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August 15, 2010

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Dear Ms. Spain:

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**Re: Comments of the Committee of 100 on the Federal City on the Final National Mall Plan/Environmental Impact Statement (July 2010)**

The Committee of 100 on the Federal City is pleased to comment on the *Final National Mall Plan/Environmental Impact Statement* that the National Park Service released in July 2010. These comments are being submitted during the 30-day no-action period ending August 16, 2010.

The future of the National Mall is a major interest of the Committee. The Committee of 100 is one of the consulting parties in the Section 106 process related to the National Mall Plan and has been participating in the current public process of preparing the National Mall Plan for the past several years. We submitted initial comments (dated May 19, 2008) on the *Draft Alternatives Matrix-The National Mall* (April 2008) and comments (dated May 15, 2009) on the *National Mall Plan-Preliminary Preferred Alternative* (March 2009). Earlier this year the Committee submitted comments (dated March 17, 2010) on the *Draft National Mall Plan/Environmental Impact Statement* (December 2009).

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 over the past several years with preparing what is now the *Final National Mall Plan/Environmental Impact Statement*. We note that a number of changes and modifications have been made to the *Draft National Mall Plan/EIS* based in part on comments from many agencies, organizations

**CHAIR EMERITUS**

LAURA M. RICHARDS, ESQ.

and individuals. We are pleased that some of the comments of the Committee of 100 have been addressed in some way. We especially want to compliment the National Park Service on providing *Volume 2: Final National Mall Plan/EIS* which provides all of the comments made on the *Draft National Mall Plan/EIS* and provides responses to comments in a useful format.

### **Continuing Issues**

The National Park Service has indicated that the National Mall Plan is a fifty-year plan, so this plan will extend into the mid-21<sup>st</sup> Century. The Committee realizes that any plan for the National Mall will evolve over such a long period. However, that evolution should be guided by a comprehensive framework. The long-range challenge is to outline a plan for the National Mall that allows for future changes (that cannot be specifically anticipated) without imposing rigid constraints that would deaden the Mall's special character.

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

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

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

- Obtaining a **comprehensive redesign and reuse plan for the Union Square area**, including lands under the jurisdiction of the National Park Service and the Architect of the Capitol.
- Continuing efforts to **locate some public facilities (restrooms, food concessions, etc) on lands under the jurisdiction of the Smithsonian Institution and the National**

**Gallery of Art** to avoid or limit paving more areas for locating such facilities on more visible and central areas of the National Mall.

- **Integration of future plans for the Smithsonian Institution and National Gallery of Art buildings and lands with National Park Service plans as part of the National Mall Plan needs to be clear.** The Committee continues to be concerned with the **future use of the Smithsonian Institution's Arts and Industries Building** and believes that some central visitor facilities pertaining to the National Mall, and operated by the National Park Service, could be located there.
- Additional work is needed to **address possible effects of global warming on the National Mall** over the next 50 years.
- The Committee believes that **additional emphasis is still needed on the design and alignment of the portion of the Washington Waterfront Walk** (the planned 11-mile waterfront walk from Georgetown to the National Arboretum) that passes through a portion of the National Mall. .
- Continuing efforts are needed to plan and **develop a multi-modal transportation system that provides convenient movement options throughout the National Mall as well as providing connections to adjacent parts of Washington.**
- **Continued development of urban design opportunities is needed**, including vistas and connections to adjacent areas. The Committee is pleased that some of its urban design recommendations have been incorporated in the National Mall Plan, and hopes that review and testing of other urban design opportunities will be undertaken in the future.
- **Further enhancement of the landscape design and use plan of the Washington Monument Grounds is needed**, including improved connections to adjacent areas and interpretation of historic features. This work should include more than just updating the previously approved landscape plan for this area.

### **Next Steps**

The Committee of 100 applauds the National Park Service for the work that has been done in bringing the *Final National Mall Plan* to the present stage but, as noted above, we still have concerns about some aspects of the final plan. However, in view of how this planning process has unfolded, we now understand that a somewhat less than comprehensive plan, including only plans for the National Park Service areas of the National Mall, is what will go forward and be presented later this year (fall 2010) to the National Capital Planning Commission. While we wish the plan were more truly comprehensive, we understand that it is important for the National Park Service to have an approved National Mall Plan so that additional funding can be obtained for future National Mall improvements and increased maintenance.

Over the next several months the National Park Service will complete a “Record of Decision” and also a “Programmatic Agreement” to complete the Section 106 review of the National Mall Plan. These processes can provide an opportunity for further clarification of some issues.

Planning work by other key participants in or adjacent to the National Mall (Smithsonian Institution, National Gallery of Art and the Architect of the Capitol) will continue to move forward and hopefully be completed to the point where public release of their plans is possible in the near future (and the status of coordinated planning can be understood).

The National Park Service has indicated that they will prepare a summary plan report after the *Final National Mall Plan* is approved. This could also provide an opportunity to clarify the plans of the other stakeholders on the National Mall, in a summary format that will allow better public understanding. Finally, as planning for various projects on the National Mall move forward over the next several years, it will be possible to clarify and refine key points.

One of the key suggestions made in the Section 106 process related to the National Mall Plan is that a National Register Nomination be prepared for the entire National Mall. The Committee of 100 on the Federal City supports this proposal. We realize that this work will likely take several years but we believe it will inform, and hopefully simplify, future decisions about the development and improvement of the National Mall and relationships to adjacent areas. 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 will likely evolve in the future.

### **Increased National Mall Role for the National Capital Planning Commission**

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

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

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

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

The Committee of 100 on the Federal City looks forward to continuing to work with the National Park Service in planning the future of the National Mall, and with the National Capital Planning Commission and other agencies and institutions involved with the National Mall. This is work that is important to all Americans, including those of us who live and work in Washington, D.C. and in the Washington region.

Sincerely,

*John Fondersmith*

John Fondersmith, AICP  
Representing the Committee of 100 on the Federal City  
in the National Mall Plan Process

*George R. Clark*

George R. Clark, Chair  
Committee of 100 on the Federal City