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September 20, 2002

Chairman John V. Cogbill, III
National Capital Planning Commission
North Lobby, Suite 500
Washington, D.C. 20576 (VIA FAX: 202-482-7272)

Re: The National Capital Urban
Design and Security Plan

Dear Mr. Cogbill:

The Committee well understands the necessity to structure security oriented streetscapes that will be aesthetically appealing and people-friendly, while at the same time achieving a certain level of protection. This is a difficult balance, and our view is that more time is needed to improve the quality and specificity of the design decisions, and to secure strong agreement on and implementation of individual area and building plans beyond simply listing them in the CIP. *We therefore urge the Commission not to send this plan forward to the President without further revision.*

Many questions remain. How will we distinguish major threat locations from those not so threatened and obtain the related security data to enable designers to design for the level of security required? How will the design of each of these six sectors relate to the larger downtown or other vulnerable areas of the city, including embassy/chancery preserves? To what degree will these plans be coordinated with those affecting the city in general and the downtown in particular?

As to the latter point, the city's administration has put forward Bill 14-652, now before the Council's Committee of Public Works and the Environment. This bill, if enacted, will spread street furniture with advertising over the city's public space without safeguards and with virtually no limit. One concern this bill raises is the area covered by the security plan, which is graced with the Mall and Monuments as well as the landmarked L'Enfant Plan (which covers not only the present street surfaces but the space between the curb and the buildings). *Our organization has taken a strong stand against any increase in advertising in any public space, which is prohibited under existing law, and we object to the Bill's removing this prohibition.* We may have to settle for a continuation of a bus shelter contract which allows advertising, but we would urge that the revenues be reserved solely for amenities such as kiosks for visitors that convey directional guides and

the listing of public events, or for assistance with "hardened" streetscapes, but with no additional advertising in public space (testimony attached). The proponents would use these revenues for open-ended possibilities as well, including public toilets, which many others feel would be of doubtful merit downtown or anywhere else. NCPC should reaffirm its position against such advertising immediately and set up a coordination process with the city administration, to achieve the plan's stated goal of "a citywide program of streetscape enhancements and public realm beautification, rather than as a separate or redundant system of components whose only purpose is security".

As stated in another goal, the perimeter security should "not impede the City's commerce and vitality, pedestrian or vehicular mobility, nor operational use of sidewalks within Monumental Core or downtown". This is a major issue on which the traffic studies are not yet completed, and the Circulator should be integrated with the District of Columbia Light-Rails Study, WMATA's Core Capacity Study, and the traffic and parking studies to be undertaken with the District. Because of the very real threat to city commerce, trade-offs must be considered with the greatest of care, and these studies should be completed before the Plan goes forward.

The Plan touches on a commitment to coordinate and comply with requirements of the National Environmental Policy Act (NEPA), Section 106 of the National Historic Preservation Act, and the District's State Historic Preservation Office, while undertaking a Preliminary Environmental Review (PER), followed by greater NEPA documentation and a Memorandum of Agreement (MOA) that will include the federal agencies to be involved with design and construction. This is all well and good, but DCHPO must review and approve the Pennsylvania Avenue Development Corporation (PADC) designs for Pennsylvania Avenue from the Capitol to 15th Street, and there should be stronger capability built-in to secure compliance beyond the MOA, including a strengthened review process and more substantial public participation.

An adequate review of trade-offs for achieving certain levels of security is lacking, perhaps because of lack of security information even for the designers, or unwillingness to share such information with the public. The major aim of the Plan should be the least intrusive options to achieve security at the least expense to the historical and symbolic significance of the city and to the environment (including trees). Without the information on the alternatives available in relation to perceived threat levels to achieve this aim, it is very difficult for designers or the public to fully explore options available. Therefore, it is difficult to be confident that the proposals are the most appropriate for the locations involved. Somehow, this match of design alternatives to security engineering in relation to level of threat must be properly explicated if there is to be any meaningful review of alternatives.

As you know, the Committee has taken a forceful stand against some of the measures being proposed in the name of increased security involving the White House and the Washington Monument, as unnecessary to achieve a desired level of security, detrimental to the historic nature of these areas and to their enjoyment, a hindrance and endangerment to pedestrians, an absolute impediment to pedestrian and traffic flow, and an assault on the local economy. In the case of the Washington Monument, its historic character, symbolic importance, and, even the physical strength of the monument are threatened by the design plan put forward by the Park Service. Why not simpler solutions for the Monuments and the White House? Why choose

these extreme measures that cannot be justified on paper or to the public? Why not bollards at the Washington Monument? Why not move the parking lot at the Jefferson Memorial closer to the roadway with provision for adequate bus ingress and egress and with a low plinth wall in keeping with the curved design of the Memorial? This is the preferable alternative over the recently proposed Park Service alternative of removing the parking lot and using bollards. In the case of the Lincoln Memorial, the earlier design scheme is preferable to the busy hodge-podge of color and design for the bollards. And what will be proposed for the World War II Memorial, thrust into the mall with a long ramp to 17th Street?

The Committee is concerned that there is no description of how to manage spacing requirements for new, large buildings (recognizing that those already existing downtown have, in most instances, inadequate space between street lanes and the building to provide a desired level of security). Since there will be additional construction of office buildings and other crowd centers throughout the city, would the Commission countenance a change in federal law which would provide for eminent domain of private space to achieve the desirable buffer for larger and more imposing structures and to force federal buildings into a more limited lot occupancy requirement than the builders would consider they are entitled to? Would there be a proposal to change D.C. Zoning Regulations to enable better control of private space surrounding buildings?

Is there no concern that attacks on large privately owned and District buildings throughout the core area are also a threat to the locus of the federal establishment? While coordination with the city is a goal, there is no operational plan portrayed to achieve it. The city has built, or is in the process of building huge crowd centers--the arena, the new convention center, possibly a baseball stadium and/or redo of the Kennedy Stadium now sitting on Park Service land. How will these kinds of large-threat areas be taken into account in developing a security plan for the nation's capital? Any major assault on the capital is an assault on the federal establishment.

The implementation program includes a scenario for taking care of priorities, including certain street projects, area projects, and agency projects, but it fails to elaborate on the problem of coordination and work processes between the NCPC led Plan for the areas it has identified and the development of adequate and attractive streetscapes in the District--which should go forward concurrently rather than sequentially. The Plan should include a workable procedure for achieving this aim.

Thank you for your attention.

Sincerely,
Ann Hughes Hargrove

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Enc: testimony on D.C. Bill 14-652