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April 5, 2023

Via E-Mail

Jeffrey P. Reinbold

Superintendent, National Mall and Memorial Parks

National Park Service

900 Ohio Dr. SW

Washington, DC 20024

RE: Rehabilitate Tidal Basin and West Potomac Park Seawalls – Environmental Assessment, Geo Tech, and Memorandum of Agreement

Dear Superintendent Reinbold:

I write on behalf of the FDR Memorial Legacy Committee. We are the citizen led organization supporting the FDR Memorial with the mission to promote education about the Memorial, to improve inclusion and accessibility so all visitors can experience the Memorial, and to preserve the Memorial for future generations. Our organization is borne out of the successful disability led campaign in the 1990s for disability representation at the Memorial. We are a 501c3, led by a board of seven and an advisory board that includes three grandchildren of Franklin and Eleanor Roosevelt and former U.S. Senator Tom Harkin.

We have tracked this \$120 million project proposed by the National Park Service (NPS) since its public announcement in July 2022 and have submitted comments for the first public comment period following that announcement. We provided testimony at the National Capital Planning Commission (NCPC) meeting of January 5, 2023, when the project was presented. We submitted a letter to the Commission of Fine Arts (CFA) for the February 16, 2023 meeting when the project was presented to that body. The FDR Committee is a consulting party to this project.

In each of these opportunities, the FDR Committee has called for concern and caution on this project. We do the same in this letter. It is important to note that our comments are derived from extensive collaboration with experts in the fields of historic preservation, civil engineering and coastal oceanography who are unaffiliated with this project. We have paid for hourly consultations with these experts to help us understand our responsibility, the project, its scope and impact, and explore possible concerns related to the FDR Memorial and surrounding area. This has come at an expense to our small non-profit organization but

underscores our commitment to preservation and our seriousness as a consulting party. Through this public submission we are making our findings available so that further discussion can take place on this project.

Our concerns are anchored by recent weather events which undergird our reasons for why this project requires serious reconsideration. There were at least two flooding events caused by heavy rain and modest storm surge, as recorded by the National Oceanic and Atmospheric Administration (NOAA), in March 2023 that overwhelmed the *entire* Tidal Basin. The seawall was significantly overtopped in all areas. (See attached photos.) Science informs us that these events are going to become more common and extreme.

Our argument is that treating flooding in one area, does not address the increased and very real flooding concerns in other areas of the Tidal Basin and in fact puts those cultural and historic sites – the Franklin Delano Roosevelt (FDR) Memorial, the Martin Luther King (MLK) Memorial, the Japanese Pagoda and Japanese Lantern – at risk. The diverted water has to go somewhere.

Of particular note is the comment from Peter May, NPS Associate Regional Director for Lands, Resources and Planning for the National Capital Region in reference to the NPS project during the February 16, 2023 CFA meeting. His remarks summarized in the meeting minutes are as follows: “... if the water rises to a level that cannot be handled by this proposed design, then the entire parkland beyond the Tidal Basin would also be affected, and additional solutions would need to be studied. He said there are intermediate measures that could be taken, such as controlling the flow of water into the Tidal Basin with the inlet gates; this would require coordination with the U.S. Army Corps of Engineers.”

We wholeheartedly agree with Director May. The water has already risen above what this proposed design can handle and we agree that “the entire parkland beyond the Tidal Basin would also be affected and additional solutions would need to be studied.” It is time for this proposed federally funded \$120 million project to pause and consider “additional solutions”.

Specific concerns to the proposed project plan:

1. Issue One – Where will the Water Go? Lack of Data.

A robust quantitative assessment is needed on the potential effects of the project’s coastal morphology on the compound flooding from co-occurring storm surges and rainfall. A reliable quantitative assessment is needed on the potential effects of sea-level rise around the Tidal Basin under the implemented plan of the rehabilitated wall. A convincing quantitative assessment is needed of the potential impacts on the un-rehabilitated 60% of the tidal basin perimeter, such as increased flooding. In other words, where is the water that is kept inside the Tidal Basin by the rehabilitated seawall and that would otherwise overtop it, going to go?

March 2023 weather events provide an example of how the overtopping of the seawall at the FDR Memorial will be exacerbated by the displaced water from the rehabilitated Tidal Basin Wall. The NPS plan will not protect the path along the shore to the FDR Memorial and it is questionable about protection along the seawall from FDR to the MLK Memorial. Of note, the Japanese Pagoda is at the “end” of the FDR Memorial and the Japanese Lantern is near the MLK Memorial putting both in harm's way.

According to scientists, the flooding at the Tidal Basin on March 13-14, 2023 was likely caused by a surge event which was only 0.7 ft above MHHW (2.5 NAVD). According to NOAA's extreme water level analysis at the DC station, this should be expected several times a year.

An assessment of storm water management should be conducted. Standing water **within** the FDR Memorial is more frequently observed. It is understood that there is a DC Water project underway to address storm water management. It is left unclear how this DC Water project will impact - if at all - storm water management for the historic sites along the Tidal Basin.

NPS officials repeatedly claim there is no risk to the rest of the Tidal Basin but our scientists have not identified any data or modeling in the publicly available information to prove this claim.

2. Issue Two - Tidal Basin Inlet Gates Can Alleviate or Even Resolve Flooding

The Tidal Basin has two inlet gates which are the responsibility of the U.S. Army Corps of Engineers (ACOE). In the NPS Cultural Landscape Report of 2020 it is cited that the curtain gates were not working. As admitted by a NPS contractor, if the curtain gates were restored to their functioning capacity, the current flooding would be reduced if not totally mitigated. As [reported by the Army Corps](#): they received “\$400,000 last year for engineering and design for either full replacement or repair of the historic Washington Tidal Inlet Flood Gates.”

The project under review has not included the Tidal Basin Inlet Gates as an additional solution.

3. Issue Three - Project Documents Claim No Potential Risk

The Environmental Assessment that NPS issued as part of this public comment period does not discuss any potential risk to the FDR Memorial or other cultural and historic sites namely the MLK Memorial, and the Japanese Pagoda and Japanese Lantern. We believe that this project, in concert with climate change, puts all of these assets that are at the shoreline of the Tidal Basin at risk and therefore need to be discussed as such in all project documents.

This omission is made more confusing given the [project summary issued by NCPC](#) for their January 2023 meeting at which this NPS project was presented states: “The applicant (NPS) has indicated the project will not address longer term rises in sea level at this time but will lay the structural foundation for additional wall increases in the future as needed.”

We believe that this project needs to address longer term rises in sea level and treat the Tidal Basin as one entire cultural landscape, rather than a piece meal approach. And, if NPS believes that there is no risk to other areas of the Tidal Basin then we ask for a public presentation of the modeling and data and allow for peer review.

The Memorandum of Agreement (MOA) does not address any risk nor offers any mitigation. We have issued repeated requests for fast tracking of a Cultural Landscape Review (CLR), Cultural Landscape Inventory (CLI) and Hazard Assessment for the FDR Memorial. Meanwhile, NPS continues to move forward with contracting for this project, and its Comprehensive Plan for the Tidal Basin. Of note, in the

NPS CLR of 2020 in which neither the FDR nor MLK Memorials received discussion, it was cited that both the Memorials should have their own CLRs.

We believe there is an important sequence of events that should occur for responsible planning. To protect cultural and historic assets, a CLR, CLI and Hazard Assessment are fundamental tools to ensure preservation, historic and cultural landscape integrity. We, the FDR Committee, ask to be named as signatories to the MOA, and that these reports become priorities for completion in a manner by which they will inform the Comprehensive Plan.

4. Issue Four – No Alternative Plan is Presented.

There are no alternatives proposed. It is either this plan or no plan as stated in the NPS EA. There are many options to preserve access to the Tidal Basin and memorials that are not explored.

We appreciate that this plan considers accessibility needs for all visitors. This must continue to be a priority for future solutions and we call on adherence to the principles of universal design to maximize inclusion for all.

Offering no alternative plans, and fast pacing of this project does not allow for other solutions to be explored and considered.

Attached please find maps prepared for us by Jim O'Donnell, from the University of Connecticut.

Sincerely,



Mary E. Dolan
Co-Founder and Executive Director

cc: FDR Committee Board of Directors and Advisory Board

Attachments



FDR Memorial seawall 3/25/2023



View of the Tidal Basin seawall near the Japanese Pagoda near the rear entrance to the FDR Memorial.
3.25.23



View of walkway near Japanese Lantern. 3.25.23



Standing water in Room 4 of the FDR Memorial 3/25/2023



The seawall shoreline at the MLK Memorial. There is standing water and water nearing the top of the seawall. 3.25.23