



United States Department of the Interior

NATIONAL PARK SERVICE

National Mall and Memorial Parks
900 Ohio Drive, S.W.
Washington, D.C. 20024-2000



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September 15, 2014

Chairman Anthony Hood
Zoning Commission for the District of Columbia
441 4th Street NW, Suite 210 South
Washington, DC 20001

Dear Mr. Hood:

As the Superintendent of the National Mall and Memorial Parks, I would like to express the National Park Service's concerns regarding the proposed text amendments to the District of Columbia Municipal Regulations Title 11, Zoning Regulations. As you know, some of the nation's most iconic memorials and cultural landscapes are located within our park. Having reviewed the proposed amendments, we are concerned that many historic viewsheds, both to and from these important sites, will be affected by this plan. The NPS has identified two specific areas where the proposed increases in building height which would be allowed as part of the zoning amendments would negatively impact the views associated with the national treasures under our jurisdiction.

Independence Avenue

Having reviewed the National Capital Planning Commission's (NCPC) modeling study of the proposed D-8-B-1 zone south of Independence Avenue, we believe that the proposed amendments would fundamentally change the character of the National Mall. The National Mall, the "Nation's front lawn," is one of the most recognizable open landscapes in the country. It is a park-like setting with edges formed by large cultural buildings which effectively screen the views of any structures beyond. The open feeling that now exists would be negatively impacted if the proposed amendments were adopted since the allowable building heights along Independence Avenue would greatly exceed the heights of the existing Smithsonian structures, thereby intruding into the Mall's viewsheds.

The new zoning proposal would also have a negative effect on the proposed Eisenhower Memorial which has been carefully scaled to fit within the context of the lower buildings that currently exist along Independence Avenue. Since the proposed zoning amendments would allow buildings on the south side of Independence Avenue to be much taller than the existing Smithsonian structures, the amendments would affect the character of the avenue, potentially impacting the broader character of the city as well. Since Constitution and Independence Avenues, two very important and complimentary elements of the L'Enfant Plan, would have different building heights under the new amendments, perceived balance and symmetry of these two radiating avenues would be greatly diminished. Similarly, the taller buildings that would be

allowed under the proposed zoning amendments would also have a negative impact on the character of NCPC's SW Ecodistrict Plan, a plan the NPS sees a critical to creating a new public space which will both link the Mall with the waterfront as well as relieve some of the intense pressure on the National Mall as a public meeting space.

Pennsylvania Avenue Development Corporation Plan

The NPS also concurs with NCPC's findings that the proposed zoning changes are inconsistent with the Pennsylvania Avenue Development Corporation Plan and Square Guidelines for the reasons stated in their June 22nd letter. The PADC plan has played a critical role in the successful revitalization of that section of the city and should be respected moving forward. The NPS recommends that the proposed zoning amendments be revised so that it is not in conflict with the Pennsylvania Avenue Development Corporation Plan and Square Guidelines so that building regulations are clear and consistent.

The NPS stands ready to work with your staff to address these issues. If you have any questions please contact Deputy Superintendent Stephen Lorenzetti at 202-245-4662, steve_lorenzetti@nps.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert A. Vogel". The signature is fluid and cursive, with the first name "Robert" being more prominent.

Robert A. Vogel
Superintendent
National Mall and Memorial Parks