

**Testimony before the National Capital Planning Commission
On Flooding and the National Mall Underground Project
by the
National Mall Coalition
November 3, 2022**

Good afternoon, Chair White and Commissioners. I am Judy Scott Feldman, chair of the National Mall Coalition, a non-profit organization dedicated to thoughtful management of the National Mall, the Stage for American Democracy. The Coalition appreciates the opportunity to brief you today on our National Mall Underground project.

We took away from NCPC's November 18, 2021 letter to Congress about the Underground two main points: **First**, NCPC's preferred solution to flooding on the Mall and in the Federal Triangle is a pumping station at 14th Street. This solution is also supported by the National Park Service, the Smithsonian, and other members of the intergovernmental Silver Jackets flood study group. **Second**, your letter says there are too many problems with the Underground, including contaminated stormwater, security screening, disruption of the Mall grass and vistas, and cost.

To begin, you should know that NCPC's objections to the Underground are not shared by all. The Army Corps of Engineers' 2018 study concluded that the Underground could alleviate the flooding problem. The Washington Post wrote a favorable editorial. The US Commission of Fine Arts told Congress that the Underground deserved further study.

And USDA Secretary Tom Vilsack commended the Coalition and stated his preference for Alternative A with no parking. **Other modifications may emerge out of a thorough public consultation – such as NCPC is now conducting on the future of Pennsylvania Avenue.**

Stormwater flooding poses an existential threat to the Mall, to the Smithsonian museums, and to the entire Federal Triangle area. The threat is well documented. Hurricane Ian just last month was another wake-up call.

Government agencies have not identified a comprehensive solution. The National Mall Underground is the only proposal, to our knowledge, that has been designed specifically to deal with stormwater flooding in the Mall area **in a comprehensive way.**

The Army Corps' study of the Underground confirmed that "Flood risk from a storm of the intensity that flooded the Federal Triangle area in 2006 could be reduced significantly during a flood event by implementation of the Underground." We have not seen any comparable objective analysis affirming that the pumping station would solve the flooding problem.

The idea of floodwater storage beneath the Mall was first proposed in the 2011 Federal Triangle Stormwater study. And, as the Silver Jackets group concluded in their 2020 report, it remains their second choice – “with no parking included.”

The Coalition’s idea in 2013 was to take the underground reservoir that would be expensive to build and sit unused most of the time, and turn it into an active, visitor-friendly facility that will generate revenue year-round. The concept has been developed by architect Arthur Cotton Moore, an esteemed member for many years of the National Mall Coalition’s Board of Directors. Sadly, Arthur died on September 4th still convinced the Underground represented a visionary, long-term solution to climate change, flooding, and clean energy needs.

The Underground reservoir can be constructed beneath the Mall's grassy panels between the Smithsonian Castle and the Natural History Museum, and between the 9th and 12th Street tunnels. The lower, floodable level is sized to hold 28 to 30 million gallons of floodwater. When not needed to collect stormwater, the lower level will serve as a parking garage for tour buses. The upper level – not to be flooded – originally included car and bus parking, plus restrooms and food service for arriving visitors, and rest facilities for bus drivers. Alternative A, developed in response to criticism of car parking, removes the cars and adds more bus parking. At each end are smaller cisterns to collect rainwater and groundwater to be used for irrigation of grass, trees, and gardens. Geothermal wells beneath the structure – added to the concept in 2014 at the suggestion of then-GSA Administrator Dan Tangherlini – will provide clean energy to Smithsonian museums and GSA-managed buildings around the Mall.

Significantly, the Underground’s multi-purpose approach greatly reduces costs. A 2019 preliminary financing plan by experienced consultants Ram Island Strategies and Bostonia Bank found that the cost of the Underground – approximately \$300 million – could be offset by stormwater credits, clean energy credits, sale of irrigation water, and parking revenue, resulting in minimal cost to the taxpayer. The Army Corps agreed that “revenue potential from parking fees and water credits may offer self-financing opportunities that attracts a public-private partnership.”

Now let’s turn to the letters to Congress.

The Park Service letter from March of this year, informs Congress that NPS is opposed to parking and that nothing – not the flood reservoir component, not the clean energy – will change that. ***In other words, without any data or analysis, the Park Service rejects the Underground outright.***

The NPS has made its position clear to other government bodies, both federal and in DC Government. Several DC agencies showed strong interest in the Underground in the beginning, but then were discouraged from supporting it, saying NPS was opposed.

NCPC’s letter casts doubt that bus parking is doable or that bus drivers would use it. But the Coalition met twice with the American Bus Association and we heard enthusiastic comments about

access to bus parking near the museums and about the bus driver rest facilities, comments reiterated in their letter of support.

Moreover, the Metropolitan Washington Council of Governments doesn't share NCPC's skepticism. COG conducted a region-wide tour bus parking study in 2015 and concluded that "The proposed National Mall Underground would be the most dramatic improvement in bus parking capacity if constructed . . ."

The most egregious misrepresentation comes from the Park Service's letter, which states that the Corps of Engineers "concluded that . . . it was not clear if the project was feasible." This distorts the main conclusion of the Corps' report, that flood risk to the National Mall, and I quote, "**could be reduced significantly during a flood event by the implementation of the Underground.**"

The Corps *did* raise concerns, including questions of how to safely evacuate people in the event of **FLASH** flooding. In their letters, NCPC, NPS, and GSA share this concern. Responding to the Corps' red flag, concept architect Arthur Moore immediately revised the design to include a series of flood gates to permit a gradual, staged intake of floodwater, thus allowing a predictable and orderly evacuation.

And then there's the staggering omission in all the letters. Why is it that while NCPC and NPS are prolific in criticizing the Underground's various components, they never discuss the field of geothermal wells? Here we have a sustainable, clean energy source able to provide 3,000 tons of cooling per hour – enough energy to power not only one, but several Smithsonian museums and other public buildings. And nothing positive to say? **This component should take on new resonance in light of the Inflation Reduction Act of 2022.**

The NCPC letter even fails to address the Army Corps' finding that the Underground is one solution to flooding.

Which brings us to the pumping station, the solution preferred by NCPC and others. The workability of the pumping station is unproven. NCPC's letter correctly warns that the stormwater runoff from city streets is contaminated. But where will a pumping station send that contaminated water? "*Into the Tidal Basin or Potomac River.*" Did EPA agree to that idea, further polluting the Potomac River?

And what if, as is likely, heavy rains cause street flooding as well as Tidal Basin and Potomac River flooding? Do we add to the already severe flooding in Alexandria and other down-river communities? *Please explain how in the likely worst-case scenario*, the pumping station would prove to be, in NCPC's words, "the most effective and implementable solution." We are fortunate there has not been a recurrence of the 2006 flood. Does anyone doubt that it will rain and flood again?

What action will this Commission take to address in a comprehensive way the existential flood threat as well other intractable problems threatening the future sustainability of our National Mall?

It is **irrational** to continue to depend on agency-by-agency plans and expect comprehensive solutions to emerge. It's profoundly **inequitable** to tell American Latinos and women their history doesn't belong on the Mall. It's unfair to criticize the Smithsonian for seeking their new museum sites "on the Mall." It is **short-sighted** to move ahead with the Park Service's proposed seawall repairs near the Lincoln Memorial if that action is not one element of a **comprehensive flood plan to ensure that the seawall repairs don't make the interior and tidal flooding even worse.**

Chair White, the National Mall Coalition urges NCPC to tell Congress two things that can be accomplished under your leadership.

First, tell Congress that this Commission will undertake a full and open consultation process to properly vet the National Mall Underground in a dispassionate and objective manner. The multi-purpose Underground requires stepping outside the agency-based planning mentality. It asks, what are the benefits to the **American public, and to the Mall as a whole** – for flood mitigation, yes, but also for clean energy, visitor access to our museums, sustainability, and affordability. The concept has been modified over time in response to public and government comments, and no doubt will continue to improve through the consultation process. **If NCPC thinks they cannot lead that review, then tell Congress why not**, so Congress can take appropriate action.

Second, tell Congress that NCPC recognizes that the **Mall cannot be a "completed work of art"** any more than American history is finished. The historic 1791 and 1902 plans for the Mall were concerned with creating a capital city and locating public buildings and monuments. But today **our urgent needs include much more**: flooding, climate change, clean energy, infrastructure upgrades, future museum sites, tourism. **These require us to think in new ways about the Mall, about its purpose as a unified landscape symbol of America, about its capacity to grow its physical boundaries to continue to tell the American story.** Each Mall agency doing its own plans cannot, and will not, solve the need to address these questions and create a new comprehensive, long-range plan for the future.

Tell Congress it's time to create a new McMillan-type commission composed of the best minds in architecture, landscape architecture, engineering, and sustainability. The task? To create an updated, comprehensive, and bipartisan plan for a sustainable National Mall, the Stage for American Democracy, in its 3rd century.

I'm happy to answer any questions.

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