

May 15, 2009

Ms. Susan Spain, Project Executive
National Mall & Memorial Parks
National Park Service
900 Ohio Drive, S.W.
Washington, DC 20024-2000

NATIONAL
TRUST
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Southern Field
OFFICE

Re: The National Mall Plan

Dear Ms. Spain:

Thank you for the opportunity to comment on the National Mall Plan Preferred Alternative. This comment letter is submitted pursuant to consultation under Section 106 of the National Historic Preservation Act and is intended to help inform the Draft Environmental Impact Statement (EIS). We understand, however, that Section 106 consultation will continue, and there will be additional opportunities to comment on and inform the National Mall Plan.

General Comments

As a general matter, we continue to believe that a “big-picture” vision plan for the National Mall should be developed in partnership with all stakeholders and agencies. By contrast, we believe that the current planning effort is best understood as a management plan for the portion of the National Mall that is controlled by the National Mall & Memorial Parks unit of the National Park Service. In our view, the National Mall, as evolved from the McMillan Plan, should be construed to include the White House, the White House grounds, President’s Park (*i.e.*, Lafayette Square, where the National Trust’s Decatur House is located), the Capitol and Capitol Grounds, as well as all land located between Constitution Avenue and Independence Avenue and 1st and 14th Streets. Many properties within the National Mall are held by other agencies and organizations, such as the Smithsonian Institution and the National Gallery of Art. We believe a comprehensive vision and stewardship plan for the National Mall should include this entire area.

We propose that, as part of the Programmatic Agreement for this current plan, the National Park Service should produce a National Historic Landmark nomination for the National Mall. This nomination would help to synthesize the disparate cultural resource studies into a single, cohesive narrative, and would formally recognize and delineate the extraordinary significance of the National Mall. Through a Landmark nomination, the National Park Service and others could define the boundaries and characteristics of the National Mall as a whole, as a basis for future planning and stewardship efforts. We would be happy to develop recommendations to help identify qualified professionals who could assist the Park Service in preparing such an important nomination.

One important issue that must be addressed is the ever-evolving character and use of the National Mall. As the Mall has evolved over time, some of these changes have acquired significance in their own right. It will be important for a detailed study of the National Mall’s significance to identify those elements and features that should have special

protection against future alteration, as well as those whose alteration could allow the Mall to continue to evolve organically in response to changing needs and uses.

In the interest of developing a stronger identity for the National Mall as a whole, we believe that consistent design in visitor facilities, signage, paving and other Mall-wide elements is important. Obviously, this idea is somewhat constrained by the fact that this plan extends only to the portion of the Mall area that is under National Park Service jurisdiction, and we strongly recommend that the National Park Service work with the Smithsonian and others to ensure that any "Mall-wide" proposal indeed extends to the entire Mall.

Visitor facilities for the National Mall do not have to be identical but should follow unified design guidelines. We believe that the food facility design by Oehrlein & Associates is generally compatible with the National Mall, and could be used as the basis for future facilities, assuming that issues such as siting and size can be resolved. We recognize that some individual monuments and memorials have ancillary structures that relate solely to their immediate contexts. However, we were surprised and disappointed to learn that the National Park Service did not re-evaluate all existing facilities as part of the National Mall plan; we believe this is a grave oversight that should be corrected in subsequent versions of the plan. In the long term, as facilities age and require upgrades, we recommend that the design and placement of context-specific facilities, such as the World War II Memorial restroom and visitor facilities, be re-evaluated in light of the current planning effort. We also recommend that the design of the proposed bookstore and restroom facility associated with the future Martin Luther King, Jr. Memorial be reconsidered with the current planning effort in mind.

Because of the compressed timeframe for Section 106 review, the consulting parties have not had the opportunity to fully evaluate the effects of the preferred alternative in the course of the consultation meetings. In particular, impacts to the National Mall itself (between 3rd and 14th Street) need greater attention than they have received in Section 106 consultation to date. Cumulative effects to the National Mall as a whole are almost impossible to gauge, given the relatively limited scope of the current planning effort, and the lack of consensus around the National Mall boundaries and characteristics, as previously discussed. Cumulative effects are also difficult to evaluate without information about associated plans, including (but not limited to): transportation and transit-related structures, such as Tourmobile kiosks; changes to the levee; and wayfinding. This planning effort should include a detailed evaluation of and recommendations for reducing miscellaneous "minor" intrusions, such as post-and-chain fencing and security measures. We request that the National Park Service provide overlays of these and other relevant projects in the Draft EIS, as well as in the course of Section 106 consultation.

Although the DC World War I Memorial, Ash Woods, Lincoln Memorial, Jefferson Memorial and Tidal Basin have not yet been addressed in Section 106 consultation, we offer some preliminary comments on specific areas of the National Mall plan preferred alternative below.

Union Square

We agree with the National Park Service's analysis that Union Square does not represent an intact historic element of the National Mall and could be redesigned. While the Capitol Reflecting Pool may well be a contributing feature of the Skidmore Owings and Merrill plan, we recognize its flaws from both a design and use perspective. We agree with the views, expressed during Section 106 consultation, that Union Square should be understood as a transition element between the formal National Mall landscape and the Capitol Grounds. We also concur that an area incorporating pavement and facilities for events would benefit the highly significant historic landscape, by reducing impacts on other parts of the Mall. However, the restroom and visitor facilities are currently proposed to be located at the terminus of the tree plantings. We believe this siting is especially inappropriate, as it would lend far too much prominence and visibility to these mundane facilities.

Ultimately, the kinds of dramatic changes being proposed for a major portion of the Mall such as Union Square must derive from an articulated vision for the entire Mall, developed with a National Historic Landmark nomination as a basis. Some questions that need to be resolved as part of the consideration for Union Square include the following:

- Historically, the space was dedicated to, among other things, a botanical garden and the victory of the Union in the Civil War. Should design changes reinforce one or more of these historic visions, or should we view this as an opportunity to rededicate the space to a contemporary idea or purpose, one that perhaps draws on historical precedent?
- How should the historic designs of the space be referenced and interpreted in a new design? We concur with the National Park Service that significant features, including historic trees and the Grant statue, should remain *in situ*.
- What are the security needs of the Architect of the Capitol? Any security measures should be invisible and incorporated seamlessly into the design for Union Square.
- Parcels to the north and south of Union Square (currently used by the Architect of the Capitol and the U.S. Botanical Garden) should be considered as part of the redesign for Union Square, particularly as potential locations for restroom and other facilities. Union Square may remain its own distinct area; however, the parcels immediately adjacent should at least inform, complement and support the new design.

For these reasons, we recommend that the National Park Service identify the Union Square area as one in need of redesign, but delay any detailed proposals for the area pending more careful analysis, within the context of the entire Mall.

National Mall (Between 3rd and 14th Streets)

This portion of the National Mall represents the most formal historic landscape; it is also one of the most heavily trafficked, and therefore vulnerable. In the characteristic grass and elm panels, any change would represent an intrusion and an adverse effect. Therefore, special sensitivity must be used when proposing and siting any new facilities,

and all current facilities should be re-evaluated with this principle in mind. Any design changes should reinforce and not detract from the formality and symmetry of the space.

We strongly recommend that the National Park Service evaluate opportunities for siting visitor amenities for this portion of the Mall “behind the architectural line,” *i.e.*, in areas under the control of the Smithsonian, National Gallery, and Department of Agriculture. The National Park Service should also collaborate with the Smithsonian to determine what visitor amenities could be offered through the restoration and reuse of the Arts & Industries Building. Museums could be open later to allow longer access to facilities inside. Separate food and restroom facilities, such as those at the National Gallery Sculpture Garden and the Smithsonian’s Air & Space Museum, should also be considered as possible candidates for longer hours.

An inter-agency visitor services agreement could reduce development on the landscape of the Mall and could dramatically improve the visitor’s experience and understanding of the historic resources. This is an area in which we believe shared planning and stewardship of the Mall is critically important.

If visitor facilities are unable to be located completely “behind the architectural line,” we recommend the following:

- Food facilities and restrooms should be paired to reinforce the symmetry and axial patterns of the Mall. However, this recommendation is conditioned upon more detailed information about the impacts of the National Park Service food facilities on the elm panels. While new structures would have an adverse effect on the historic landscape of the Mall, that impact may well be less severe than the impact from siting the facilities separately, or at other locations.
- The carousel and food facility in front of the Arts & Industries Building should be relocated, and the elm panel should be restored. Due to landscape changes in the late 19th century, this portion of the elm panel is already heavily compromised. It will be further damaged by proposed security changes for the Smithsonian Castle. The carousel is an important feature of the Mall and should continue in operation at a different location, perhaps near Constitution Gardens or on the grounds of a Smithsonian museum, such as the National Museum of American History.
- The existing food facility in front of the National Museum of American History should be removed. In addition to numerous refreshment opportunities in adjacent museums, as well as a new facility in the Sylvan Theater site, the National Mall plan provides for two large new facilities on the 12th Street axis that should be able to absorb this need.
- The two facilities proposed for the 12th Street axis should reinforce the axial and symmetrical forms of this portion of the National Mall, without compromising views into or out of the Mall. Special attention in particular should be given to the design and placement of the proposed northern facility, as this area is a visual gateway to the National Mall. Additionally, the 12th Street axis – proposed in the Preferred Alternative as a paved space – should include at least partial landscaping around the facilities, in a manner consistent with the formal landscape character of the

National Mall. At this time, we recommend against paving the center panel of this axis, unless no alternative can be found to accommodate events on this portion of the Mall.

Regarding general treatment for this portion of the National Mall, elm tree and grass panel restoration should be paramount; this may require re-engineering soils and additional funding for landscape stewardship. Wherever possible, first priority should be given to landscape restoration. To succeed, this project may also require a re-evaluation of how to accommodate designated national events that significantly harm the landscape on an annual basis.

We agree with the National Park Service that the current paving system of the National Mall should be replaced with a unified paving system that is sympathetic to the landscape design, as well as sustainable. We also support the proposal to reduce the number of minor paved crossings, forming large grass panels and reinforcing the formal landscape. However, we urge caution in creating the large paved areas proposed for 7th Street, the entrance to the National Gallery Sculpture Garden, and (as mentioned previously) the 12th Street axis. The proposed removal of grass panels has not been adequately discussed in Section 106 review and requires further consultation.

Washington Monument Grounds

We concur with the National Park Service that the Sylvan Theater area offers an opportunity for a multi-purpose visitor facility; however, we recommend that this be designed, programmed and implemented only after a thorough reconsideration of ways the National Park Service might work with other agencies to offer combined visitor services for the National Mall. In addition, we believe the Park Service should explore more sustainable alternatives that would renovate and reuse the existing facility, or elements of it, rather than tearing down entire the Sylvan Theater and sending it to a landfill.

Constitution Gardens

In general, we support the National Park Service's proposal for Constitution Gardens. While the changes proposed would be significant, they are consistent with the Skidmore Owings and Merrill concept for this portion of the National Mall. A restaurant and performance space would provide a draw for an underutilized and underappreciated portion of the Mall. In fact, Constitution Gardens may offer additional recreation or commemorative opportunities, with the original Skidmore Owings and Merrill concept as a guide; these should be considered as part of a larger vision plan for the Mall.

We concur that measures should be taken to ensure that the pool is as environmentally sustainable as possible, while retaining its essential character - in particular, the hard designed edge. In our view, changes could include moving water. A plan should be developed to restore the landscape over time to its original design, by replacing trees that die with the originally intended species. If implementation of the original design is not feasible, a plan should evaluate which elements of the landscape are successful and which should be redone, in a spirit consistent with the Skidmore Owings and Merrill design. We note that Constitution Gardens is an area where an overlay of the proposed levee changes

would be especially helpful, in understanding how all of the current plans would work together.

With regard to architectural features of any new structures, we believe that the Constitution Gardens facilities can be distinctive to this area of the Mall, but should reference the National Park Service facilities elsewhere in the park, as well as the Skidmore Owings Merrill concept.

DC World War I Memorial and Ash Woods

The National Trust is very pleased that the DC World War I Memorial received dedicated stimulus funding for its much-needed restoration. We also concur with the decision to remove the restroom near the memorial. However, we request that the National Park Service consider whether a new facility is necessary, given the proximity of the World War II Memorial and proposed Martin Luther King, Jr. Memorial facilities. At the same time, we request greater detail about proposed changes to the stables, which create a visual intrusion and should be modified to be more compatible with the landscape setting.

Before treatment recommendations can be made for this parcel of the National Mall, the National Park Service should complete a Cultural Landscape Report for Ash Woods, including recommendations for restoration and maintenance.

Lincoln Memorial and Grounds

The National Trust is pleased that the National Park Service will reopen consultation regarding the proposed security measures for the Lincoln Memorial, given the stimulus funding received for renovation of the Reflecting Pool. We hope the reopened consultation will provide an opportunity to address design issues that were never fully resolved under the earlier Section 106 consultation. We support the National Park Service's decision to provide walking paths along the sides of the reflecting pool. Although this measure is inconsistent with historic precedent, it does reflect how the use of the space has evolved.

We remain concerned about the proliferation of facilities around the Lincoln Memorial. The National Park Service should consider ways to consolidate and streamline services in partnership with any new facilities. Because this area of the National Mall has not been fully discussed in the course of Section 106 review, we cannot supply detailed recommendations at this time. We note, however, that new facilities in the proposed Vietnam Veterans Memorial Visitors' Center would duplicate the functions of other nearby facilities, such as the visitors' information kiosk adjacent to the Vietnam Veterans Memorial itself. Certainly, the proposed new Vietnam Veterans Visitors' Center would further "crowd" the area, and we remain strongly opposed to the adverse effects of its design and location.

Tidal Basin and Jefferson Memorial

As with the DC World War I Memorial and the Reflecting Pool, we are pleased that stimulus funding has been set aside to address the seawall at the Jefferson Memorial, which is in desperate need of repair. In general, the focus of planning efforts for this area

should be the stewardship and long-term health of the cherry trees, the Tidal Basin, and the memorial setting. In this respect, we generally support the recommendations set forth by the National Park Service, but note that we have not begun Section 106 consultation for this area.

Thank you for considering the views of the National Trust for Historic Preservation on this important matter. Please contact me (nell_ziehl@nthp.org or 202-588-6040) or Elizabeth Merritt (betsy_merritt@nthp.org or 202-588-6036) with any questions you may have. We look forward to participating in future discussions as the Section 106 consultation process moves forward.

Sincerely,

A handwritten signature in cursive script, appearing to read "Nell Ziehl".

Nell Ziehl
Program Officer
Southern Field Office