

April 29, 2008

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

Re: The National Mall Plan

**NATIONAL
TRUST
FOR
HISTORIC
PRESERVATION®**

**Southern
FIELD OFFICE**

Dear Ms. Spain:

The National Trust for Historic Preservation appreciates the opportunity to comment on the National Park Service's National Mall plan, and to participate as a consulting party in this project, pursuant to Section 106 of the National Historic Preservation Act.

In response to the National Park Service's request, the National Trust for Historic Preservation will work together with other consulting parties, including the Latrobe Chapter of the Society of Architectural Historians, the DC Preservation League, the Committee of 100 on the Federal City, and the National Coalition to Save Our Mall, to evaluate the Draft Alternatives Matrix. We believe that a shared response would 1) be most comprehensive and 2) best meet the National Park Service's need for an expedited consultation process. For this purpose, the National Trust requests an extension of the comment deadline to May 30, 2008. We also request a consultation meeting during the week of May 19th, between the proposed May 7th bus tour and the comment deadline, to discuss the Draft Alternatives Matrix and some of the issues raised in this letter.

The National Trust's Previous Position and Master Planning for the National Mall

In testimony before the Committee on Energy and Natural Resources Subcommittee on National Parks in April, 2005 and in a January, 2007 letter following the National Park Service's scoping meeting regarding the National Mall plan, National Trust president Richard Moe has detailed our organization's position on master planning for the National Mall. In essence, we believe that the National Mall is such a complex and overwhelmingly significant historic resource that 1) any master planning project should involve a coordinated, multi-agency approach to the need for ongoing maintenance and minor design challenges; and 2) any major design changes should derive from a unified vision for the National Mall. This master plan would be based on a thorough evaluation of the evolution of the National Mall and its current condition, the needs of all relevant agencies, and it would include creative solutions to restore, enhance – and in some cases, allow for the first time – the seamless, extraordinary experience that visitors find inspiring and unique on the National Mall.

We recognize that this ideal planning vision for the National Mall will be difficult to realize, and may be impossible within the constraints of the current undertaking. We also recognize that the National Park Service is charged to produce a master plan with its own resources, to meet immediate and foreseeable needs, within its agency jurisdiction. To that end, we appreciate the Park Service's willingness to consider the suggestions of several consulting parties at the April 16, 2008 meeting: 1) to identify the National Park Service's definition of the "National Mall" as a subset of the historic, symbolic core of the L'Enfant Plan and the McMillan Plan; and 2) to evaluate alternatives, especially major design changes, within this larger context. For the National Trust, this perspective and contextualization is essential.

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Specific Recommendations for Future Section 106 Consultations

Recommendation 1: Clarify the undertaking. Although we stand ready to help the National Park Service move forward with the National Mall plan, we request further clarification about the scope and goals of the project. We understand that the National Park Service's plan responds to the National Capital Planning Commission's *Legacy Plan* – a plan that we support and endorse. However, the scope of this current undertaking includes many critical details not addressed in the *Legacy Plan*, each of which require thorough and careful evaluation, given the significance of the National Mall. As we and others have mentioned in previous comments, a "master plan" implies the development of a larger-picture vision for the National Mall, where consideration of major changes (such as those proposed for Union Square, Constitution Gardens, and the Tidal Basin) would be appropriate. A "management plan" or "maintenance plan" would include primarily minor changes and a general refurbishment of resources on the National Mall. The plan as proposed incorporates both major and minor changes, which we believe must be treated differently. It would also be helpful to understand more about the National Park Service's priorities for this project, so that we can most productive in addressing the agency's immediate needs.

Recommendation 2: Seek to develop at least three alternatives, each of which will preserve historic resources, provide for public enjoyment, and accommodate First Amendment demonstrations. We disagree with the statement on page 1 of the Draft Alternatives Matrix that "preserving historic resources, providing for public enjoyment, and accommodating First Amendment demonstrations" are potentially "contradictory" purposes of the National Mall. In our view, meaningful preservation of the National Mall is the preservation of the unified, symbolic core of green space and monumental architecture at the heart of the city. Features within this core have changed over time, in response to changing visions, changing needs and changing management; this evolution is also part of the historic character of the National Mall. Instead of freezing the National Mall in time, or treating discrete parcels based solely on historic precedent, we believe that the National Mall plan Section 106 consultation presents an opportunity to examine what really constitutes the historic and symbolic character of the National Mall as a whole, and to select alternative treatments based on what will reinforce, enhance, and promote that character. Those treatments should also provide for public enjoyment and accommodate First Amendment demonstrations. From at least three alternatives, each posing various options, a preferred alternative can then be developed.

Recommendation 3: For the purposes of this planning project, consider the area of the undertaking a nationally significant historic resource. We share Congress's view, articulated in amendments to the Commemorative Works Act in 2003, that the National Mall Reserve is a "substantially completed work of civic art." It is also a nationally significant historic resource, but one that is difficult to evaluate as a traditional historic landscape or historic district. Although the National Mall is based upon the philosophies and structure of the L'Enfant and McMillan plans, these plans were never fully implemented, and the Mall has continued to evolve. We cannot and should not, therefore, seek to restore the National Mall to a specific design or period in time. Architecturally, the Mall is a collection of iconic buildings and monuments, each of which could be individually listed on the National Register, and each new museum or memorial becomes a critical and highly significant element of the National Mall experience. Even those individual elements that are less than 50 years of age, such as the Vietnam Memorial, would be considered eligible based on their "exceptional importance." Some of the major landscape features on the National Mall that are less than 50 years of age are considered to have a similar degree of historic significance. Many of the Mall's architectural features and landscape features are inextricably interrelated; this is also part of the historic character of the whole. In that context, what can be changed? What is sacrosanct? For structures or landscape features that could be altered, are there characteristics of the design elements that should be retained, based on historic and symbolic precedent? For each of these issues, the history of public use of the space must also be considered.

Recommendation 4: Differentiate between major and minor proposed changes. Planning for major changes to the National Mall would require considerable background information and time for adequate evaluation of alternatives. If adequate planning is not possible within the National Park Service's timeframe, we request that the agency narrow the scope of the project. Planning for minor changes (such as upgrades to paving materials, lighting improvements and standardization, and wayfinding signage) are far less controversial and would, in our view, be most easily achieved within the National Park Service's time constraints.

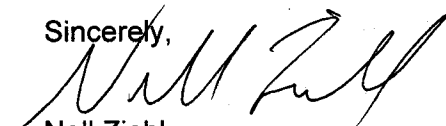
Recommendation 5: Evaluate any proposed structures within the context of the architectural character of the National Mall; this "architectural character" requires definition. Food kiosks, restrooms and other visitor services could be classified as major or minor changes, depending on permanence, reversibility, and impact to historic resources. As improvements in visitor amenities appear to be a high priority for the National Park Service, we recommend that these issues continue to be included under the current planning effort. To what extent will the National Mall planning process guide future development? Is it limited to siting, or will it establish design guidelines for food kiosks, bathrooms, bookstores, restaurants, security posts and visitor service areas? Should new designs react more to immediate context or follow universal guidelines throughout the National Mall? What constitutes the immediate context? How should public use and movement — including current transportation options and potential changes to transportation and pedestrian access — affect the placement of amenities? Some of these issues are raised in the National Park Service's Draft Alternatives Matrix, but it is unclear how we will address these important details within the context of Section 106.

Recommendation 6: Evaluate any proposed landscape changes within the context of the National Mall as a cultural landscape; the character of this cultural landscape requires definition. Certainly, elm trees, paving materials, and cherry trees are characteristic of parts of the Mall, as well as expanses of grass, and gravel pathways. Should these character-defining elements be restricted to one or more areas? Is there an opportunity for other symbolic plantings? What is the nature of the relationship and shape of current and historic water features, the use of ellipses, the transition between the formality of the grounds between the Capitol and the Lincoln Memorial, and the curvilinear landscape around the Tidal Basin? What should it be? Should there be a system of paving materials that define the Mall as a whole?

The National Trust does perceive a need for a larger vision for the National Mall, consistent with the grand design concepts of the past. Through the National Mall plan Section 106 consultation, we would like to better establish what comprises the historic character of the National Mall, and achieve consensus for which projects can be addressed through the limited current planning effort by the National Park Service, and which would be better left to a more comprehensive, far-reaching design or planning process. We want to be helpful in addressing the agency's needs. At the same time, we are extremely sensitive to proposed changes on the Mall and strongly recommend a well-justified, rational, contextualized approach to both minor and major alterations. Following more discussion regarding some of these major preservation and design issues, we believe the Section 106 consulting parties may be able to offer reasonable guidance for specific treatments.

Thank you for considering the views of the National Trust in this important matter.

Sincerely,



Nell Ziehl
Program Officer