

**National Coalition to  
Save Our Mall**   
*Preserving Our Monument to Democracy*  
*an organized voice for the public on Mall matters*

March 18, 2010

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

Dear Ms. Spain:

The National Coalition to Save Our Mall, a nonprofit citizens organization and voice for the public on Mall matters seeking long-range, visionary planning for the Mall for the 21<sup>st</sup> century, welcomes this opportunity to comment on the National Park Service National Mall Plan and Draft Environmental Impact Statement. The Coalition has been a strong supporter of the Park Service's Mall planning efforts and has actively participated since 2006 in the public consultation process. A main interest of the Coalition has been to support and enhance the symbolic quality of the Mall, which has continually evolved from the original concept in the 1791 L'Enfant Plan and the McMillan Plan of 1902 to the present day to meet the changing needs of American democracy and the American public.

In 2005, NPS and representatives of the National Capital Planning Commission and Commission of Fine Arts testified to Congress that they would undertake a new master plan for the Mall. However, the new NPS Plan is not that comprehensive, long-range, visionary plan. It focuses only on NPS lands and interests, not the entire Mall and larger needs of the Smithsonian, National Gallery, Architect of the Capitol, District of Columbia, and the American people who share stewardship of the open space and historic legacy inherited from the L'Enfant and McMillan Plans.

The NPS Plan together with the NCPC and CFA Monumental Core Framework Plan, contrary to agency assertions, cannot be considered to constitute the new Mall vision for the 21<sup>st</sup> century. NCPC's plan looks at areas surrounding the Mall but not the Mall itself. The NPS Preferred Alternative focuses only on NPS lands and basic maintenance and restoration of natural resources. The symbolic quality of the National Mall and its larger cultural value to all Americans is not addressed at all. In our opinion, only an independent National Mall Commission of prominent Americans can rise above the fragmented mentality and status quo thinking that now dominates planning for the National Mall and Washington's Monumental Core.

NPS has been saying that failure to complete this plan has been holding up all maintenance projects and fundraising efforts (Plan, p. 125). But these claims are irrelevant and false. Even before the Mall Plan and Draft EIS were released in December 2009, the NPS had already begun actively planning and implementing major projects including the Tidal Basin seawall repair and the Lincoln Memorial Reflecting Pool rehabilitation project. A Mall Plan was never needed for basic maintenance. Indeed, NPS already has hired consultants to implement turf grass improvements.

We would like to make the following observations and recommendations to improve the Plan and Draft EIS and make this document more useful for future planning.

1. The Plan should be given a new title to reflect its NPS-centered, jurisdictional scope and goals, something like A Concept Plan for National Park Service Holdings on the National Mall.
2. Even within the limited scope of a NPS jurisdiction plan, the Plan and Draft EIS should include additional Alternatives to support the interests of the Smithsonian museums, Capitol grounds, White House grounds, National Gallery of Art, USDA, District and the public who share stewardship of this nationally significant symbolic landscape. The Plan cannot simply ignore or dismiss outright without serious discussion, as it does on pp. 125-131, alternatives proposed by the public and other Mall constituencies that do not meet NPS interests. A typical example is the conflict over use of the under-tree areas, with the Smithsonian wanting to use those areas for the Folklife Festival and the NPS banning such use.
3. The Plan and Draft EIS should acknowledge that NPS lands and “cultural landscapes” are part of the larger concept of the National Mall as a unified whole. Because there is no official, statutory definition of the National Mall, NPS should work with other Mall institutions and historians to develop an agreed-upon definition. Key to that definition must be the L’Enfant Plan of 1791 and the McMillan Plan of 1901-2 which are the historic blueprints for the Mall. The Coalition’s February 1, 2010 letter to the Advisory Council on Historic Preservation outlines the problems and issues to be resolved.
4. The Plan should establish design guidelines and principles to ensure unified planning across all NPS lands. NPS should work with other Mall institutions and in the public consultation process to integrate those guidelines into Mall-wide principles for the entire National Mall. All major ongoing projects, including the Lincoln Memorial Reflecting Pool rehabilitation, should be developed within those guidelines.
5. Development of the NPS Plan over the past three years has demonstrated the inadequacy and weakness of the NEPA and Section 106 process to produce a Plan that respects the integrity of the National Mall as a unified symbolic landscape. Recent enthusiastic support for the plan by the federal review agencies, U.S. Commission of Fine Arts and National Capital Planning Commission, even before the public comment period is completed and Commissioners have an opportunity to hear what the public is saying about the plan, further proves that the public process is not working as intended. There is no evidence in the Plan or Draft EIS to show NPS ever seriously considered public input and alternatives that do not serve NPS purposes and priorities. This is another reason to rename this plan. And it further points to the need for an independent Mall Commission to prepare a comprehensive, visionary plan for the entire Mall.

In our further comments we explain these main points. We make recommendations to make this document useful for any future planning for the National Mall.

## **1. The title should be changed to reflect its NPS-centric focus and conceptual character**

What would a National Mall Plan worthy of that title look like? The National Mall is our country's most symbolic landscape and civic space at the center of American democracy, the legacy of two historic plans, the L'Enfant and McMillan Plans. A truly comprehensive, long-range, visionary "National Mall Plan" would require a multi-jurisdictional and multi-disciplinary effort, involving all constituencies including the Architect of the Capitol, White House, Smithsonian, District residents, and others. Such a plan would include a physical master plan, design principles, a landscape plan, a circulation plan, and clear sustainability goals and practices to support unified, coherent development across the entire Mall.

A National Mall master plan would address urgent problems and needs including new locations for future museums such as the Latino American Museum, which is currently seeking a location "on the Mall"; low-cost circulation the public, District officials, and business interests have been clamoring for for years; and a flood plan to address problems associated with large portions of the Mall being on landfill and in the 100 year flood plain and worsening conditions due to climate change. It would anticipate long-range future needs by building upon on the historic plans to meet modern needs and anticipate long-range needs of the American public, including expansion areas to provide for the inevitable growth of public activities well into the future.

### A jurisdiction plan, not a Mall master plan

This Plan, instead, is NPS-centric; focuses only on NPS portions of the Mall; is concept-based instead of a physical master plan; maintenance focused; and emphasizes improvements to the status quo but not long-range future concerns.

NPS has chosen to place its attention on NPS lands and on important practical matters such as improving the turf grass, repairing crumbling pathways and monuments, and upgrading visitor services. This is understandable given strong reaction in Congress and the national media to the Mall's deplorable, run-down physical condition of the open space under NPS stewardship. We also understand from NPS spokesmen that completing this jurisdiction Plan will allow NPS to move forward to develop these concepts into real projects as soon as possible.

### A concept plan, not a decision-making document

This Plan is essentially a wish-list of "written concepts" of goals and discrete projects – improvements to turf grass, visitor services at Constitution Gardens, Union Square, and the Washington Monument, as well as rehabilitation of memorials. These individual projects only will be further developed into actual designs, involving separate NEPA and Section 106 public consultations, when Park Service and private funding becomes available. Many of these projects are good ideas – improve the grass, repair monuments and walkways. Other are more troubling, such as hard paving the gravel walkways and new large plazas, and introducing numerous kiosks, restaurants, restroom facilities, and visitor centers on the open space that could have dramatic and adverse impacts on the historic quality and landscape character of the National Mall. (We do not understand how NPS justifies the addition of two new visitors in the face of the 2003

Congressional moratorium on visitor centers on the Mall.) The next steps of design development will be critical. These concepts must be fully and publicly vetted and scientifically evaluated within the larger context of the entire Mall, and any necessary changes or revisions made, before moving forward to final review agency approval.

#### Need to incorporate a Mall circulation plan

As NPS planning directives point out, circulation planning is a critical planning tool. Identifying a variety of transit and circulation options, from interpretive sightseeing service to basic low-cost shuttle, and establishing a network of routes to, across, and around the Mall's two-mile length will also determine pedestrian patterns and appropriate locations for visitor service such as food, restrooms, parking, and so on. The NPS sightseeing bus service proposed in the NPS Plan and Draft EIS is not adequate. We are alarmed to see the February 2010 Finding of No Significant Impact decision by NPS rejects any low-cost option and instead chooses only an expanded tourmobile-type sightseeing service. It is not enough for NPS to simply coordinate with District planners, Metro, and Circulator to allow those low-cost options around the Mall periphery. Visitors have been demanding for years those kind of options on the Mall itself. NPS should immediately open a public discussion about additional alternatives for Mall circulation including on the Mall's inner streets, Madison and Jefferson Drives. This should be a priority.

## **2. Expand Alternatives studied to include the interests of other Mall stakeholders**

The Plan and Draft EIS show no evidence that comments and alternatives proposed by the Smithsonian and other Mall institutions, or by the public, during countless hours of consultation meetings, were taken seriously. On the contrary, the NPS Preferred Alternative and its almost exclusively NPS-centric focus, is little changed from the proposals first advanced by the NPS in 2007. The National Coalition to Save Our Mall repeatedly requested that consideration be given to solutions that preserve, restore, and build upon the historic legacy of the L'Enfant and McMillan Plans, to no avail. However, the historic legacy must be respected. And the Mall's larger context as a cherished place the American public experiences as a unified whole requires consideration of additional alternatives. Only once those alternatives are identified and evaluated with data and scientific analysis against the NPS Preferred Alternative can this be considered a decision-making document. Such alternatives include the following:

### **UNION SQUARE**

There is near universal agreement that this pool is a failure and a barrier that needs to be redesigned while also protecting its modern role as popular, highly symbolic site for First Amendment demonstrations. We are concerned about NPS intentions to turn this critical parcel of the Mall at the intersection of Capitol grounds and greensward to the west into a lively urban space, a concept at odds with the historic plans. Consideration should be given to an alternative based in the McMillan Plan concept, which would call for smaller water elements and more paved plaza without however changing this areas quality as an integral component of the overall Mall landscape.

Another alternative is to coordinate with the Architect of the Capitol and Botanic Garden to move any new restroom or visitor service structure off the central Mall vista to the side panels. The Coalition believes that consideration should be given to transferring jurisdiction for this panel from NPS back to the AOC. This would allow AOC, which includes this parcel in its own master plan for the Capitol grounds, to design a unified ensemble between 1<sup>st</sup> and 3<sup>rd</sup> Streets and Pennsylvania and Maryland Avenues. The Botanic Garden could apply the principles now being established with its Sustainable Landscape Initiative here, making this prominent Mall focal area a model of forward-looking sustainable planning.

## THE MALL

Instead of replacing the gravel pathways with hard paving, and adding large new plazas at 12<sup>th</sup> Street and elsewhere, sustainable alternatives and permeable surfaces should be considered. These alternatives could be developed in consultation with the Botanic Garden and ASLA Sustainable Landscape Initiative as well as other experts. NPS favors solutions that give preference to natural resources over public use, and has instituted a ban on public events under the elm trees.

Additional alternatives could include a plan to retrofit the under-tree areas to accommodate public use that has grown in recent decades and will continue to grow in the future. New sustainable techniques using permeable paving, and used successfully for centuries in Europe and in many urban parks in the United States, would allow the trees to be used as intended, as shade trees for human protection and comfort, while also creating new kinds of spaces to accommodate the Mall's evolving role for cultural and educational activities on the open space. The Smithsonian depends on this kind of alternative in order to carry out its educational and cultural role on the Mall.

Additional alternatives for restroom and food facilities could be developed through inter-agency collaboration. Instead of the Preferred Alternative that locates these structures on the open space, they could be located to the sides, in or near existing buildings. For years there has been talk of a single National Mall Welcome Center inside the Smithsonian's centrally located Arts & Industries Building. That alternative would minimize adverse impacts on the Mall's open space.

## WASHINGTON MONUMENT

This area now slated for three major construction projects – the 17<sup>th</sup> Street flood levee, the Smithsonian African American Museum, and redevelopment of the Sylvan Theater site with a multi-purpose structure – lacks a master plan. Rather than accept the status quo and turn the 2003 security plan into the master plan, additional alternatives are needed to put these three projects into a larger, unified design whole. The concept of a continuous Mall shaded promenade was never realized here, and is not part of the 2003 plan, but should be a focus for creating a welcoming human environment.

One alternative would be to reevaluate the McMillan concept for what the 1902 plan considered the centerpiece of the Mall design and “gem of the Mall system” or consider other design alternatives that achieved that important design goal for the Mall as a whole. Within that larger context, the location and purpose of any Sylvan Theater redevelopment should be fully reconsidered. Is that site, chosen in 1917 for an outdoor theater but now next to heavily trafficked roads and off main pedestrian routes or low-cost transit, still the best location for a visitor center,

performance space, restrooms and so on? Probably not. With completion of the African American Museum in 2013, pedestrian movement will shift to the north. The Plan needs to consider the additional alternatives that anticipate future pedestrian use patterns.

#### LINCOLN MEMORIAL/ WEST POTOMAC PARK

As stated above, the ongoing Lincoln Memorial Reflecting Pool rehabilitation project needs to be considered within the larger Mall context, including decisions about paving materials, lighting, and park furniture. NPS proposes locating a new water pumping and filtration structure (24 x 60 feet) next to the jumble of buildings and stables south of the Pool. However, the Coalition believes NPS should first consider a different alternative: relocate the stables, which are old and unsightly and draw cars and trucks onto the open space, more to the west or other areas, in order to open up the vista and open space from the Pool toward the forthcoming MLK Memorial, Tidal Basin, and Potomac River. A different location should be found for the large, visually intrusive, and potentially noisy pumping structure.

In addition to these highlights, the Coalition believes that all aspects of the Preferred Alternative will benefit from this kind of broader contextual thinking that includes the interests of all Mall stakeholders and recognition of the historic plans that must be respected in any planning effort.

### **3. Identify the cultural resources as integral parts of the larger National Mall and the historic L'Enfant and McMillan Plans**

A problem that arises time and time again for National Mall plans and projects is the confusing and inconsistent way the federal government defines the National Mall. This issue has particular significance for this NPS Plan and must be resolved before actions are taken based on the Plan that could destroy the essential unity of the Mall as a designed symbolic landscape.

#### Jurisdiction-based definitions

A fundamental flaw of the Plan as a useful planning document is its failure to acknowledge the unique quality of the Mall and its roots in the L'Enfant and McMillan Plans. Instead, the NPS Plan treats the Mall lands as parcels within a larger NPS administrative unit called National Mall & Memorial Parks whose "memorial parks" include Dupont Circle and Farragut Square park.

The foundation of this jurisdiction-based thinking is the Foundation Statement itself. This basic planning document identifies the "park" and its "purpose" not as the National Mall but as "National Mall & Memorial Parks," which is an administrative unit of the Park Service encompassing central Washington within which the Mall cultural landscape units are only a part. Instead of recognizing the Mall's purpose as civic stage and symbol of American identity, the Statement identifies the purpose as to *manage* these lands.

This NPS Plan further subdivides these NPS parcels into separate, NPS-designated "cultural landscapes" – The Mall, Washington Monument, Union Square, and so on. Based on this

segmented approach, the NPS Plan proposes improvements based on each area's individual history and character, not its larger context within the National Mall as a whole.

The Plan's goal to use "best practices" from other urban parks reinforces a generic approach that treats the Mall as one park within a larger NPS administrative unit that includes all central Washington. But the Mall is a unique symbolic landscape and solutions should represent the most innovative and forward-looking solutions, not generic treatments. This jurisdiction plan will only be useful as a Mall planning document once it is folded into the larger visionary plan for the entire Mall.

#### Inconsistencies in defining the National Mall

The astonishing fact is, as the Congressional Research Service found in 2003, there is no statutory definition of the Mall. Equally surprising, the Mall has never been officially recognized a National Historic Landmark. This basic need must be resolved as part of the completion of the Plan.

The NPS does not even have a consistent way to define the National Mall. The maps showing the "National Mall" planning area includes a large area from 1<sup>st</sup> Street to the Lincoln Memorial, and from Constitution Avenue to the Jefferson Memorial. However, the NPS elsewhere defines the National Mall in two other ways: the National Register Nomination defines the western boundary to be 14<sup>th</sup> Street, and so not to include the Washington Monument and Lincoln Memorial; the Historic Districts map shows the Mall boundary at 15<sup>th</sup> Street. Which of these three different definitions is right? The first step in any planning effort is to accurately identify the resource and its purpose, so this must be clarified.

#### NEPA and Section 106 leave definitions to federal agencies

We understand that the NEPA and Section 106 processes give authority to the federal agency undertaking a plan to determine how the resource is described, and NPS identifies the planning areas according National Register nominations for individual "cultural landscapes" such as The Mall, Union Square, Washington Monument. However, the Coalition strongly believes that these separate parcels must be further integrated into the historic concept of the National Mall as a whole. We will not support an approach that treats the Mall as a collection of park units within a larger central Washington NPS administrative district and fails to recognize its unity as a unified designed landscape. That approach denies the very value of the Mall as the symbolic core of our national capital.

#### National Coalition to Save Our Mall seeks resolution of the Mall definition problem

On February 1, 2010, the Coalition sent a letter and historical analysis to the Advisory Council on Historic Preservation asking this White House office to take a lead in resolving this problem. As we state in our letter, the Coalition believes that this complicated task of reconciling the historic L'Enfant and McMillan Plans with subsequent planning studies needs to engage independent historians able to objectively evaluate the applicability of National Register principles and NPS jurisdictional thinking to the National Mall.

In recent weeks, and in response to the Coalition's letter, NPS has acknowledged inconsistencies in how NPS-produced studies define the Mall and the various cultural landscapes within it, and stated the intention to revise the relevant National Register documents and to potentially nominate the National Mall to National Historic Landmark status. Because the problem is vast with major implications for all Mall planning efforts, we believe the Landmark process should begin immediately. It could start with a narrower focus directly related to the African American Museum location, which was the subject of our February letter, by landmarking the Washington Monument grounds.

#### **4. Establish design guidelines and principles that apply to all Mall projects**

Design principles and guidelines need to be developed and coordinated among other Mall institutions to ensure unified, coherent development on NPS lands and throughout the National Mall. Ongoing projects such as the Lincoln Memorial Reflecting Pool rehabilitation that have the potential to dramatically alter the historic Mall landscape and establish precedents that could have significant impacts on future Mall-wide improvements to pathways, lighting, water treatment must not be separated out from the Plan. Steps should be taken immediately to make any decision-making regarding elements that have large implications for the Mall as a whole into a broader, inter-agency and public discussion about Mall-wide standards and guidelines.

Statements by NPS planners and the National Capital Planning Commission that the Lincoln Memorial landscape and Pool are "separate" landscapes from the rest of the Mall and should be treated without consideration of a larger Mall-wide context are misguided. As noted above, these opinions, rooted in a piecemeal, segmented approach to planning that divides the National Mall into separate, unrelated "cultural landscapes," denies the overall unity of the Mall as a symbolic whole and legacy of the historic L'Enfant and McMillan Plans.

As we have learned through the ongoing Lincoln Memorial Reflecting Pool project, moving forward on a major design program before completing a physical master plan or developing Mall-wide principles to guide development leads to piecemeal growth with potentially damaging effects on the Mall's larger unity. When the contractors have no clear direction, they can only guess as to which choices of water treatment, lighting, and paving materials will be compatible with future development of *other* areas of the Mall.

#### **5. NEPA and 106 are inadequate for planning the National Mall**

Having participated actively in the planning process since 2006, the National Coalition to Save Our Mall has serious concerns that the conventional NEPA and Section 106 process is not an appropriate process for planning for the National Mall. The Mall is not a typical National Register property. It is not simply a collection of unrelated parts, but that is how the process treats it. The Mall is not a typical historic resource but an ever-evolving symbol.



Nonprofit consulting parties raised concerns that this “National Mall Plan” was not rising to the necessary level during public meetings as well as in two joint letters in 2008; those groups included the National Trust for Historic Preservation, the National Parks Conservation Association, the DC Preservation League, the Committee of 100 on the Federal City, and National Association for Olmsted Parks, and the National Coalition to Save Our Mall. (Those letters can be read at <http://www.savethemall.org>.) Project review agencies reminded us that the NEPA and Section 106 laws give NPS the authority to define the project as it sees fit so long as other agencies agree. The NCPC and DC Historic Preservation Office concurred with NPS decisions.

In essence, the evolving quality of the Mall is not even valued by the NEPA and Section 106 process by which this Mall Plan has been developed. This makes it almost impossible for the Coalition and other consulting parties to comment on the Plan and Draft EIS in a way that NPS and other federal and District review agencies take seriously. We wonder if there is any way to reconcile this dichotomy between National Register-based planning and L’Enfant and McMillan Plan-based planning without establishing a special approach appropriate to the unique quality of the National Mall.

The Coalition feels that we have spent much time and effort in taking seriously the public consultation component of the NEPA and Section 106 process only to have our well-thought-out ideas and alternatives dismissed outright without comment in either the Plan nor the Draft EIS. During the course of the planning process since 2006, the Coalition published two reports that include some of these ideas: *Rethinking the National Mall* in 2008, and *Renewing American Democracy on the 3<sup>rd</sup> Century Mall* in 2009. So far as we can tell, none of these ideas has made its way into the NPS Plan or the Alternatives considered. If NPS does not accept these ideas legitimate, then it should state why. A meaningful public process must be put in place and followed.

The National Coalition to Save Our Mall looks forward to seeing our comments and concerns addressed in future public consultation meetings and in the final Plan and EIS.

Sincerely,



Judy Scott Feldman, Ph.D.  
Chair and President  
[jfeldman@savethemall.org](mailto:jfeldman@savethemall.org) / 301-340-3938  
9507 Overlea Drive  
Rockville, MD 20850