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**Comments of the D.C. Preservation League  
to the National Park Service on the  
Draft National Mall Plan/Environmental Impact Statement**

**March 18, 2010**

The D.C. Preservation League (“DCPL”), the leading non-profit organization dedicated to preservation of historic resources in the Nation’s capital, appreciates the opportunity to provide these comments as part of the ongoing review of the National Mall Plan.

At the outset, DCPL commends the efforts of NPS staff for the hours of work and devotion to the Mall that they have obviously dedicated to the development of the preferred alternative and the Section 106 process; 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; and for the care they have taken to reconcile the many competing purposes of the Mall so as to continue to serve the needs of all the Mall’s constituencies.

The Park Service has shown an obvious and commendable regard for preservation of historic resources, and the material adverse impacts on sites of historical significance are relatively few and minor. Consequently, DCPL finds much to commend and little to critique in the particulars of the preferred alternative. This submission will set forth our chief comments, but then address a larger issue that goes beyond the purview of the draft plan, but which provides critical context for properly assessing the National Mall Plan.

**Comments on the preliminary preferred alternative**

As an initial matter, DCPL understands that the preferred alternative merely sets forth broader contours of an integrated plan for the Mall, that the Section 106 review conducted to date is only the first stage of an ongoing review, and that as specific components are implemented -- *e.g.*, re-design of Union Square -- each of those “sub-undertakings” will be subject to further review and comment. DCPL’s comments today are subject to those understandings.

*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.*

Where features of the preliminary preferred alternative plan are not addressed, DCPL supports or at least has no objection to those features.

### Union Square

- We concur with the retention of Union Square as a Civil War memorial space, with the Grant Memorial as its primary feature. With a *de facto* 20th-century “war memorial park” now situated around the Lincoln Reflecting Pool, it is appropriate that the Civil War also 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 are concerned, however, 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 could have a much more significant effect. We anticipate that this concern will be addressed as the Park Service proceeds to more detailed planning.

### National Mall (between 3rd and 14th Streets)

- We are likewise concerned with the notion of a paved area for events between the National Gallery of Art Sculpture Garden and center grass panels, and staging space on the 12th Street axis and 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. With respect to infrastructure supporting large-scale events, we urge the Park Service to consider more mobile facilities that can be removed from these areas when not in use.

### 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 prior comments from the National Trust and the Committee of 100 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.

- The reference in the plan to relocating the Lock Keeper's House away from its current location is somewhat indeterminate. As the Lock Keeper's House is no longer in its original location, we have no objection to additional re-location, so long as it preserves its basic spatial orientation to the siting of the historic canal.

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

### **Comments on comprehensive forward planning for the National Mall.**

Those are DCPL's comments on the particular features of the preferred alternative. DCPL does wish to raise with a larger concern, reflecting the fact that the preferred alternative is overly narrow with respect to the metes and bounds of the overall planning area, and with respect to the scope of the planning effort itself.

The preferred alternative is limited to areas within the jurisdiction of the National Park Service. Indeed, the document specifically -- and with some circularity -- "define[s] the National Mall to include three specific areas over which the agency has legal jurisdiction." Draft National Mall Plan/EIS at 125. We understand that the Park Service can only plan for what the Park Service controls. But the lines on a map demarking the Park Service's jurisdiction are not visible to visitors to the Mall, and do not limit visitors' conception of the Mall, and they likewise should not define the scope of such a significant planning process.

To begin with, planning for the usage and aesthetic design of the Mall within the vacuum of Park Service jurisdiction foregoes consistency of design among Park Service 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. From the standpoint of historic preservation, by trying to accommodate all the desired uses and amenities of the Mall on property managed by the Park Service, the Park Service necessarily concentrates the impacts on historic properties on its own property, while limiting the options for mitigation.

What the preferred alternative does not reflect is any inter-agency coordination of uses and effects among the Mall and its adjacent properties. Three examples -- two of them reflected in the concerns we stated earlier -- illustrate this clearly:

- First, with respect to the development of infrastructure in Union Square, 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.
- Second, the development of fixed, hard-surface utility areas to support large events on the Mall should likewise be the subject of inter-agency discussions to determine if such facilities can be located off of Park Service property, so as to reduce or eliminate impact on the Mall grounds proper.

- Third, the Smithsonian Arts & Industries Building is obviously a potential resource for location of amenities, visitor welcome facilities, or event management infrastructure that otherwise the preferred alternative plan proposes to locate on the Mall's open space.

Other participants in the Section 106 review process have expressed similar concerns, and have called for a planning commission for the National Mall, similar to the McMillan Commission. The Park Service rejects that proposal, on the grounds that "it would necessarily supersede the purview of" the Commission of Fine Arts and the National Capital Planning Commission. Draft National Mall Plan/EIS at 127. Well, precisely. What the Park Service's current effort appears to demonstrate is the pitfalls of implementing plans on an agency-by-agency basis. We are informed that the Park Service has worked closely with the other stakeholders of the Mall. What does not appear in the preferred alternative is any sense that those other stakeholders are making their own contributions to the comprehensive and optimal development of the Mall.

It is too much to expect one agency, or even a committee of agencies, to successfully implement any plan for the Mall and the monumental core. What distinguishes the McMillan Commission from the NCPC is that the former was directly commissioned by, and thereby carried the authority of, the nation's highest political leaders. The re-shaping of the Mall that occurred in the 20th century could not have occurred without the weight of Congressional and Presidential support behind its fundamental concepts. Similarly, any plan today requires greater authority to be successfully implemented on an inter-agency, inter-jurisdictional basis. Without similar political authority and momentum behind it, the NCPC plan runs a considerable risk of being implemented haphazardly, intermittently, and incompletely -- and worst, incoherently.

Similarly, proponents of a Mall planning commission have called for a third-century plan for the Mall. And that is a worthy goal, for today's plans become tomorrow's history. Any planning effort must look forward, not merely backward, and create something that 100 years from will itself be deemed worthy of preservation. That requires planning for the Mall to occur in a larger context than is presented here.

The draft plan rejects the need for a third-century plan, deferring to the National Capital Planning Commission's Extending the Legacy and Monumental Core Framework plans. Draft National Mall Plan/EIS at 126-27. Perhaps those plans, taken together, will one day receive from our successors the same reverence that we give the L'Enfant and McMillan plans today.

But again, what distinguishes the L'Enfant and McMillan plans from the NCPC plans is that the McMillan Commission deliberately set out to re-envision the Mall, while the NCPC takes the Mall as a static, "substantially completed work of civic art," as set forth in the Commemorative Works Act, 40 U.S.C. § 202(a)(1). NCPC and NPS are of course bound to start from that premise, dictated to them by Congress. But while that Congressional finding, which was an important response to the impending profusion of new monuments, memorials and museums on the Mall, it forecloses the continuing long-term growth and evolution of the Mall

The very purpose of a third-century commission (in addition to overcoming the frictions inherent in any inter-agency, inter-jurisdictional process) is to re-visit the question answered by the Commemorative Works Act. It is with considerable trepidation that we suggest asking the

question, “How should the Mall change (if at all)?”, given the narrow interest-group considerations that would inevitably come to the fore. (As the Park Service correctly recognizes, such a commission would “creat[e] another advocacy or grievance forum.” Draft National Mall Plan/EIS at 127.) And it may well be that the answer to such a question would be a call to more fully implement the McMillan plan or other plans that have gone before.

But the irony of historic preservation is that all buildings and places that are now deemed historic themselves were built on some other “historic” site, and many of them were controversial at the time they were built. We believe the question is worth asking.

We recognize that such long-term visioning is beyond the purview of the Mall planning and improvement effort that the Park Service has undertaken. But just as it is not the Park Service’s place to create such a plan on its own, nor is the Park Service’s place to reject it on its own. We urge the National Park Service, along with all other stakeholders and supporters of the National Mall, to continue to address the question whether the Mall should be deemed “completed.”

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

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