

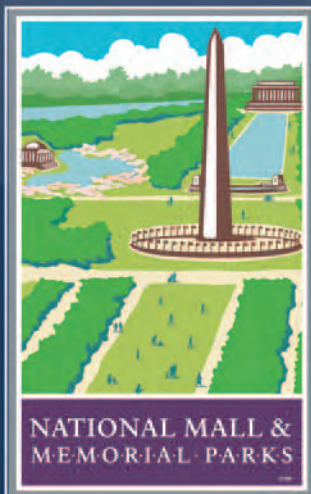


THE NATIONAL MALL

1997
THE LEGACY PLAN

1901
MCMILLAN PLAN

1791
L'ENFANT PLAN



Public Comments Report
Newsletter 4: A Preliminary Preferred Alternative
The National Mall
Fall 2009

National Park Service
U.S. Department of the Interior

National Mall and Memorial Parks
Washington, D.C.



PUBLIC COMMENTS REPORT

NEWSLETTER 4: A PRELIMINARY PREFERRED ALTERNATIVE

A Background Report for the National Mall Plan

Fall 2009

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SUMMARY

Since 2005 the National Park Service (NPS) has engaged in a major cooperative planning effort to assess the current state of the National Mall and to create a collaborative vision for its sustainable future. In March 2009 the National Park Service published the fourth newsletter for the planning effort and presented the basic concepts of a preliminary preferred alternative for the future management of the National Mall. Members of the public were invited to comment on the various elements of the alternative—whether or not they agreed with the basic concepts, and what specifically they might change and why.

The preliminary preferred alternative was developed after the preliminary range of alternatives was presented in newsletter 3 in December 2007. Nearly 18,000 comments were received on newsletter 3 by February 15, 2008. These comments were then considered in the development of the preliminary preferred alternative during the spring and summer of 2008. The purpose of newsletter 4 was to present to the public the general direction that the National Park Service was proposing as its preferred alternative so that the public could comment on this alternative as they had on the original alternatives. Specifically, the Park Service wanted to identify issues that were of most concern to the public, consider potential revisions and refinements to alternatives, and determine areas where additional information about the affected environment or impacts would be needed for the draft environmental impact statement.

The public comment period for newsletter 4 extended from March 1 to May 15, 2009. During this time 415 respondents provided valid comments online; 70 spam messages were eliminated from consideration. As part of the customized online questionnaire, the National Park Service provided the public with 24 distinct response areas so that topics could be efficiently analyzed. Respondents were asked whether they agreed, disagreed, or had no opinion about general and specific elements of the preliminary preferred alternative. For 22 of the 23 topics, between 77%

and 94% of the respondents indicated they had no opinion, suggesting that many respondents approached the comment process with specific issues in mind. The response area receiving the most comments was the Mall, and these comments and perceptions were considered in the impact analysis. Very few respondents provided written responses to a majority of the questions. Instead, commenters often responded to a limited number of specific topics. Additionally, in many cases, people marking no opinion provided written comments that were sometimes not relevant to the comment topic or draft proposals.

In addition to online comments, the National Park Service also received responses in various other formats. Cooperating agencies, consulting parties, and other entities provided written comments in 16 letters. Moreover, a privately produced booklet promoted certain ideas for the National Mall. The American Society of Landscape Architects (ASLA) convened a Blue Ribbon Panel in March 2009 with professionals in architecture, landscape architecture, and planning to review the preliminary preferred alternative. A report was later published and a related set of webpages (<http://www.asla.org/nationalmall/>) was launched to outline the panel's suggestions for a visionary plan for the National Mall and to offer recommendations on stormwater management, soil health, trees, water features and connectivity.

Two specific issues generated a large volume of response. The first issue related to proposed restrictions on the use of the elm tree panels on the Mall for temporary event facilities during the Smithsonian Folklife Festival. Respondents objected to any such restrictions, and many of the comments were very similar. The second issue related to First Amendment demonstration rights, and the Partnership for Civil Justice and its supporters submitted over 1,100 faxes as variations of a form letter. These responses indicated that many of these respondents had not read the newsletter, which stated on the first page that First Amendment demonstration rights will not change under any alternative.

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INTRODUCTION

The *National Mall Plan Newsletter 4 — A Preliminary Preferred Alternative* was issued at the beginning of March 2009. It described a general vision for the National Mall, general proposals for 8 specific topics that apply to the entire National Mall, and proposals for 15 specific areas within the National Mall. The National Park Service, in collaboration with its cooperating agencies and consulting parties, developed the preliminary preferred alternative after receiving nearly 18,000 comments on the preliminary alternatives presented in December 2007 in newsletter 3. The purpose of newsletter 4 was to present to the public the general direction that the National Park Service was proposing as its preferred alternative so that the public could comment on this alternative as they had on the original alternatives. Together with the feedback on newsletter 3, all these comments were used to refine the alternatives, including the preferred alternative, presented in the draft environmental impact statement.

In addition to learning about preferences related to a specific topic or area on the National Mall, the National Park Service planned to use public comments to identify areas where additional information was needed on legal and policy mandates, as well as in the affected environment. Comments were used to determine needed refinements and revisions to the preferred alternative, and to identify topics needing additional analysis. Throughout the National Mall planning process, planners consistently reminded the public that the volume of comments received would not dictate what planning decisions would or should be made.

With this in mind, members of the public were invited to state whether or not they agreed with the basic concepts of the preliminary preferred alternative, as well as what specifically they would change and why. The National Park Service requested online responses within 24 categories so that topics could be efficiently analyzed. The first 8 response areas provided opportunities to discuss actions related to the following topics for the National Mall as a whole:

1. Cultural resources
2. Natural resources
3. Demonstrations and special events
4. Public access and wayfinding
5. Visitor information, education, and enjoyment
6. Visitor amenities
7. Health, public safety, and security
8. Park operations

Response areas 9 to 23 applied to the following specific locations within the National Mall:

9. Union Square
10. The Mall
11. Washington Monument grounds
12. World War II Memorial
13. Constitution Gardens
14. Vietnam Veterans Memorial
15. Lincoln Memorial grounds
16. Korean War Veterans Memorial
17. D.C. War Memorial
18. Ash Woods
19. Tidal Basin area
20. Franklin Delano Roosevelt Memorial
21. West Potomac Park Riverfront
22. George Mason Memorial
23. Thomas Jefferson Memorial and grounds

Response area 24 asked for any general comments, and 17% of online respondents provided additional comments in this field.

The public comment period extended from March 1 to May 15, 2009, during which time 415 members of the general public submitted responses online, 16 letters were received via mail or e-mail, a report was presented by a Blue Ribbon Panel convened by the American Society of Landscape Architects, an illustrative booklet

was privately produced to promote certain ideas, and over 1,100 faxes were received.

In the online responses, between 77% and 94% of the respondents indicated they had no opinion for 22 of the 23 response areas. In many cases, however, people marking “no opinion” did provide written comments. In other cases, respondents were interested only in a small number of specific topics. Many comments also discussed issues not relevant to the topic area or the draft proposals. For example, some commenters opposed government or NPS management of public land, while others provided comments that seemed to be based on hearsay or a partial or incorrect understanding of the proposals.

The methodology for reviewing and summarizing all comments received involved sorting and categorizing those comments not already sorted online, studying statistical breakdowns of response categories (agree, disagree, or no opinion), and selecting representative quotes from written responses to illustrate the range of comments on a topic. Occasionally, the same

comments were submitted in all 24 response areas; however, in this report, comments are analyzed under the relevant topic only. In order to accurately represent comments, grammar and punctuation have not been corrected; spelling has been corrected to allow for better readability.

Two issues generated a large volume of response. The first issue related to proposed restrictions on the use of the elm tree panels for temporary event facilities during the Smithsonian Folklife Festival, and respondents objected to any such restrictions. The second issue related to First Amendment demonstration rights, and the Partnership for Civil Justice, an organization seeking to protect free speech and dissent on the National Mall, and its supporters submitted over 1,100 faxes objecting to any restrictions on First Amendment rights (an example of a form letter is included in the appendix D). These comments indicated that many of these people had not read the newsletter, which stated on the first page that First Amendment demonstration rights will not be changed under any alternative.

ONLINE PUBLIC COMMENTS

At the beginning of newsletter 4, the National Park Service articulated the following draft vision for the National Mall:

The National Mall — the great swath of green in the middle of our capital city and stretching from the foot of the United States Capitol to the Potomac River — is America’s civic stage. This historic open space with its planned views provides an inspiring setting for national memorials, many of them symbols of our democracy. It also provides a visual connection between the branches of government, and a backdrop for government buildings and the great cultural institutions of our nation. For more than 200 years, it has symbolized our nation and its democratic values, which have inspired the world. “We the People” come here to demonstrate our rights and celebrate our freedoms, our history and culture, our unity and diversity, and our way of life.

Guided by this vision, the preliminary preferred alternative would refurbish the National Mall as the primary civic space for the nation in order to better accommodate high levels of use and meet the needs of visitors in an energy efficient and sustainable manner. As defining features of the historic landscape, its treasured memorials and landscapes would be protected, and large areas of unprogrammed open space would be preserved. The National Park Service would seek to create “a rich, coherent pedestrian environment that would complement and balance the natural environment,” while emphasizing First Amendment demonstrations, commemorations, and national celebrations.

In the following sections, a summary for each specific element of the preliminary preferred alternative is included at the beginning of each response area. Percentages are then provided, indicating the breakdown of respondents who indicated whether they agreed, disagreed, or had no opinion on the proposals specific to that response area. Representative excerpts are then provided that reflect the range of written responses.

GENERAL ACTIONS FOR THE NATIONAL MALL

Cultural Resources

Preliminary Preferred Alternative: Improved preservation efforts would protect memorials, statuary, and commemorative elements of the National Mall landscape. Planned views and vistas would be improved to enhance the historic landscape, and room would be granted for changes in the way the Mall is used and valued.

Agree: 57 (13.7%)
Disagree: 34 (8.2%)
No Opinion: 324 (78.1%)

Excerpts:

- “Thank you so much for your plan to make this area more user friendly for all of us who want to enrich our children’s lives with this incredible local resource.”
- “An important part of the downtown section of D.C. Most appropriate to show off the monuments of the city.”
- “The National Mall already has a strong ‘sense of place.’ If anything, it has too MANY memorials, related statuary and places of commemoration. The most striking feature of the Mall is its space, greenery and peace — even in the midst of a huge demonstration, it retains a wonderful feeling of openness and I completely disagree with the addition of ‘multipurpose facilities,’ ‘food,’ ‘retail’ and ‘recreational equipment’ facilities. Restrooms, okay, more would be nice; however, please continue to keep them well to the outskirts of the Mall.”
- “It is time to pay some serious attention to the maintenance of the national mall.”
- “I think that the current handling of the cultural resources is done quite well, and my own main concern is that the NPS work to develop a more collegial relationship with the other agencies concerned, such as the Smithsonian to make it easier to continue to do these things well.”

- “This has been a long time coming and I applaud it.”

Natural Resources

Preliminary Preferred Alternative: Soil, tree and turf conditions would be improved by re-engineering and/or enhancing soils, prohibiting driving or parking near trees, and installing or replacing durable irrigation systems. Sustainable water management strategies would also be implemented to address water quality, water use and re-use, and flood control. Regional coordination would be continued with the U.S. Army Corps of Engineers and other national park units and agencies to address these issues, including concerns for wildlife.

Agree: 48 (11.6%)
 Disagree: 34 (8.2%)
 No Opinion: 333 (80.2%)

Excerpts:

- “Limiting activities, both scheduled and ‘pick-up,’ as well as proper plant selection and soil amendments are needed to restore the greater Mall. Low maintenance materials, such as no-mow/low-mow grasses would save money and be better for the overall environment.”
- “I would like the trees to be kept. They make the visitors feel more attracted to being in the shade versus the hot sun.”
- “I think there needs to be better landscaping. There are no flowers or shrubs on the Mill and it looks bare.”
- “What we do on the Mall is an opportunity for demonstration of preservation and respect of our natural resources. A great place to have gardens and plants that will encourage birds and small mammals — not rats.”
- “I am impressed by the ‘engineered soils that could better withstand intense use’ that will replace compacted soil. That will give grass a fighting chance. Well done.”
- “Consider the use of synthetic turf surfaces for the most intensively used turf sections of the Mall (i.e. the center, non-tree portion of

the Mall between the Capitol and the Washington Monument).”

- “This one is tricky, the natural resource in the area get high visitor use and needs have to be balanced.”
- “Any improvements should be natural and I would hope that the park service could protect the trees without limiting the people from enjoying the Mall.”
- “2 PARKWIDE ACTIONS — Natural Resources See Part 10: ‘Mall (3rd to 14th)’ — re barring Smithsonian Folklife Festivals from the shaded sections of the Mall. These trees and the lawns they shade are a magnificent natural resource right in the urban center. . . .”

Demonstrations and Special Events

Preliminary Preferred Alternative: In order to protect the Constitutional freedom of expression, demonstrations will continue to be accommodated on a first-come, first-serve basis throughout the National Mall. Consistent with federal regulations (36 CFR 7.96), allowable areas include the Lincoln Memorial, Washington Monument, Thomas Jefferson Memorial, and the Vietnam Veterans Memorial. Existing venues for demonstrations, special events, and enjoyment would be improved, and additional forums would also be provided. Permanent infrastructure as well as space for temporary facilities would be developed to protect resources, reduce the impact of annual events and improve event operations. Other proposed measures include a new computer mapping reservation system, the development of intense post-event recovery procedures, and the provision of adequate staff to support national celebrations, events and demonstrations.

Agree: 41 (9.9%)
 Disagree: 52 (12.5%)
 No Opinion: 322 (77.6%)

Excerpts:

- “Functions such as the inauguration and concerts should not be held on the mall, they only tear it up.”

- “Public Responsibility for special events: Integrate the message about the event holders’ and event attendees’ responsibility to remove trash and care for the space they occupy, throughout all literature, all communication from start to finish for all events. If at the conclusion of the inauguration ceremonies for Mr. Obama, Diane Feinstein had asked the gathered crowd to pick up all trash within 2 feet of where they were standing . . . the cooperation would have been enormous. Have kids earn summer credits for acting as tour guides. Have schools integrate in their curriculum kids’ responsibility for caring for the Mall and other Monuments when visiting.”
- “I am relieved by the Plan’s assurances that demonstrations will be basically unaffected. I especially liked the proposal to facilitate media coverage of demonstrations. Freedom of speech, assembly, and protest are essential to my love of country.”
- “A, if not the, primary purpose of the mall should be to provide a place where citizens can assemble and take full advantage of their rights to speak freely in support or opposition to the actions of the government. If the lawn gets trampled, that’s just the cost of freedom.”
- “Demonstrations, while a right, does not mean they have to take place on the mall. To distress the lawns, locations would be rotated, or not held on the mall proper at all. For major demonstrations, deposits would be required to cover the expense of clean-up and disposal. Any other event would require a fee/deposit, based upon utilities or services provided. Trash removal/refuse can supply would be one fee, power and water would be another, and a general deposit to cover damages would be required for ANY event on the Mall.”
- “Please the demonstrations and special events are wonderful to have on the mall.”
- “Great idea to provide more balance in the scheduling and distribution of special events. I understand there is some discussion over the Smithsonian’s Folklife Festival. While I support keeping it out from under the trees, I believe it does need to extend over the 12-day period to make it worthwhile for both the visitors and participants to get the fullest appreciation of it all.”
- “While I agree that it would be good to create ‘event utility infrastructure’ to make it faster and easier to erect and take down tents and stages, I do not agree that the land under the elm trees should be barred to events. I have noticed that events that use tents in the center of the mall (where there are no trees) and the sides (where there are trees) suffer in the center — it is always far warmer there. Events that use the sides with the trees are more comfortable, as the trees are better protection from the sun and provide more cool than the tents. Perhaps the engineered soil mentioned in answer #2 could help mitigate the effect of event participants and visitors on the land under the trees, while allowing event participants and visitors to enjoy the trees and their shade.”
- “Encouraging the scheduling of major events in non-peak seasons (Newsletter 4, page 2, column 2) is a good idea, to take pressure off the resources.”
- “Better management of access is needed to allow for more people to attend special events on the Mall. Cases in point: The limitations on access to the area around the Lincoln Memorial for the Inaugural concert and to the main Mall for the Inaugural ceremony were excessive, and the management of egress after the events should have adhered to the publicly disseminated plans. More openings for entrance and exit to such events are needed and less use of fencing.”
- “In order to plan for these special events, the park service needs to have a better system for maintenance and plan for better access to the events and facilities using better systems of supplementary transportation.”

Public Access and Wayfinding

Preliminary Preferred Alternative: Circulation would be improved to adequately accommodate bicyclists, walkers, and people with disability challenges, while also managing urban traffic more efficiently. Bike racks and bike lanes or routes would be added. Parking meters would be

installed in some places, while options would continue to be explored with city and local parking garages for visitor parking, weekend rates, and valet or shuttle services. Courtesy shuttles and rental scooters could also accommodate the elderly, families with small children, and others.

The National Park Service also supports the long-term vision of the National Capitol Planning Commission, which encourages:

- *the relocation of the I-395/14th Street bridges*
- *a new Metro station near the Thomas Jefferson Memorial*
- *new Metro station entries*
- *midblock crossings on Constitution Avenue*
- *redesigning roadways to improve pedestrian access and connections to and from adjacent neighborhoods and the Kennedy Center*

Agree: 45 (10.8%)

Disagree: 37 (8.9%)

No Opinion: 333 (80.2%)

Excerpts:

- “Improvements need to be made to the infrastructure of the park as a whole. My great uncle served in WWII. After the memorial opened we brought my uncle and his wife to the memorial for the first time. She needs to use a wheel chair for long distances. The only parking we found was down by the Tidal Basin. We had a very difficult time pushing a wheel chair around on the variety of paths — crushed gravel, packed earth and sidewalks. It never occurred to me the Mall would not be fully ADA compliant.”
- “More disabled parking spaces is vital. More regular parking spaces would also be helpful. I like the idea of shuttles for the elderly.”
- “Please do not increase the access of personal vehicles to the Mall. In their place, please increase the access of Metro riders and those on tour buses to the Mall (i.e.: public and mass transport)”
- “Wayfinding is poor, and much of the Mall does not comply with current codes, even though it had been built when the codes were applicable. A universal sign system should be developed for wayfinding, and strategically placed at every opportunity for a pedestrian to travel in multiple directions. These signs need to be designed to fit in with the grandeur of the monuments. As well, architectural entry features should be placed to certain areas of the Mall, such as between the DC War Memorial and the Korean War Memorial, to identify the preferred access points and provide a visual cue for visitors to locate from a distance. Adjustments to signal timing to allow for better pedestrian crossing of streets should also be explored.”
- “I’m 70 years old. When I walk very long I hurt. I need to be able to get close. This is the nation’s front yard. It needs to be accessible to all.”
- “As a resident of a nearby community, with an occasional elderly or handicapped visitor, places like the Jefferson memorial should be more accessible to such visitors. Currently, they need to stand by the car, and look, but since they do not have a wheelchair cannot travel the distance required to see the memorial.”
- “I don’t think people should be able to walk across the grass; it never gets better because it never gets any rest!”
- “Not exactly disagreement but some questions/clarifications: — ‘Parking meters would be installed to make parking more available to visitors.’ I’m not quite sure of the logic behind this statement, but they really should be ‘pay stations’ good for at least 4 hours for adequate sight-seeing time, and that will accept credit cards. — ‘Supplementary transportation could be provided.’ Primary public transportation to the Vietnam, Lincoln, FDR, and Jefferson Memorials really needs to be addressed in addition to anything supplementary. There are many visitors who would take advantage of AFFORDABLE transportation to these locations (not the costly Tourmobile), such as another Circulator loop which could intersect the existing Mall Loop at the WWII Memorial, and go around the Tidal Basin to Jefferson and FDR, on to the Lincoln circle, past the Vietnam Memorial, making all of these far more accessible than they are now. There are many visitors who arrive by public transportation (e.g., train, plane, MetroRail),

and it is shameful that in a city that should be setting examples in public transportation, they can't get to many of our major sites. (The Metro Station at the Jefferson Memorial will help the Tidal Basin area, once it gets built, but that is not a short-term solution and still won't get people to the memorials at the west end of the area)."

- "Better signage is definitely in order but let us not over do it. Maybe people rather than signs can answer visitors' questions."
- "I like the idea of bike lanes and improved public transportation access."
- "Installing parking meters might 'make parking more available to visitors', but it could have the unintended consequence of encouraging even more people to drive to the Mall area. I don't know if underground parking near the Mall would be feasible from several viewpoints (engineering, security). But assuming it is, this would also seem to serve to encourage more people to drive to an area that is already congested. In addition to working with the city and local parking garages, consider using the existing surface parking at RFK Stadium as part of the approach to managing parking issues on the Mall. There is ample parking ready and waiting to be used at RFK, and a Metro station that could have people on the Mall in a few minutes. This option uses existing infrastructure, and probably could be implemented fairly quickly. Longer term, evaluate constructing a parking garage on Hains Point. A parking garage at this location would have easy access on/off from I-395, remove traffic from the Mall area, yet it would be a short walk or shuttle bus trip to the Mall. Update the 'Tourmobile' into a modern shuttle system with a lower base cost for users. A shuttle service specifically dedicated to serving visitors to the Mall area sites (including Arlington National Cemetery) is necessary, but the cost needs to be reasonable. It's hard for a family on a budget to afford the current rates. Instead of having a live narrator on board, maybe visitors wanting to have a detailed narrative description could have the option of renting a small portable device with earbuds. This narrative description would also be available in

multiple languages to serve non-English speaking visitors. Continue to work with city agencies to address tour bus issues, but keep an appropriate balance in decision making between tour bus users and issues and non-tour bus users and issues."

- "Bike lanes are important — keep walkers/runners safe from bikers; keep bikers safe from vehicles. Parking on Madison/Jefferson should be metered or in some way restricted beyond current signage. Off-Mall parking should be encouraged."
- "Great idea to expand 12th street accessibility."
- "I agree that there needs to be better access for parking with a better shuttle service. Having been there with disabled elders, it is very difficult to compete for parking. You can't always just drop off disabled persons and expect them to fend for themselves while you park a mile away. Maybe there needs to be more disabled zones and underground parking for most visitors. I think the idea of scooter rentals is a good idea. I know when we visited that wasn't available and made it more difficult for us to visit the Smithsonian museums. Even having more Metro stops would help."
- "Separate bicycle lanes from walking lanes somehow; definitely separate bikes from cars buses."

Visitor Information, Education and Enjoyment

Preliminary Preferred Alternative: Orientation, wayfinding, and information services would all be improved. Visual sign clutter would be minimized and clear, multilingual information would be provided at key entry points, intersections and corridors. Additional educational waysides would be installed in key locations, and the number of roving rangers and variety of guided tours would be increased. Improved technology would continue to facilitate improvements in communication networks, mass notification systems, program and activity listings and other coordinated information networks. Necessary infrastructure would also be added or improved at the D.C. War Memorial, the lower approachway to the Lincoln Memorial, and at the

Thomas Jefferson Memorial plaza in order to facilitate continued entertainment options at these locations. Small-scale performances and events could also be accommodated at new visitor service areas and multipurpose facilities. Permitted league sports and informal recreational activities would continue, and existing commercial recreational ventures could be diversified and expanded. Connections to nearby recreational facilities would also be enhanced via trail connections and continued off-site bike rentals.

Agree: 41 (9.9%)

Disagree: 32 (7.7%)

No Opinion: 342 (82.4%)

Excerpts:

- “I think it’s great to give out maps, guided tours, and educational info. All of the above can only improve a visitor’s experience.”
- “Remove ‘entertainment’ opportunities away from all monuments and memorials. Provide a specially designed space to be programmed and scheduled by NPS permit at a location appropriate for such activities. In order to preserve a level of reverence and decorum, this location is to be a distance away from any war memorial or monument. From independent research, most visitors do not want or appreciate additional distraction when visiting a memorial or monument, it is enough to see the memorial or monument in person. Any athletic activity is not to be permitted on what is currently the JFK Hockey Fields. With the opening of the WWII memorial and the proximity of the Korean War Memorial, this is no longer an appropriate place for such activities. This is especially critical for the organized field hockey or soccer, or rugby tournaments held on these fields. The noise from whistles, cheering of the crowd, and the often profanity laced players is very disrespectful less than a 100’ from a memorial to war dead. Let alone the decorum of the attendants to these activities while within the memorial spaces. The DC War Memorial has been treated like a snack bar in tournaments past (I have photographs). Men who have fought in these wars have more than earned the right to visit these memorials at any time and grieve in peace, without distractions from such a trivial activity. Especially when the fields in West Potomac Park are close, and almost completely unused during these tournaments.”
- “People need to know what the mall has to offer.”
- “There should be visitor information stations at both ends and at the middle of the Mall so that people can ask questions and get directions. It would help all of our tourists and provide volunteer opportunities.”
- “Again, not disagreement per se - Keeping ‘visual sign clutter’ down is critical. There are numerous references to ‘educational wayside exhibits’ throughout this PPA: I hope they are being planned in accordance with the concept of minimizing sign clutter. — In addition to the ‘roving rangers’ what about a volunteer corps to help tourists during high season? It would require training and coordination (and some sort of ‘uniform’ — even just tee or polo shirts), but the types of questions that tourists have (restaurants, directions out of town, off-Mall sites, etc.) indicate a need for people, not just signs. The volunteer corps could offer service hours needed by high school students for graduation, or even tap into the city’s summer employment promise for teens, as well as draw on the Washingtonians who would be interested in showing off their city. — ‘Opportunities for entertainment’ especially at the Jefferson and the lower approachway to the Lincoln Memorial are problematic because of the flyover noise from planes approaching DCA. I’d put this way low on the expenditure list. — Bike trails also need to coordinate with routes across Memorial Bridge to Arlington National Cemetery and on to Pentagon 9/11 memorial. There are major hazards to cross the road at either end of the bridge, and to link up with the Rock Creek Park bike path.”
- “Reducing visual sign clutter and improving orientation are good ideas (page 2, column 5). So are multi-lingual signs, readable at night (without, I trust, adding to light pollution). In light of an article in the March 16, 2009 Washington Post (Metro section, page B1), it may be necessary to have signs identifying iconic memorials, even though

most of us know what they are and where. It's good that no additional visitor centers are proposed (page 2, column 6). There is no need for any more of these — whether a building is above or below ground, it results in desecration of the landscape, and use of limited space. Try to ensure (page 2, column 6) that additional information signs and waysides do not lead to additional grass trampling. You say 'current commercial recreation activities could be diversified or expanded' (page 3, column 1). I can see diversifying these activities, space and impacts permitting, but expanding them would undoubtedly require more space and more impacts upon the resources, and I would recommend against such expansion."

- "I'm not sure what is meant by meant by 'small scale programs or entertainment could be used as ways to enhance the pedestrian experience.' I hope this doesn't refer to having jugglers, mimes, face painters, etc. along the Mall. I like that the Mall is available for recreational activities, but organized leagues (particularly softball in the spring and early summer) are a growing safety hazard along the Mall, especially from the Capitol to the Washington Monument grounds. Many of the softball games take place very close to the main walkways along the Mall and the Monument grounds, and frequently the game action and players spill into the walkways. There's a bad accident waiting to happen out there. Someone is going to get seriously hurt by a line drive, or run over by players chasing a ball. I realize there is limited space to accommodate everyone that wants to use the Mall for all kinds of activities. However, it's dangerous for some of the league activity to occur so close to, or actually in, these main walkways."
- "The ability to provide access to information on activities happening beyond the National Mall--in the District of Columbia and the region--should be called for in the National Mall plan. Unlike most of the major national parks--e.g., Yellowstone, Yosemite, Glacier--the National Mall lies in the middle of the fifth-largest Metropolitan Statistical Area (MSA) in the country. Attractions and activities complementary to the National Mall visitor experience occur at locations

within short distances of the Mall--at other federal facilities, the Smithsonian Institution, other museums, arenas and ballparks and public and private spaces. While the National Mall Plan is on target in calling for improved facilities for visitor information, education and enjoyment, the plan is lacking in calling for a widened focus in what is promoted and how. The National Park Service should collaborate with Destination DC, the Downtown BID and other organizations to provide excellent visitor information rather than continuing its narrow focus on National Mall-related attractions and activities."

- "Great idea to add the visitor's plaza at the Smithsonian Metro entrance."
- "I agree that you need to have information sites outside the buildings but some visitor centers are using electronic equipment to replace signs and are even using an individual's personal cell phone for guided tours. More environmentally friendly."

Visitor Amenities

Preliminary Preferred Alternative: Coordinated, high-quality, timeless facilities and furnishings would be provided, including trash/recycling containers, curbs, signs, drinking fountains and restrooms. More seating opportunities and shaded locations would be provided for visitors, as well as attractive multi-purpose visitor facilities and additional high-quality food service options. A coordinated, sustainable and durable paving system would also be developed and installed for all sidewalks, walkways and crosswalks. The National Park Service would also work closely with partner agencies to re-establish the lighting task force and to develop a comprehensive lighting strategy for the monumental core.

Agree: 47 (11.3%)
 Disagree: 29 (7.0%)
 No Opinion: 339 (81.7%)

Excerpts:

- "I think any person who wants to vote against this section should first have to chaperon a Second Grade field trip down to the Mall first. When you are there with little people, you realize the vast open spaces and bathroom free distances. Up on the museum

end, you have plenty of options in the open to the public buildings to use the facilities- once you try to cross to the Washington Memorial- you are all on your own.”

- “More permanent public toilet facilities, not porta-johns.”
- “A sufficient number of permanent well kept restrooms needs to be provided.”
- “The food concessions have a monopoly on the tourists’ dollars. Why not take a hint from the new Nationals stadium and offer local favorite restaurants the opportunity to run (or feature their foods) at the concessions? GSI is pretty awful. Cupcakes from Cake Love, a half smoke from Ben’s Chili Bowl, ice cream from Gifford’s?”
- “More CLEAN bathroom and water facilities are a must.”
- “Restrooms, yes. Food, no.”
- “More seating areas and restrooms are needed. It is hard to find one when you have disabled people with you.”
- “I agree that more bathrooms need to be added and food available, especially beverages during the summer. Tourists use the Smithsonian buildings for bathroom and food all the time.”

Health, Public Safety, and Security

Preliminary Preferred Alternative: To enhance pedestrian safety, street crossing signals would be longer and crosswalks would be improved. Midblock crossings, larger waiting areas, walkway lighting and emergency call stations would also be designed and installed. A mass notification system would be developed in case of emergencies, and an increased number of interactive water features would provide relief in hot weather. The National Park Service would also work with city agencies, districts, and Congress to address the causes and impacts of homelessness.

Agree: 44 (10.6%)

Disagree: 29 (7.0%)

No Opinion: 342 (82.4%)

Excerpts:

- “I think uniformed and undercover officers/ staff are a great idea. I think security cameras would be a good addition as well. As for lighting, so as to not take away from the memorials, I think overhead lighting (like street lamps) should be eliminated in favor of hip-high lights that light the walkways, but don’t interfere with building/memorial lighting.”
- “The Mall must be safe. There is no usability without safety.”
- “. . . have more presence of park police, especially at night.”
- “Working to alleviate problems caused by the homeless and transient population is admirable.”
- “Many of the items listed are valid, but some are not. Mid-block pedestrian crosswalks by-and-large are very dangerous and should not be implemented at any time. In place of longer signal times for pedestrians, implement a pedestrian cycle into the signal pattern. By utilizing this system, pedestrians would cross all the roads in an intersection at one time, preventing a build-up of people on the corners waiting to cross a perpendicular street. Also, this allows turning vehicular traffic unobstructed movement into the intersection without having to stop for crossing pedestrians, creating better traffic flow for both vehicles and pedestrians. As well as park police, one ranger should be in every memorial at all times, or at the very least, be watching via camera. Much of the time, they are in their ‘ranger huts’ while people are wading in the WWII Memorial Fountain, riding bicycles through the memorials, or climbing where they should not be. I’ve seen veterans yelling at other tourists at the memorials because no police or ranger is present to control the public. Coming from a background in which I had designed large water theme parks, the addition of an interactive fountain would be expensive, a maintenance nightmare, and a health liability. Fogging systems would be more effective and more universally accessible than an interactive fountain.”

- “NPS needs more funding for security. There have been several violent crimes on NPS grounds in the past few summers. I used to hang out at the monuments with friends in high school. It should always be safe, safer than other places.”
- “I strongly agree that interactive water features should be added.”
- “There should be water fountains on the Mall to enable people to have a drink when it’s hot and dusty. People shouldn’t always have to buy water on the Mall in order to slake their thirst. It would be much more user-friendly and might even eliminate some of the discarded plastic water bottles that have to be picked up.”
- “I assume that the ‘upgraded communications network’ would permit coordination among the NPS, the DC police, the Capitol Hill police, and whatever other law enforcement agencies need to be included.”
- “In addition to mass notification capability, a related issue is shelter for visitors in case of weather or other emergencies. The Smithsonian museums are potentially available as shelter between 10 am – 5:30 pm, and there need to be contingencies outside of these hours.”
- “Since I am from the west, I like the idea of water features since the humidity is overwhelming if visiting in the summer. Since you can’t have vendors on the streets it makes it difficult to find water if you have a disabled person.”
- “7 PARKWIDE ACTIONS -- Health, Public Safety, and Security. See Part 10: ‘Mall (3rd to 14th)’ — re. barring Smithsonian Folklife Festivals from the shaded sections of the Mall. I would not send elderly friends or those with small children to that location if the shade trees did not relieve the periods in the sun. To bar these areas would increase dangers of heat prostration and skin cancers, cut sharply into the numbers of people who attend despite the hot and sometimes exciting stormy weather that recurs without fail at the end of June and early July every year.”

Park Operations

Preliminary Preferred Alternative: Deferred maintenance would adequately be addressed to improve conditions, and a visual quality team would continue to prioritize projects that improve the appearance of the National Mall. New facilities would be high-quality, environmentally sustainable, durable and easy-to-maintain. Recycling, waste management, and restroom cleaning would be improved, and standardized recirculation systems would be installed in all water features. Renewable energy sources would be sought for lighting and other electrical systems. An attractive, lightweight fencing system would be designed for rehabilitation and restoration of natural and cultural resources.

Agree: 34 (8.2%)

Disagree: 30 (7.2%)

No Opinion: 351 (84.6%)

Excerpts:

- “In addition to renewable energy, using LED lights uses less electricity and saves cost.”
- “I am embarrassed by the current lack of recycling bins on the Mall and in the District. During peak tourist season I see regular trash cans piled high and overflowing with empty water and soda bottles. Since there is not a lot of affordable food sold on the Mall, barely another piece of garbage is visible in the cans, just water bottles and the occasional popsicle stick. And DC comes to haul it all to the landfill. This is embarrassing for the Nation’s Capital and harmful to our planet. I am glad to see that recycling is part of the plan. But it is unclear to what extent. However, the receptacles must be easy to use and numerous (next to each trash can). These kinds of bins would send a message to international and domestic visitors. Please see Chicago’s ‘Chicago Recycles’ blue bins. They are ideal in that they send a message to all visitors (I first saw them in the airport) and they are easy to spot and difficult to put other trash in. I know that sales of water bottles are important to the park and its vendors, but it sends a backwards message. Could refillable water bottles be sold in the gift shops instead? I propose water bottle filling stations next to drinking fountains for refillable water bottles.

Many people carry them these days and they are unlikely to be strewn about the Mall.”

- “Need to build public feeling of investment and ownership of Mall. Start with the DC schools. Create a project whose tasks routinely require participation on a mandatory volunteer (that’s right) basis from scheduled DC schools. It may be routine maintenance, or routine park guides (this would help kids prove they know their history). Link that to school credits for History or other school curricula. Earn summer credits for acting as a tour guide. Have schools integrate in their curriculum kids responsibility for caring for the Mall and other Monuments when visiting. Integrate trash pick up message in all park visitor signs and literature.”
- “I support taking care of deferred maintenance (page 3, column 4). The Mall is, to my way of thinking, sacred national ground, and needs to be taken care of no matter what else is happening.”
- “Increasing trash removal and restroom cleaning to cover hours of visitation is good.”
- “Don’t accept second rate architecture just to be ‘green.’”
- “Replace the trash bags tied to stakes around the Washington Monument with suitable and attractive containers.”
- “Renewable energy should be used. Having alternative work hours would lessen the impact on visitors.”

SPECIFIC NATIONAL MALL AREAS

Union Square (1st to 3rd Streets)

Preliminary Preferred Alternative: The Grant Memorial would be restored and would become the focal point of a re-designed civic square that could better accommodate events and First Amendment demonstrations. The Capitol reflecting pool would be removed, but the Union Square re-design would include reflective and interactive water features that highlight sustainable water management practices. Pedestrian circulation, viewsheds, and connections with the surrounding areas would all be improved, for example with crosswalks on 3rd Street. A small indoor/outdoor refreshment stand

would provide seating, shade, refreshments, educational exhibits and flexible, high-capacity restrooms.

Agree: 22 (5.3%)
Disagree: 36 (8.7%)
No Opinion: 357 (86.0%)

Excerpts:

- “I love the Capitol reflecting pool and disagree with the plan to remove it. This large expanse of water with its visiting gulls and ducks brings a seashore-like feel to my daily commute. I walk from Union Station to 4th C Sts SW and back each day—perhaps the nicest walk I know of in downtown Washington—and the Capitol reflecting pool is its highlight. When it’s dark outside, the pool beautifully reflects the city lights, and on bright days, its sunlit ripples transport me far away from the urban scenery. I love the panorama, standing by the statues, looking out at the reflecting pool’s image of the open Mall and the Washington Monument. I feel inspired, ready for another day at work. Even at 6:30 a.m., I’m never alone. Numerous people walk and jog around the pool every morning. Later in the day, it’s a relaxing spot for tourists. This large area of open water counterbalances the buildings and other man-made structures better than any amount of turf or gardens could. I can’t imagine how any interactive water display could come close to what I experience and love about the Capitol reflecting pool. Please preserve it!”
- “Pave the pool but keep the area green with grass and trees. It must be an open gathering place for First Amendment events to hear the speakers etc. The speaker platform should be set up across the street at bottom of Capitol Hill. The way it is done for the Washington Symphony orchestra on July 4 — only facing west, not up the hill toward the Capitol.”
- “This would be the primary public performance place on the Mall, as it is far away from anything. Adding more to the hardscape would make this the ideal place for demonstrations, as it would not stress the grass on the Mall, and allow for utilities to be in place and easily accessible. The reflecting pool should be renovated, and perhaps enhanced with fountains/lighting to enhance

the space. Better pedestrian connections to the rest of the Mall are an easy fix, and surprisingly have not been done in the last 30 years or so, given the obvious desire lines that are re-sodded at least twice a year. It is also suggested that this space be taken out of the control of the Architect of the Capitol, as their recent design and construction quality, let alone maintenance, leaves a lot to be desired.” [Clarification: Union Square is currently managed by the National Park Service, not the Architect of the Capitol.]

- “Fixing up Union Square for First Amendment demonstrations (page 3, columns 5-6) is a good idea — it will take some pressure off grass areas.”
- “Instead of removing the Capitol Reflecting Pool, consider redesigning that area into a shallow water feature that retains the current reflecting quality, but could be easily and quickly drained if the area is needed for event use. The idea of flexible, high capacity restrooms is good, and should be considered at multiple locations along the Mall.”
- “Agree with most but there is a significant point of disagreement. I think there should be some way to maintain and upgrade the Capitol reflecting pool or install something more akin to it than the preferred alternative proposes AND include a removable cover that can be used to cover the water when demonstrations and events there require it.”

Mall (3rd to 14th Streets)

Preliminary Preferred Alternative: To improve conditions and better accommodate First Amendment demonstrations and other events on the Mall, the historic landscape would be improved and protected. Compacted soils would be removed and re-engineered; drainage and irrigation systems would be installed; social trails would be reduced; and park furniture and interactive water features would be provided. To protect the historic American elm trees along the pedestrian promenade, temporary event facilities would no longer be allowed to set up within those panels, although First Amendment demonstrations could still make use of these spaces.

Agree: 18 (4.3%)

Disagree: 304 (73.3%)
No Opinion: 93 (22.4%)

Excerpts:

- “While I agree with additional parking meters on Jefferson and Madison Drives to make more access, I would strongly disagree with the long term plan to eliminate parking on those streets. I do not believe that you need more speedy traffic flow on those busy parts of the Mall.”
- “In conjunction with the Dept. of Agriculture, or leading agricultural universities, the Mall could be a final proof of hardiness for certain traffic resistant grasses. Think how stimulating to the agricultural/horticultural/turf industry it would be for a company to show the hardiness of their grasses and grass seeds, that they stood up to the rigors of Mall use. Please collaborate with the seed companies to identify the best grass seeds for this purpose.”
- “Better management, as well as complete redesign of paving and soils are required. Better pedestrian continuity is also needed. The use of a pedestrian cycle in the signal timing is necessary to facilitate pedestrian safety and movement, as well as vehicular traffic. STRICT policing of areas set off limits for restoration/re-growth is needed.”
- “Keep it green and ensure its open space.”
- “This section and the previous refer to the elimination of ‘social trails.’ However, these pathways should be taken into consideration when formal paths are laid out. ‘Social trails’ are created for a reason: people take the most direct or convenient route, and will continue to do so, if the formal paths don’t work for tired tourists. — A welcome plaza would be an excellent location for some of the trained volunteers to be stationed. — I assume WMATA has plans to cover the escalators at this Metro entrance someday, otherwise this should be included in this plan. — Glad you’re getting rid of that nasty gravel stuff on the main paths of the Mall. — ‘Parking meters would be installed to make parking more available to visitors.’ Again, I’m not quite sure of the logic behind this statement, but they really should be ‘pay stations’ good

for at least 4 hours for adequate sight-seeing time, and that will accept credit cards.”

- “I think the tree panels should be off limits to First Amendment demonstrations as they are to other special events. There is certainly plenty of other space available for First Amendment activities. . . . My recommendation is to do it right; find out the detailed specifications used for the paths in the Tuileries and use identical materials in a test area to see if the scheme originally dreamed of will work on this side of the ocean and if it does, redo all the paths with identical materials in the same proportions as at the Tuileries instead of paving them with a masonry material or asphalt or concrete (heaven forbid). . . . Parking meters are old fashioned. It makes more sense to have the parking kiosks so people can use credit cards. . . . Since you mention the Smithsonian’s carousel here, I will put my comments about a play area for toddlers and pre-kindergarten children here.”

Smithsonian Folklife Festival:

- “As a visitor to the Folklife festival all my life, I am well aware of how hot it can get during the duration of the festivals. Keeping the Folklife festival from using the wooded areas would negatively impact the festival overall by forcing the workers and visitors to remain in the hot sun if not protected by a tent. It would also limit the amount of space possible to use, thereby limiting the amount of cultures represented at the festival.”
- “The only scientific, peer-reviewed study of the trees of the National Mall found that the Smithsonian Folklife Festival had no negative impact on soil quality or the health of the trees. I have assisted elderly persons and children attending the world-renowned Festival into the comfortable shade of these trees many times over the years. NPS plans to relocate this year’s festival away from the trees are not only misguided, they pose a clear danger to public health and safety.”
- “I feel that the area under the trees is vital to some events that are held there. People should be able to gather in this area as long as they are respectful and take care of the area.”
- “Though the plan to improve soils and drainage systems for improvement of the elm trees on the Mall is good, I am concerned about prohibiting events such as the Smithsonian Folkway Festival from setting up activities under the trees. There should be procedures that make it possible to promote public health, safety, and learning by keeping culture and the American people under the Mall’s trees.”
- “When I was a teenager growing up in Rockland County New York, one of the big events of the year was the rinky dink traveling carnival that set up next to the firehouse. Everyone was there cruising around the warm summer night, throwing balls at Kewpie dolls, riding the rides, all delighting in a cotton-candy-fed ritual of community affirmation—though we didn’t know it at the time. The Folklife festival has something of that feel, a little more refined perhaps, but just right for the place: loose, gay, filled with little amusements telling us something happy about who we are, and who we are when we come together. Now the carnival is gone, zoned out of existence, and we’re left with a shopping mall and a long easy slide into becoming a much more anonymous sort of people. So I say let’s keep the Folklife Festival going! Man the barricades, save the trees, we have precious few rituals left. Especially fun ones.”
- “As mentioned earlier, consider the use of synthetic turf surfaces for the most intensively used turf sections of the Mall (i.e. the center, non-tree portion of the Mall between the Capitol and the Washington Monument). In attempting to reduce social trails, please resist the temptation to put up posts and chains along every inch of the Mall. The idea of a welcome plaza near the Smithsonian Metro entrance is good. Maybe operate this welcome plaza in partnership with the Smithsonian, Agriculture Department, DC Tourism, etc. Removing the gravel on the Mall walkways, and improved pedestrian lighting are good proposals. The proposal notes installing parking meters on Madison and Jefferson Drives. Was installing meters on Constitution Avenue considered? Construct ‘small, architecturally compatible’ restrooms near all the current refreshment

stands, not just the Air and Space Museum stand. In addition to a high capacity restroom north of the central grass panel near 12th St., consider building similar restrooms near 4th St., and between 7th and 9th St.”

Washington Monument Grounds

Preliminary Preferred Alternative: The Washington Monument is the primary visual orientation point for the National Mall; therefore, views to and from the monument would be protected and improved. Additional space and some event infrastructure would be provided in the northeast, northwest and southwest corners of the monument grounds in order to better accommodate demonstrations and other high-volume events. South of Independence Avenue, roads, parking, bike lanes and pedestrian circulation would be re-designed to enhance safety, reconnect park areas and increase recreational opportunities. A separate system of dedicated bike trails would also be constructed. A new high-quality, permanent visitor facility would replace the existing temporary one and would provide food service, retail, information, educational waysides and restrooms. The facility would replace the Sylvan Theater and could accommodate audiences up to 3,000 for performances, programs and events. Survey Lodge would also be adaptively reused for other services, parking for visitors with disabilities, and possibly recreational equipment rentals.

Agree: 31 (7.5%)

Disagree: 33 (8.0%)

No Opinion: 351 (84.6%)

Excerpts:

- “I have marked disagree, because I strongly object to the removal of the Sylvan theater. It is part of the history of the Mall and should be maintained. I do strongly agree however with making more parking for the disabled available. The lack of disabled parking on or around the Mall is a very real problem.”
- “Give recognition in overall design of the location of the Jefferson Pier, where axis of Virginia and Indiana Avenues intersect (and where Virginia ‘bends’ a little), also on the north/south axis of White House/16th Street/Jefferson Memorial; this is where the Wash Monument would have been built had soil conditions allowed. Also, make sure that

the signage for roadways reflects name of L’Enfant Avenue even as its right of way is within the area between Constitution and Independence Avenues. This would include (but currently unsigned) Indiana and Virginia Avenues connecting 14th and 15th near the Washington monument.”

- “Sylvan Theater at the Washington Monument is to be removed and not replaced. Public performances spaces are to be built away from any memorial or monument to preserve decorum on the Mall.”
- “Needs to be better signage at the Monument and directing people to the Monument. I agree that the Sylvan Theater should be removed. It’s hardly ever used.”
- “Bike trails need to link to paths crossing Memorial Bridge. — While I agree that Sylvan Theater needs to be upgraded to take advantage of current technology, and that the area can be expanded for public restrooms and ranger offices, the current description of the facilities makes it sound like another Carter Barron Amphitheatre. This may not be the intent, and I certainly hope it isn’t, as this site seems best suited for smaller performances, with informal grass seating on the hillside.”
- “I think that the Sylvan Theatre should be kept ‘as is’ — rustic, a bit creaky, and one-of-a-kind.”
- “I do not like the little security box that was fastened to the east side of the Monument, and I am not particularly happy about the two-foot walls breaking up the lawn. People can get over them and sit on them, which is okay, but small animals are effectively blocked.”
- “Extending the Monument hours to 10 p.m. during high use season is great. I hope the high use season includes the spring time because that’s when it can be really difficult to visit the Monument. More details are needed about some of the proposals. An example is ‘roads and parking would be redesigned south of Independence Avenue to reconnect park areas and to enhance safety and recreational opportunities.’ That sounds good in concept, but without more details it’s difficult to make specific comments. More

details are needed about the new multipurpose facility. The Sylvan Theater and the nearby restrooms definitely need to be replaced. But a new facility with food service, retail, information, exhibits, restrooms, performance space, operations space and ranger offices sounds like it could have a big footprint in that area.”

- “Why remove the Sylvan Theatre and replace it with another theatre? Is there a high demand for theatres on the mall? It is hard for me to believe that a new theatre would get any more use than the current building.”
- “Improving pedestrian connections between the monument tidal basin would be visually appealing as well as improve safety; bike lanes along independence ave might work well, although frequently buses park on the right side.”

World War II Memorial

Preliminary Preferred Alternative: No major actions are proposed for the World War II Memorial.

Agree: 24 (5.8%)
 Disagree: 25 (6.0%)
 No Opinion: 366 (88.2%)

Excerpts:

- “Being new I thought this area was very well done”
- “The disabled parking, drop off and the providing of wheel chairs is very beneficial.”
- “Renovate and expand the restrooms. Although they are relatively new, they are undersized and frequently in need of repair.”

Constitution Gardens

Preliminary Preferred Alternative: The Potomac Park levee would be redesigned and upgraded, and Constitution Gardens Lake would be rebuilt with self-sustaining circulating pumps, nonpotable water, and an adequate filtration system. Landscape conditions would be improved to include upgraded walkways and improved operational access. Some walkways would also be widened to accommodate small events. Recreational opportunities would be increased in ways

that do not conflict with nearby commemorative spaces. A multipurpose facility at the east end of the lake would have a unique indoor/outdoor garden character and would offer food service, restrooms, education exhibits, a bookstore, equipment rentals, and space for partner activities. A flexible performance space, stage, or gazebo would also be located towards the east end of the lake to host performances and events that are respectful of nearby memorials.

Agree: 24 (5.8%)
 Disagree: 25 (6.0%)
 No Opinion: 366 (88.2%)

Excerpts:

- “Why do you think it’s necessary for so many theaters/stages. While a couple seem acceptable, having one near/at every major destination seems, to me, to be disrespectful to the memorials and the people visiting them. Memorials are supposed to be quiet places for people to reflect, and putting concerts there, seems to go against the point of a memorial in the first place.”
- “Reconcile plan with forthcoming 17th Street flood levee.”
- “Constitution Gardens, while in need of repair and repaving, would be an ideal space for another large scale monument. The idea of providing a performance space here is valid, but its proximity to the WWII and Vietnam War Memorials makes this less desirable. It should be restored and water quality improved. Its pastoral pathways make it idea to place small monuments/statuses around its perimeter, perhaps on a rotating basis such as the statues in the Capitol.”
- “If people want to bring their boats or fishing rods (‘catch and release’) to the Constitution Gardens, fine, but I would hate to see a vendor renting out this equipment, which would disturb the tranquility of these venues. I also would disagree that the Gardens should be allowed to be a venue for smaller events, so if that means disagreeing that ‘some walkways [should be widened to create venues for smaller events (exhibits and performances),’ so be it. Also, I don’t think that that the Canal Lockkeeper’s House should be re-situated. The National Mall is

not an amusement park, where you place activities for the convenience of the customers. The point of the Mall is to review our history, and our future, and you can't do that if you're engaging in revisionism. . . . I refer to your proposal '[t]he historic canal Lock-keeper's House, which would be relocated away from the corner of 17th and Constitution Avenue NW, would be adaptively reused in conjunction with the new facility.'"

- "Food service — a warm-weather restaurant complete with tables chairs will fit this area well. Please provide more than burgers, fried chicken, hot dogs, ice cream, popcorn, sodas!! There are kiosks around Washington that sell far more than that at lunchtime."

Vietnam Veterans Memorial Grounds

Preliminary Preferred Alternative: The only significant change recommended for this area includes the addition of adequate seating near the memorial wall for rest and contemplation.

Agree: 25 (6.0%)
 Disagree: 23 (5.6%)
 No Opinion: 367 (88.4%)

Excerpts:

- "I really thought that the elegant, haunting, simplicity of the wall was enough and still dislike all of the statuary added later."
- "This memorial area is already getting too cluttered and away from the simplicity and drama of the original design. As there is going to be a new visitor's center, I object to adding 'educational themes' — I assume as some form of signage - to this area."
- "Please do not disturb the tranquility and reflection of this magnificent memorial by adding any more seating, explanation, or anything else near the 'V.'"

Lincoln Memorial Grounds

Preliminary Preferred Alternative: The exhibit area, restrooms and bookstore would be renovated and expanded. The lower approachway would be rehabilitated, and the reflecting pool would be re-built using a nonpotable water source

to improve water quality, create recirculation, and reduce the total volume of water used. A new paved walk alongside it would be accompanied by a soft-surface trail for jogging, and the elm walks would be repaved to reflect the coordinated paving system throughout the Mall. Permanent light fixtures would also be installed for pedestrian safety and would not interfere with memorial lighting. A new architecturally compatible restroom would be added near the south concession stand, and information facilities would be rehabilitated. Future road projects that simplify traffic patterns and improve pedestrian connections to adjacent areas would also be supported.

Agree: 25 (6.0%)
 Disagree: 15 (3.6%)
 No Opinion: 375 (90.4%)

Excerpts:

- "At the Lincoln Memorial, the suggested improvements are valid. However, the placement of future memorials near the Watergate Steps in the traffic medians leading to Georgetown is poor. This area would not be visited as much, and the passing traffic would be a terrible distraction. As well, because of the traffic, pedestrian circulation here would be very poor and at time, dangerous. Whatever memorials are to be located here, can be located elsewhere on the main areas of the mall."
- "Need true public transportation — e.g. Circulator Bus — down to this area."

Korean War Veterans Memorial

Preliminary Preferred Alternative: Walkways on the west side of the Memorial would be widened to better accommodate pedestrian circulation and group visitation. Pedestrian connections between the memorial, the Lincoln Memorial reflecting pool, and Independence Avenue would also be improved.

Agree: 28 (6.8%)
 Disagree: 12 (2.9%)
 No Opinion: 375 (90.4%)

Excerpts:

- "Keep it in better repair."

- “As with the other memorials, somewhat of a concern over sign clutter with yet more ‘educational themes.’”
- “If you plan to improve pedestrian connections with the Korean War memorial (page 7, columns 4-5), try not to widen the walks too much. Six or 8 feet might be an appropriate width; 12 feet would be excessive, in my judgment.”

D.C. War Memorial

Preliminary Preferred Alternative: The D.C. War Memorial and grounds would be rehabilitated and utilities upgraded to continue the memorial’s historic use as a bandstand.

Agree: 24 (5.8%)
 Disagree: 15 (3.6%)
 No Opinion: 376 (90.6%)

Excerpts:

- “The memorial is to be restored as suggested, but its only use would be that as a bandstand with historically appropriate music, its original intent. Any other performances would be held elsewhere.”
- “Personally, I believe it needs to be renamed to simply ‘The WWI memorial.’”
- “I agree with the proposed improvements around the D.C. War Memorial, but do not want to see any tree cutting in the name of ‘rehabilitation of the grounds.’”
- “It needs fixing up desperately.”
- “The walkway around this is very uneven and dangerous.”

Ash Woods

Preliminary Preferred Alternative: U.S. Park Police stables would be rebuilt to be compatible with the historic character and quality of the National Mall. The paddocks would be made part of the educational experience, and educational waysides would describe the U.S. Park Police and horse patrols. A new stables parking area and vehicle access road would be constructed, and the present Ash Woods road would become a pedestrian walk. Seating and pedestrian lighting would also be provided. The existing Ash Woods restroom

would be demolished and replaced an architecturally compatible restroom facility.

Agree: 24 (5.8%)
 Disagree: 12 (2.9%)
 No Opinion: 379 (91.3%)

Excerpts:

- “I didn’t know the stables were here!”

Tidal Basin Area

Preliminary Preferred Alternative Redesignped pedestrian circulation and parking would create a more successful sense of arrival at the Tidal Basin. A system of separate, dedicated bike trails would be developed, and the pedestrian experience would be enhanced by better lighting, high-quality paving, additional seating and more scenic stopping points. The Tidal Basin seawalls would also be rebuilt to a level above tidewater, which would involve designing wider walkways and improving circulation. Recreational boat service via rowboat, canoe and kayak rentals could provide access to the Franklin Delano Roosevelt Memorial, the Jefferson Memorial, and the future Martin Luther King, Jr. Memorial. The existing refreshment stand would also be replaced with a newer, compatible facility.

Agree: 31 (7.5%)
 Disagree: 13 (3.1%)
 No Opinion: 371 (89.4%)

Excerpts:

- “The Tidal basin needs new sidewalks. It is suggested that curbs be placed to the planting side of the sidewalk to discourage pedestrians from trampling the roots of the cherry trees, as well, a 4” high curb would be required along the water side of the walk to be in compliance of the ADA/ANSI standard for accessibility. Guards are not suggested unless required by code (water level must be on average 30” below the walking surface level).”
- “Would you please also clean up the dead fish that float on the surface and seem to collect around the edges of the basin?”
- “The Tidal Basin area and East and West Potomac Parks should have better signage to indicate rare varieties of Cherry Blossoms. The sidewalks in East Potomac Park should

also be repaired as many are not level and are even covered by water.”

- “More visible signs about not messing with the trees and new caution signs about the danger of having children running around the Tidal Basin. I have seen too many parents who allow their children to run free and I’m always afraid that one of them is going to fall into the water since there’s no barriers around the Basin.”
- “The alternative notes that parking would be redesigned. Does the parking redesign include installing meters in the Tidal Basin lot? I agree with rebuilding the Tidal Basin seawalls above tidewater. The alternative notes separate bicycling lanes and wider pedestrian walkways, resulting in a ‘slightly smaller’ Tidal Basin. More details re: size of lanes/walkways, and the resulting reduction of the Basin, would be helpful in making specific comments. I realize compaction around the cherry tree roots is an issue. However, part of what makes the cherry blossom festival a wonderful event is being able to walk and picnic underneath the canopy of blossoms. Please don’t completely restrict the ability to continue to be able to do this. New refreshment/restroom facilities at the Tidal Basin would be an improvement.”
- “Clean it up occasionally, it is a shame to see it with so much debris and dead fish, especially during Cherry Blossoms.”
- “Especially like the opening sentence. Also recreational boat service — rent a canoe and paddle under the trees! Great thought!”

Franklin Delano Roosevelt Memorial

Preliminary Preferred Alternative: Paving would be revised in areas where vegetation is trampled by heavy visitor use, and a small food service facility could be located between the FDR Memorial and the Martin Luther King, Jr. Memorial if warranted by future visitation.

Agree: 25 (6.0%)
 Disagree: 15 (3.6%)
 No Opinion: 375 (90.4%)

Excerpts:

- “In conjunction with the addition of the Martin Luther King Jr. Memorial, visitor use patterns in this area are likely to change dramatically. Increased tour bus and pedestrian activity should be expected, and it may be necessary to plan on a multipurpose facility (food service, retail, information, restrooms sized for high use volume, etc.) near West Basin Drive between these two memorials. Traffic patterns on Independence Avenue will be affected, as tour buses are likely to want to load/unload/park along Independence near West Basin Drive.”
- “Just a single point that I would hope you would address. That is do what is necessary to allow people to put feet into the water. If something needs to be done to the water because placing feet in it would be a health hazard, include a proposal to fix the water, please figure out what needs to be done and include it.”
- “Keep the fountains running.”

West Potomac Park Riverfront

Preliminary Preferred Alternative: Where feasible, a vegetated shoreline would be established along the Potomac River and additional seating would be provided for fishing, water taxis, and enjoying the river. Separate bike lanes would be developed along Ohio Drive and river walks, and parking areas could be reconfigured for more efficient and metered parking.

Agree: 23 (5.6%)
 Disagree: 13 (3.1%)
 No Opinion: 379 (91.3%)

Excerpts:

- “This area feels underutilized. There could be a greater reason to move along the river edge if there were future memorial sites along this edge.”
- “For West Potomac Park, all of the suggestions, especially the stabilization of the seawall, are valid. One area of improvement is the creation of additional parking. This can be accommodated easily by placing back-in parking along the field side of the roadway (which may be widened slightly). The

parking should be placed on the field side to allow views of the Potomac, as well as provide a safety buffer between the fields and the moving traffic. New sidewalks would be placed behind the parking, leading to existing sidewalks to either end of the FDR memorial. This is the ONLY area to allow organized athletics near any of the memorials.”

- “Bike paths need to connect to Memorial Bridge — ‘Parking meters’ should be pay stations, accepting credit cards and allowing for extended time limits.”
- “As with the Tidal Basin (item 19, above), strengthening the shoreline along West Potomac Park is important and necessary; I am in favor of the establishment of a vegetated shoreline if that can be done (page 8, column 1). Parking meters are also a good idea (page 8, columns 1-2).”
- “Sustainable, vegetated shoreline where feasible! Just like the Virginia side? Brilliant idea! Go for it!”
- “‘Sustainable, vegetated shoreline’ is such a good idea that one wonders why there’s not one now, as on the Virginia side of the river.”

George Mason Memorial

Preliminary Preferred Alternative: The historic fountain would be rehabilitated to improve water quality.

Agree: 18 (4.3%)
Disagree: 11 (2.7%)
No Opinion: 386 (93.0%)

Only three write-in comments directly refer to this question. Two of these acknowledge a lack of familiarity with George Mason and his legacy. One of these respondents expressed irritation with a perceived overabundance of ‘statuary and memorial “stuff”’ that degrades the Mall’s sense of place. The third comment praised this area for its flowers and water fountain.

Excerpts:

- “Great park, maintain the flowers and water fountain.”

Thomas Jefferson Memorial and Grounds

Preliminary Preferred Alternative: Adjacent seawalls would be rehabilitated as recommended by engineering studies. The concession stand would be rebuilt to include restrooms, seating and tables. No special event stage, roof, or walls would be allowed to obstruct the historic view to the White House from the plaza. Bike lanes or trails would be provided and tour bus drop-offs would be redesigned to better accommodate pedestrian circulation.

Agree: 33 (7.9%)
Disagree: 12 (2.9%)
No Opinion: 370 (89.2%)

Excerpts:

- “The Jefferson Memorial needs to be repaired as suggested, however, its grounds should only be used for the memorial itself, no public performances are to be held here, even during festivals.”
- “Handicapped access to this memorial needs to be improved. I miss the old parking lot.”
- “This is my favorite memorial. Best for contemplation of our nation’s history because it is often so quiet and rather ‘off the beaten path.’”
- “If you provide restrooms, seating, and tables at the Jefferson Memorial (page 8, column 2), I recommend you find a way to ensure that they do not disrupt the view of the Memorial from the north and east sides of the Tidal Basin, or from the paddle boats in the Basin itself.”

GENERAL COMMENTS

24. Do you have any general comments about the preliminary preferred alternative?

Agree: 69 (16.6%)
Disagree: N/A
No Opinion: 346 (83.4%)

Excerpts:

- “How do we build volunteerism into all projects for the Mall and its surroundings? Complexity aside, there are some tasks

- within every project which can be carved out as an opportunity for volunteers to engage. With President Obama publicly supporting volunteerism, what projects or tasks can we identify? Criteria for selection: Must complete within 1 day or 1 weekend or 1 week? Let's get the public involved in caring for the Mall and Mall spaces.”
- “It is not clear to me whether the ownership and management of the mall will change. It is of fundamental importance to me that it remain a public venue, with public, NOT PRIVATE, ownership and management.”
 - “There are many good-sounding ideas in this proposal. My major concern is they will be executed with the desire to create some ‘perfect’ picture, like a museum that is more interested in the items on display than the welfare of the people coming to visit. So a demonstration wears the grass thin at times. Better that than a perfect lawn at the expense of un-scalable fences and ‘keep off the grass’ threats. Freedom may not be good for lawns, but it is for people. Also nothing about the mall should bear the least resemblance to an amusement park with its the overriding push to manipulate visitors in ways that satisfy the owner’s desire for profit. Our government should be way above that. Off on another planet.”
 - “As an experienced and licensed professional who has designed with large scale pedestrian entertainment and retail oriented developments, I believe I have knowledge that the average person, let alone designer has. The above are a few ideas based upon several years of observation and independent research, including firsthand behavioral and design efficiency study. While a good document, I believe the proposal is a bit overreaching in scope. Many of the Mall’s issues can be very easily solved with minimal amounts of money or effort. The quality of materials and design must be top notch, not quick fixes or old techniques (exposed aggregate sidewalks). Feel free to contact me for any further information. I have years of photographs and text analysis to illustrate a few of the point above, and would be willing to volunteer my time.”
 - “Fences should be avoided at all costs. At the inauguration, I was trapped, cold and ready to go home, but couldn’t get out because there were too many people and few exits, people would have been crushed against the fence if there was an emergency. It isn’t clear from the plans whether any new fences will be built, but none should be.”
 - “Keep the sightline of the National Mall unimpaired. Provide info that explains to tourists the original meaning of the term ‘Mall.’”
 - “Keep it simple, keep it elegant, keep it green — and keep it open to all Americans (no unilateral decisions to close walkways, roads, etc. as in other areas of the National Park Service). And, most importantly, no concessions, no tacky ‘tourist memento’ junk, and no subcontracting of this, our most visible National Park.”
 - “I commend those responsible for development of the National Mall Plan. Such infrastructure issues as correcting deferred maintenance and improving the communication system are considered essential.”
 - “I like the capitol grounds the way they are.”
 - “Please, let us not make this a place that makes visitors feel too much like a visitor. This is ours and we must be able to relax and enjoy in a familiar, beautiful place.”
 - “Thank you for taking the time to come up with a thoughtful plan that takes into consideration the wishes of the public. And thank you for keeping the Mall open for public protest and expression of free speech. Anything you can do to accommodate more efficiently large crowds of people without restricting our right to gather has my support.”
 - “Washington DC is a city built by and for public use. Through the nation’s people and their tax dollars, the city can and should be as inclusive and non restrictive as humanly possible. Things such as surveillance cameras, police bearing lethal weapons, road blockades, restrictive access areas, and so called security measures are unacceptable.”
 - “This entire proposal is too ‘twee’ — too much fakery, too much like the plans for an

amusement park, not enough required of the citizens and other visitors who visit. Please fix the sidewalks and the re-circulating pumps, but enough of the amusements that you can get somewhere else? Rental boats for Constitution Gardens? Will we next be renting Nintendo so the kids don't actually have to look up to see where they are?"

- "By and large, it is a splendid start. Ms. Spain and other Park Service planning staff have done a terrific and thorough job thinking through the condition and the proposed future of the National Mall."
- "The mall must be available for demonstrations and marches. It's a constitutional right to have the freedom to assemble. The ability to express dissent is an important part of democracy. Keep the mall open to the people."
- "Overall, I am a huge proponent of restoring, improving, and protecting the National Mall. Not caring for it also makes a poor impression on visitors and does nothing to help educate them about the environment and the vital role of parks."
- "I have a question about the NPS' plan to renovate the National Mall. Nowhere in your write-up does it specify when the renovations might begin. I see where the stimulus package designated for the Mall has been reduced, so with that in mind, how much of this can actually be accomplished? I appreciate your response. Thank you."
- "A well thought out presentation. We do need to take better care of the National Mall."
- "In general it is a positive plan"
- "The Downtown BID is a not-for-profit corporation managing a one-square-mile area of Downtown Washington, DC, that includes 185,000 employees, 9,000 residents and 19 [million] square feet of office space. We salute the National Park Service and Susan Spain, in particular, for their hard work in producing a preliminary preferred alternative in the National Mall Plan. We all will benefit from the painstaking work to provide plans that address the areas of cultural resources; natural resources;

demonstrations and special events; public access and wayfinding; visitor information, education and enjoyment; visitor amenities; health, public safety and security; and park operations. The National Mall Plan will provide confidence in the future, as well as an investment strategy for the U.S. Congress, the Department of the Interior, the National Park Service and, just as importantly, the private sector and individuals who care about the Mall. There are many, many aspects of the Preliminary Preferred Alternative with which the Downtown BID is in full agreement—indeed, is excited about. Our detailed comments (above) concentrate on those areas of the National Mall Plan that we think can be improved upon—in some cases, greatly improved. We have been pleased to participate in the National Mall plan and will continue our participation. We look forward to continuing to be a valued partner to the National Park Service. Please do not hesitate to let me know if you have any questions or comments."

- "While I have read this newsletter, it is hard to understand exactly what you all are doing. However, please listen to those institutions that have brought people to mall and don't take away accessibility (general accessibility) to the mall. We don't care about umbrellas, keep the design simple. The Mall is not a picnic area, it should be malleable enough to accommodate grand events. I think that what this location is good for. Picnic umbrellas will only be good for those who work down there — and there will be loiterers. As it stands now, the mall works for getting people from building to building on a daily basis and the big events are draw during the 'peak' hours."
- "In recent years it has become habit to replace walkways with bricks. This is not very hospitable to people with disabilities as well as people who seem to trip for no reason. I recently fell and broke my wrist because the sidewalk was uneven and it's very difficult to use a walker on brick walk ways. For the most part I am in agreement for the plan except to keep the Folklife Festival off the grounds/mall. I also urge Congress to get going with funds to get as much of this done as possible. I have been visiting Washington, DC and the Mall since at least 1966 and it

needs help . . . big time. I don't remember any of these problems back then. One other item . . . the 'gentlemen' who stand at the top of the METRO station escalator passing out 'free' maps which turn out to not be free after all. Can't something be done about them?"

- "Overall, great job and some truly innovative solutions except for the trees on the Mall. Thank you for this public discussion."
- "My opinion on the monuments are that there needs to be more information for visitors especially when things close too early. Maybe opening later hours in the summer since people enjoy walking in the

evening and nothing is open to enjoy the monuments or museums. Maybe alternative work weeks with later hours/security. When you travel thousands of miles to get there and nothing is open is disappointing. Facilities shouldn't take away from the monuments. While it is nice to have amenities like shops, refreshments and biking trails, people go to see the monuments or events near the monuments. Make it accessible. I think the wheelchairs is a nice idea especially for elders that can't walk far. Any improvements should limit visiting the Mall. We need to all enjoy it."

ADDITIONAL COMMENTS

COMMENTS FROM ORGANIZATIONS

Cooperating agencies, consulting parties, and other entities also provided reactions to the preliminary preferred alternative, offering responses that were considered in the development of the draft environmental impact statement. Sixteen letters were received through the mail or e-mail. Three agencies working with the National Park Service provided comments — the D.C. Office of Planning, the D.C. Department of Transportation, and the Smithsonian Institution. Several letters were received from section 106 consulting parties, including the Committee of 100 on the Federal City, the Guild of Professional Tour Guides, the National Coalition to Save Our Mall, the National Parks Conservation Association, and the National Trust for Historic Preservation.

COMMENTS FROM INDIVIDUALS

Several letters were received from individuals, and the following excerpts are included to reflect the range of comments.

- “As the National Park Service continues to refine the Plan, it must confront the tour bus parking problem . . . offer options for accommodating the myriad tour buses that arrive at the Mall daily, or the problem of congested streets will continue to worsen.”
- “The collateral effect of bus traffic and specifically bus parking on neighboring District streets is untenable.”
- “Develop a detailed National Mall tree plan . . . decide on the best materials and techniques for tree planting and ground surfacing in the special tree groves.”
- “The truly masterful frameworks of L’Enfant and McMillan Plans as conceived need new flesh on their bones — and a dream consistent with contemporary reality. . . . The National Mall should be a touchstone of sustainable integrity. . . . *Make* the educational content, the interpretive strength, the civic art of this quintessentially American public space *ask*

the questions and *create* the dialog that needs to invigorate the public discourse — we have undervalued education in this country for far too long. . . . Create, by all means, a more appropriate and definitive urban square for citizens to petition their government directly. The foot of the Capitol Grounds, east from the Grant Memorial perhaps as far as 4th Street, is an area large enough for order of magnitude demonstrations.”

- “The area is lacking a play space for the toddlers. . . . It seems you have made a choice to favor families traversing the Mall rather than coming to a single spot by dispersing the play options.”
- “The D.C. War Memorial needs help because it has a lot of problems.”

The Partnership for Civil Justice, an organization seeking to protect free speech and dissent on the National Mall, coordinated a massive fax campaign that emphasized the need to preserve this critical function that the National Mall provides. Following the release of newsletter 4, the partnership and its supporters submitted over 1,100 faxes as variations of a form letter. An example of this form letter is available in appendix D. This response indicated that many of these respondents had not thoroughly read newsletter 4, which stated on the first page that no First Amendment demonstration rights will be changed under any alternative.

ASLA BLUE RIBBON PANEL REPORT

In March 2009 the American Society of Landscape Architects convened a Blue Ribbon Panel with nationally renowned professionals in architecture, landscape architecture, and planning to review the preliminary preferred alternative. A report was later published, and a related set of webpages (<http://www.asla.org/nationalmall/>) was launched to outline the panel’s suggestions for a visionary plan for the National Mall and to offer recommendations on stormwater management, soil health, trees, water features, and connectivity. While applauding the majority of NPS efforts within the plan, the panel also made

several recommendations that differed from those in the preliminary preferred alternative. They suggested that there be one central visitor center as opposed to scattered, smaller visitor facilities and excessive signage that might otherwise fragment a cohesive experience of the Mall. The panel also cautioned against a one-size-fits-all approach to paving materials and suggested that careful consideration is needed before replacing the historic and sustainable gravel paving. A summary of the full report is included in the appendix C.

A BOOKLET FROM AN INDIVIDUAL

In conjunction with the Cultural Landscape Foundation, Cy Paumier, a retired landscape architect from the Washington, D.C., area privately produced a booklet to promote certain ideas for the National Mall plan. This submittal examined successful public spaces and put forth design recommendations for the Mall, a few of which came from the range of alternatives presented in newsletter 3. Excerpts from this booklet included:

- Union Square — “An ideal place to celebrate freedom and democracy, a true people’s park.” (Illustrated Alt C)
- The Mall — “The McMillan Master Plan of 1901 recommended development of a major water feature midway between the U.S. Capitol and the Washington Monument.”
- Washington Monument — “The outdoor festivals and fairs should be relocated to a 15-acre open space north of the Washington Monument.”
- Constitution Gardens — “The National Mall would be enhanced with the addition of family oriented services and amenities in Constitution Gardens. . . . The elevated site at the eastern edge of the lake can accommodate a restaurant and a lakefront café. A series of terraces overlooking the lake will allow people to enjoy watching boat (model) activity. . . . The development of creating play space for small children would complement family-related services and lake activities.” (Alt C)
- Tidal Basin — “The Independence Avenue bridge over the Tidal Basin would be removed and replaced with a new east bound road and park creating a green space around the north side of the Tidal Basin.” (Alt C)

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APPENDIXES

A. Comments by Cooperating Agencies

- D.C. Office of Planning
- D.C. Department of Transportation
- Smithsonian Institution

B. Comments by Consulting Parties

- The Committee of 100 on the Federal City
- Guild of Professional Tour Guides
- National Association of Olmsted Parks
- National Coalition to Save Our Mall
- National Parks Conservation Association
- National Trust for Historic Preservation

C. Summary of ASLA Blue Ribbon Panel Report

D. Sample of Comments Pertaining to First Amendment Rights

A. COMMENTS BY COOPERATING AGENCIES

District of Columbia Office of Planning



Office of the Director

May 14, 2008

Susan Spain, Project Executive
The National Mall Plan
National Mall & Memorial Parks
900 Ohio Drive, S.W.
Washington, D.C. 20024-2000

Dear Ms. Spain:

Thank you for the opportunity to comment on The National Mall Plan Newsletter 4 – A Preliminary Preferred Alternative. The District of Columbia Office of Planning has reviewed the recommendations included in the newsletter and has comments that cover three general categories:

1. Reinforce priority corridors to serve as multi-modal connections and for focused investment
2. Develop a strategy for sustainable transportation to NPS facilities to reduce negative impacts on the National Mall and the Center City
3. Recognize the role of active recreation facilities

The District's *Center City Action Agenda 2008* highlights the great opportunity to develop well-connected and distinct areas in the rapidly-expanding downtown that has the National Mall as its centerpiece. Both the National Mall and the District's Center City belong not only to the residents of D.C., but to the entire nation. Coordinated planning and investment at federal and local levels are essential to ensuring we collectively meet the needs of residents and visitors alike. Fully integrating the attractions, distinction, history and amenities of the National Mall with the services, transportation choices and destinations of the Center City is critical to fully realizing Washington, D.C. as a world-class capital city.

Today's conception of the *Center City* is as the heart of a federal complex and the heart of a thriving metropolis --with the National Mall at its core. This should inspire a National Mall that relates to residents and workers in the District, as well as visitors from across the nation and around the world. This vision presents great opportunities to weave central Washington across this national treasure with cultural institutions, revered monuments, major events, and ample open space. Greater connectivity between the Mall and key destinations throughout the city, such as the waterfront, as well as improved access to the Mall is a necessity. With seamless transitions, improved pedestrian and bicycle facilities and enhanced programming that extends to evening and after-hours, visitor experience at the National Mall is enormously enhanced as visitors get to partake in the daily life of the City.

The following comments are intended to enhance visitors' enjoyment of the Mall by minimizing the elements that act as barriers for residents and workers on a day-to-day basis, and maximizing connections between the Mall and the city that surrounds it.

Reinforce Priority Corridors to Serve as Multi-Modal Connections and for Focused Investment

The Center City Action Agenda identifies 4th, 7th, and 14th Streets as priority corridors for improving the connection between established areas in the downtown and emerging districts. *4th, 7th, and 14th Streets should be highlighted as important pedestrian connections across the National Mall as part of parkwide actions for public access and wayfinding.* Proposed facilities in the National Mall Plan should support the long-term vision for each of these corridors (described below), and in particular reinforce the focus on pedestrian, bicycle and transit travel.

4th Street is identified as an ideal opportunity to turn an ordinary street into a model green, multi-modal street, with generous space for street trees and other plantings, wide sidewalks, integrated storm water management features, and bicycle lanes. It has the potential to provide a pedestrian- and bicycle-friendly connection across the Mall and between Mount Vernon Triangle, the National Building Museum, Judiciary Square, and the Southwest Waterfront. Signage and other information systems are needed to provide wayfinding at the National Mall about attractions north and south of the Mall, including the Arena Stage Theater and waterfront attractions along Maine Avenue.

7th Street is envisioned as an important transit corridor, connecting the established northwest neighborhood areas of the city with the emerging Southwest Waterfront. Eventually the Circulator and local bus routes would be augmented with additional rapid bus or streetcar service. Improved environmental performance and streetscape design include energy efficient street lights, trees, and enhanced pedestrian crossings. Shade trees linking 7th Street within the Mall, along with outdoor programming, exhibits, kiosks, and pavilion-type year-round restaurants would serve residents, visitors and workers. This would encourage pedestrian crossings along the three blocks between the National Gallery of Art and the Hirshhorn Museum, day and evening, without detracting from the monuments and view corridors.

14th Street is becoming an important cultural corridor, creating a connection from the White House Visitor's Center, past Pershing Park and the landmark Willard Hotel, the Wilson Building and Freedom Plaza, to the cultural attractions on the Mall, the planned African American Museum of History and Culture, the American History Museum, the Washington Monument, the Jefferson Memorial, and to East Potomac Park. While 14th Street will continue to provide important vehicular access from Virginia, 9th and 12th Streets serve as the primary vehicular routes for motorists in and out of the downtown to I-395. Improvements to the street, intersection design, and signage can maintain and even improve traffic flow while increasing convenience and safety for walkers, runners, and bicyclists. The potential reconfiguration of 14th/15th Streets over the Tidal Basin could enlarge areas for monuments and recreation, and improve access within the Mall.

Develop a Strategy for Sustainable Transportation to NPS Facilities to Reduce Negative Impact on the National Mall and Center City

The issues of public access and wayfinding should be reframed as how to best provide a positive visitor experience to the National Mall as part of an urban experience rather than "accommodating urban traffic within a park environment."

The District of Columbia welcomes 20 million visitors every year, and feels an ongoing obligation to serve as a model of best practices in sustainable transportation. It is a source of pride for our city that many visitors have their first experience on public transit here in the District of Columbia. And similarly, we feel that traveling to and from our multitude of tourist destinations should set the example for visitors of a low impact, green, convenient and hassle-free experience.

Hundreds of thousands of large motor coaches arrive in the District annually, with more than 1,200 arriving daily in the peak tourist season. Most of those vehicles take visitors to NPS destinations, particularly the National Mall. It is common practice for tour bus operators to drive up to the main entrance of museums and monuments to drop off and pick up patrons, and to circle, park and idle on District streets. These practices contribute substantially to poor air quality, high particulate levels and noise pollution, add congestion and create delays on District roadways, and have a negative visual impact on the National Mall itself, blocking views and pedestrian access to some of our most appealing sites.

The District of Columbia recommends that the NPS develop strategies to create a more sustainable transportation system for bringing visitors to the National Mall. NPS should look to technological advances and the best in green vehicles to create a model system. NPS can look to other national parks for examples. Strategies in the General Management Plan for Philadelphia's Independence National Historical Park's (INHP) emphasize reducing the impact of visitor traffic on the park and surrounding neighborhoods through a coordinated system for autos, tour buses, and school buses. In Acadia National Park propane-powered shuttles take visitors to park attractions and Intelligent Transportation Systems provide visitors with real time information on parking availability, shuttle arrival and departure times and weather conditions. These are efforts to reduce traffic congestion and air pollution, and improve the visitor experience

Arrival of visitors by **motor vehicle** should be discouraged. A NPS management policy for parking that promotes greater reliance on satellite parking and arriving to the park via subway, bus, or shuttle should be emphasized over the installation of parking meters and street parking. This will reinforce the park-like character of the Mall by reducing the number of vehicles parked at the curb, idling on the street, and adding to pollution and traffic congestion. Recommendations to coordinate with the District Department of Transportation and WMATA should be specified as a way to provide supplementary access to, and around the National Mall. In particular, coordination with the District's SmartBike program should be addressed. The newsletter does incorporate alternative modes of travel around the Mall after visitors arrive – courtesy shuttles, electric scooters, and bicycles. However, greater emphasis should be placed on travel to the Mall.

The full extent of existing **tour bus** drop-off and pick-up locations are not clearly identified in the preliminary preferred alternative newsletter. In coordination with the District, the plan should identify specific locations for tour bus drop-off and pick up. Once the drop off or pick up occurs, tour buses would ideally move on to park at a city-designated location beyond the historic area. One potential location for bus parking is Banneker Overlook which has the potential to accommodate a multi-level parking facility, along with a commemorative monument (as proposed by NCPC). This site between the National Mall and Southwest Waterfront is an ideal location to create a pedestrian-friendly and monumental gateway between the two prominent destinations and to house buses and private vehicles for visitors.

Recognize the Role of Active Recreation Facilities

The National Mall should continue to play its historic role in providing active recreational facilities for residents, visitors, and workers of the District.

The National Mall's athletic fields are critical recreational amenities in the District. While recreational activities are discussed throughout the newsletter and have been incorporated into the vision for many parts of the National Mall, the preliminary preferred alternative should more clearly identify active recreation as a category of Parkwide Actions.

An analysis by the CapitalSpace Initiative, a partnership among the NCPC, the National Park Service and several other federal and District agencies to develop a framework plan for improving the District's parks and open space, shows that there is a deficiency of medium and large parks in

the Center City that can serve active recreational needs of the residents. With the exception of the National Mall (including East and West Potomac Parks), the majority of parkland within the Center City area is in small-sized parks, especially in parks of less than one acre. Consequently, the athletic fields on the National Mall are critical for accommodating the active recreational needs of Center City residents, visitors and workers.

The National Park Service, steward to 6,900 acres of parks and open space in the District (74% of all parks and open space in the city), has historically recognized the importance of providing active recreation facilities. As the result of a 1949 agreement between the National Park Service and the District, the recreation amenities offered on the National Mall include 33 athletic fields in three locations: East Potomac Park (6), World War II Memorial (17), and the Washington Monument (10). They represent more than half of all recreation fields in the National Park Service's inventory of athletic fields in the District and include fields for baseball, football, and rugby. They provide a vital recreation amenity and should be integrated into the vision and long-range planning for the National Mall.

Again, thank you for the opportunity to comment on this document. The Office of Planning looks forward to working with you to find the best way to incorporate these comments into the final preferred alternative, and for achieving the right mix of facilities and components for the National Mall. Should you have any questions, please contact me or Patricia Zingsheim, Associate Director for Revitalization and Design, at (202) 442-8965.

Sincerely,

Harriet Tregoning
Director, DC Office of Planning

HT/rh/cgb

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DISTRICT DEPARTMENT OF TRANSPORTATION



TRANSPORTATION PLANNING AND POLICY ADMINISTRATION

May 20, 2009

Susan Spain, Project Executive
The National Mall Plan
National Mall & Memorial Parks
900 Ohio Drive, S.W.
Washington, DC 20024-2000

Dear Susan Spain,

This letter will act as formal comments from the District Department of Transportation (DDOT) on the Preliminary Preferred Alternative for the National Mall Plan as outlined in the National Mall Plan Newsletter 4. DDOT supports National Park Service's goals of promoting the pedestrian and bicycle activities on the National Mall. DDOT would like to urge the National Park Service to use ADA-friendly paving for sidewalks and crosswalks.

However, DDOT feels that the proposed parking management system promotes personal vehicles and does not adequately address the large number of tour buses that bring visitor the National Mall area from other parts of the country. Currently the tour bus parking is insufficient, as is evident by multiple tour buses parking in designated no-parking zones, blocking crosswalks, even blocking whole travel lanes and streets throughout the District. DDOT would like to see a much stronger effort to increase tour bus parking space. This could be accommodated, for example, along Jefferson and Madison Drives where personal vehicles are encouraged to park. Tour buses could also be clustered in certain areas. These spaces could all be managed with multi-space meters, which would print tickets for the tour buses to display. In short, DDOT feels that accommodating tour buses and shared transit should be a higher priority than accommodating personal vehicles.

Thank you for the opportunity to comment on the Preliminary Preferred Alternative. If you have any questions, please feel free to contact Christopher Ziemann at christopher.ziemann@dc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Karina Ricks', is written over a horizontal line.

Karina Ricks
Associate Director



Smithsonian Institution

Dr. Richard Kurin
Under Secretary for History, Art, and Culture

May 14, 2009

Dr. Stephanie Toothman
Acting Superintendent
National Mall & Memorial Parks
900 Ohio Drive, SW
Washington, DC 20024

Re: National Mall Plan

Dear Dr. Toothman,

Thank you for the opportunity to comment on the Preliminary Preferred Alternative for the National Mall Plan. We also thank you and your staff for meeting with us on March 13. Hearing you and Ms. Spain talk about the Plan and the Preliminary Preferred Alternative gave those present an appreciation of the challenges the National Park Service (NPS) faces in developing this massive undertaking. We commend the effort – and understand that the ultimate goal – a National Mall that well-serves our country and its people is a most worthy one.

We offer the following comments in our role as acting as a “coordinating agency” in the National Environmental Policy Act process and as a “consulting party” in the National History Preservation Act, Section 106 process. We also offer them as your neighbors and colleagues. Known as “America’s front lawn,” the National Mall literally is the Smithsonian’s front lawn, connecting many of our museums and serving as an outdoor location for many of our educational programs. Most museum visitors by definition are Mall visitors. The converse is also true: our museums provide educational opportunities, shelter, and amenities to Mall visitors – the Smithsonian’s record-breaking attendance during the 2009 Presidential Inauguration is just one recent example of the positive connection between our museums and the Mall.

Our comments are listed here by the headings shown in your National Mall Plan Newsletter (Winter 2009 edition).

A PRELIMINARY PREFERRED ALTERNATIVE

The Smithsonian strongly supports civic engagement as the guiding principle for NPS’s National Mall Plan. The Mall is not a natural landscape. It is a human-made open space that is intimately connected to the civic life and conception of our nation. It is a place where Americans have gathered to celebrate, make their opinions known, and commemorate significant events. The

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Mall's history makes it unique among national parks. Since the 1850s when it was called Smithsonian Park, it has undergone fundamental changes; but it has always been defined as much by the character of its use as its constructed landscape. Considering this history, we believe that certain elements of the Preliminary Preferred Alternative aimed at resource preservation are not supported by scientific study and could be detrimental to the Mall's role as the premier place of civic engagement.

PARKWIDE ATTRACTIONS

Natural Resources

We support NPS's desire to improve turf and tree conditions and use sustainable water management strategies. We are concerned, however, that certain measures proposed to protect the elm trees (e.g., a ban on organized event activity in the tree panels) are not supported by scientific evidence. Absent such evidence, we are in favor of using management strategies, such as those cooperatively developed by the Smithsonian Folklife Festival and NPS to balance the need for event participant and visitor comfort with protection of the trees. We discuss this element of the Preliminary Preferred Alternative more specifically below.

Public Access and Wayfinding

We are supportive of efforts to improve visitor parking on the Mall through use of parking meters, and note a particular need to improve parking for visitors with disabilities. As the Preliminary Preferred Alternative mentions, a large number of visitors arrive by tour bus. We anticipate that the badly needed solution for bus drop-off and off-site parking will not be immediate and encourage NPS, in the short-term, to explore making additional space available for bus drop-offs (in lieu of single family vehicle parking) on Madison and Jefferson drives.

Visitor Amenities

We support NPS's recommendation for more visitor seating. More benches should be included at all locations, but especially along the central paths on the Mall between 3rd and 14th streets.

The Preliminary Preferred Alternative does not address the need for covered shelters that would serve as outdoor picnic areas for visitors. Such shelter is particularly important for school groups and others who bring lunches to the Mall and have no place to sit other than the grass, which can be problematic if the ground is wet.

We support NPS's effort to establish public restrooms throughout the Mall area. However, care needs to be taken in placing and sizing the restrooms. For example, two restroom pavilions are proposed for the 12th Street crossing of the Mall. At this point, it is unclear what form or how large these would be. Depending on form and size, these pavilions could have a profound effect on the street vista and the views near the Metro entrance. Placing them directly on axis with the street may not be the best way to handle the structures discreetly. Under the elm trees might be a better place to put the pavilions so that they blend into the landscape. The existing food service pavilions and the proposal to locate restrooms across from the National Air and Space Museum are good models.

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We are in favor of the proposal to replace the gravel paths with low-maintenance, sustainable paving materials and very much agree this would improve the visitor experience.

Health, Public Safety, and Security

Emergency call boxes would be welcome additions to the National Mall area. However, implementation will be a challenge. The devices need to be noticeable, but at the same time blend in and be compatible with the surrounding environment. The challenge will be especially pronounced on the Mall proper.

Park Operations

We share NPS's desire that the Mall be a showplace of environmental leadership and use "cutting edge sustainable facility and site design measures." Although "engineered soils" is mentioned frequently, the Preliminary Preferred Alternative does not provide specifics about such soil or other techniques that might be used. We hope the planning process can serve as an opportunity to look at emerging best practices, such as using cisterns under the lawn panels, and to expand recommendations related to sustainable design.

We welcome implementation of a computerized lighting system to more quickly identify and repair inoperable lights. However, this system should not be a substitute for a regular and comprehensive schedule of maintenance and repair. For example, many lighting lamps change their color rendition widely over their life spans, often from warm to cool tone. To keep an acceptable and consistent color rendition over the area, lamps may need to be changed before the end of their useful life.

Visitor Information, Education, and Enjoyment

We support the initiative to install a mass notification system. Although it is mentioned under the Visitor Information, Education, and Enjoyment heading in the Preliminary Preferred Alternative, it is of equal importance to public safety and security.

THE MALL

Union Square (1st to 3rd Streets)

We support the NPS's effort to revitalize Union Square. In particular, we note the Union Square could be used for many smaller First Amendment demonstrations and other events, thereby taking pressure of the Mall's grass and tree panels, where larger events, like the Smithsonian Folklife Festival, occur.

The Mall (3rd to 14th Streets)

The Preliminary Preferred Alternative would prohibit national celebrations and special events from using the shaded sections of the Mall. This is of great concern to the Smithsonian, particularly because of its negative impact on the Smithsonian Folklife Festival which has been held on the Mall for the past four decades and has been so important in respectfully representing the diverse, living cultural traditions of the American and world's people. The shade of the

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Mall's elm trees reduces the air temperature by as much as ten degrees during the height of the summer heat and humidity, and is therefore essential to protecting public health. Many of the tradition-bearers honored by the Smithsonian Folklife Festival have acquired their expertise over years of hard work, and accordingly, they are advanced in age. Prohibiting small-scale activities from using the shade poses a danger to the health of these elders, as well as to the health of thousands of elderly and very young visitors who come to the Festival. The evidence that event activity is specifically harmful to the elm trees on the Mall has yet to be presented in the planning process. *Because peer-reviewed scientific studies have in the past demonstrated that the Festival does not negatively impact the Mall's elm trees, we believe that the proposal to disallow use of the tree panels, even for small-scale activities is inappropriate.*

We favor, instead, use of responsible practices to protect the elm trees such as:

- 1) Placing all large venues in non-shaded sections;
- 2) Limiting elm-tree panels to activities planned to accommodate small groups (e.g., with seating for 75 or fewer visitors);
- 3) Rotating the use of elm-tree panels, so that they have "fallow" periods during which they are not used;
- 4) Laying load-bearing matting under heavily traversed areas; and
- 5) Excluding any activities in elm-tree panels that would require trenching, digging, or the construction of underground support systems.

The Preliminary Preferred Alternative contains several measures that could be helpful to some event producers, including the installation of utility/communication lines and the addition of both "staging space" and performance sites for special events. However, this infrastructure will require substantial funding that has yet to be identified. (We note that much of the in-ground infrastructure in the Mall's center panels was installed at the Smithsonian's expense more than a decade ago.) While the proposed additional infrastructure could be very helpful, it could prove limiting without careful planning and placement. Given the Smithsonian's experience in producing high-quality educational and commemorative events on the Mall and the importance of thoughtful planning and implementation of this proposal, we request the opportunity to participate in the planning for these elements, when that planning takes place.

With regard to the proposal to widen the 12th Street corridor to accommodate utility services, staging areas, and tent set-up locations we request the opportunity to further coordinate in detail with you. The Smithsonian National Museum of American History and National Museum of Natural History regularly use the 12th Street service road, and could be affected by this proposal.

Both the American History Museum and the Natural History Museum would benefit immensely from the crosswalk improvements planned at the corners of their sites, and the addition of a mid-block crossing on Constitution Avenue.

The welcome plaza proposed at the Mall entrance of the Smithsonian Metro stop would be a good opportunity for coordination and should be a discussion item between us in the future.

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Constitution Gardens

We note under this heading that a gazebo is proposed for the end of the lake. Currently, the American History Museum plans to re-install the large Calder sculpture on its grounds to its original location at the west end of the museum building. An open bandstand is at this location now. The museum is looking for a new home for this structure and if the NPS could use it in Constitution Gardens as a gazebo or for other needs, we would be happy to explore this possibility.

PUBLIC COMMENT

You have asked us to address several suggestions relating to the Smithsonian that have arisen in Section 106 meetings, cooperating agency briefings, and public meetings. Most of these suggestions deserve serious consideration, but the decision whether or not to implement any one of them requires greater discussion and collaboration than the comment process allows.

What are the Smithsonian's future plans for the Arts and Industries Building. Is it possible that SI facilities could meet NPS needs for admin/office space?

Secretary Clough has stated that one of his priorities is to restore and reopen this National Historic Landmark with a new vision and purpose. In April, the Secretary formed to a pan-Institutional committee to look carefully at the many program ideas that Smithsonian staff, the public, and outside consultants have suggested in recent years, as well as new ideas. The committee is scheduled to present recommendations on program plans and options by the end of June. The Smithsonian has begun some preliminary renovation and restoration work, such as re-pointing the building's exterior, using some of the Institution's funding from the American Recovery and Reinvestment Act of 2009.

As the NPS knows, the last Congress passed, and President Bush signed, the National Museum of the American Latino Community Commission Act (H.R. 512/S. 500). In a letter to the Smithsonian Board of Regents, the Hispanic Caucus asked that no permanent decision be made about the future of the Arts and Industries Building until the Commission has considered the building as a possible home for the new museum.

Is it feasible for museums to accommodate increased visitor services and improve access to them?

- Locate public restrooms on museum sides of Madison and Jefferson but outside the museums so they can be accessed after museum hours. The Smithsonian does not have any plans to construct exterior restrooms on museum grounds and does not believe this is a feasible idea, especially in light of the significant perimeter security work underway at the Mall museums. The Smithsonian is open to exploring with the Park Service ways to improve access to the museum's existing restrooms.

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- Provide a new exterior public entrance to the food court/restrooms on the east side of Air and Space and keep the location open longer hours. Opening Smithsonian food service locations, including the restaurant at Air and Space, before and after hours raises security, financial, and accessibility issues, but it is something that the Smithsonian is willing to consider.
- Simplify access from the Mall side for visitors with disabilities. The majority of the Smithsonian's museums are accessible from the Mall. The Natural History Museum, the most notable exception, has made efforts in the past year to improve its signage directing visitors to its accessible Constitution Avenue entrance.
- Create destinations on the National Mall and in adjacent areas to provide information, orientation, ticketing, and exhibits without consideration of jurisdiction (NGA, SI, NPS, AOC, NARA, etc). Would it be possible for the Castle to take on that type of role? The Smithsonian believes that visitors could be well served by a combined ticketing and information system, and would be happy to explore the means of accomplishing this with NPS, whether through a single location or from multiple existing or new locations across the Mall.
- Create a super agency/commission to take over management of museums, memorials, landscape, permitting and managing events in the monumental core as a way of reducing bureaucracy. There are certainly ways in which coordination between NPS and the Smithsonian can be improved, and ways in which, working together, the Smithsonian and NPS, as well as other agencies, could leverage their resources to improve the visitor experience; however the Smithsonian does not believe that a super-agency overseeing both the Smithsonian's and NPS's functions on the Mall would be an effective or efficient way to achieve that purpose.

As noted in several of the comments above, the Smithsonian and NPS have many common interests and much to discuss together. The Smithsonian is committed to improving visitor services across the Mall and we look forward to working with you as you continue the important work of developing the National Mall Plan.

Again, thank you for the opportunity to comment.

Sincerely,

Dr. Richard Kurin
Under Secretary for History, Art, and Culture
Smithsonian Institution

cc:

Peggy O'Dell, Regional Director, National Capital Region, National Park Service
Dan Wenk, Acting Director, National Park Service
Secretary of the Interior Ken Salazar

B. COMMENTS BY CONSULTING PARTIES



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May 15, 2009

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Dear Ms. Spain:

Re: Comments of the Committee of 100 on the Federal City on the National Mall Plan-Preliminary Preferred Alternative (March 2009)

The Committee of 100 on the Federal City is pleased to provide comments on the "Preliminary Preferred Alternative" for the National Mall Plan, provided in summary form in the *National Mall Plan Newsletter-Winter 2009* (released in early March 2009). 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 National Mall Plan that is now being formulated is a key element for the future of the Monumental Core of Washington, D.C., our nation's capital and the home town of Washingtonians. The Committee of 100 has been participating in the public process of preparing the National Mall Plan in recent years and submitted initial comments last year (dated May 19, 2008). 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.

The comments of the Committee are presented below in three parts. **Part 1** outlines key overview points and big ideas. **Part 2** follows the format of 24 points for parkwide and specific areas that the National Park Service has listed on their web site to obtain comments. **Part 3** indicates the Committee's concerns with the next steps in preparing The National Mall Plan.

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PART 1: OVERVIEW AND BIG IDEAS

The Opportunity

The work of the McMillan Commission (1901-02) provided a framework for the development of the National Mall in the 20th century. That framework evolved over the 20th 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 now being prepared (to be completed in 2010) is 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 21st 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.

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 20th of this year 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 several projects on the National Mall, Secretary of the Interior Ken Salazar noted that "this is the Mall that belongs to the people of the United States of America".

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, it is likely that the Martin Luther King, Jr. National Memorial, the National Museum of African American History and Culture, and the Vietnam Veterans Memorial Education Center 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 23rd Street, NW), the United States Institute of Peace Building is under construction and is expected to open in 2010. 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 being proposed at Independence Avenue and 12th Street, SW, adjacent to the National Mall.

The Long-Range Challenge

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

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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. The museums, galleries and sculpture gardens of the Smithsonian Institution and the National Gallery of Art are key parts of the National Mall experience. The monuments, memorials, museums and galleries are major Mall destinations--what people come to see.

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 often perceived to be part of the Mall experience.

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 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 a car 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.

Planning Area and Approach for the National Mall

In preparing the National Mall Plan, the National Park Service has outlined a planning area based on internal Park Service administrative boundaries. This area has a number of limitations. While the Committee understands that there is background coordination within the Park Service and with 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.

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 reflected in the National Mall Plan, at least in the materials that have been provided thus far. The Whitten

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Building of the U.S. Department of Agriculture is also part of the area of the National Mall between 12th and 14th 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.

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, not divided by jurisdictional boundaries.

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.

The Committee of 100 urges 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 not apparent in the draft materials provided thus far.

If there are internal National Park Services administrative procedures that prevent such a comprehensive approach, the National Capital Planning Commission should step forward and undertake a coordinating planning role with the National Park Service and other agencies and institutions involved, in order to present a truly comprehensive planning approach for the National Mall.

National Mall Relationships with Surrounding Areas

Planning for the future development and use of the National Mall should be closely integrated with adjacent areas, including areas under the jurisdiction of the National Park Service but with different boundaries. Fortunately, the National Capital Planning Commission and the U.S. Commission of Fine Arts have just completed a three year planning program for four key areas adjacent to the National Mall, and both agencies have approved the *Monumental Core Framework Plan: Connecting New Destinations with the National Mall*. Future studies are proposed to test and refine key proposals and move forward with implementation. The final National Mall Plan should 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.

One of the most important features of the National Mall in future decades of the 21st century will

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be its increased centrality with other areas of Central Washington, a condition stressed in the *Center City Action Agenda* prepared by the D.C. Office of Planning and others. 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.

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.

Integration with District of Columbia Objectives

The District of Columbia government and the citizens of Washington, D.C. have a major stake in the future development 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.

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 role and needs, and that the District government, civic organizations and the private sector be involved in the process.

Need for Additional Information

There is still considerable background information that has not been provided to the public at this stage of the planning process. The following are some key issues and needs.

Future Visitation Numbers: 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 to the National Mall. It seems likely that visitation from foreign countries will also increase. Locally, the combination of 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). The National Park Service has indicated that conservative future visitation numbers are being used but the future projection numbers have not been provided to the public.

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Transportation System: Improvements in transportation systems will be critical to the use of the National Mall in the future. Yet very little specific information about transportation systems, volumes and capacities has been provided. The Committee of 100 believes that the overall transportation approach for the National Mall needs to be outlined more clearly, especially with reference to changes in roadways and pathways. One need is to have a clear approach to separating pedestrian and bicycle travel paths from automobile and bus routes when possible. The continuing issue of tour buses needs attention. While specialized transit services for visitors are needed (Tourmobile, etc.) it is critical that providing such services not prevent the provision of new transportation services to allow residents and visitors to easily move around the National Mall and connect with adjacent areas.

Impact of Global Warming: 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 requests, the National Park Service has not provided information on this possibility. This issue needs to be addressed before a final draft plan is outlined.

Big Ideas

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.

Restoring the National Mall: 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 in the near term) 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.

Union Square: The major new initiative for the National Mall in the "Preliminary Preferred Alternative" in Newsletter 4 is the total redesign of Union Square and adjacent areas between 1st and 3rd 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. However, the Committee strongly opposes any suggestion that demonstrations be restricted only to this area.

The Grant Memorial is proposed 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

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Constitution and Independence Avenues, including the two triangular areas under the jurisdiction of the Architect of the Capitol.

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. 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.

Tidal Basin Area: 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 when the Martin Luther King, Jr. Memorial is completed in the next several years. The "Preliminary 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.

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. The earlier National Mall Plan Newsletter 3 (Fall/Winter 2007) included an Alternative C that filled in part of the Tidal Basin on the north side and seemed to have the possibility of improving 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. Additional study is needed.

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 recently adopted *Monumental Core Framework Plan* 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 significant 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.

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Washington Waterfront Walk: 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 *Legacy Plan* prepared by the National Capital Planning Commission. The "Preliminary Preferred Alternative" for the National Mall 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 21st century. It is especially important that adequate connections for the Washington Waterfront Walk be provided from West Potomac Park to the Southwest Waterfront.

Urban Design Initiatives

In addition to the major ideas and possibilities mentioned above and elsewhere, there are a number of smaller urban design initiatives that seem to hold the 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 other such urban design enhancements are noted in the *Monumental Core Framework Plan* recently adopted by the National Capital Planning Commission and the U.S. Commission of Fine Arts. These ideas below need further study to see if they are desirable and feasible. Opening such vistas generally involve some tradeoffs, primarily in altering some existing and perhaps sacrosanct 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 requests that the National Park Service consider these concepts in preparing the final National Mall Plan.

Maryland Avenue Vista to Tidal Basin and Beyond: The vista along Maryland Avenue from the Capitol to the southwest extends 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 vista back 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 the Lady Bird Johnson Park.

Nineteenth Street Vista to D.C. World War Memorial: The D.C. War Memorial is located on the axis of 19th Street, NW, the street that leads south from Dupont Circle to Constitution Avenue. The D.C. World War Memorial is scheduled to be restored in the near future. The Committee suggests that studies be made to see if a vista could be opened along the line of 19th Street to the Memorial, thus visually connecting this little known memorial to the area of the city north of the National Mall. It should be noted that the 1902 McMillan Commission Plan included a similar vista between 20th and 21st Streets, NW to connect with a northern extension of the Reflecting Pool (that extension was never built and the vista was not opened).

Virginia Avenue Vista East Toward the Washington Monument: Earlier this year, in discussions of the Potomac Park Levee Project, Lindsay Williams suggested that the vista of Virginia

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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.

North-South Vista from Washington Monument Grounds to Jefferson Memorial: The north-south vista from the White House to the Jefferson Memorial already exists, one of the strong legacies of the McMillan Commission Plan. As indicated previously, the Committee suggests 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.

The “View to the West”

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.

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 sacred 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.

PART II: PARKWIDE AND AREA COMMENTS

Comments are provided below on “parkwide” (National Mall) actions and actions for different areas of the National Mall. However, we note that many description of actions are so limited and general in Newsletter No. 4 that it is often difficult to provide specific comments.

1. **Parkwide Actions-Cultural Resources:** The Committee supports the statements in Newsletter No. 4 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.

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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.

2. **Parkwide Actions-Natural Resources:** The Committee generally agrees with the statements in Newsletter No. 4 about improving conditions for tree and turf areas. However, we question prohibiting 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.
3. **Parkwide Actions-Demonstrations and Special Events:** 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 that development of facilities in adjacent areas could allow some non-political events to be moved off the National Mall.
4. **Parkwide Actions-Public Access and Wayfinding:** This involves the design and operation of the transportation system for the National Mall, including connections for different transportation modes to surrounding areas. Unfortunately, as noted previously, the limited transportation system information that has been provided makes comment difficult. The Committee recommends that additional transportation information be provided in the next draft stage of the National Mall Plan. Providing access for tour buses, including parking off the National Mall, is especially important. Note that wayfinding is addressed in Item 5.
5. **Parkwide Actions-Visitor Information, Education and Enjoyment:** 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. The Committee of 100 understands the logic of this decentralized approach but believes a central National Mall history exhibit is also desirable.

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.

6. **Parkwide Actions-Visitor Amenities:** 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 reserves judgement on these proposals pending specific plans. 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.

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7. **Parkwide Actions-Health, Public Safety and Security:** 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. Proposals for new interactive water features are also welcome.
8. **Parkwide Actions-Park Operations:** This category deals with addressing the deteriorated condition of many areas 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).
9. **Union Square (1st to 3rd Streets):** The proposal for an almost complete redesign of the Union Square area is one of the big ideas of the National Mall Plan (see comments in the “Big Ideas” section of these comments).
10. **Mall (3rd to 14 Streets):** 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.

The Committee supports adding “National Mall” to the name of the Smithsonian Metrorail Station and to providing orientation information adjacent to the station entrance on the Mall. However, this does not negate the need for a more sizeable visitor center in this central area. Space in a renovated Arts and Industries Building might be an appropriate location.

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. Cooperative provision of visitor services should be explored, such as additional restrooms and food service on Smithsonian museum property (outside the buildings). 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.

11. **Washington Monument Grounds:** 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 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.

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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.

12. World War II Memorial: The Committee generally supports the program of no major actions for this memorial at this time.

13. Constitution Gardens: 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. Careful design to achieve a festive yet dignified setting is necessary. 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.

The Potomac Park Levee will be constructed near 17th Street and Constitution Avenue, extending both north and south of 17th Street. The Committee supports the proposal for interpretive information near the old 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 understand the rationale for the proposal to move it again.

14. Vietnam Veterans Memorial Grounds: 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 the memorial.

15. Lincoln Memorial Grounds: 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 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 (scheduled to open in 2010).

16. Korean War Veterans Memorial: The Committee supports the proposed minor improvements to walks and interpretive materials.

17. D.C. War Memorial: 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 recent announcement 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 much more elaborate

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and some more simple. 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.

18. **Ash Woods:** 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.
19. **Tidal Basin Area:** See comments under “Big Ideas”.
20. **Franklin Delano Roosevelt Memorial:** The Committee supports the recommendations for the FDR Memorial and related areas.
21. **West Potomac Park Riverfront:** 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 sections of the National Mall.
22. **George Mason Memorial:** 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.
23. **Thomas Jefferson Memorial and Grounds:** 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 *Monumental Core Framework Plan*. 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.
24. **General Comments: Do you have any general comments about the preliminary preferred alternative?** The Committee of 100’s general comments, and some specific comments, have been outlined above. The Preliminary Preferred Alternative outlined in Newsletter 4 is written in a conditional tense that is somewhat discouraging. The final National Mall Plan should be more positive in tone and should include appropriate maps and graphics to explain the concepts. We note again that many of the National Mall proposals in Newsletter No. 4 are so general that it is difficult to make specific comments.

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PART III: NEXT STEPS

In conclusion, the Committee of 100 on the Federal City appreciates the opportunity to comment on the “Preliminary Preferred Alternative” for the National Mall Plan. We applaud the National Park Service for the work that has been done in bringing the plan for the future of the National Mall to the present stage but we have serious concerns and reservations about some aspects of the National Mall Plan that we have seen to date. As the work moves forward to the next stage of preparing and releasing the draft plan for the National Mall, we hope that a more comprehensive approach can be outlined. Suggestions from the Committee of 100 on the Federal City, and many other individuals and organizations across the country, should be considered. Background information on which planning decisions have been made should be made available to the public. The Committee reserves the right to provide future comments when the draft National Mall Plan is presented.

The Committee of 100 understands the need to move forward to obtain an approved plan so that funding can be obtained. At the same time, it is important that ample time be provided for review and comment of the final draft National Mall Plan. It will be appropriate to obtain advice from individual experts and organizations in a structured process before the final draft plan is revised and adopted. In addition to the ongoing Section 106 process with a variety of organizations, it would be appropriate for the National Park Service to convene groups of experts to provide comments on specific elements of the National Mall Plan.

We hope the National Park Service will be able to incorporate the comprehensive steps recommended in our comments to prepare a long-range plan that incorporates the needs of all the agencies and institutions that have a role in the future development of the National Mall. If the National Park Service cannot do this, we suggest that the National Capital Planning Commission should step forward and assist with preparing a comprehensive plan for the National Mall.

We look forward to continuing to work with the National Park Service in the overall approach to 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 the Washington region.

Sincerely,

John Fondersmith

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

Laura M. Richards

Laura M. Richards, Chair
Committee of 100 on the Federal City



Peter C McCall
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05/10/2009 06:22 PM

To Susan_Spain@nps.gov
cc
bcc
Subject Guild of Professional Tour Guides Comments on NPS
Preferred Alternative to National Mall Plan

Dear Susan Spain,

Here is the Guild of Professional Tour Guides comments on the NPS Preferred Alternative Plan for the National Mall .

The Guild of Professional Tour Guides Washington DC, representing some 400 professional tour guides in the nation's capital, applauds the National Park Service's Preferred Alternative for the National Mall Plan to provide a welcoming, sustainable, flexible and transformable public space for all to enjoy. As interpreters of American history, our Guild members spend as much of our time "showing off" the National Mall and its memorials as anyone--except NPS rangers.

As the national civic stage for American democracy, the well-worn National Mall must be protected, enhanced and maintained continuously to attract and impress all visitors/local citizens in the 21st century and beyond. We believe a beautiful, visitor-friendly National Mall can best serve as America's "front yard" and no longer be considered the Smithsonian's dusty "back yard" - i.e., a staging area for festivals, military demonstrations and other Mall events.

* In view of high levels of use/abuse, it is essential to protect/restore the Mall's historic landscape and memorials: (1) to reverse soil compaction, (2) to improve water quality in the now-filthy ponds/pools and (3) to enhance growing conditions of trees and turf. We suggest the NPS explore an innovative approach to maintaining the Mall's greensward to make "our front yard" as verdant and viable as L'Enfant and McMillan envisioned.

* Improvement of visitor amenities and facilities * is high on the Guild's list of priorities for the National Mall. As tour guides, we see first-hand the need for more conveniently located restrooms, food service facilities, water fountains, benches, waste receptacles, accessibility ramps and, yes, tour bus pick-up, drop-off and parking spaces. We concur that visitor enjoyment of the Mall can inspire more memorable, comfortable and educational experiences for everyone. Needless to say, we believe tour bus parking is important to the overall visitor experience.

* Better pedestrian lighting, signage and walkways * are also paramount to a positive Mall experience. We are especially concerned about poor lighting and often-poor maintenance of lighting at the FDR, Lincoln, Korea and Vietnam Veterans War memorials. Occasionally, tour guides lose track of visitors on nocturnal tours of these memorials due to poor lighting. We believe that well-maintained lighting is essential to improving public safety as well as visibility and wayfinding.

*The Guild is encouraged by the plan's "wayfinding and new pedestrian guides" proposal. *We were concerned that deficient signage and

wayfinding often confused Mall visitors. It is important for visitors to know where they are headed and be able to read pertinent information about each significant site, including the often-overlooked DC World War I Memorial. We believe this neglected structure and adjacent grounds should be rehabilitated and upgraded to continue the memorial's historic use as bandstand for "patriotic" concerts.

We are also encouraged by the plan's call for improved traffic circulation on and around the Mall. We agree this plan should be coordinated to better meet all visitor/user needs—for pedestrians, joggers, bicyclists, motorists and tour bus passengers. We believe the tour-bus problem must be addressed in this plan and provisions be made for long-term parking spaces/facilities on/near the Mall.

*In considering logistics for current/future tour-bus management/parking, *we suggest that Ohio Drive SW be widened south of Independence Avenue and north of FDR to provide diagonal parking for tour buses. This would increase parking considerably and help relieve tour bus congestion at various sites on and near the Mall—e.g., the Lincoln/Korea drop-off/pickup zone on Daniel Chester French Drive. We suggest an extra-wide lane could be created by snipping just a bit from the free-form ball fields and having that lane dedicated to bus parking at an angle. This would provide a cheap and quick way to add parking for the vehicles that transport so many visitors to enjoy the National Mall. Other suggestions:

- --Consider the proposed construction of an underground intermodal transportation center (ITC)/parking facility within Benjamin Banneker Park/L'Enfant Promenade as part of major renovations to the 10th Street overlook/Maine Avenue waterfront areas. The ITC would be designed to accommodate up to 1,150 cars and 75 tour buses.

- --Allow Circulator bus service on both Constitution and Independence Avenues to include the area between the Washington Monument and the Lincoln Memorial.

- -- Build more restrooms at convenient locations on the Mall and make sure they are operating and clean all the time. Consider additional bathrooms for the Vietnam and Korea War memorials areas, as well as at all food-service venues. No one should have to walk more than a half-mile to find relief.

- -- Provide more eating venues/better-quality food service facilities offering a wider selection of affordable/tasty meals. Uniform-style ice cream/soft drink wagons would be a welcome addition on hot days. Please get rid of those tacky food/souvenir vending vehicles on the Mall and along 15th Street, where tour buses need to park.

- -- Place more recycling/trash receptacles throughout the Mall, especially around the Washington Monument between 14th and 17th streets. (The lack of trash cans encourages people to litter.)

- -- Provide uniform-style pathways and benches throughout the Mall, especially in the Constitution Gardens area.

- -- Install uniform-style, clean/cool drinking fountains throughout the Mall, thus discouraging visitors from discarding plastic water bottles. There seems to be no working fountains at the Vietnam or Korea memorials. Water fountains are ecologically correct and help fight dehydration in warm weather. Also, consider the desirable addition of

cooling/heating stations and shady areas on the Mall.

- -- Expedite development of a National Mall lighting plan_ to upgrade public safety and visibility.

- -- Provide presentation spaces for tour guides_ to offer commentary around the Korea and Vietnam memorials so that crowds as large as 50 visitors do not block walkways to these memorials.

- -- Move the National Park Police Facility_ to a site on or near Ohio Drive or East Potomac Park and revert Ash Woods to its previous use as a space for rest and serenity.

- -- Convert the historic Survey Lodge into a multi-use, NPS-operated facility_ offering rental of bikes, wheelchairs and even Segways for Mall tours. Provide short-term parking for disabled persons' cars/ vans for seniors.

- -- Remove the Sylvan Theatre from the Washington Monument grounds and replace it with a full-service facility_ including a sit-down eatery, restrooms, information desk and gift shop highlighting the first president's legacy. The existing run-down, round restroom structure should be removed.

- -- Build a two-level food-service/information facility on the terraced area at the east end of Constitution Gardens_. The attractive new center would feature a sit-down, cafeteria-style restaurant-like the Pavilion Café--and exhibits on the Mall, including L'Enfant's vision, history of the former canals, the McMillan Plan and the NPS. It should include a gift shop/bookstore offering literature about the nation's capital and its history.

- -- Remove the existing Capitol Reflecting Pool at Union Square and cover that large space with a landscaped, hard-surface area with pervious paving_ for peaceful 1st Amendment demonstrations. Create two small rectangular pools in front of the Grant Memorial's artillery and infantry unit statues, using water plumes similar to those at WWII. Retain/improve existing trees and grass.

- -- Convert the historic Smithsonian Arts & Industries Building into an attractive visitor/educational center_ for not only the National Mall but the entire city. Food service and restrooms should be included.

On a related matter, we strongly support the NPS proposal to rebuild the crumbling seawall in front of the Thomas Jefferson Memorial, to resurface the memorial's cracking north plaza by the Tidal Basin and to enhance transition areas between the plaza and adjacent areas.

Submitted to the National Park Service by Shirley Timashev, President, Guild of Professional Tour Guides Washington DC

For further information, contact: Pete McCall, Co-Chair, Government Affairs & Tourism Committee, Guild of Professional Tour Guides, 202-547-5024, pcmtours@gmail.com <<mailto:pcmtours@gmail.com>>



NATIONAL
ASSOCIATION for
OLMSTED
PARKS

May 15, 2009

Susan Spain, Project Executive
The National Mall Plan
National Mall & Memorial Parks
900 Ohio Drive, S.W.
Washington, DC 20024

Re: National Mall Plan Preliminary Preferred Alternative

Dear Ms. Spain:

The National Association for Olmsted Parks (NAOP) appreciates the opportunity to participate as a consulting party in the National Mall planning, pursuant to Section 106 of the National Historic Preservation Act, and to comment on the National Mall Plan Preliminary Preferred Alternative.

NAOP continues to see the need for a **multi-agency, long-term comprehensive vision** for the National Mall as the nation's symbol of democracy and one of the country's greatest works of civic art.

This vision should evolve from the principles embedded in the L'Enfant and McMillan Plans and include the areas that, historically, were designed to complete the experience and purpose of the Mall – the Capitol Grounds, the grounds of the White House, President's Park, as well as the land held by agencies and organizations between Constitution Avenue and Independence Avenue and 1st and 14th Streets, and areas of the city immediately surrounding the Mall, integrated with it through roads, natural systems, view sheds and vistas.

In contrast, we believe that the National Park Service's National Mall Plan which is currently being developed will best serve as a management plan for the portions of the Mall that are under National Park Service jurisdiction.

A formal definition and recognition of the National Mall—i.e., through a National Historic Landmark nomination as proposed by the National Trust for Historic Preservation—accompanied by a vision statement and a set of guiding principles would help direct the visionary planning process, clarify the goals and scope of the undertaking, and assist with prioritizing decision making and resource allocation.

An independent commission, chartered by Congress, may be best suited for leading the multi-jurisdictional long-range planning effort.

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With regards to visitor amenities, specifically for the portion of the Mall between 3rd and 14th Streets, NAOP believes the National Park Service should more strongly collaborate with the Smithsonian Institution, National Gallery of Art, USDA, and other relevant stakeholders to determine what visitor amenities could be offered through existing facilities and cooperative visitor services agreements, and through the restoration and reuse of the Arts & Industries building. As the most formal historic area of the Mall, any design changes in this area should reinforce and not detract from the formality and symmetry of the space.

With regards to Union Square, NAOP agrees with the National Park Service's assessment that Union Square should be redesigned to strengthen its design, usefulness and, above all, its function as a transition element between the National Mall and the Capitol Grounds. However, visitor activities, facilities and amenities should not overshadow the dignity and symbolism of this significant historic landscape. We recommend that the National Park Service identify Union Square as an area in need to be re-designed, and that the design be considered as part of a comprehensive, multi-agency vision plan.

Thank you for considering our comments. The National Association for Olmsted Parks looks forward to continuing involvement in the Section 106 consulting process.

Sincerely,

Iris Gestram
Executive Director

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May 15, 2009

Ms. Susan Spain, Project Executive
National Mall & Memorial Parks
National Park Service
900 Ohio Drive, S.W.
Washington, DC 20024

Re. Preliminary Preferred Alternative for the National Mall Plan

Dear Ms. Spain:

The National Coalition to Save Our Mall appreciates the opportunity to comment on the "Preliminary Preferred Alternative" (PPA) for the National Park Service's (NPS) National Mall Plan. The Coalition has participated in the public process for the National Mall Plan since the first public session in fall 2006. We have attended the public comment sessions as well as all of the Historic Preservation Act Section 106 public consultation meetings, including tours to the Mall for on-site reviews.

Over the long course of this planning process to date, it has been clear that the National Park Service and consulting parties want the same thing – a long-term plan that will guide preservation and change in coming decades. So we appreciate the considerable work that Project Executive Susan Spain and others have put into this planning effort.

However, the release of the PPA earlier this year allows us to see clearly for the first time the narrow, jurisdictional scope and goals of the National Mall Plan and the vague, undefined quality of proposed improvements and changes. Even though the NPS recognizes that the Mall has become our "civic stage," the driving force behind this planning process seems to be more the protection of natural resources than a program for supporting increased public involvement with and use of the Mall.

We continue to believe – more than ever since completion of the National Capital Planning Commission's Framework Plan and now release of NPS's Preliminary Preferred Alternative – that a multi-jurisdictional, long-range visionary plan for the entire Mall and all interested parties, including the District and public, is needed to guide future growth. As you are aware, the Coalition has called for formation of an independent, 18-month Congressionally-chartered or Presidential commission that will address the needs of all stakeholders in creating a comprehensive, long-range vision for the Mall in its third century.

In the following comments, we identify main issues and then provide further details below:

- The document as published, labeled a "Plan," is not a "plan." It is much too general in proposals and raises many more questions than it answers. Details are provided below. It is at best a "Refurbishing" program for deferred maintenance, with some improvements

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Ms. Susan Spain
 NPS National Mall Plan PPA
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to existing conditions at various locations primarily for food concessions and NPS support facilities. In many ways, this “plan” is little more than an update of NPS’s 1973 “The Washington Mall Circulation Systems” visitor amenities and tourmobile document – minus any inclusion of the transit element. One alarming aspect is the potential addition of many new concession and visitor services structures on the already-overbuilt public open space.

- The scope of the PPA includes only NPS jurisdictions and does not cover the entire area that is now considered the National Mall in the National Capital (including, at a minimum, the White House grounds and grounds of the Capitol). While the stated boundaries include the area between Constitution and Independence avenues, there is no mention in the Newsletter, nor has there been discussion during the Section 106 meetings, of improvements to portions under the jurisdiction of the Smithsonian, National Gallery, USDA, and other agencies and institutions on the National Mall.
- The proposals for refurbishments and improvements represent NPS interests but not the interests of those other groups, or of the District or public. A glaring omission in this regard is the lack of a basic transit component.
- This planning effort does not attempt to dovetail with the L’Enfant and McMillan Plans, the planning precedents that articulated a vision for the Mall’s first two hundred years. Instead the PPA divides the planning area into a collection of NPS-administered “cultural landscapes” and “historic districts,” each having its individual and separate history, design, and significance.
- Flooding is an urgent matter, especially since a large portion of the Mall is landfill and in the flood plain, but the PPA has no flood control element and makes no mention of any completed NPS “Continuous Maintenance and Operations Program” which we understand is required by the Army Corps for federally sponsored projects such as the Potomac Park Levee now being developed for the Mall at 17th Street.

We wonder how the NPS planning process can be considered to conform with federal planning policies and requirements. The NPS document cannot be considered a “Master Plan” as defined by National Capital Planning Commission (NCPC) submission requirements because it does not contain:

- An Urban Design Framework Diagram
- A proposed Land Use Plan
- A Circulation Plan
- A proposed Site Development Plan, and
- A Landscape Plan

In addition NCPC submission requirements, among others, call for a Transportation Management Program, a Stormwater Management Plan and a Staging Plan. The newsletter publication makes no reference to any of these required plan elements. Nor has there been any discussion of such plans during the Section 106 consultation meetings.

The PPA still has not addressed limitations and inadequacies for a “National Mall Plan” that our Coalition has raised since fall 2006, or the concerns raised in May 2008 and again in December 2008 in two joint letters by a group of nonprofits including the Committee of 100 on the Federal City, National Association for Olmsted Parks, National Parks Conservation Association, DC

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Preservation League, National Coalition to Save Our Mall, and, as signatory to the May 2008 letter, the National Trust for Historic Preservation.

On the contrary, NPS continues to assert the totally unsupportable claim that this NPS Mall planning effort constitutes the much-needed long-term vision for the National Mall. In her letter from April 16, 2009 responding to the abovementioned December 2008 joint letter, National Capital Regional Director Margaret O'Dell repeats the NPS assertion made from the outset of the planning process that [the Plan] "being prepared by a multi-disciplinary planning team that involves numerous cooperating agency representatives"... "will set a broad, long-term conceptual vision for the National Mall." We strongly dispute that statement.

There is no evidence either in the NPS Newsletters or in the Section 106 consultation meetings that NPS is attempting to plan for the entire Mall or for the interests of other Mall constituencies. For example, regarding treatment of the under-tree areas of the Mall, the NPS proposes to prevent future public events (except First Amendment) to protect tree roots, while Smithsonian and the general public interest favor use of these areas, and modern scientific techniques have been proven to protect roots while also permitting public uses. Where is the science to support the NPS "Preliminary Preferred Alternative" for this critical public use policy?

Furthermore, during the Section 106 consultation meetings questions have arisen as to how the current planning effort conforms to NPS policies regarding the requirement for preparation of a General Management Plan (GMP) for each park unit. When we requested copies of earlier Mall Management Plans as a baseline for evaluating the current NPS planning effort, Acting Superintendent Stephanie Toothman confirmed to us that in fact there has never been a Mall Management Plan and that the current planning effort, while incorporating some management elements, is not a Management Plan as defined by the National Park Service's management policies. We wonder if one reason for the Mall's current state of disrepair and neglect – especially when compared to the meticulous grooming of the Smithsonian, National Gallery of Art, and USDA landscapes – is the lack of any management plan. We believe developing a standard NPS General Management Plan should be a priority.

The following are examples where the PPA document is vague and non specific:

1. To which areas does "unprogrammed open space areas" refer? (page 1)
2. Suggesting "engaging eminent professionals...to design high-quality design" illustrates that the document is further out of phase with the National Environmental Policy Act and EIS process and the ongoing Section 106 process. Examining the document now without the future proposals by the "eminent professionals" will require amending the EIS and prolonging the 106 process.
3. Cultural resources such as memorials, related statuary and places of commemoration are "to be preserved." A good idea but no mention has been made how each of these resources would be preserved. (page 1)
4. The Parkwide Actions indicate that the historic landscape "would be improved, but its use would continue to evolve, and its value...would change, reflecting significant national events." This reinforces that this is not a "plan" because it does not try to foresee future needs. (page 1)

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5. An area that is plagued by severe flooding needs a permanent solution to hydrology and flood control. "Cooperating with the Corps of Engineers to maintain the flood control system (the Potomac Park levee)" is again not a permanent solution and once more indicates that this document is not a "Plan." (page 1)
6. "Intense post-event recovery procedures would be developed..." (page 2) Such procedures are part of an operational or maintenance plan not a development plan. There is no method indicated for "The intent would be to protect resources, reduce impact of annual events..." How will this intent be accomplished?
7. Page 3 suggests "Pedestrian circulation would be improved..." No proposals are given to carry out this objective for the entire Mall area. Placing yellow pedestrian improvements (paved areas) on the map legend does not adequately indicate what these improvements would be. How much more paving is proposed? How many more pedestrians can be accommodated by the vague improvement suggestion, or is this to better accommodate the current level of pedestrians?
8. Page 6, The Mall (3rd to 14th Streets) suggests that the Mall would remain a highly visible landscape... General words such as "improved" and "protected" are used but no specific plan methods are provided to achieve these objectives.
9. Page 6 also highlights that "All Visitor Facilities Would Be Compatible with the Character of the National Mall." A very noble objective. What design standards are suggested to accomplish this objective?
10. "Near all refreshment stands, seating and tables... would add to visitor enjoyment..." No scale or magnitude is provided except to say "small-scale" "small architecturally compatible..." A document without some design standards for such areas gives little guidance to the implementation of the idea. What is small to some is big to others.
11. A major omission, in the document, is the lack of reference to the "8th Street Cross Axis" as provided in the L'Enfant and McMillan Plans. This "cross axis" is part of the historic plans listed on the National Register of Historic Places.
12. For the Washington Monument Grounds (page 6), the document states that "a permanent visitor facility is needed" without any documentation to support current and future needs. Detailed plans for such an underground facility have been prepared previously by the NPS but no funds were appropriated by the Congress. Historically, the Washington Monument was intended to be the centerpiece of the National Mall, though that plan was never realized. Addressing the Monument grounds' centrality to the Mall's symbolic cross-axis aspect requires much more thought and planning than simply adding a food service facility.
13. Page 7 indicates that "Historic Views Would Be Improved and Perpetuated." The prominent views of three memorials are involved. No suggestions as to how this would be done are included in the document.
14. Page 8 states for the FDR Memorial "A small food service facility convenient to both memorials, (including the Martin Luther King Jr. memorial) and closer to Ohio Drive **could be provided if warranted by future visitation.**" This implies that current visitations do not warrant such a small food service facility. At what level of visitation would a small food service facility be appropriate?
15. The Map legend indicates "Security Perimeter Completed." There is no discussion of what form that security perimeter may take. To date, each of the several monuments has their own security barriers. Is that approach to be applied to the Mall perimeter?

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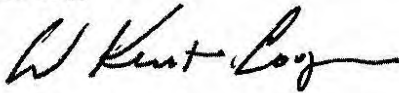
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Given the vague and non-specific quality of the PPA as outlined above, it is not possible to evaluate proposals for major design changes to areas such as Union Square, the Washington Monument Grounds, and Constitution Gardens, changes that would alter also the overall integrity and quality of the Mall's historic designed symbolic landscape.

In conclusion, it is impossible to provide objective comments on this premature preliminary document. The Draft EIS which is to be released soon "will analyze all the alternatives that have been presented..." Without knowing the potential adverse impacts this preliminary preferred alternative may have, it is not productive to provide comments which in the final analysis may be irrelevant due to adverse impact.

In the past, representatives of the NPS have testified to Congress that this plan must be completed before NPS can begin work on restoration projects. However, maintenance is a basic NPS function and does not require completion of this plan and so should not be affected by this planning process, which already has moved well past the stated late 2008 completion date.


Sincerely,



W. Kent Cooper, FAIA
Vice Chair



Judy Scott Feldman, PhD
Chair



George H.F. Oberlander, AICP
Vice Chair



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National Headquarters

May 15, 2009

Ms. Susan Spain, Project Executive
National Mall & Memorial Parks
National Park Service
900 Ohio Drive SW
Washington, DC 20024-2000

Dear Ms. Spain:

The following comments are submitted on behalf of the National Parks Conservation Association (NPCA) and our more than 325,000 members nationwide in response to the Preferred Preliminary Alternative National Mall Plan as set forth in the *National Mall Plan Newsletter 4*. The nonpartisan NPCA is a nonprofit, advocacy organization serving as the leading voice of the American people on behalf of our national parks since 1919.

NPCA thanks the Park Service, the National Mall planning team, and planner Susan Spain for guiding us through the Section 106 process and providing an opportunity to comment on the preferred preliminary alternative. NPCA strongly agrees that the National Mall, America's premier civic space, is in dire need of reinvestment and refurbishment, both to protect the historic landscape and to enable the Mall to accommodate high use and meet (potentially even exceed) visitor expectations well into its third century. The draft, which touches upon issues of access, public safety, visitor enjoyment, wayfinding, interpretation and education, First Amendment rights, and visitor amenities, furnishes a plethora of recommendations synthesized from public comments received by the Park Service in December 2007.

The preferred preliminary alternative makes several proposals with which it is easy to agree. Consistent design in visitor facilities, signage, paving, and other elements that extend throughout the Mall would help address the Mall's current lack of a strong, coherent identity, especially if those efforts include areas of the Mall not under Park Service jurisdiction. We support Park Service efforts to use more sustainable materials and design.

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However, the preferred preliminary alternative lacks sufficient context and analysis to explain why proposed actions were chosen regarding the placement, removal, or alteration of structures and spaces, how those decisions were reached, and what (if any) alternatives were considered or may be available for consideration by the Park Service and the public. While the preferred preliminary alternative articulates an overarching vision for the National Mall as America's premier civic stage, the ensuing text does not make clear how this collection of recommendations connects to and was informed by that vision, and how the proposed actions to protect and enhance the natural, cultural, and symbolic aspects of the Mall fit into an that overarching vision.

Of fundamental importance, the preferred preliminary alternative defines the National Mall as the area between Union Square and 14th Street, bordered by Jefferson Drive to the south and Madison Drive to the north. Many participants in the Section 106 consulting party process including NPCA take issue with this definition, as the National Mall includes land held by other agencies and organizations, such as the National Gallery of Art, the Smithsonian, and the U.S. Department of Agriculture.

To resolve this issue, and to provide a solid basis for the National Mall's future, we recommend that the National Park Service produce a National Historic Landmark nomination for the National Mall. Undergoing this process would allow stakeholders for the National Mall an opportunity to craft a single, overarching narrative for the Mall, define the boundaries and characteristics that make the Mall a unique civic space, and provide a foundation for future planning efforts.

While we are aware of the various plans by other entities with a stake in the National Mall, the preferred preliminary alternative provides little information about how the Park Service and this alternative coordinate with and are informed by those plans. Our response to the draft document would be better informed by information on existing and planned coordination with the Smithsonian and other Mall entities to better accommodate the needs of visitors. For example, has there been analysis of the potential to place restrooms and information/orientation stations on the grounds of the Department of Agriculture, the National Museum of Natural History, or the currently open and under-utilized western patio of the Air and Space Museum? Even if these options have been considered and ruled out, access to that information would inform our views of the proposed preferred alternative.



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For example, the Park Service document calls for the construction of a restroom and a combination restroom and information/orientation station on the north/south walkway along the 12th Street corridor. The preferred preliminary alternative provides no analysis of why these locations are thought to be ideal, or whether alternatives have been considered that expand access to visitor services such as food and restrooms provided by these other entities. There needs to be more analysis – or existing analysis needs to be made available -- of how pedestrians and cyclists would navigate around new structures on this site, how the new structures would diminish rather than add to the congestion visitors already experience at the top of the Smithsonian Metro portal, how new structures would be sited with respect to protecting the historic, iconic sightlines that draw millions of people to the Mall each year, and alternatives that leverage resources of other Mall entities.

The preferred preliminary alternative lacks details about the size and capacity of the restrooms, nor does the document reference Park Service analysis of visitor needs. How will the Park Service balance location, function, and protecting the iconic open space and vistas of the Mall?

NPCA supports the concept of making Union Square a more accessible, hospitable, and aesthetically appealing place, but the preferred preliminary alternative does not address the potential precedent-setting nature of the proposed redesign. Can the proposed changes outlined in *Newsletter 4* be undertaken without an amendment to the Commemorative Works Act? What adverse impact (if any) might the introduction of a dedicated performance and other new or changed facilities have on the integrity of the space? Could the proposed bathrooms and other infrastructure be instead located on the parcels to the north and south of Union Square rather than on rather than on this significant anchor landscape?

Redesigning Union Square cries out for practical coordination with the Architect of the Capitol and the U.S. Botanic Garden, who own these neighboring parcels, and with whom together the best design could be achieved. The proposed redesign of Union Square underscores our concerns about lack of coordination with other agencies with a stake in the Mall. A multi-organization visitor services plan that leverages each of the Mall entities' resources would minimize construction of new structures, and better protect the Mall's resources and its meaning.



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These are the kinds of questions we have about other areas of the National Mall slated in the preferred preliminary alternative for development or redesign, including the Sylvan Theater and the eastern edge of Constitution Gardens. Again, the issue is not an opposition to change, but rather a sense that the Park Service either has not completed adequate study of alternatives and the potential impacts of those alternatives, and/or needs to make that analysis available to the public. And of fundamental importance, these changes need to be considered in the overall context of the vision for the National Mall and its meaning and use.

In a letter dated March 26, 2007, NPCA outlined several issues that we hoped any plan for the National Mall would address. Chief among our concerns were the following:

1. The plan would address the Mall's lack of a well-defined and coherent identity.
2. The plan would seek coordination among all the relevant entities, including the Smithsonian, the Department of Agriculture, and others, in all aspects of planning and enhancement. And,
3. The plan would meaningfully engage citizens from all across the country.

While the Park Service has stepped up efforts to engage a wide variety of consulting partners and citizens in the Section 106 process for the National Mall, the preferred preliminary alternative fails to provide sufficient context and analysis to help the reader form a sound opinion as to how and why the recommendations listed in the document were made. And the plan, as it exists, contributes too little to the creation of a well-defined coherent identity for the Mall and offers little in the way of coordination with other relevant agencies and institutions.

NPCA understands that by issuing a preferred preliminary alternative, the National Mall planning team's intention was to identify and begin to address controversial issues in advance of the release of the draft environmental impact statement. However, the abbreviated nature of the alternative largely thwarts this goal.

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We thank you for the opportunity to comment, and look forward to continuing to serve as a consulting partner in the Section 106 process for the National Mall.

Sincerely,

Joy M. Oakes
Senior Director, Mid-Atlantic Region
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May 15, 2009

Ms. Susan Spain, Project Executive
National Mall & Memorial Parks
National Park Service
900 Ohio Drive, S.W.
Washington, DC 20024-2000

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Re: The National Mall Plan

Dear Ms. Spain:

Thank you for the opportunity to comment on the National Mall Plan Preferred Alternative. This comment letter is submitted pursuant to consultation under Section 106 of the National Historic Preservation Act and is intended to help inform the Draft Environmental Impact Statement (EIS). We understand, however, that Section 106 consultation will continue, and there will be additional opportunities to comment on and inform the National Mall Plan.

General Comments

As a general matter, we continue to believe that a “big-picture” vision plan for the National Mall should be developed in partnership with all stakeholders and agencies. By contrast, we believe that the current planning effort is best understood as a management plan for the portion of the National Mall that is controlled by the National Mall & Memorial Parks unit of the National Park Service. In our view, the National Mall, as evolved from the McMillan Plan, should be construed to include the White House, the White House grounds, President’s Park (*i.e.*, Lafayette Square, where the National Trust’s Decatur House is located), the Capitol and Capitol Grounds, as well as all land located between Constitution Avenue and Independence Avenue and 1st and 14th Streets. Many properties within the National Mall are held by other agencies and organizations, such as the Smithsonian Institution and the National Gallery of Art. We believe a comprehensive vision and stewardship plan for the National Mall should include this entire area.

We propose that, as part of the Programmatic Agreement for this current plan, the National Park Service should produce a National Historic Landmark nomination for the National Mall. This nomination would help to synthesize the disparate cultural resource studies into a single, cohesive narrative, and would formally recognize and delineate the extraordinary significance of the National Mall. Through a Landmark nomination, the National Park Service and others could define the boundaries and characteristics of the National Mall as a whole, as a basis for future planning and stewardship efforts. We would be happy to develop recommendations to help identify qualified professionals who could assist the Park Service in preparing such an important nomination.

One important issue that must be addressed is the ever-evolving character and use of the National Mall. As the Mall has evolved over time, some of these changes have acquired significance in their own right. It will be important for a detailed study of the National Mall’s significance to identify those elements and features that should have special

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protection against future alteration, as well as those whose alteration could allow the Mall to continue to evolve organically in response to changing needs and uses.

In the interest of developing a stronger identity for the National Mall as a whole, we believe that consistent design in visitor facilities, signage, paving and other Mall-wide elements is important. Obviously, this idea is somewhat constrained by the fact that this plan extends only to the portion of the Mall area that is under National Park Service jurisdiction, and we strongly recommend that the National Park Service work with the Smithsonian and others to ensure that any "Mall-wide" proposal indeed extends to the entire Mall.

Visitor facilities for the National Mall do not have to be identical but should follow unified design guidelines. We believe that the food facility design by Oehrlein & Associates is generally compatible with the National Mall, and could be used as the basis for future facilities, assuming that issues such as siting and size can be resolved. We recognize that some individual monuments and memorials have ancillary structures that relate solely to their immediate contexts. However, we were surprised and disappointed to learn that the National Park Service did not re-evaluate all existing facilities as part of the National Mall plan; we believe this is a grave oversight that should be corrected in subsequent versions of the plan. In the long term, as facilities age and require upgrades, we recommend that the design and placement of context-specific facilities, such as the World War II Memorial restroom and visitor facilities, be re-evaluated in light of the current planning effort. We also recommend that the design of the proposed bookstore and restroom facility associated with the future Martin Luther King, Jr. Memorial be reconsidered with the current planning effort in mind.

Because of the compressed timeframe for Section 106 review, the consulting parties have not had the opportunity to fully evaluate the effects of the preferred alternative in the course of the consultation meetings. In particular, impacts to the National Mall itself (between 3rd and 14th Street) need greater attention than they have received in Section 106 consultation to date. Cumulative effects to the National Mall as a whole are almost impossible to gauge, given the relatively limited scope of the current planning effort, and the lack of consensus around the National Mall boundaries and characteristics, as previously discussed. Cumulative effects are also difficult to evaluate without information about associated plans, including (but not limited to): transportation and transit-related structures, such as Tourmobile kiosks; changes to the levee; and wayfinding. This planning effort should include a detailed evaluation of and recommendations for reducing miscellaneous "minor" intrusions, such as post-and-chain fencing and security measures. We request that the National Park Service provide overlays of these and other relevant projects in the Draft EIS, as well as in the course of Section 106 consultation.

Although the DC World War I Memorial, Ash Woods, Lincoln Memorial, Jefferson Memorial and Tidal Basin have not yet been addressed in Section 106 consultation, we offer some preliminary comments on specific areas of the National Mall plan preferred alternative below.

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Union Square

We agree with the National Park Service's analysis that Union Square does not represent an intact historic element of the National Mall and could be redesigned. While the Capitol Reflecting Pool may well be a contributing feature of the Skidmore Owings and Merrill plan, we recognize its flaws from both a design and use perspective. We agree with the views, expressed during Section 106 consultation, that Union Square should be understood as a transition element between the formal National Mall landscape and the Capitol Grounds. We also concur that an area incorporating pavement and facilities for events would benefit the highly significant historic landscape, by reducing impacts on other parts of the Mall. However, the restroom and visitor facilities are currently proposed to be located at the terminus of the tree plantings. We believe this siting is especially inappropriate, as it would lend far too much prominence and visibility to these mundane facilities.

Ultimately, the kinds of dramatic changes being proposed for a major portion of the Mall such as Union Square must derive from an articulated vision for the entire Mall, developed with a National Historic Landmark nomination as a basis. Some questions that need to be resolved as part of the consideration for Union Square include the following:

- Historically, the space was dedicated to, among other things, a botanical garden and the victory of the Union in the Civil War. Should design changes reinforce one or more of these historic visions, or should we view this as an opportunity to rededicate the space to a contemporary idea or purpose, one that perhaps draws on historical precedent?
- How should the historic designs of the space be referenced and interpreted in a new design? We concur with the National Park Service that significant features, including historic trees and the Grant statue, should remain *in situ*.
- What are the security needs of the Architect of the Capitol? Any security measures should be invisible and incorporated seamlessly into the design for Union Square.
- Parcels to the north and south of Union Square (currently used by the Architect of the Capitol and the U.S. Botanical Garden) should be considered as part of the redesign for Union Square, particularly as potential locations for restroom and other facilities. Union Square may remain its own distinct area; however, the parcels immediately adjacent should at least inform, complement and support the new design.

For these reasons, we recommend that the National Park Service identify the Union Square area as one in need of redesign, but delay any detailed proposals for the area pending more careful analysis, within the context of the entire Mall.

National Mall (Between 3rd and 14th Streets)

This portion of the National Mall represents the most formal historic landscape; it is also one of the most heavily trafficked, and therefore vulnerable. In the characteristic grass and elm panels, any change would represent an intrusion and an adverse effect. Therefore, special sensitivity must be used when proposing and siting any new facilities,

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and all current facilities should be re-evaluated with this principle in mind. Any design changes should reinforce and not detract from the formality and symmetry of the space.

We strongly recommend that the National Park Service evaluate opportunities for siting visitor amenities for this portion of the Mall "behind the architectural line," *i.e.*, in areas under the control of the Smithsonian, National Gallery, and Department of Agriculture. The National Park Service should also collaborate with the Smithsonian to determine what visitor amenities could be offered through the restoration and reuse of the Arts & Industries Building. Museums could be open later to allow longer access to facilities inside. Separate food and restroom facilities, such as those at the National Gallery Sculpture Garden and the Smithsonian's Air & Space Museum, should also be considered as possible candidates for longer hours.

An inter-agency visitor services agreement could reduce development on the landscape of the Mall and could dramatically improve the visitor's experience and understanding of the historic resources. This is an area in which we believe shared planning and stewardship of the Mall is critically important.

If visitor facilities are unable to be located completely "behind the architectural line," we recommend the following:

- Food facilities and restrooms should be paired to reinforce the symmetry and axial patterns of the Mall. However, this recommendation is conditioned upon more detailed information about the impacts of the National Park Service food facilities on the elm panels. While new structures would have an adverse effect on the historic landscape of the Mall, that impact may well be less severe than the impact from siting the facilities separately, or at other locations.
- The carousel and food facility in front of the Arts & Industries Building should be relocated, and the elm panel should be restored. Due to landscape changes in the late 19th century, this portion of the elm panel is already heavily compromised. It will be further damaged by proposed security changes for the Smithsonian Castle. The carousel is an important feature of the Mall and should continue in operation at a different location, perhaps near Constitution Gardens or on the grounds of a Smithsonian museum, such as the National Museum of American History.
- The existing food facility in front of the National Museum of American History should be removed. In addition to numerous refreshment opportunities in adjacent museums, as well as a new facility in the Sylvan Theater site, the National Mall plan provides for two large new facilities on the 12th Street axis that should be able to absorb this need.
- The two facilities proposed for the 12th Street axis should reinforce the axial and symmetrical forms of this portion of the National Mall, without compromising views into or out of the Mall. Special attention in particular should be given to the design and placement of the proposed northern facility, as this area is a visual gateway to the National Mall. Additionally, the 12th Street axis - proposed in the Preferred Alternative as a paved space - should include at least partial landscaping around the facilities, in a manner consistent with the formal landscape character of the

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National Mall. At this time, we recommend against paving the center panel of this axis, unless no alternative can be found to accommodate events on this portion of the Mall.

Regarding general treatment for this portion of the National Mall, elm tree and grass panel restoration should be paramount; this may require re-engineering soils and additional funding for landscape stewardship. Wherever possible, first priority should be given to landscape restoration. To succeed, this project may also require a re-evaluation of how to accommodate designated national events that significantly harm the landscape on an annual basis.

We agree with the National Park Service that the current paving system of the National Mall should be replaced with a unified paving system that is sympathetic to the landscape design, as well as sustainable. We also support the proposal to reduce the number of minor paved crossings, forming large grass panels and reinforcing the formal landscape. However, we urge caution in creating the large paved areas proposed for 7th Street, the entrance to the National Gallery Sculpture Garden, and (as mentioned previously) the 12th Street axis. The proposed removal of grass panels has not been adequately discussed in Section 106 review and requires further consultation.

Washington Monument Grounds

We concur with the National Park Service that the Sylvan Theater area offers an opportunity for a multi-purpose visitor facility; however, we recommend that this be designed, programmed and implemented 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. In addition, we believe the Park Service should explore more sustainable alternatives that would renovate and reuse the existing facility, or elements of it, rather than tearing down entire the Sylvan Theater and sending it to a landfill.

Constitution Gardens

In general, we support the National Park Service's proposal for Constitution Gardens. While the changes proposed would be significant, they are consistent with the Skidmore Owings and Merrill concept for this portion of the National Mall. A restaurant and performance space would provide a draw for an underutilized and underappreciated portion of the Mall. In fact, Constitution Gardens may offer additional recreation or commemorative opportunities, with the original Skidmore Owings and Merrill concept as a guide; these should be considered as part of a larger vision plan for the Mall.

We concur that measures should be taken to ensure that the pool is as environmentally sustainable as possible, while retaining its essential character – in particular, the hard designed edge. In our view, changes could include moving water. A plan should be developed to restore the landscape over time to its original design, by replacing trees that die with the originally intended species. If implementation of the original design is not feasible, a plan should evaluate which elements of the landscape are successful and which should be redone, in a spirit consistent with the Skidmore Owings and Merrill design. We note that Constitution Gardens is an area where an overlay of the proposed levee changes

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would be especially helpful, in understanding how all of the current plans would work together.

With regard to architectural features of any new structures, we believe that the Constitution Gardens facilities can be distinctive to this area of the Mall, but should reference the National Park Service facilities elsewhere in the park, as well as the Skidmore Owings Merrill concept.

DC World War I Memorial and Ash Woods

The National Trust is very pleased that the DC World War I Memorial received dedicated stimulus funding for its much-needed restoration. We also concur with the decision to remove the restroom near the memorial. However, we request that the National Park Service consider whether a new facility is necessary, given the proximity of the World War II Memorial and proposed Martin Luther King, Jr. Memorial facilities. At the same time, we request greater detail about proposed changes to the stables, which create a visual intrusion and should be modified to be more compatible with the landscape setting.

Before treatment recommendations can be made for this parcel of the National Mall, the National Park Service should complete a Cultural Landscape Report for Ash Woods, including recommendations for restoration and maintenance.

Lincoln Memorial and Grounds

The National Trust is pleased that the National Park Service will reopen consultation regarding the proposed security measures for the Lincoln Memorial, given the stimulus funding received for renovation of the Reflecting Pool. We hope the reopened consultation will provide an opportunity to address design issues that were never fully resolved under the earlier Section 106 consultation. We support the National Park Service's decision to provide walking paths along the sides of the reflecting pool. Although this measure is inconsistent with historic precedent, it does reflect how the use of the space has evolved.

We remain concerned about the proliferation of facilities around the Lincoln Memorial. The National Park Service should consider ways to consolidate and streamline services in partnership with any new facilities. Because this area of the National Mall has not been fully discussed in the course of Section 106 review, we cannot supply detailed recommendations at this time. We note, however, that new facilities in the proposed Vietnam Veterans Memorial Visitors' Center would duplicate the functions of other nearby facilities, such as the visitors' information kiosk adjacent to the Vietnam Veterans Memorial itself. Certainly, the proposed new Vietnam Veterans Visitors' Center would further "crowd" the area, and we remain strongly opposed to the adverse effects of its design and location.

Tidal Basin and Jefferson Memorial

As with the DC World War I Memorial and the Reflecting Pool, we are pleased that stimulus funding has been set aside to address the seawall at the Jefferson Memorial, which is in desperate need of repair. In general, the focus of planning efforts for this area

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should be the stewardship and long-term health of the cherry trees, the Tidal Basin, and the memorial setting. In this respect, we generally support the recommendations set forth by the National Park Service, but note that we have not begun Section 106 consultation for this area.

Thank you for considering the views of the National Trust for Historic Preservation on this important matter. Please contact me (nell_ziehl@nthp.org or 202-588-6040) or Elizabeth Merritt (betsy_merritt@nthp.org or 202-588-6036) with any questions you may have. We look forward to participating in future discussions as the Section 106 consultation process moves forward.

Sincerely,



Nell Ziehl
Program Officer
Southern Field Office

C. SUMMARY OF ASLA BLUE RIBBON PANEL REPORT

EDITOR'S NOTE: The American Association of Landscape Architects (ASLA) has been a consulting party for the National Mall planning process. The following extract is from their website (<http://www.asla.org/nationalmall/>).

Reviving America's Front Yard

America's Front Yard

- | In Perspective: The Highly-trod Ground of the National Mall
- | Washington Monument: Award Winning Landscape Architecture
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From Crisis to Vision An Assessment of the National Park Service Plan for the National Mall

On March 19 and 20 in Washington, D.C., the American Society of Landscape Architects (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 National Mall Plan, released in early March.

ASLA President, Angela Dye, FASLA, principal of A DYE DESIGN, Phoenix, chaired and facilitated the panel, whose members were:

- Robin Abrams, ASLA, AIA, professor of architecture and head of the school of architecture at North Carolina State University in Raleigh
- Joseph Brown, FASLA, chief executive of AECOM's Global Planning, Design and Development group and CEO of EDAW, one of the world's leading land and community consultancies
- Fernando Costa, FAICP, veteran city planner and assistant city manager for the City of Fort Worth
- Gary Hilderbrand, FASLA, principal of Reed Hilderbrand Associates Inc., in Watertown, Massachusetts, and adjunct professor of landscape architecture at Harvard University Graduate School of Design
- Harry Hunderman, FAIA, senior principal and director of knowledge and communications management, Wiss, Janney, Elstner Associates Inc., in Northbrook, Illinois.

To launch the effort, the National Park Service gave a comprehensive overview of the plan, then took the panelists on a tour of key sites on the National Mall — Union Square, the Mall, the Washington Monument grounds, and Constitution Gardens, among them. The following day, panelists discussed and debated the plan's concepts and proposals and considered them in light of other planning initiatives. The following report presents the panel's findings and recommendations. We thank the National Park Service for their cooperation and the opportunity to be heard.

The ASLA Blue Ribbon Panel applauds and fully endorses the Park Service's overarching goals, objectives, and efforts to preserve and enhance the National Mall, a living treasure. The Park Service and other planning entities have worked hard to protect this critical national asset and have clearly articulated its role in our national heritage.

While we were aware that the National Mall was suffering from financial neglect, it was eye-opening to tour the Mall and see for ourselves the crisis conditions created by the many years of deferred maintenance necessitated by inadequate funding. Despite the Park Service's best and valiant efforts, deplorable conditions exist throughout this landscape: cracked, broken, and unsafe pathways; sinking seawalls; inadequate and deteriorated restrooms; sick or dying trees; impenetrable turf; and polluted, evil-smelling water features that actually put wildlife in harm's way. Such problems point out clearly that the National Mall has not undergone serious renovation in more than 30 years. Instead of its role as a symbol of the American spirit, the Mall has become an international embarrassment that calls for immediate attention.

Documentation of the planning process reveals that, as the Park Service moves closer to a final plan, its early aspirational language has given way to a more pragmatic tone to address critical needs caused by chronic funding shortages. The Park Service now is understandably focused on solving problems, both near and longer term. But the dire conditions of the Mall, and opportunities afforded by other D.C.-focused planning efforts such as "Monumental Core Framework Plan: Connecting New Destinations with the National Mall" by the National Capital Planning Commission (NCPC) call for a bolder vision. This new vision should reach beyond the boundaries that define the various jurisdictions (National Park Service, Smithsonian Institution, Architect of the Capitol) and reinforce the National Mall's significance of place. The vision should highlight the need to:

- Continually educate our leaders and citizens about the significance of the National Mall and Memorial Parks as a collective expression of our democratic ideals
- Preserve the legacy of the 1791 L'Enfant Plan and the 1901 McMillan Commission Plan
- Foster higher awareness of the present crisis conditions of parts of the National Mall that are in need of help immediately—and tie the urgent action required to a grander, more holistic and inspired vision
- Build a sustainable urban ecology through introduction of sustainable landscape and building practices
- Foster strong physical, social, and economic connections for the future between the National Mall and other areas of the District of Columbia.

Connecting critical needs with an aspirational vision will catalyze the power of solid planning for the future

National Mall and its environs.

We also want to strongly state that the **National Park Service still needs to compile a complete design plan** that addresses this preeminent public space consistently and comprehensively to better weave the National Mall into D.C.'s larger urban fabric. The plan would also serve to guide all future design and maintenance. In this light, we offer the following suggestions.

TYING THE CRITICAL NEEDS TO THE VISION

There is great opportunity embedded in the crisis level of needed maintenance if the Park Service's overall strategy ties together these bottom-up critical needs with a top-down "Grand Vision" plan for the future. Some opportunities we identified within the Park Service's plan include:

Union Square: While we support many of the concepts underlying the plan's recommendations for this critical area, this bridge between the Capitol grounds and the Mall, at the intersection of major connections to the city, cannot be fully realized without addressing the areas beyond the managed by the National Park Service. Its potential as an active destination with flexible, multi-purpose visitor facilities needs to be thought through in a broader context. To enhance the Park Service's vision, one idea we propose for consideration is that Union Square be the site of an international urban-design competition for 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. Another idea is to host an international design forum, bringing the most accomplished and knowledgeable design experts together to explore a design vision.

The National Mall and Civic Facilities: First, we fully endorse Congress' declaration of no new construction on the National Mall beyond what has already been approved. In addition, there has been a disturbing trend in past years to create individual visitor centers of interpretation for monuments and memorials. The panel strongly opposes any additional such development because, while well intended, it fragments the Mall and diminishes the way the memorials and monuments were intended to be experienced. In the same vein, the panel opposes the Park Service's stated plans to incorporate what the panel views as excessive signage on the Mall.

While food service, respite, and restroom facilities should be available at strategic points along the two-mile stretch of the National Mall, the panel recommends the creation of a central visitor facility to address the National Mall and the monuments and memorials contained therein. One option for such a visitor center could be the renovation (and, if necessary, environmental remediation) of the Smithsonian Arts and Industries Building. We envision the currently unused building, located not far from the Smithsonian Metro stop, as a potential welcoming center to orient visitors to the layout of the National Mall, introduce the full ranges of monuments and memorials that dot its landscape, and provide comprehensive interpretive displays to reduce or eliminate need for individual facilities. A model for this approach already exists: The Smithsonian Institution Building, otherwise known as the Castle, now serves just such purposes for the Smithsonian's 17 museums plus the National Zoo, among its other uses.

Sylvan Theater and Washington Monument Grounds: In agreement with the National Park Service, this is one area that needs to begin with "removal," specifically of the temporary visitor-service tent adjacent to the monument and the 1917 Sylvan Theater to its east. We further endorse the Park Service's finding that this offers an appropriate potential site for centralized visitor services.

Tidal Basin: We agree that the reconstruction of the seawall is critical to the preservation of the Tidal Basin Area. We also endorse the idea of building the seawall a few feet farther into the Tidal Basin to allow for the widening of walkways, which will improve pedestrian movement and help protect cherry tree roots. The panel also strongly supports the integration of bike trails in this area, as well as throughout the National Mall.

Constitution Gardens: We specifically applaud the Park Service's plans for Constitution Gardens as "a rejuvenated garden and destination for relaxation and enjoyment." Their vision is to embrace and enhance this area's unique character as an "eddy within the mainstream" of the National Mall's design. We suggest that Constitution Gardens may become the new site of Washington's equivalent of Central Park's "Tavern on the Green." Any plan for this area should also be considered in light of the National Capital Planning Commission's vision, as contained in the Framework Plan, of linking the northwest corner of the National Mall to Kennedy Center and, ultimately, the Potomac waterfront.

REVITALIZING A SUSTAINABLE, HEALTHY LANDSCAPE

We applaud the Park Service's determination to bring sustainable design and maintenance practices to the National Mall and believe strongly that developing a healthy, functioning urban ecology is essential to the National Mall, and to Washington, D.C., as a livable city. In particular, we believe the following suggestions would strengthen the Park Service's plans.

Stormwater: Management requires integrated planning. We agree that irrigation systems should not use potable water and recommend that the Park Service investigate use of water from large water features such as the Tidal Basin for irrigation or, as noted in the National Capital Planning Commission's Framework Plan, pumped from the basements of buildings in the Federal Triangle area (an ongoing issue), which now flows directly into the overtaxed sewer system. Collected rainwater runoff from roofs and collection of air-conditioning condensate would be other sources to explore for irrigation purposes.

Soil health: We encourage the Park Service to commit all necessary resources and the best, most current research to regenerate the soil, the very foundation for a new, dynamic biology on the National Mall. This may involve augmenting existing research with new investigations. If needed, the Park Service should convene a panel of soil experts for scientific investigation to fill such gaps in the research and help in creating a coherent and effective overall approach.

Trees: We recommend that the Park Service continue its study of tree health, calling on all potential partners, both public, such as the NPS Center for Urban Ecology and the U.S. Department of Agriculture's U.S. Forest Service, and private, such as the Casey Trees Foundation, to help carefully evaluate the health of the National Mall's trees. We also recommend the end of replacing the American Elms with other varieties as "experiments."

INTEGRATING WATER AND PAVING FEATURES

We emphasize that designing an environmentally sustainable National Mall requires that these elements all be part of a fully integrated urban ecology.

Water features: We are in accord with the Park Service's overall plan for water features, especially in terms of ending the use of potable water for public display, developing systems to keep water bodies ecologically and clinically healthy, and rethinking the reflecting pool in Union Square as part of an integrated redesign of that space. In general we recommend extending the vision so that all the National Mall's water features, current and new, are "of the future, not the past," meaning that they employ state-of-the-art strategies for environmental sustainability.

Integrating the paving: We agree that the paving system for the entire National Mall area needs a redesign, yet caution about selecting a "one-size-fits-all" uniform solution for the 26 miles of pedestrian paths within the area. We also recommend that the Park Service weigh carefully the pros and cons of replacing 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. The panel recognizes the maintenance challenges created by such walkways but notes that major parks around the world are 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, the panel does not support the concept of paving over the 12th Street corridor but remains open to considering other surface treatments. We also endorse the concept of flanking a restored grass or other surface expanse with support facilities on the north and south to put this area to work for the Mall.

CREATING CONNECTIONS

We recommend that the National Park Service:

Develop stronger connections and communications that integrate the National Mall with the surrounding urban fabric—environmentally, economically, and socially. We applaud the close collaboration between the National Park Service and the National Capital Planning Commission, along with other stakeholders, to begin the process of forging a comprehensive plan for the entire capital core that rises above individual jurisdictions. Individual solutions and approaches need to be compared, debated, and resolved to ensure the best possible outcome of these bold planning efforts. 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. All plans must appropriately recognize that residents' and visitors' experiences of the city are not defined by jurisdictional boundaries. This is all federal land, meaning belonging to the people, and should be addressed accordingly. The ASLA Blue Ribbon Panel commends the efforts to coordinate the National Park Service's plan for the National Mall with NCPCC Framework Plan, and we urge even closer coordination as they move forward.

Members of the ASLA Blue Ribbon Panel stand ready to provide continued input as deemed appropriate by the involved entities to help integrate substantive, sustainable design principles into a comprehensive vision for the future of our nation's capital.

The panel calls on Congress and the Administration to live up to their responsibilities and provide all necessary funding and resources to bring the National Mall back to life and ensure its future as one of the great landscapes of the world and a symbol of our nation.

We would like to end this report as it began, with thanks to the National Park Service for the opportunity to contribute to this all important effort to save one of America's great treasures and their support of the effort. Also, a thank you to the national Capital Planning Commission for related resources.

Special thanks to:

- Susan Spain, Project Executive, The National Mall Plan, National Park Service
- Stephanie Toothman, Acting Superintendent, National Mall and Memorial Parks, National Park Service
- Steve Lorenzetti, Deputy Superintendent, National Mall and Memorial Parks, National Park Service
- Randy Biallas, Hon. ASLA, Assistant Director, Park Cultural Resources Program, National Park Service
- Elizabeth Miller, ASLA, Project Manager, "Monumental Core Framework Plan: Connecting New Destinations with the National Mall," National Capital Planning Commission
- Nancy Witherell, Historic Preservation Officer, National Capital Planning Commission
- The American Institute of Architects
- The American Planning Association

ASLA

D. SAMPLE OF COMMENTS PERTAINING TO FIRST AMENDMENT RIGHTS

Partnership for Civil Justice Fund's 8 Point Plan to Protect Free Speech and Dissent on the National Mall

- 1) No new restrictions on the time, place or manner of use of the National Mall for demonstration activity.
- 2) No new obstacles to the contiguity of space: no new fencing or walls or other obstacles that would or break up the continuous use of the length of the Mall for large, mass demonstrations.
- 3) No new restrictions that would reduce the ability to use staging. For example, versions of the Mall plan have included proposed prohibition on banners or staging that would "interfere" with the line of sight to the U.S. Capitol and include paved "protest pits" where protestors will be urged to assemble.
- 4) No new restrictions on use of sound, including no new volume limitations and no new rules limiting the direction that speakers may point or direct sound.
- 5) No restrictions on the size of demonstrations.
- 6) No restrictions on frequency of demonstrations.
- 7) No restrictions imposing a "maximum" number of demonstrations in a given period of time; no new restrictions imposing an across-the-board maximum number of large events on the Mall that would restrict or limit demonstrations.
- 8) No "black out" periods. No restrictions on back-to-back or multiple-day events, and no new restrictions imposing a "black out" or "turf rehabilitation" period that would bar/restrict demonstrations from occurring close in time to other large events using the Mall.

May 14, 2009

National Parks Service / National Mall Plan

Dear National Mall Plan,

I am writing to comment on the NPS "Preliminary Preferred Alternative" plan for the reorganization of the National Mall. This location is the iconic Public Space for the whole nation, a veritable outdoor temple of First Amendment rights.

I ask that the National Park Service guarantee that there will be no new restrictions on the time, place or manner of use of the National Mall for free speech activities.

The Mall is an historically important location for free speech in the Nation's Capital. I support the Partnership for Civil Justice Fund's 8 Point Plan to Protect Free Speech and Dissent on the National Mall and request that the NPS affirmatively agree to these points in any final plan.

Sincerely,

REPORT TEAM

Susan Spain, Project Executive for the National Mall Plan, National Park Service

Deryn Goodwin, Community Planner, National Park Service

Ruth Eitel, Visual Information Specialist, National Park Service

Lori Yokomizo, Web Developer, National Park Service

Greg Sorensen, Editor, URS Corporation



As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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