Mall nomination form for the National Register of Historic Places to include the entire area of the National Mall. The programmatic agreement with the Advisory Council on Historic Preservation and the D.C. Historic Preservation Office would cover this topic as part of mitigation.</p>

Comment	Letter 19.2. National Coalition to Save Our Mall (cont.)	Response
	<p style="text-align: right;">NPS National Mall Plan Comments by the National Coalition to Save Our Mall March 18, 2010 Page 7</p> <p>segmented approach, the NPS Plan proposes improvements based on each area's individual history and character, not its larger context within the National Mall as a whole.</p> <p>The Plan's goal to use "best practices" from other urban parks reinforces a generic approach that treats the Mall as one park within a larger NPS administrative unit that includes all central Washington. But the Mall is a unique symbolic landscape and solutions should represent the most innovative and forward-looking solutions, not generic treatments. This jurisdiction plan will only be useful as a Mall planning document once it is folded into the larger visionary plan for the entire Mall.</p> <p><u>Inconsistencies in defining the National Mall</u> The astonishing fact is, as the Congressional Research Service found in 2003, there is no statutory definition of the Mall. Equally surprising, the Mall has never been officially recognized a National Historic Landmark. This basic need must be resolved as part of the completion of the Plan.</p> <p>The NPS does not even have a consistent way to define the National Mall. The maps showing the "National Mall" planning area includes a large area from 1<sup>st</sup> Street to the Lincoln Memorial, and from Constitution Avenue to the Jefferson Memorial. However, the NPS elsewhere defines the National Mall in two other ways: the National Register Nomination defines the western boundary to be 14<sup>th</sup> Street, and so not to include the Washington Monument and Lincoln Memorial; the Historic Districts map shows the Mall boundary at 15<sup>th</sup> Street. Which of these three different definitions is right? The first step in any planning effort is to accurately identify the resource and its purpose, so this must be clarified.</p> <p><u>NEPA and Section 106 leave definitions to federal agencies</u> We understand that the NEPA and Section 106 processes give authority to the federal agency undertaking a plan to determine how the resource is described, and NPS identifies the planning areas according National Register nominations for individual "cultural landscapes" such as The Mall, Union Square, Washington Monument. However, the Coalition strongly believes that these separate parcels must be further integrated into the historic concept of the National Mall as a whole. We will not support an approach that treats the Mall as a collection of park units within a larger central Washington NPS administrative district and fails to recognize its unity as a unified designed landscape. That approach denies the very value of the Mall as the symbolic core of our national capital.</p> <p><u>National Coalition to Save Our Mall seeks resolution of the Mall definition problem</u> On February 1, 2010, the Coalition sent a letter and historical analysis to the Advisory Council on Historic Preservation asking this White House office to take a lead in resolving this problem. As we state in our letter, the Coalition believes that this complicated task of reconciling the historic L'Enfant and McMillan Plans with subsequent planning studies needs to engage independent historians able to objectively evaluate the applicability of National Register principles and NPS jurisdictional thinking to the National Mall.</p> <p style="text-align: center;">National Coalition to Save Our Mall P. O. Box 4709 Rockville, MD 20849 301-340-3938 jfeldman@savethemall.org www.savethemall.org</p>	<p>aa. It is true there are inconsistencies in how the National Mall is defined in nominations to the National Register of Historic Places. That is why nominations are updated periodically. The National Mall Historic District actually described the area that the McMillan plan and the National Park Service refer to as the 'Mall.' The title of the nomination form is the only location where the term 'National Mall' is used. Also see response Z to your letter. Also, please note that an error on the National Register Historic Districts and Properties map (DEIS, p. 261) has been corrected to show that the boundary between the Mall and the Washington Monument grounds is 14th Street, not 15th Street.</p> <p>bb. Please see responses Z and aa to your letter.</p> <p>cc. The intent of the proposed plan is to comprehensively address all areas of the National Mall. There have been and will continue to be numerous studies by historians and others about the development of central Washington, D.C.</p>



Comment	Letter 19.2. National Coalition to Save Our Mall (cont.)	Response
dd	<p style="text-align: right;">NPS National Mall Plan Comments by the National Coalition to Save Our Mall March 18, 2010 Page 8</p> <p>In recent weeks, and in response to the Coalition's letter, NPS has acknowledged inconsistencies in how NPS-produced studies define the Mall and the various cultural landscapes within it, and stated the intention to revise the relevant National Register documents and to potentially nominate the National Mall to National Historic Landmark status. Because the problem is vast with major implications for all Mall planning efforts, we believe the Landmark process should begin immediately. It could start with a narrower focus directly related to the African American Museum location, which was the subject of our February letter, by landmarking the Washington Monument grounds.</p>	dd. Please see responses Z and aa to your letter.
ee	<p style="text-align: center;"><b>4. Establish design guidelines and principles that apply to all Mall projects</b></p> <p>Design principles and guidelines need to be developed and coordinated among other Mall institutions to ensure unified, coherent development on NPS lands and throughout the National Mall. Ongoing projects such as the Lincoln Memorial Reflecting Pool rehabilitation that have the potential to dramatically alter the historic Mall landscape and establish precedents that could have significant impacts on future Mall-wide improvements to pathways, lighting, water treatment must not be separated out from the Plan. Steps should be taken immediately to make any decision-making regarding elements that have large implications for the Mall as a whole into a broader, inter-agency and public discussion about Mall-wide standards and guidelines.</p>	ee. Planning and design principles, which were developed with cooperating agencies and printed in newsletter 2, have been updated and added to the <i>Final Environmental Impact Statement</i> as appendix F. Many of these principles were also addressed in the plan objectives (DEIS, pp. 4, 7-8, and Table 6, pp. 140-45). The programmatic agreement could address how guidelines would be developed for individual projects.
ff	<p>Statements by NPS planners and the National Capital Planning Commission that the Lincoln Memorial landscape and Pool are "separate" landscapes from the rest of the Mall and should be treated without consideration of a larger Mall-wide context are misguided. As noted above, these opinions, rooted in a piecemeal, segmented approach to planning that divides the National Mall into separate, unrelated "cultural landscapes," denies the overall unity of the Mall as a symbolic whole and legacy of the historic L'Enfant and McMillan Plans.</p>	ff. There is a separate history of development and cultural landscape information for a variety of areas on the National Mall, including the Lincoln Memorial grounds, which was taken into account for the reflecting pool project. Those proposals are consistent with the National Mall plan. Also see response ee to your letter.
gg	<p>As we have learned through the ongoing Lincoln Memorial Reflecting Pool project, moving forward on a major design program before completing a physical master plan or developing Mall-wide principles to guide development leads to piecemeal growth with potentially damaging effects on the Mall's larger unity. When the contractors have no clear direction, they can only guess as to which choices of water treatment, lighting, and paving materials will be compatible with future development of <i>other</i> areas of the Mall.</p>	gg. On projects such as the Lincoln Memorial Reflecting Pool, the National Park Service defines the project, program, and parameters, and approves all final design, with input from consulting parties and review or approval by the D.C. Historic Preservation Office, the Commission of Fine Arts, and the National Capital Planning Commission. Contractors are thoroughly briefed about the history of the project, background information, and constraints. All contractors are also briefed about the National Mall plan.
hh	<p style="text-align: center;"><b>5. NEPA and 106 are inadequate for planning the National Mall</b></p> <p>Having participated actively in the planning process since 2006, the National Coalition to Save Our Mall has serious concerns that the conventional NEPA and Section 106 process is not an appropriate process for planning for the National Mall. The Mall is not a typical National Register property. It is not simply a collection of unrelated parts, but that is how the process treats it. The Mall is not a typical historic resource but an ever-evolving symbol.</p>	hh. We agree that the National Mall is not a collection of unrelated parts. Planning objectives, the purpose and significance statements, and the vision emphasis (DEIS, pp. 67 and 150 [row 1.2]) look at the entire National Mall and recognize that its historical significance continues to evolve.
	<p style="text-align: center;">National Coalition to Save Our Mall P. O. Box 4709 Rockville, MD 20849 301-340-3938 jfeldman@savethemall.org www.savethemall.org</p>	

Comment	Letter 19.2. National Coalition to Save Our Mall (cont.)	Response
<p>ii</p> <p>jj</p>	<p style="text-align: right;">NPS National Mall Plan Comments by the National Coalition to Save Our Mall March 18, 2010 Page 9</p> <p>Nonprofit consulting parties raised concerns that this “National Mall Plan” was not rising to the necessary level during public meetings as well as in two joint letters in 2008; those groups included the National Trust for Historic Preservation, the National Parks Conservation Association, the DC Preservation League, the Committee of 100 on the Federal City, and National Association for Olmsted Parks, and the National Coalition to Save Our Mall. (Those letters can be read at <a href="http://www.savethemall.org">http://www.savethemall.org</a>.) Project review agencies reminded us that the NEPA and Section 106 laws give NPS the authority to define the project as it sees fit so long as other agencies agree. The NCPC and DC Historic Preservation Office concurred with NPS decisions.</p> <p>In essence, the evolving quality of the Mall is not even valued by the NEPA and Section 106 process by which this Mall Plan has been developed. This makes it almost impossible for the Coalition and other consulting parties to comment on the Plan and Draft EIS in a way that NPS and other federal and District review agencies take seriously. We wonder if there is any way to reconcile this dichotomy between National Register-based planning and L’Enfant and McMillan Plan-based planning without establishing a special approach appropriate to the unique quality of the National Mall.</p> <p>The Coalition feels that we have spent much time and effort in taking seriously the public consultation component of the NEPA and Section 106 process only to have our well-thought-out ideas and alternatives dismissed outright without comment in either the Plan nor the Draft EIS. During the course of the planning process since 2006, the Coalition published two reports that include some of these ideas: <i>Rethinking the National Mall</i> in 2008, and <i>Renewing American Democracy on the 3<sup>rd</sup> Century Mall</i> in 2009. So far as we can tell, none of these ideas has made its way into the NPS Plan or the Alternatives considered. If NPS does not accept these ideas legitimate, then it should state why. A meaningful public process must be put in place and followed.</p> <p>The National Coalition to Save Our Mall looks forward to seeing our comments and concerns addressed in future public consultation meetings and in the final Plan and EIS.</p> <p>Sincerely,</p>  <p>Judy Scott Feldman, Ph.D. Chair and President <a href="mailto:jfeldman@savethemall.org">jfeldman@savethemall.org</a> / 301-340-3938 9507 Overlea Drive Rockville, MD 20850</p> <p style="text-align: center; font-size: small;">National Coalition to Save Our Mall P. O. Box 4709 Rockville, MD 20849 301-340-3938 <a href="mailto:jfeldman@savethemall.org">jfeldman@savethemall.org</a> <a href="http://www.savethemall.org">www.savethemall.org</a></p>	<p>ii. Some of the ideas expressed have been included, such as respect for and emphasis on historic plans, the importance of the civic stage, improved opportunities for the public, and the need for the National Mall to evolve. Other ideas were dismissed after they were thoughtfully considered (see DEIS, pp. 125–31).</p> <p>jj. The National Mall plays a vital role in our nation’s history, culture, and expression of rights. An inclusive and meaningful public nationwide participation process has taken place throughout this planning effort. We have received around 30,000 comments from all areas of the country. These comments were in three reports for newsletters 1 (scoping), 3 (preliminary range of alternatives), and 4 (preliminary preferred alternative). Scoping comments were also summarized in newsletter 2. Each newsletter also identified the next steps in the planning process and how people could submit comments.</p> <p>Throughout the planning effort, meetings were held with cooperating agencies regarding the NEPA planning process and with consulting parties regarding the NHPA section 106 process. These meetings were specifically kept separate to avoid a perception that some groups might have more influence than general citizens. Frequently local groups may feel that their comments are more valuable than those from people who may be less familiar with a park, whether it is a national park like Yellowstone or the National Mall. The National Park Service considers all public comments equally, and comments that we received about the National Mall are reflected in the range of alternatives considered in the <i>Draft Environmental Impact Statement</i>, including the preferred alternative. Public comments were also used to identify issues where greater public understanding is needed related to policy, legal mandates and constraints, and values that affect decision making (see “Purpose of and Need for the Plan: Scope of this Document — Environmental Impact Topics” and the methodologies for impact analysis under each topic in the “Environmental Consequences”). The public involvement process used throughout this planning effort is described in detail in the <i>Draft Environmental Impact Statement</i> under “Consultation and Coordination” (pp. 543–48).</p> <p>During the NHPA section 106 consultations, NPS representatives repeatedly explained the dual roles of the NEPA and NHPA processes and the best way to participate. Groups were requested to present alternatives and ideas during the NEPA scoping and alternatives development portion of the process. The reports mentioned where apparently developed independently of the process that was outlined in each of the newsletters and in public meetings. The role of the section 106 process is to identify and mitigate impacts to historic resources of proposed actions, not to develop alternatives.</p>


Comment	Letter 20. National Parks Conservation Association	Response
A	<p>March 18, 2010</p> <p>Ms. Susan Spain, Project Executive National Mall &amp; Memorial Parks National Park Service 900 Ohio Drive SW Washington, DC 20024-2000</p> <p>Dear Ms. Spain:</p> <p>Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for the National Mall. I am writing on behalf of the nonpartisan National Parks Conservation Association (NPCA) and its more than 320,000 members. NPCA is a nonprofit advocacy group dedicated to protecting and enhancing America's national parks for our children and grandchildren. NPCA has served as a consulting party during the Section 106 process regarding development of this plan, as well as related but separately-developed plans for projects on the Mall such as the Lincoln Reflecting Pool.</p> <p>NPCA acknowledges that the Draft EIS for the National Mall is broadly written and meant to serve "as an overarching organizational document for subsequent project implementation." We are, nonetheless, concerned that the Draft EIS does not provide enough information about the location, nature, and impact of proposed construction and redesign projects that could fundamentally alter the physical characteristics and symbolic nature of the National Mall, America's civic stage for our democracy. The Draft EIS states that future implementation plans will "include standard procedures for site-specific design,"<sup>1</sup> including review by historic preservation consultants, the public, and relevant commissions. A separate summary of major concepts provides some specificity regarding the redesign of the National mall, including a listing of new, removed, expanded, or replaced facilities, and plans for turf rehabilitation and management. Still, this approach presents several challenges.</p> <p>By engaging in a process that furnishes specifics about restoration, rehabilitation, and construction projects only as each individually comes on line, the National Park Service (NPS) is fragmenting planning and failing to consider the holistic nature and needs of the National Mall. Second, despite the fact that the Draft EIS states that the "Impacts of the alternatives are analyzed in accordance with the guidelines of the Council on Environmental Quality (CEQ) for implementing the National Environmental Policy Act (40 CFR Part 1500) and the National Historic Preservation Act,"<sup>2</sup> the document does not contain sufficient detail about proposed development or redesign to provide consulting parties and other members of the public with the ability to give meaningful feedback on the plan.</p> <p>Some specific examples highlighting our concerns include:</p> <p><sup>1</sup> National Park Service Draft National Mall Plan/Environmental Impact Statement, 2009, 3 <sup>2</sup> 357</p> <p style="text-align: right;">1   Page</p>	<p>A. NPS vision plans, such as general management plans and the proposed National Mall plan, generally do not provide prescriptive details about how each proposed action should be implemented. The comments we have received on the <i>Draft Environmental Impact Statement</i> range from those stating that the proposed plan is too prescriptive to those saying there is not enough detail. For example, the D.C. Historic Preservation Office (letter 4) thought there was too much detail for some areas. The goal of the plan is to provide sufficient guidance for future design teams without being too prescriptive.</p> <p>As stated in the <i>Draft Environmental Impact Statement</i> on pages iii and 3-4, subsequent design and construction documents will be prepared to detail how to achieve the plan objectives. This process will generally include standard procedures for site-specific design, commission reviews, public engagement, and historic preservation consultation.</p>

Comment	Letter 20. National Parks Conservation Association (cont.)	Response
<p>B</p> <p>C</p> <p>D</p> <p>E</p> <p>F</p> <p>G</p>	<p>Regarding cultural resources</p> <ul style="list-style-type: none"> <li>The Draft EIS states the “health and appearance of the historic landscape [of the National Mall] would be improved,” but provides few details as to how this will be accomplished. The summary of major concepts states that five to seven facilities will be added to the National Mall, four removed, and nine replaced or revised. While the need to add, revise, or remove these structures may be valid, the Draft EIS does not provide sufficient context to enable consulting parties and the public to understand the visual impacts of such redesign and development, nor its relationship to the Mall narrative. No specific information is provided as to how big the new structures will be, where they will be placed, or whether alternative locations adjacent to the National Mall have been considered.</li> </ul> <p>The section on Union Square suggests that the Ulysses S. Grant Memorial “would be restored,” but does not discuss how plans to reduce the size of the reflecting pool, and add a performance space, food service stands, equipment rental kiosks, interactive water features, and rest rooms would affect the area except to conclude that the “impacts on Union Square would be long-term, minor to major, and adverse.”<sup>3</sup> Key questions relating the proposed development and redesign of Union Square include:</p> <ul style="list-style-type: none"> <li>Have NPS and the Architect of the Capitol jointly considered whether the land immediately north of Union Square owned by the Architect could play a useful role in the redesign of Union Square, and if so, what alternatives have been discussed?</li> <li>Should the areas immediately north and south of Union Square be deemed to be off-limits to development, what measures will NPS take to ensure that the redesign of Union Square and the construction of new visitor facilities have a minimal impact on the historic landscape and sightlines involving this portion of the National Mall?</li> </ul> <p>The Draft EIS is equally vague regarding the impact on the historic landscape of redesigns proposed for other areas of the Mall. Plans for the Washington Monument and its grounds call for the construction of a multi-use facility at the northwest corner of 15<sup>th</sup> Street and Independence Avenue that would replace both the temporary visitor services tent and the Sylvan Theater. The new facility would provide food services, house interpretive displays, and restrooms, and would accommodate audiences of up to 3,000 people. Construction of such a facility is bound to have impacts on the historic landscape of the National Mall but the Draft EIS is silent on the matter except to say that the facility will “be a pleasant destination... constructed below the level of roads and oriented to muffle noise and provide views of the monument,” and that the redesign would “provide long-term, minor, beneficial impact.”<sup>4</sup></p> <p>A new “flexible performance space” is planned for the eastern end of Constitution Gardens. The “gazebo” or “stage” would take advantage of the existing terrain to “accommodate an audience of several thousand.” The Draft EIS states that utilities (sound system and amplifiers) would be provided but that noise from events at this new performance space would be mitigated to preserve the ambience at nearby memorials. Unfortunately, the document does not contain any information regarding how NPS would prevent audio and visual intrusions from disturbing</p> <p><sup>3</sup> 377  <sup>4</sup> 378</p> <p style="text-align: center;">2   Page</p>	<p>B. Page 84 in the <i>Draft Environmental Impact Statement</i> describes how natural resource conditions for the historic landscape would be improved; also see row 3.4 on page 156.</p> <p>C. Please see response A to your letter regarding subsequent design and construction documents.</p> <p>D. Please see letters 2.1 and 2.2 from the Architect of the Capitol.</p> <p>E. We agree that these areas need to be treated holistically.</p> <p>F. The Sylvan Theater area was selected for visitor services because of its physical location in a lowered dell outside vistas and view corridors and its proximity to major walks and tour bus parking. Specific impacts of a new facility would be analyzed during the preparation of subsequent design and construction documents (see response A to your letter). On page 371 of the <i>Draft Environmental Impact Statement</i> under “Environmental Consequences: Cultural Resources — Impacts Common to All Alternatives,” we state that “the actions described are conceptual in nature and their effect on the historic character of contributing features cannot be definitively stated. The impacts are referred to as potential effects.”</p> <p>G. Measures to prevent audio and visual intrusions at nearby memorials from activities at Constitution Gardens would be determined during the subsequent design and construction process. Those projects would be guided by the criteria included in the approved National Mall plan.</p>

Comment	Letter 20. National Parks Conservation Association (cont.)	Response
<p>H</p> <p>I</p> <p>J</p> <p>K</p> <p>L</p> <p>M</p>	<p>visitors at the World War II Memorial (one tenth of a mile distant) or at the Vietnam Veterans Memorial (a little less than a half-mile away).</p> <p>The Draft EIS also mentions the intention of NPS to install barriers in “various places” to reduce pedestrian trampling of sensitive areas and allow for recovery. The document states such measures would result in “long-term, moderate, beneficial impacts to soil resources,” but fails to address what the barriers would look like, where they would be placed, and the impact on the historic landscape of having additional bollards, fencing, and/or concrete barriers placed on the 162 acres of turf currently maintained by NPS on the National Mall.<sup>5</sup></p> <p>Demonstrations, special events, and national celebrations</p> <p>The complexity of balancing use and preservation comes into focus as one reflects on the more than 20 million people who annually visit the National Mall. Clearly, First Amendment demonstrations, as well as special and recurring events such as presidential inaugurations, the Fourth of July, and the Folk Life Festival, are a part of our national culture and will continue in the future. Just as clearly, these events have adverse impacts on the Mall and degrade the resource for visitors who arrive a day, week, or month after a special event has taken place. Inevitable wear and tear must be managed so that the expectation that the National Mall should be an inspirational, attractive, and well-maintained symbol of our American democracy, can be met.</p> <ul style="list-style-type: none"> <li>○ NPS proposes a number of seemingly reasonable steps to reduce the damage done by large events, while still allowing those events to take place. Have the past sponsors of large events also proposed additional steps that could be taken to reduce such damage from occurring?</li> <li>● The Draft EIS states that “permanent infrastructure and space would be planned for temporary facilities (such as portable restrooms, trash, recycling, logistical or operational space, media activities, access, and law enforcement).” The document then notes that “narrow strips of turf along 3<sup>rd</sup>, 4<sup>th</sup>, 7<sup>th</sup>, and 14<sup>th</sup> streets would be removed and paved to accommodate event facilities.” While having hardened surfaces for event support would save wear and tear on the fragile turf, the Draft EIS is silent on a number of key questions including: <ul style="list-style-type: none"> <li>○ What would be the visual and other impacts of such a redesign?</li> <li>○ How will the placement of logistical staging areas along major, and already crowded, north/south pedestrian corridors impact pedestrian circulation and access?</li> <li>○ Will such hardened areas reduce the space available for pedestrians and cyclists, and if so, how will pedestrians and cyclists be accommodated?</li> <li>○ How will this fit with other elements of the Mall plan that call widening sidewalks and pathways?</li> <li>○ Are there locations off the Mall, on adjacent lands, where staging areas might be provided?</li> </ul> </li> </ul> <p><sup>5</sup> 300</p> <p style="text-align: right;">3   Page</p>	<p>H. Every project on the National Mall is extensively reviewed by the U.S. Commission of Fine Arts, the National Capital Planning Commission, the D.C. Historic Preservation Office, and the Advisory Council on Historic Preservation. Most projects are also subject to the consultation process under NHPA section 106. The purpose of the consultations is to ensure that impacts to historic resources are identified and mitigated.</p> <p>I. We believe that sponsors of events or permitted activities can take more actions to reduce impacts, and the National Park Service has been encouraging them to do so.</p> <p>J. Visual impacts would be improved by removing generators and items like cable protection devices. Much civic infrastructure would be invisible belowground. Most proposed locations are frequently used already.</p> <p>K. Pedestrian routes would always need to remain open, and some north-south walks would be widened to ensure that pedestrian and bicycling uses were accommodated.</p> <p>L. The total size of hardened areas would need to be addressed in design and through discussions with the U.S. Commission of Fine Arts and the National Capital Planning Commission, as well as consultations with the D.C. Historic Preservation Office, the Advisory Council on Historic Preservation, and consulting parties. There may be trade-offs in widths of walks. Hardened areas on the Mall would be part of a rainwater collection system with cisterns storing graywater for irrigation use.</p> <p>M. The National Park Service will continue to encourage the use of areas off the National Mall. The NCPC <i>Monumental Core Framework Plan</i> also examined this topic, and the Downtown D.C. Business Improvement District would like more activities downtown.</p>

Comment	Letter 20. National Parks Conservation Association (cont.)	Response
<p>N</p> <p>O</p> <p>P</p> <p>Q</p>	<p>Regarding the matter of adding new paved or hardened areas, NPS planners have stated that redesign is necessary to meet compliance with the American's with Disabilities Act. Increasing the amount of paved or hardened areas also may have a beneficial impact in terms of aiding the National Mall capturing and using rain water to irrigate sections covered by turf. These are, in general, quite commendable objectives. Still, several questions remain including:</p> <ul style="list-style-type: none"> <li>• What is the total acreage of proposed new paved or hardened areas?</li> <li>• What would be the net change, if any, in newly paved or hardened areas?</li> <li>• What other impacts would these new hardened areas have?</li> <li>• How would NPS mitigate any increase in paved or hardened areas?</li> </ul> <p>On-the-ground agency cooperation</p> <p>The Draft EIS lists the Smithsonian, the U.S. Department of Agriculture, and the Architect of the Capitol among a list of cooperating agencies and participants. Representatives from each attended National Mall planning meetings in April 2006 and NPS planners have received and incorporated over 1,000 comments from these cooperating departments and agencies. Understanding that these comments are pre-decisional, nonetheless, the public is left to wonder what options-if any- have been considered to incorporate these adjacent lands managed by other federal agencies into the planning process. Such collaboration might reduce the need for new construction on the National Mall itself, while meeting visitor needs.</p> <ul style="list-style-type: none"> <li>○ Have NPS, the Smithsonian, and other appropriate cooperating agencies, jointly discussed a range of potential collaborations, ranging from the location of restrooms to the establishment of visitor service kiosks, stations, and structures?</li> </ul> <p>The Draft EIS states that "visual and physical connections" between the Mall and Capitol would be improved,<sup>6</sup> and the preferred alternative for circulation calls for the extension of "Circulator-like" bus service from the National Mall to Capitol Hill. This is a good beginning. As the Park Service considers replacing Tourmobile with high-quality, sustainable, and affordable transportation services that could include a "two-way National Mall route" with loops linking the Mall to downtown Washington, D.C. <sup>7</sup> emphasis should be placed on developing a comprehensive, hop-on, hop-off, low-cost transit service that links all the important areas of the National Mall from the Lincoln Memorial to the U.S. Capitol, and all points in between, including the Smithsonian Museums, and other attractions.</p> <ul style="list-style-type: none"> <li>• Have NPS, the Smithsonian, and other appropriate cooperating agencies, jointly discussed a range of potential collaborations, from the location of restrooms to the establishment of visitor service kiosks, stations, structures, or other strategies using existing facilities? If not, when can that discussion occur?</li> <li>• Regarding transportation, are the Smithsonian, the Architect of the Capitol, and other cooperating agencies interested in collaborating with NPS to develop a year-</li> </ul> <p><sup>6</sup> 89 <sup>7</sup> 450</p> <p style="text-align: right;">4   Page</p>	<p>N. We have discussed visitor facilities with the managers of surrounding visitor destinations. As stated in the <i>Draft Environmental Impact Statement</i> on pages 90 and 210, the National Park Service would work with the National Gallery of Art and the Smithsonian Institution to improve access to visitor services in existing and proposed facilities. Please see the discussion of facilities under "Summary of Comments and Responses" beginning on page 11 for more information.</p> <p>O. This is proposed in the <i>Visitor Transportation Study</i>.</p> <p>P. Please see response M to your letter. NPS managers have had and will continue to have discussions with other cooperating agencies about such opportunities.</p> <p>Q. No decision has been made about who would operate a visitor transportation service. Discussions have been started with public transportation providers.</p>

Comment	Letter 20. National Parks Conservation Association (cont.)	Response
<p>R</p> <p>S</p>	<p>round convenient, affordable circulator bus system that would move visitors among all the attractions on the Mall?</p> <p>The preferred alternative identifies the National Mall as the nation's premier civic space. It prioritizes the need for improvements that will make the Mall more accessible, more sustainable, and capable of meeting the changing needs of an increasingly diverse society, while respecting the "planned historic character and visions" of early planners like L'Enfant and McMillan. The Draft EIS rhetoric is especially strong regarding sustainability and emphasizes the intention of the Park Service to develop water conservation measures, reduce energy consumption and solid waste output, and participate in the EPA's "Climate Friendly Parks" program. These are but a handful of the sound management concepts presented in the Draft EIS that will contribute to the overall enhancement of the National Mall.</p> <p>The ideas offered in the Draft EIS are generally good but the concepts are presented without sufficient context. As a result, we are frustrated by the fact that the Park Service is asking the public to comment on a plan whose impacts cannot be evaluated. NPCA respectfully requests that the Park Service provide greater detail about the location, nature, and impact of proposed developments and redesign projects in the EIS for the National Mall before moving ahead with subsequent planning.</p> <p>Sincerely,</p> <p>Alan Spears  Legislative Representative  1300 19<sup>th</sup> Street NW #300  Washington, DC 20036  202/454-3384</p>	<p>R. We agree that there are additional sound management concepts.</p> <p>S. The purpose of NPS vision plans is to provide a coordinated and comprehensive written program for future action to protect America's national parks, and they are prepared with public involvement and environmental analysis in accordance with the National Environmental Policy Act. The proposed National Mall plan provides a cohesive guideline for future management by addressing physical development needs as well as resource protection, the civic forum, circulation, visitor enjoyment, and park operations.</p>

Comment	Letter 21. National Trust for Historic Preservation	Response
<p>A</p>	<div style="text-align: right; margin-bottom: 20px;">  </div> <p>March 18, 2010</p> <p>Ms. Susan Spain National Mall and National Parks National Park Service 900 Ohio Drive SW Washington, DC 20024</p> <p>ATTN: Draft National Mall Plan / Environmental Impact Statement</p> <p>Dear Ms. Spain:</p> <p>I am writing on behalf of the National Trust for Historic Preservation to provide comments regarding the Draft National Mall Plan / Environmental Impact Statement ("DEIS").</p> <p>The National Trust strongly supports efforts to better maintain and preserve the National Mall and to make this extraordinary civic space more accessible to the public. Consequently, the National Trust has been actively engaged in consultation with the National Park Service and other stakeholders regarding the preservation of the National Mall, which is one of our nation's most significant historic landscapes. We have provided extensive comments during the National Park Service's planning process, and wish to join the DC Preservation League, American Society of Landscape Architects, and others in commending the Park Service for its hard work and public outreach to prepare the Draft National Mall Plan.</p> <p><b>The National Mall would benefit from a comprehensive vision and planning approach.</b></p> <p>Unfortunately, one of the primary defects in the Draft National Mall Plan is its failure to take a comprehensive look at the National Mall as a whole and not simply at the National Park Service property. Through its planning process, we understand that the National Park Service aspires to establish "a comprehensive vision and framework to protect the historic character of the National Mall, to restore its health and beauty, to help it function better as America's civic space, and to meet the needs of local, national, and international visitors today and tomorrow for enjoyment, education, and recreation." [DEIS p. 8] However, the Draft National Mall Plan as written provides a conceptual framework for stewardship only of the portion of the National Mall under the jurisdiction of the National Park Service. As the Advisory Council on Historic Preservation observed in its March 17, 2010 comment letter, "The scope of the National Mall Plan is limited to the areas over which the National Park Service has control. Yet the concept and the experience for visitors of the National Mall extends beyond those boundaries."</p> <p>1785 Massachusetts Avenue, NW Washington, DC 20036 P 202.588.6035 F 202.588.6272 E law@nthp.org www.preservationnation.org</p>	<p>A. Because the National Park Service has no control over areas beyond its borders, we have worked closely with cooperating agencies as well as planning offices and agencies to ensure coordinated, complementary, and cohesive planning for the areas covered in the McMillan plan.</p> <p>The proposed plan is a vision plan for all lands on the National Mall under the jurisdiction of the National Park Service, which excludes the lands on which the buildings of the Smithsonian Institution, the National Gallery of Art, and the U.S. Department of Agriculture are located. However, the proposed plan presents a vision for the National Mall that is consistent with the other vision plans for this area, such as the NCPC <i>Extending the Legacy</i> (1997), the <i>Center City Action Agenda</i> (DC 2008), the NCPC <i>Memorials and Museums Master Plan</i> (2001), and the NCPC <i>Monumental Core Framework Plan</i> (2009). The NCPC <i>Legacy</i> plan is the successor to earlier plans, such as the L'Enfant and McMillan plans (see DEIS, p. 42), and other plans are all compatible with the <i>Legacy</i> plan. The National Park Service considers the National Mall plan to be one of the implementing plans for the <i>Legacy</i> plan.</p>





Comment	Letter 21. National Trust for Historic Preservation (cont.)	Response
<p>B</p>	<p>Ms. Susan Spain March 18, 2010 Page 2</p> <p>In our view, the successful preservation of the National Mall depends upon fully integrating the planning processes of all of the responsible agencies and entities into a long-term, big-picture vision and planning approach. The National Trust continues to support a comprehensive, long-range visionary plan for the entire National Mall and we do not believe it is possible to develop this vision solely within the National Park Service's jurisdiction. This view is supported by other notable entities as well. For example, the American Society of Landscape Architects testified on March 4, 2010, before the National Capital Planning Commission, that "there must be close coordination and cooperation among all of the institutional stakeholders. Not all of the needs of the National Mall can be met within the narrow precincts of the area consigned to the stewardship of the Park Service, and planning for the National Mall and the federal precincts cannot be done in isolation."</p> <p>The National Park Service's attempts to address the limited scope of its planning process do not correct the overall deficiency of the Draft National Mall Plan. Specifically, in 2006, the National Park Service invited eighteen federal and DC stakeholder agencies to provide their views early on in the process and to "cooperate in the preparation of a National Mall plan." [DEIS p. 545] Later, the National Park Service and some of the cooperating agencies jointly developed a set of twenty-one planning principles to guide the National Mall Plan. According to the National Park Service, these planning principles "formed the basis for the plan objectives presented in the National Mall Plan." [DEIS p. 544] The second planning principle, for instance, states that "Historic and natural resources will be protected and maintained."</p> <p>Importantly, the fourth planning principle states that "Cooperating agencies will coordinate planning, information, services, facilities, and programs for visitors, residents, and the local workforce." In our view, however, the Draft National Mall Plan does not indicate that the cooperating agencies have coordinated the provision of visitor facilities. As the DC Preservation League testified before the National Capital Planning Commission on March 4, 2010, the Draft National Mall Plan "requires placement of all visitor amenities on NPS property, and none on property of adjacent federal (or federally chartered) entities." The DC Preservation League's March 4<sup>th</sup> testimony continues:</p> <p>From the standpoint of historic preservation, by trying to accommodate all the desired uses and amenities of the Mall on property managed by the Park Service, the Park Service</p>	<p>B. While consulting parties may represent specific constituents, the planning team was careful to keep meetings for cooperating agencies and for NHPA section 106 consulting parties separate to avoid a perception that some groups have more influence than general citizens.</p> <p>As stated in the <i>Draft Environmental Impact Statement</i> on pages 544-46, cooperating agencies participated in many multiday workshops to help develop planning principles, the preliminary range of alternatives, and the preliminary preferred alternative, as well as internal reviews of the draft document before its publication. Most cooperating agencies chose not to participate in section 106 meetings for consulting parties.</p>

Comment	Letter 21. National Trust for Historic Preservation (cont.)	Response
	<p>Ms. Susan Spain March 18, 2010 Page 3</p> <p>necessarily concentrates the impacts on historic properties on its own property, while limiting the options for mitigation. ... We are informed that the Park Service has worked closely with other stakeholders of the Mall. What does not appear in the preferred alternative is any sense that those stakeholders are making their own contributions to the comprehensive and optimal development of the Mall.</p> <p>In short, a much more integrated planning vision is needed, which will avoid concentrating the adverse impacts exclusively on National Park Service land. If the National Park Service declines to take a more comprehensive approach to the future vision of the National Mall, at a minimum, the twenty-one planning principles that reflect the other stakeholders' concerns must be expressly incorporated into the National Mall Plan itself and be fully considered in the specific direction and implementation of the plan.</p> <p><b>C</b></p> <p>The Draft National Mall Plan calls for too many new structures on the National Mall, which have the potential to undermine its historic integrity.</p> <p><b>D</b></p> <p>The National Trust is concerned that the Draft National Mall Plan calls for the construction of too many new ancillary buildings on the National Mall, which is supposedly considered to be a "substantially completed work of civic art." According to the draft plan, the National Mall "must be refurbished so that (1) its treasured memorials and historic landscapes can be preserved, (2) very high levels of use can be sustained, and (3) the needs of visitors can be met." [DEIS p. 4] To meet this three-prong need, the Draft National Mall Plan sets out to provide "Various visitor and commercial amenities ... that are conveniently located and that are sized and configured to meet visitor use levels on high-volume days." [DEIS p. 7] Consequently, the National Park Service's preferred alternative proposes a considerable number of new permanent ancillary structures to be constructed within the area subject to the agency's jurisdiction on the National Mall, including the following projects:</p> <ul style="list-style-type: none"> <li>▪ Union Square, new food service and restroom structures</li> <li>▪ Smithsonian Metro Station, new visitor contact station and restroom structures</li> <li>▪ Washington Monument grounds, new multi-purpose visitor facility</li> <li>▪ Constitution Gardens grounds, new multi-purpose visitor facility</li> <li>▪ Tidal Basin area, new multi-purpose visitor facility</li> <li>▪ Lincoln Memorial grounds, new restroom structure</li> <li>▪ Ash Woods, new stable, food service, and restroom structures</li> </ul>	<p><b>C.</b> As discussed in the NHPA section 106 consultations, the planning principles from newsletter 2, which informed the planning objectives, have been updated and added as appendix F to the final document.</p> <p><b>D.</b> The National Mall is large and primarily a walking environment, so it is vital that facilities be well dispersed. There has been a long history on the National Mall of providing facilities that are too small or of denying the need for facilities, resulting in resource damage or pressure for additional facilities. The proposed plan recognizes that high levels of visitation will continue and will in all probability increase. This is not an issue to be taken lightly, and we have examined best practices used within the United States and around the world to learn how others have successfully dealt with many of the same problems that need to be addressed on the National Mall.</p> <p><i>Tourism Congestion Management at Natural and Cultural Sites</i> (World Tourism Organization 2004) identifies successful approaches to developing facilities and managing congestion around the world. At the Louvre this included providing a large new paved entry courtyard (the Pei pyramid), conserving historic buildings, developing additional visitor facilities underground, and dispersing smaller visitor facilities such as food service and restrooms to avoid congestion. The document also states the following: "Particular care should be devoted to preserving and upgrading monuments, shrines and museums, as well as archeological and historic sites which must be widely open to tourist visits. . . . Site managers and staff need to carefully monitor the way the visitors interact with the site. . . . When crowd management techniques are likely to adversely impact on the important values of the destination or site, consideration should be given the relocating the proposed event to another, less sensitive venue."</p>

Comment	Letter 21. National Trust for Historic Preservation (cont.)	Response
<p>E</p> <p>F</p> <p>G</p>	<p>Ms. Susan Spain March 18, 2010 Page 4</p> <ul style="list-style-type: none"> <li>▪ Franklin Delano Roosevelt Memorial, new food service and restroom structures</li> <li>▪ Thomas Jefferson Memorial grounds, new food service, retail, and restroom facility</li> </ul> <p>We acknowledge that the Park Service also intends to use mobile food carts and refreshment stands as well as temporary portable restrooms during high-use seasons and special events. [DEIS p. 87] We understand that "The size and character of [Union Square] visitor facilities and amenities would be determined during design." [DEIS p. 89] We appreciate that the Park Service intends that these new structures would be "designed to be compatible with the character of the National Mall." [DEIS p. 86] We also certainly support that "The National Park Service would encourage partnerships between all visitor destinations along the Mall to serve visitor needs. ... NPS staff would also work with the National Gallery of Art and the Smithsonian Institution to improve access to food service and restrooms for National Mall visitors." [DEIS pp. 89, 90]</p> <p>On the other hand, it is readily apparent that the draft plan calls for the National Park Service to build its way out of the challenge of accommodating public use of the historic landscape. The National Trust shares the concern expressed by the National Coalition to Save Our Mall in its March 4, 2010 testimony before the National Capital Planning Commission that the proposed introduction of "numerous kiosks, restaurants, restroom facilities, and visitor centers on the open space could have dramatic and adverse impacts on the historic quality and landscape character of the National Mall."</p> <p>Moreover, the National Trust is concerned that the Draft National Mall Plan places too much emphasis on using permanent new structures to accommodate peak public events on the Mall, such as inaugurations and Independence Day celebrations. This is a recipe to over-build the National Mall. Indeed, one of the so-called best practices which guided the development of the preferred alternative is that the National Park Service should provide "Sufficient convenient and accessible visitor amenities (rest areas, water, food service, gift shops, and stroller and locker rentals) should be sized and configured to meet the visitation levels on high-volume days." [DNMP p. 53] (By contrast, the cooperating agencies' fifth planning principle states that "Facilities will be ... appropriately sized to meet a range of uses." The planning principles do not recommend building out the National Mall to accommodate visitation levels on high-volume days.) Instead, we believe the plan should rely much more heavily on temporary infrastructure, which can be</p>	<p>E. All facilities would be sited to reduce impacts and would be outside primary and secondary vistas and views. Multipurpose facilities rather than single-purpose facilities are proposed to reduce the number of new structures. As stated in the <i>Draft Environmental Impact Statement</i> on page 83, "The National Park Service would ensure compatible and enduring high-quality design, as well as the highest facility maintenance standards, to create a sense of place that would reinforce the civic, historic, and symbolic role of the National Mall to our nation."</p> <p>F. The National Mall hosts thousands of events annually, each requiring various levels of support. The volume of almost continuous use has resulted in a near constant proliferation of temporary facilities, such as toilets. Portable toilets are unacceptable to most women and children, and the accompanying odor is unpleasant for nearby visitors. The proposed plan carefully balances the need for temporary and permanent facilities so that current and expected levels of use can be accommodated without having the National Mall appear to be a constant construction zone.</p> <p>G. The proposed plan does not recommend building for the highest use levels, which is never a good practice. It does recognize that some areas will always receive high levels of use, either because they are close to tour bus drop-offs or locations that are nearly continually used for permitted events. Facilities in these areas would be sized and designed for efficient use. The objective has been rephrased to say "flexibly meet visitor-use patterns during the peak season."</p>

Comment	Letter 21. National Trust for Historic Preservation (cont.)	Response
	<p>Ms. Susan Spain March 18, 2010 Page 5</p> <p>removed when visitor use is at normal levels. Designing to accommodate the maximum-use public events with permanent new buildings would greatly exacerbate the adverse impacts of this plan on the National Mall, and would needlessly destroy too much public open space.</p> <p><b>The National Park Service must prioritize the list of projects in the draft plan, and should limit any new facilities to those that are necessary.</b></p> <p>In the National Trust's view, very special sensitivity must be used when proposing, siting, and designing any new permanent buildings anywhere on the National Mall.</p> <p>First, we consider it essential that the National Park Service objectively assess and demonstrate the necessity of any new ancillary facilities as it implements this conceptual framework plan. The cooperating agencies' twenty-first planning principle states that "Business services will provide a range of <u>necessary</u> and appropriate commercial visitor services and products of consistent high quality at a range of prices." A visitor service proposed for the National Mall which could be appropriately provided off of the Mall would violate this principle. To its credit, the Draft National Mall Plan indicates that the National Park Service will "assess the economic feasibility, necessity, and appropriateness" of changes to existing facilities as well as for the construction of "additional food service, retail, and recreation equipment rentals." [DEIS p. 71, 83]</p> <p>Second, the National Trust continues to strongly recommend that the National Park Service evaluate opportunities for locating necessary visitor amenities "behind the architectural line," in areas under the control of the Smithsonian, National Gallery, Department of Agriculture, and other entities. New ancillary facilities should be designed, programmed, and implemented within the Mall only after a thorough reconsideration of ways the National Park Service might work with other agencies to offer combined visitor services for the National Mall. For example, the National Park Service should collaborate with the Smithsonian to determine what visitor amenities could be offered through the restoration and reuse of the Arts &amp; Industries Building. An inter-agency visitor services agreement to reuse some or all of the Arts &amp; Industries Building in this way could reduce development on the historic landscape of the Mall and dramatically improve the visitor's experience and understanding of the National Mall's historic resources.</p>	<p>H. We suggest that a listing of priorities and development map accompany a programmatic agreement with the Advisory Council on Historic Preservation and the D.C. Historic Preservation Office.</p> <p>I. We agree.</p> <p>J. The National Mall plan proposes that visitor facilities be better dispersed to conveniently meet visitor needs. As stated in the <i>Draft Environmental Impact Statement</i> on page 484, "Under the preferred alternative visitor facilities and amenities would be provided on the National Mall to accommodate the high levels of visitation it receives. Visitor facilities and amenities would be conveniently located, and they would generally be designed to serve multiple purposes and to incorporate naturally compatible amenities, such as restrooms near food service locations or seating and information by restrooms, in accordance with best practices used at other sites."</p> <p>K. As stated in the <i>Draft Environmental Impact Statement</i> on pages 90 and 210, the National Park Service would continue to explore the ability of adjacent museums to provide new access to existing or proposed facilities. Please see the discussion of facilities under "Summary of Comments and Responses" beginning on page 11 for more information. Regarding the Arts and Industries Building, please see letter 14.2H.</p>


Comment	Letter 21. National Trust for Historic Preservation (cont.)	Response
L	<p>Ms. Susan Spain March 18, 2010 Page 6</p> <p>Third, the National Park Service should revise the Draft National Mall Plan to clearly prioritize the list of specific projects outlined in the preferred alternative. In its March 17, 2010 comments, the Advisory Council on Historic Preservation observes that the Draft National Mall Plan "functions effectively as a set of coordinated action items" and has urged the National Park Service to revise the plan to "establish a consistent approach to these projects, and in particular, identify principles and priorities for decision making on individually funded projects." The National Trust also concurs with the National Capital Planning Commission's February 25, 2010, staff report when it recommends that the National Park Service "Prioritize short-term and long-term projects to support progress in the implementation of the Plan." (For example, the NCPC staff report describes the redevelopment of Union Square as "one of the linchpins" of the plan and "an early priority" for the Commission's staff.) Although the National Park Service's priorities for the plan's specific projects may change over time, the National Trust believes that sharing the Park Service's priorities during the planning process is one step to ensure that "park spaces and structures [on the National Mall] will welcome all and ... will feature the highest quality of sustainable design, construction, and maintenance"—as the cooperating agencies' first planning principle requires.</p> <p>Thank you in advance for considering the views of the National Trust for Historic Preservation regarding the Draft National Mall Plan. We look forward to participating in future consultation pursuant to Section 106 as the National Park Service's plan is implemented, including those site-specific actions highlighted on Table 41 at page 547 of the Draft National Mall Plan.</p> <p>With best regards.</p> <p>Sincerely,</p>  <p>Robert Nieweg Director and Regional Attorney Southern Field Office National Trust for Historic Preservation</p>	L. Please see response H to your letter.

Comment	Letter 22. Society of Architectural Historians, Latrobe Society	Response
<p>A</p> <p>B</p> <p>C</p>	<p style="text-align: center;">Latrobe Chapter • SOCIETY OF ARCHITECTURAL HISTORIANS • Washington, D.C.</p>  <p>Dear Colleagues,</p> <p>As historians and preservationists we favor conservation and restoration of the Mall System. We do not encourage new elements that renovate areas creating uninvited change to the whole. For instance, rearranging the Union Square area can achieve the goals of this report without introducing yet another design. Restoration of the streets, paved areas, fountains, and plantings intended and depicted in the McMillan Plan would serve today's needs without disturbance to the unity of the 1901-2 plan. In regard to accommodating demonstrations and events at numerous sites, the plan common to all alternatives (Draft National Mall Plan p 77) with "enhanced monitoring procedure to ensure that resources are better protected") achieves the desired outcome without adding new and visible changes such as buildings, bathrooms, and concrete paths and pads in places meant to be grass. In all cases creative solutions to identified problems such as water quality and others should be applied without attendant design changes. These small changes add up to altering the totality of the historic resource the Park Commission called "the Mall system."</p> <p>There is a duty here to do no harm. We urge the National Park Service to search ceaselessly for ways to find solutions to wear and usage problems that will maintain the greensward and the trees of the entire Mall assembly as designed, without any added paving. We find there is a gap in reasoning between calling for the rebuilding of such areas as the Tidal Basin or Constitution gardens and the piling on of changes in the name of that necessary reconstruction. In the interest of accommodating the needs and appetites of the visitors we call for a contractual change at the highest level among the Park service, the District of Columbia and the Smithsonian. The boundaries among them prompt the new facilities for information, creature comforts, food and shops called for in this plan, which already exist in Smithsonian facilities. Security, lighting, signage and landscape design all happen within the same spatial envelope so should be done by these agencies as single systems.</p> <p>We understand and support the goal stated by the National Park Service in this draft "to prepare a long-term plan that will restore the National Mall." We differ as to the comprehensive nature of the Mall. In historical terms the Mall has been understood as a unified composition by L'Enfant, McMillan Commission, and the Fine Arts Commission and architectural historians such as Richard Guy Wilson, John Repp, Richard Longstreth, Jon Peterson, Kirk Savage, Pamela</p>	<p>A. It is clear that Union Square is not well used and that it does not meet the McMillan plan goal to be a connection between the U.S. Capitol grounds and the Mall. The issues of congestion and high levels of use require that all areas of the National Mall be able to function flexibly now and in the future.</p> <p>B. Sustainable solutions must be used to address issues like water quality and water volume, and to comply with policies to reduce the use of potable water. The large designed water features are the primary reasons why the National Mall is the highest user of potable water in the national park system. The impacts of small actions do add up, which is why the National Environmental Policy Act requires that the cumulative impacts of past, present, and reasonably foreseeable projects be analyzed. This concern has also been addressed during the NHPA section 106 consultations, where interested parties identified historic elements and features, as well as ways to avoid, minimize, or mitigate adverse effects.</p> <p>C. These systems are all part of the pedestrian environment and need to be coordinated.</p>

Comment	Letter 22. Society of Architectural Historians, Latrobe Society (cont.)	Response
D	<p>Scott, Cynthia Field, Don Hawkins, to name but a few. The historical term, the “Mall System”, used by the McMillan Commission, recognizes the different parts that make up the whole and yet understands the meaning of the whole to be paramount. Their report stated that ““the Capitol, White House, and [Washington] Monument shall become constituent parts of one composition.” (Park Plan Commission Report under Axial Relationships).</p> <p>Our work in interpreting the past points to the success of a visionary plan for the Mall System. To ignore this lesson is to allow us to fall into the disarray of low points in this history. Historical studies of the history of the Mall and its changes over time demonstrate that its success has been the result of visionary plans done by selected experts chosen for their distinction and not employed by any of the stakeholders. In the case of the Mall the lesson is clearly that a new visionary plan should first set the goals for practical alteration.</p> <p>Representing the Latrobe Chapter of the Society of Architectural Historians, Dr. Cynthia R. Field</p>	<p>D. Because the National Park Service has no control over areas beyond its boundaries, we have worked closely with cooperating agencies as well as planning offices and agencies to ensure that planning is coordinated, complementary, and cohesive for the areas covered in the McMillan plan. During the NHPA section 106 consultations, the National Park Service recommended updating the National Mall nomination to the National Register of Historic Places.</p>

Comment	Letter 23. Trust for the National Mall	Response
<p>A</p>	<p>March 2, 2010</p> <p>Mr. Marcel Acosta Executive Director National Capital Planning Commission 401 9th Street, NW Suite 500 North Washington, DC 20004</p> <p>Dear Marcel:</p> <p>The Trust for the National Mall applauds the National Park Service for their dedicated work on the National Mall Plan. The Park Service has led an unprecedented and inclusive planning process for the future of the National Mall. The Plan reflects the input of more than 30,000 Americans, research into best park practices around the globe, the guidance of more than 100 consulting parties, and outreach to the best and the brightest from a multitude of disciplines. The Park Service has taken a smart and open approach to working with the District Planning Agency, the National Capitol Planning Commission, the Commission on Fine Arts and the Architect of the Capitol to make certain that the interests of all are reflected, and dovetail the multiple planning efforts now underway.</p> <p>The Trust for the National Mall supports the Park Service's Preferred Alternative and is eager to get to work implementing the Plan, which we think is a well-conceived framework for National Mall's future. The following components have been well-addressed including: enhancing the park's infrastructure and protecting it as a place for first amendment demonstrations; making certain that the long-term care, health and beauty of the park's natural resources are made a priority; ensuring that the needs of park visitors are met in a respectful, appropriate and inviting manner; and engaging visitors in meaningful ways that reflect the great history and character of America's Front Yard.</p> <p>It is paramount that the park's infrastructure is restored to the highest standards that reflects the great pride that we have in our country and its premier civic space. With more than \$400 million in deferred maintenance, we can no longer wait to invest in the restoration and improvement of the park. The areas, including Union Square, outlined in the Preferred Alternative will create more space for public demonstration while simultaneously addressing the long-term sustainability of the park's natural resources and protecting its historic character. The Plan finally identifies the need to repair the park's waterways that have rightly received the lion-share of criticism and deter public enjoyment of the National Mall.</p> <p>With more than 30 million annual visits, the park was never designed to handle the magnitude of people who come each year to share this glorious space. The Preferred Alternative identifies a number of areas that will support the people load and visitor's needs, creating mixed-used (food, bathroom, souvenir shops and performance space) sustainable facilities that reduce the potential footprint of required additional amenities. At the same time, the Park Service has also been mindful of widening walkways, providing more accessibility and creating a more fluid and pleasant visitor experience.</p> <p>It is important and right that the Preferred Alternative focuses on the visitor's experience making certain that all who come are engaged in meaningful ways and that the Park Service acts as an engaged steward</p> <div data-bbox="1039 259 1113 422" style="text-align: right;">  </div> <div data-bbox="987 430 1123 519" style="text-align: right;"> <p>401 Third Street, NW Suite 300 North Washington, DC 20006 T 202.307.3930 F 202.347.2043</p> </div>	<p>A. The National Park Service greatly appreciates your efforts dedicated to making the National Mall the best park in the world.</p>



Comment	Letter 23. Trust for the National Mall (cont.)	Response
	<p>of the great history and character of this iconic park. The National Mall serves as a pilgrimage for Americans and international guests alike and better use of technology, tours, talks, and performances are critical to making this a more vibrant and active park.</p> <p>Together with the recently completed Visitor Transportation Study, the Preferred Alternative provides a framework for an integrated transportation solution that meets the needs of people moving from public transportation nodes in and out of the park, while addressing the pedestrian and bike environments. This is exactly the type of coordination that is needed for a seamless visitor experience in the Nation's capital.</p> <p>The Trust hopes the National Capitol Planning Commission shares our enthusiasm for the Preferred Alternative and acts immediately in its support. It is the Trust's belief that together, with this significant and successful Mall Planning effort completed, we can make the National Mall the best park in the world.</p> <p>Sincerely,</p>  <p>Caroline Cunningham President</p>	