

# National Mall Coalition

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P.O. Box 4709  
Rockville, MD 20849  
301-335-8490

March 5, 2025

Ms. Teri Hawks Goodmann, Chair  
National Capital Planning Commission  
401 9<sup>th</sup> Street, NW, Suite 500N  
Washington, DC 20004

Dear Chair Goodmann and Commissioners:

The National Mall Coalition has been a participant in the public consultation process for projects on and around the National Mall for 25 years, and we are especially interested in participating in the public review for the National Park Service's proposed Development Concept Plan for the Tidal Basin area of the Mall. The Coalition is a grassroots organization whose mission is to help ensure the vitality, beauty, and continued active role of the National Mall in the capital and in American life. We were unable to attend the recent NPS Zoom session but have reviewed the materials from that event.

We are confused and disturbed by both the plan and the public process for this project. The rather sudden presentation of a plan before the Commission of Fine Arts and the National Capital Planning Commission before any public consultation process is underway, besides a brief online presentation a short nine days ago, seems premature. Our comments here will focus not on the design alternatives but on the scope of the plan, the public consultation process, and the question of flooding in this part of the Mall. Flooding has been the subject of serious scrutiny by this Commission as well as other federal and DC agencies and engaged members of the public in recent years but seems to warrant little critical scrutiny for this plan.

Based on the Executive Director's Recommendation, it appears that neither NPS nor NCPC realizes that without a flood plan (which we believed was called for in the 2023 Memorandum of Agreement) the entire plan is purely hypothetical and thus premature – and potentially a waste of effort and taxpayer money. A quick look at the FEMA map of this area in Slide 15 of the NPS presentation demonstrates the severity of the flooding matter which, we were led to believe, was the main focus of the MOA.

As parties to the consultation process, we ask for answers to the following questions:

- Can NPS and NCPC explain the apparent sudden urgency of a project which is being taken before both CFA and NCPC before NPS has given the public sufficient opportunity to learn about the plan, ask questions and receive answers, and thoughtfully compose written comments for CFA and NCPC consideration?

The public scoping period needs to be longer and in person. Consulting Parties are mostly in the dark about many, indeed most, aspects of this proposed plan. We need time and opportunity to ask questions, hear other Consulting Parties' concerns, and weigh options. Only after that process can Consulting Parties feel confident to prepare their formal written comments for NPS, CFA, and NCPC. This consultation with NCPC is premature and we believe violates the spirit of the Section 106 consultation process. While we know we will be told that there will be other opportunities to give comments, we also know from experience that once a project is presented, it takes on a life of its own and approvals flow easily in favor of the project.

- We are very concerned that NCPC staff do not appear to recognize that the Tidal Basin area is an integral part of the National Mall with all that implies regarding historic properties, including the historic McMillan Plan, cultural resources, and national significance. Instead, the EDR says “The area of focus for this Plan includes the Tidal Basin and surrounding land located within West Potomac Park in Washington, DC.” (EDR, p. 1) and “West Potomac Park is a U.S. national park in Washington, DC, *adjacent to* [my emphasis] the National Mall. It includes . . . Jefferson Memorial, Franklin Delano Roosevelt Memorial, George Mason Memorial, and the Martin Luther King Jr. Memorial.” (EDR, p. 2) Do NPS and NCPC no longer consider the Tidal Basin an integral component of the Mall? The NPS’s 2010 *National Mall Plan/Environmental Impact Study* is clear that its definition includes the entire Tidal Basin (see the “National Mall Plan Area” map on p. 5 of the NPS’s 2010 Mall plan). Correctly defining the property is crucial and has a direct bearing on assessing adverse effects.
- What is the status of the NCPC (along with several federal and DC agencies) study and proposed comprehensive solutions for flooding in the Tidal Basin and Mall area? Last we heard, staff reported to NCPC that results were “inconclusive.” Has NCPC decided there is no urgency and that planning will proceed regardless of a lack of comprehensive flood plan?
- Where is the data to show that the height of the seawalls for the current ongoing seawall project is sufficient for the rest of the Tidal Basin? That the new Cherry tree plantings will not be doomed from the start?
- The NPS National Mall Plan in 2010 – for which the Coalition was a Consulting Party in numerous meetings – proposed concepts very similar to the three Alternatives proposed in this Concept Plan. Is this Plan based on the 2010 Plan? Looking back at our copy of that Plan, we are reminded that flooding was not a major concern in any aspect of the planning process or proposed solutions. Under the “Preferred Alternative,” NPS states “Based on engineering recommendations, the Tidal Basin seawalls would be rebuilt above tidewater.” Are NPS and NCPC adhering to that outdated premise instead of updating the scope and planning priorities to recognize more recent and urgent flooding threat assessments?
- In 2010, NPS assured Consulting Parties to the NPS National Mall Plan that no planning action would be taken on the “design concepts” proposed for various

parts of the Mall, including the Tidal Basin, without a new Section 106 process being started. How did NPS come up with the three alternatives without having first opened a Scoping session to invite public comment on the purposes, scope, and scale of the Plan?

- Finally, how does the NPS Concept Plan respond to the 2020-2021 “National Mall Tidal Basin Ideas Lab,” a partnership that included NPS and its partner The Trust for the National Mall? The stated purpose clearly and urgently identified the flooding problem. The Lab then engaged five prominent architecture firms to propose long-term solutions, *none of which suggested a simple raising of the seawalls*. In fact, the project makes clear that raising seawalls is at best a temporary solution. The Lab’s “urgent call to action” [states](#):

“To rescue and transform the nation’s most iconic memorial landscape, we must balance preservation with the realities of climatic, geological, and social changes. So profound are the effects of these forces that conventional responses – rebuilding infrastructure or adding safeguards such as seawalls – will only delay, but not prevent, the submersion of the Tidal Basin and its monuments.”

It appears to us that with this Tidal Basin Concept Plan NPS is going back in time, to its 2010 National Mall Plan, and ignoring all the data and good efforts by NCPC and other federal and DC agencies to seriously address the flooding problem, and the Ideas Lab push for creative solutions. We believe that NCPC should not agree with this head-in-the-sand approach to protecting this beloved part of our National Mall.

We ask Commissioners to defer any comments at this time and, instead, direct NPS to provide informed written answers to our questions, to questions raised by the Committee of 100 and the FDR Legacy Commission, and to other questions that no doubt will be raised by other Consulting Parties once the Section 106 public consultation process can be meaningfully started, with in-person meetings.

Thank you for your consideration of our comments and concerns.

Sincerely,



Judy Scott Feldman, PhD  
Chair, National Mall Coalition

cc. NPS, CFA, FDR Legacy Committee, Committee of 100, Trust for the National Mall, National Trust for Historic Preservation, National Parks Conservation Association, DC Historic Preservation Office

# The Committee of 100

on the Federal City



**DATE:** March 5, 2025

**TO:** Lee Webb, National Capital Planning Commission

**FROM:** Pat Tiller, Committee of 100 on the Federal City, Co-Chair, Planning Committee

**RE:** Committee of 100 on the Federal City Comments: Tidal Basin Concept Plan

The Committee of 100 on the Federal City (Committee) is pleased to comment on the Tidal Basin Concept Plan. We watched the video and reviewed the Concept Plan with great interest and found the "guided tour" of the document especially helpful. Comparing the different treatments of the same items in each of the three Concepts made it easier to think through them. The Committee of 100 anticipates that this approach will lead to creating an extraordinary experience, reflective of the American spirit. Overall and at this stage, we found the general approach to the project supportable.

While we realize that the final decision will draw from each option, The Committee is most aligned with the Concept C approach. Its proposals offer a more natural experience. And it seems to be the most thoroughly thought out and most creative in utilizing the natural resources of the Study Area to support a healthy environment and to enhance the visitor experience because. Specifically:

- \* It limits vehicular traffic in the Tidal Basin area; the parking lot is for ADA visitors only --which is safer for them.
- \* It has more evergreen trees for year-round buffering the playing fields along Ohio Drive in the southwest portion of the area. Those trees will help muffle the noise of traffic and provide better shade.
- \* It includes the greatest extent of wetlands to help deal with overflows.
- \* It moves the Floral Library back from the Tidal Basin, itself, to permit more cherry trees in that area and to make the Library more accessible from Raoul Wallenberg Place.

Looking at the Concept Plan as a whole, the Committee of 100 offers some key points, organized to reference your five themes:

## **EXPAND CONNECTIVITY**

### **\* Multi-modal transportation**

The Tidal Basin may seem remote for those who are more accustomed to the vista from the Capitol to the Lincoln Memorial. Therefore, accessibility and connectivity will be enhanced by having different modes of transportation from different points to accommodate people's various needs

and ease visits to the Tidal Basin. While walking will be the main means of access to the Tidal Basin, provision for bicycles, scooters, and small electric carts would enhance access.

*Recommendation: We encourage NPS to coordinate with different transportation modes from different points so that people may more easily get to and enjoy the beauty and serenity of the Tidal Basin. The use of small electric vehicles, bicycles, and scooters within the Tidal Basin will contribute to the visitors' experience.*

**\* Metro connection**

The Smithsonian/National Mall Metro station is the nearest Metro station to the Tidal Basin, at about one mile away. It is served by the Orange, Silver, and Blue lines. Will there be shuttle buses and/or pedicabs to connect this Metro Station and the Tidal Basin?

*Recommendation: Arrange for shuttle buses or pedicabs to make a stop at the Tidal Basin, connecting it with the Smithsonian/National Mall Metro Station.*

**\* Safe crossing of Independence Avenue**

Crossing busy Independence Avenue as a pedestrian is a challenge and a safety issue.

*Recommendation: Install stop lights on Independence Avenue to allow safer passage between the Tidal Basin and monuments and memorials to the north.*

**\* Avert risk of collisions with pedestrians**

*Recommendation: Consider rerouting vehicular and other motorized traffic so as to avert the risk of collisions with groups of pedestrians.*

**\* Connect the Trail from the Lincoln Memorial to the Tidal Basin Area**

It is important that the Tidal Basin area be connected to other sections of the National Mall and to other parts of the waterfront through trails for pedestrians and bicyclists. The proposed extension would facilitate and encourage accessibility to the Tidal Basin from the Lincoln Memorial as well as from as far away as the Wharf. The extension would join the walkway and bike trail already designed in the Tidal Basin area, which runs from the northwest corner, down around the Jefferson Memorial, then northward to tie into the end of Maine Avenue. *The Committee of 100 has long advocated this concept to connect trails along the riverfront as a "Washington Waterfront Walk", eventually linking with a series of trails along the Anacostia River past Kenilworth Gardens to the Maryland line.*

*Recommendation: Ensure that the pedestrian walkway and bike trail along Ohio Drive and the Potomac River (mostly west of the Tidal Basin itself) extends to the Lincoln Memorial area.*

**\* Future increase in accessibility: Long Bridge Ped/Bike Bridge**

The off-ramp of this future pedestrian-bicycle bridge across the Potomac River is likely to impact pedestrian and bicycle movements near Ohio Drive, just outside the Tidal Basin Study Area. It is part of the improved Potomac River Railroad Bridge project. (Construction is expected to begin in late 2026.)

*Recommendation: Ensure that potential impacts from this nearby project be considered while planning for the Tidal Basin Area.*

## **ENHANCE VISITOR EXPERIENCE:**

### **\* Expand the "pink cloud" and protect it**

As the cherry trees are a key, seasonal attraction in the Tidal Basin, protecting them, maintaining their health, and increasing their numbers is a universally shared priority. The Committee of 100 strongly supports programs that will keep the cherry trees healthy and increase their numbers.

Do you mark and describe on signage the characteristics of the various kinds of cherry trees? Periodic data on hydrological changes, including sea level and tidal heights, which would affect these pink treasures might also be of interest to Tidal Basin visitors.

*Recommendation: Enable visitors to make their trip to the Tidal Basin a learning experience in addition to enjoying the beauty of the Anchor on the Mall.*

### **\* Interpretation: Signage, maps, information boards, kiosks, park rangers**

The Tidal Basin's 107 acres can be daunting to navigate for the uninitiated. Increased and more strategically placed wayfinding signage and information boards with narratives, pictographs, maps and a QR code would help visitors chart their course for their visit.

*Recommendation: The Committee recommends that interpretation -- e.g., signage, information boards, or QR code, plus means to get emergency help if necessary -- be installed or increased in easily noticeable locations. If possible, assign Park Rangers or other NPS staff and volunteers to help near a kiosk or kiosks during peak visitor periods. Assemble information appropriate for this service.*

### **\* Physical separation of cyclists, pedestrians, and vehicular traffic**

Painted lines on pavement, delineators, and bollards are not satisfactory. Physical separation reassures pedestrians, cyclists as well as car drivers of a more relaxed experience as they enjoy the serenity of the Tidal Basin.

*Recommendation: The Committee strongly supports physical separation of these modes of transportation as proposed in the draft plan.*

### **\* Pedestrian bridge by the Kutz Bridge**

Of the three options for this pedestrian bridge, two are particularly appealing: (i) the cantilevered bridge for its steadiness, and (ii) the floating bridge for the adventure of experiencing the sensation of flowing water beneath your feet, as well as a close-up view of *aquatic flora and fauna*. *Why not both?*

*Recommendation: Choose both pedestrian bridges as each provides a different and valued experience.*

### **\* Playing fields**

At least 12 playing fields are proposed for the renovated Tidal Basin in the current Draft Plan. Current research on artificial turf indicates a level of toxicity for users that is concerning.

*Recommendation: Ensure the most appropriate, safe natural variety of grass to use for the Tidal Basin playing fields, instead of artificial turf.*

## **MANAGE ECOLOGICAL IMPACTS SUSTAINABLY:**

### **\* Marsh Plantings**

Marshes, an example of green infrastructure, are thought to sequester more carbon than any other environment. Especially critical is the marshes' ability to help slow the kind of destructive and costly changes that the Tidal Basin has been subject to. Through photosynthesis, they produce fresher, healthier air which is a welcome feature for Tidal Basin visitors. Marshes provide food for some fauna. They also protect small young fauna from predators as they develop. Not the least of the marshes' potential contributions is adding to the distinctive beauty of the Basin.

Oysters live in brackish shallow waters, such as the Tidal Basin. Oyster reefs help diffuse energy from storms and tides, thereby slowing erosion along waters' edges. Even loose oyster shells have been shown to reduce coastline erosion. Oysters are considered "nature's water filters" as they clean gallons of water per day. Like marshes, they serve as protective breeding grounds for marine life.

*Recommendation: The Committee appreciates and welcomes marsh plantings in the Shallows of the Tidal Basin, by Basin Drive, and on the skirts of the Jefferson Memorial for their role in taming flooding, sequestering carbon, supporting aquatic fauna. We urge the project team to look for more areas where marsh plantings can be incorporated. Also, the Committee encourages NPS to inquire into the feasibility of oysters sharing these sites as they may augment the benefits provided by the marshes.*

### **\* Lifting the site and "Plan B"**

With the sea level rising, high tide reaching further up on shore, and fierce storms becoming more erratic, it is no wonder that NPS plans to create higher ground. Since there is not anything to speak of in the Tidal Basin, how does NPS propose to accomplish this? We note that the sea wall currently under construction will be able to be built higher later if necessary. Are you developing a "Plan B" in case, at some point, even the higher walls are breached -- whether by a trifecta of high sea level, high tide, and storm surge or, eventually, by the encroaching sea level?

*Recommendation: We urge NPS to develop an alternative "Plan B".*

## **PROTECT CULTURAL AND NATURAL RESOURCES:**

### **\* APE/ Section 106 and National Environmental Policy Act**

On the small graphic on p. 18 of the Tidal Basin Concept Plan, it is difficult to discern which buildings are included in the Area of Potential Effects (APE) to the east of the Tidal Basin. They are the Bureau of Printing and Engraving (BPE) and Liberty and Loan Buildings, both of which are designated historic buildings under Section 106 of the National Historic Preservation Act and 36CFR 800. Accordingly, the proposed rehabilitation of the Tidal Basin would affect both. Yet the proposed APE shown on p. 18 appears to cut through those buildings (as well as through the Lincoln Memorial), which is, of course, counter to current historic preservation professional practice. Please clarify.

*Recommendation: Please clarify the status of the historic buildings as far as the Area of potential Effect for this project.*

### **National Environmental Policy Act**

One of the three important provisions of NEPA "directs federal agencies to take environmental consequences of potential into account in decision-making". "Consequences", of course, suggest future impacts. The proposals in the Concept Plan are designed to improve many environmental

issues in the Tidal Basin. And they appear to It is noteworthy the possible damaging effects of sea walls at openings that raging waters would find -- especially downstream.

*We applaud the several measures proposed in the Concept Plan that will significantly improve environmental issues in the Basin and urge NPS to inquire into mitigating possible damaging effects from the seawall downstream.*

**\* The Original Hydrological Function of the Tidal Basin**

Would restoring the ACE gates mitigate river and stormwater rise? Has research been conducted on the possibility and feasibility of effectively restoring the Tidal Basin's original hydrological function: flushing the Washington Channel? How deep was the Tidal Basin when the four ponds were first joined? What is the range of depths now? What would be the purpose of flushing the Washington Channel now -- if feasible? If not, how might the original gates, owned by the Army Corps of Engineers (ACE), and their original function be memorialized?

***Recommendation:** Please research and draw a conclusion about the current and probable future utility of the ACE gates. If their best role is to now be symbols of a remarkable hydrological feat of the late 19th century, it would be fitting to find a way to commemorate them.*

Thank you for the opportunity to comment on the Tidal Basin Concept Plan. We look forward to the next design iteration and expect to be one proposal - combining the best elements of the three concepts.

Cc: Marcel Acosta, Executive Director, NCPC  
Thomas Luebke, Secretary, CFA  
Mary Dolan, Executive Director, FDR Memorial Legacy Committee  
Judy Scott Feldman, Chair, National Mall Coalition  
David Maloney, DC Office of Planning, State Historic Preservation Officer  
Anita Cozart, Director, DC Office of Planning