

National Coalition to Save Our Mall

Preserving Our Monument to Democracy
an organized voice for the public on Mall matters



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October 13, 2009

Perry Wheelock
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Washington, DC 20024

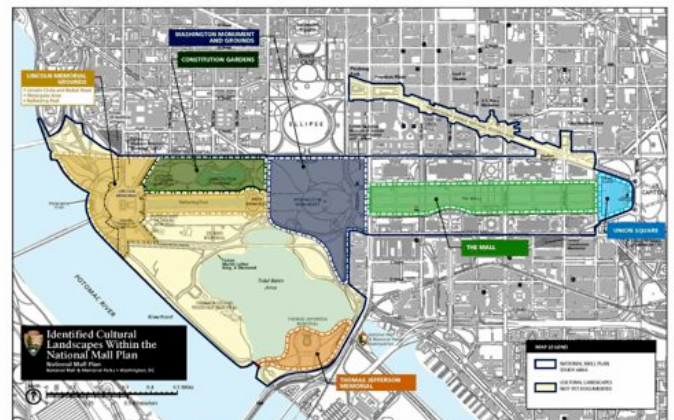
RE: Lincoln Memorial Reflecting Pool Rehabilitation

Dear Ms. Wheelock:

The National Park Service asked for comments on the Lincoln Memorial Reflecting Pool Rehabilitation as part of the National Historic Preservation Act Section 106 public consultation process. We appreciate the opportunity to submit the following remarks.

The National Coalition to Save Our Mall, a non-profit national organization advocating long term, comprehensive planning for the entire National Mall, is pleased to whole-heartedly support the National Park Service proposed restoration and rehabilitation of the Lincoln Memorial Reflecting Pool and Grounds.

We continue to point out, as we have previously, that separate, piecemeal improvement projects such as this should be guided by a larger, comprehensive plan for the National Mall, in the tradition of the L'Enfant and McMillan Plans. This is critically important because choices made regarding paving materials, lighting, landscaping, and so on will have an impact on the design integrity of the entire Mall for the next fifty years. Today, instead, the National Park Service relies on Park Service Cultural Landscape studies that treat the Mall as a collection of separate and unrelated memorial landscapes (colored areas shown at right) and do not recognize the McMillan Plan as the historical blueprint for the National Mall. Without a comprehensive plan, the National Park Service, as well as the review agencies, lack Mall-wide standards and design principles to guide coherent decision-making.



With regard to this rehabilitation project, as a major restoration project directly on the Mall's main symbolic axis, this project must be exemplary in all aspects from planning to implementation. Above all, it should be **a model of sustainability**, in keeping with the Obama Administration's goals. This means using natural systems to create a sustainable environment whenever possible. The current proposal does not begin with that goal and, as yet, shows little attention to sustainable concerns. Other alternatives must be considered. Parks around the country provide models.

We propose that several alternative approaches be considered.

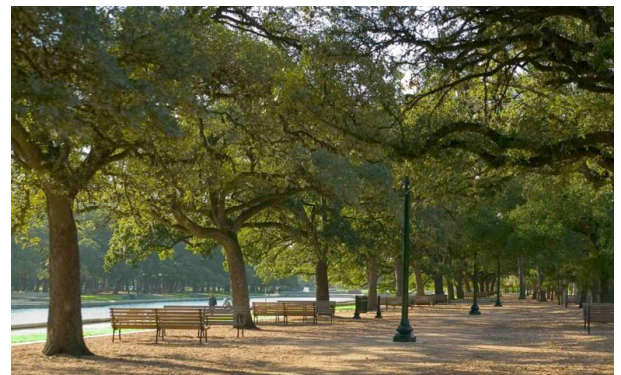
Granular surface elm walkways

The plans now call for four fully paved pedestrian walks running the length of the Reflecting Pool, together with an enlarged, fully paved area at the west end of the pool. We concur that a paved walkway, replacing the informal dirt path along the edge of the pool, is an appropriate change to make, even though it doubles the amount of glaring pavement in this area of the Mall. As a mitigation to the increased hard paving, we suggest that the two 14 foot wide outer pathways between the double rows of Elm Trees flanking the Reflecting Pool, now paved in asphalt, could be reconstructed with granular paving. This solution could serve as a prototype for improved permeable pedestrian paths elsewhere on the Mall.

Stabilized granular paving is being used very effectively in completely accessible public spaces in other cities. While the hard paving along the pool edges will serve as an alternate route for pedestrians who prefer firmer paving, making the shaded walk an ideal place for a more naturalistic paving material will offer a change of pace for pedestrians on a scorching hot summer day. With enough benches along the way, visitors will find this a welcoming new experience.

Permeable paving systems have been used in at least three award winning park installations and have performed well for years: Pier A Park in Hoboken, NJ, Metrotech Park in Brooklyn, NY and Hermann Park in Houston, TX, shown at right.

The use of a granular paving system, as opposed to 4,000 feet of paved walkway, should lower the capital cost of this element.



Hermann Park, Houston, Tx

Self-cleaning bio-filtration

The general project goals for the Reflecting Pool indicate that sustainability has not been an objective for this work. The six design options that are presented in the documents are all conventional engineering oriented solutions. No preferred option is indicated, no costs are included. None of these options can be characterized as an example of contemporary sustainable design using natural filtration systems. Options such as flushing the Pool continually with filtered Potomac River water requires major construction off-site of water lines and pumping facilities, and a carefully engineered intake and filtering system to pull river water into the Pool and discharge it into the Tidal Basin.

We suggest that a seventh option be added, a proven self-cleaning bio-filtration system, designed to operate without tapping the Potomac River, or employing ultrasonic devices to kill algae (and put other aquatic life at risk). A reflecting pool that cleans itself, using fish and other natural systems, is certainly to be preferred. Also, such a system should have a much lower capital cost than the options presented to date.

Again, the award winning Hermann Park, TX pool, provides a prototype for this system. This Reflecting Pool is half as long as the Lincoln Reflecting Pool, but similar in configuration. We have spoken at length with the designers. Full operational information can be obtained through the Hermann Park Conservancy or the design team, the SWA Group.

Fountains

Additionally, there is the possibility of adding fountains. The Pool today has a deceptive sense of scale. The McMillan Commission Plan designers in 1902 envisioned a cross axis pool at the mid-point and fountains at either the west or east ends. These were never constructed. A major



Left, McMillan Commission concept for Reflecting Pool fountains; middle, long view of Reflecting Pool today with fountain at west end; right, close up of fountain concept at west end.

fountain could add an intermediate visual destination without altering the shape of the Pool. Other smaller fountains would also be add color and sparkle to the visual interest as visitors traverse the long distance, as shown above.

Fountains are more than decorative features. They are the classic way to add oxygen into the water, and would help keep the pool clean.

Lighting

The lighting fixtures for the shaded walkways have not yet been identified. We would strongly suggest that a full-scale mock-up of two or three fixtures be field-tested before a final determine is made, since this fixture could be a model for use in other parts of the Mall. We would like to be included in such a test.

Continuous pedestrian pathways

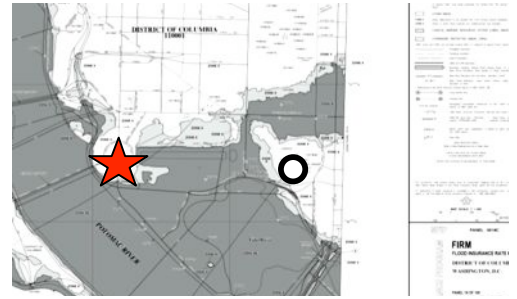
The overall planning documents presented to the review agencies in recent weeks focused on security and accessibility issues. The consultants have finally solved these issues. Secure access from the Pool to the Lincoln plaza has been planned. Direct access to the pool-side walkways from the east, through the WWII Memorial, has not yet been addressed, although this could influence the design of the renovation.

There are two other issues that are not addressed by NPS. While they may be considered to be outside the program limits of this project, they are basic to the functioning of this area: flood protection and public use.

Flood protection

This area of the Mall is in the 100-year flood plain that also encompasses other major parts of the Mall, as shown in the new FEMA map below, with the Lincoln Memorial marked with a star and the

Washington Monument circled. Instead of ignoring this critical threat – a threat that will only be exacerbated in coming years as a result of climate change – this rehabilitation project should be part of a larger, Mall-wide flood plan. (The 17th Street levee will only protect Downtown DC, not the Mall.) To spend millions restoring the Reflecting Pool but ignore the flooding problem of Mall itself is short-sighted.



Public use

With respect to public use, already by the first Section 106 public consultation at the Old Post Office in August 2009, NPS appeared to have established the program for this project and ruled out alternatives being proposed by attendees – including suggestion of putting coils in the water and allowing recreational use. NPS staff stated that NPS feels that recreation should be elsewhere, perhaps in Constitution Gardens. However, this and other public use alternatives need to be fully evaluated and not summarily dismissed. Iceskating had a long history on the Reflecting Pool, until NPS banned it in recent years. At the present time there is no alternate plan for accommodating this popular recreation.

We hope that the Reflecting Pool, and its grounds, can be developed in the 21st century to be a not only an accessible and secure environment, but one that is evolving with the national desire to utilize natural “green” systems as often as practical. This project can show the way for the long-term sustainable development of the whole Mall. We believe that these suggestions also would be useful in controlling cost, an issue that has not been included in any of the material furnished to the public to date.

We are prepared to provide additional materials regarding these ideas and the model parks mentioned in our comments. Please contact Kent Cooper at 202-338-3442 or w.kent.cooper@verizon.net.

For the National Coalition to Save Our Mall,

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