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The mission of the DC Preservation League is to preserve, protect, and enhance the historic and built environment of Washington, DC, through advocacy and education.

July 7, 2009

Ms. Susan Spain
National Mall & Memorial Parks
National Park Service
900 Ohio Drive, SW
Washington, DC 20024

Dear Ms. Spain:

The DC Preservation League (“DCPL”) appreciates the opportunity to participate in and provide these comments as part of the ongoing Section 106 review of the National Mall Plan. At the outset, DCPL wishes to commend the efforts of National Park Service (“NPS”) staff Steve Lorenzetti, Susan Spain, Jennifer Talken-Spaulling and Perry Wheelock, not only for the hours of work and devotion to the Mall that they have obviously dedicated to the development of the preliminary preferred alternative and to the Section 106 process, but for their patience and professionalism in wrangling so many consulting parties who are equally passionate about the past and future of this invaluable, and incomparable, historic national resource.

DCPL has reviewed the comments of many of the other consulting parties and, in the main, agrees with them, both in particular recommendations and in more general observations. The particular are addressed below; the more general are addressed here.

DCPL recognizes, but does not entirely share, the frustration that other consulting parties have found in the scope of review of the preliminary preferred alternative, which is at once too broad and too narrow. It paints with too broad a brush with respect to the details of the particular components of the proposed plan, but it is unduly narrow with respect to the metes and bounds of the overall planning area.

Some of the other consulting parties have critiqued the preliminary preferred alternative because it does not spell out the particulars of each aspect of the plan. DCPL, rather, understands the preferred alternative to set forth broader contours of an integrated plan for the Mall, for the purpose of identifying impacts on historic resources, in order to determine which impacts are adverse effects and how those might be avoided or mitigated as specific components of the preferred alternative are implemented. DCPL further understands that this review is only the first stage of an ongoing Section 106 review, and that as specific components are implemented -- *e.g.*, re-design of Union Square, or restoration of the DC War Memorial -- each of those “sub-undertakings” will be subject to further review and comment. Subject to those understandings, DCPL is prepared to comment now on the broader preferred alternative plan -- recognizing that its comments are necessarily likewise general.

At the same time, the scope of the defined undertaking overall is not broad enough. The preferred alternative is critiqued because it is limited to areas within the jurisdiction of the NPS. DCPL understands that this is because the NPS can only plan for what is under its jurisdiction, and is seeking comment on the effects of its plan, thus limited, on historic resources managed by NPS.

To that extent, critiques of what the preferred alternative is not might seem out of place. But NPS invites that critique by the nature of its own undertaking: by trying to accommodate all the desired uses and amenities of the National Mall [stet] on property managed by NPS, it simultaneously concentrates the impacts on historic properties while limiting the options for mitigation. Thus, separate from the issue of whether it makes good planning sense for NPS to focus only on its own property, it becomes necessary to assess the implications of that restricted focus on historic preservation.

Moreover, today's plans become tomorrow's history. Any planning effort must look forward, not merely backward, and create something that 100 years from now will itself be deemed worthy of preservation. That requires planning for the Mall to occur in a larger context than is presented here.

That being the case, DCPL joins in the call of the other consulting parties for an initiative to plan for the long-term future of the Mall that includes all constituencies and affected agencies. DCPL would like to take the opportunity to go on the record here with its own view of what is needed in such a plan.

The need for a third-century plan.

Simply put: The National Mall must have a plan for its development in the 21st century that future generations will give the same exalted status as the L'Enfant and McMillan plans.

Such a plan must have three characteristics. First, it must go beyond the area of the present National Mall Plan. Second, it must balance the intent and philosophy of the L'Enfant and McMillan plans (and to a lesser extent the Skidmore Owings Merrill "SOM" plan) with the ongoing evolution of the city. Third, precisely because of the first two purposes, it must have the imprimatur and backing of our highest elected officials.

First, such a plan cannot be limited to the areas within National Park Service jurisdiction that are considered in the preliminary preferred alternative. Planning for the usage and aesthetic design of the Mall cannot -- or at least should not -- take place in a vacuum. Initially, such limited scope of planning foregoes consistency of design among NPS and adjacent properties. More significantly, it requires placement of all visitor amenities on NPS property, and none on property of adjacent federal (or federally-chartered) entities.

Prime examples are the proposed plans for Union Square and for the Mall between 3rd and 14th Streets, as discussed in our specific comments below.

More importantly, focusing on what MOST visitors have historically considered "the Mall" -- bounded by the three presidential Memorials, the White House and Capitol, and Smithsonian and National Gallery of Art museums -- would confine planning and imagining to that space. Otherwise, all uses are concentrated in an unduly limited space. For instance, if ball fields were relocated outside Park Service properties, that would free up space for other uses.

Instead, we should be calling not for a new plan for the Mall, but a plan for the "monumental core," or the "federal city center." This area would extend from the Kennedy Center to Union Station, down past the Capitol and Supreme Court to the House Office Buildings, then westward along Independence Avenue to 14th Street, finally turning south to include not only the Tidal Basin and Jefferson Memorial but also the Potomac Parks and Hains Point.

Indeed, DCPL proposes that this planning area "leap the river," acknowledging Arlington County's historic origins as part of the nation's capital, and incorporating such national sites as the Pentagon, Arlington National Cemetery, and the Custis-Lee Mansion, as well as the riverfront from Key Bridge to the 14th Street Bridge.

Second, such a plan should treat the L'Enfant and McMillan plans not as holy writ but as iterative drafts of the ongoing evolution and development of the Mall, faithfully preserving those elements that were implemented while hewing to the overall philosophy, deferring only when elements of the plans have been rendered obsolete by 200 years of use and surrounding development.

DCPL considers the SOM plan to have less historic weight than the L'Enfant and McMillan plans, and thus those elements of the SOM plan that were not implemented might provide fruitful planning ideas, but should not be given emphasis merely because they were part of one earlier plan.

Third, the broad visions outlined above are beyond the purview of the NPS or other individual stakeholders in the Mall. It is not their place alone to balance the many uses -- memorial, educational, political, recreational, and aesthetic -- of the Mall area. Nor is it their place to adapt 18th and 19th century concepts of urban landscape to the needs of an ever-changing and frenetic 21st-century metropolis.

Nor can such goals be established by even an inter-agency process. Such planning by committee is a guarantee of poor planning.

Thus, while the NCPC/CFA framework plan is a sound and impressive document, and those agencies would be logical choices to manage an inter-agency process, any plan that resulted would likely never be implemented, or would be implemented only in some of its pieces, for lack of political weight.

For these reasons, as with the L'Enfant and McMillan plans, such a plan needs the imprimatur of nation's highest leaders. It needs to be commissioned by Congress or the President, and it needs to comprise individuals of national significance. Ten years ago it could have known as the Moynihan Commission; today it could be the O'Connor or Kennedy Commission, or be the namesake of some equally eminent national figure.

DCPL urges the National Park Service to advocate before the Administration and Congress for the need for such a third-century commission.

Having made those observations, we turn to the preliminary plan at issue.

Comments on the preliminary preferred alternative

DCPL's comments on the plan as presented are relatively minor. NPS has shown an obvious and commendable regard for historic properties, and the material adverse impacts on sites of historical significance are relatively few and minor.

We largely concur with the views of the National Trust for Historic Preservation and the Committee of 100 on the Federal City, except where noted. Where features of the preliminary preferred alternative plan are not addressed, DCPL supports or at least has no objection to those features.

Union Square

- The concept of Union Square as a Civil War memorial space, with the Grant Memorial as its primary feature, should be retained. With a *de facto* 20th-century "war memorial park" now situated around the Lincoln Reflecting Pool, it is appropriate that the Civil War be commemorated on the Mall. For the same reason, the Grant Memorial should remain as a counterpart on the Mall to the Lincoln Memorial, as they were the central figures in the greatest cataclysm in the country's history.
- The elements of the reflecting pool and the broad, paved plaza, however, lack historical significance, and may be removed or reconceived, consistent with the purposes and uses outlined in the preferred alternative plan.

- We share the concern with the placement of amenities within the tree areas of this space. Unlike the elm panels along the Mall proper, which are extensive enough that they can accommodate physical structures with relatively little visual or other impact, the presence of buildings in these sites on Union Square would have a much more significant effect.
- Here is a simple demonstration of the need for inter-agency planning. The U.S. Botanical Garden and Architect of the Capitol should be involved to develop an amenity plan that serves Union Square and the adjoining north-south parcels in a coordinated way, so as to reduce impacts on all three sites.

National Mall (between 3rd and 14th Streets)

- We agree with the Trust that amenities should be the subject of inter-agency discussions to see if they can be located on non-Park Service property, so as to reduce or eliminate impact on the Mall grounds proper.
- We support relocation of the carousel to a less formal area on the Mall (or adjacent grounds). [One suggestion has been to relocate it to Constitution Gardens; care must be taken that not detract from solemnity of adjacent memorials.]
- We are concerned with the notion of a “paved welcome area” near the Metro entrance, as well as staging space over the 12th Street tunnel entry north of Madison Drive. Such hard-surface, utilitarian spaces are at odds with the fundamental nature of this portion of the Mall, and should be minimized and softened as much as possible.

Washington Monument and grounds

- We have no objection to the proposed redevelopment of the Sylvan Theatre site.

Constitution Gardens

- We have no objection to the proposed redevelopment of the area at the east end of Constitution Gardens -- with the important caveat that any such development and use should not encroach visually or aurally on nearby World War II and Vietnam War memorials. We concur with the Committee of 100 and the Trust that architectural features here should be “festive yet dignified,” and could be distinctive to this area of the Mall, while referential to other facilities on the Mall.
- As the Lock Keeper’s House is no longer in its original location, we have no objection to additional re-location that preserves its basic spatial orientation to the siting of the historic canal.

DC War Memorial

- The DC War Memorial, having once been the only war memorial on the national Mall, is now distinctive as the only one of the now four memorials to the major wars of the “American Century” that is a local rather than national memorial. DCPL concurs with the Committee of 100 that the interpretation of this site should reflect the national participation in World War I, as well as the sacrifice of District of Columbia residents in all the nation’s wars. Appropriate memorial inscriptions should be included in the restored paving around the memorial, or on any seating that may be added to the site.

The remaining features of the preferred alternative plan indicate no material adverse effects to historic properties.

DCPL appreciates the opportunity to comment on the preliminary preferred alternative plan, and looks forward to further Section 106 participation.

Sincerely,

A handwritten signature in black ink that reads "Rebecca A. Miller". The signature is written in a cursive style with a large initial 'R' and 'M'.

Rebecca Miller