

GOVERNMENT OF THE DISTRICT OF COLUMBIA
HISTORIC PRESERVATION OFFICE



May 19, 2008

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

RE: The National Mall Plan - Draft Alternatives Matrix

Dear Ms. Spain:

Thank you for providing the DC Historic Preservation Office (DC HPO) with the Draft Alternatives Matrix for the National Mall Plan. We have reviewed the document in accordance with the National Historic Preservation Act and the National Environmental Policy Act and are writing to provide our initial comments regarding the alternatives under consideration and their possible effects on historic properties.

As you are aware, the Alternatives Matrix identifies a range of approaches for making a wide variety of improvements to the National Mall. These approaches are grouped into three action alternatives, each with a different focus. Alternative A focuses on the "Historic Landscape and Education," Alternative B concentrates on creating "A Welcoming National Civic Space for Public Gatherings, Events, and High-Use Levels" and Alternative C centers upon "Urban Open Space, Urban Ecology, Recreation and Healthy Lifestyles." Ideally, every improvement to the National Mall should address each of these goals but, in order to assist the National Park Service (NPS) in developing a preferred alternative, we are recommending that some of the actions be implemented and that others should not. As the State Historic Preservation Office for the District of Columbia, our recommendations are based primarily upon the alternatives' potential to affect historic properties.

Before providing specific comments, we point out several important principles that should be kept in mind when developing the preferred alternative. For example, implementation of any one proposal may not cause a drastic change to the National Mall's environs but carrying out a number of them could significantly alter the characteristics that qualify the subject historic properties for listing in the National Register of Historic Places. In other words, the cumulative of these alternatives must be considered. Doing so will not only increase the chances to identify and avoid adverse effects, but will also provide critical opportunities to examine how the various approaches should relate to each other in terms of circulation patterns, consistency of design and related matters.

Although the National Mall has been described as a "completed work of civic art," we also believe that it is important to acknowledge that the National Mall has, and will always continue to change and evolve. Basing current decisions about future actions upon historical precedents such as the L'Enfant Plan and the McMillan Plan is of the utmost importance. Yet it must be simultaneously recognized that the National Mall which exists today is not the embodiment of any single plan, but rather a combination of all of the significant historical planning efforts, most of which were only partially implemented.

The heterogeneous origins of the National Mall are implicitly acknowledged in the present-day efforts to establish a unifying name for the area—the National Mall—or vice versa, to define the agreed-upon area described by that commonly used term. The “National Mall” for the purposes of this project is not in fact a single designed entity, but rather a collection of separate landscapes designed at different times according to sometimes radically different design philosophies. It is in these respects wholly unlike New York’s Central Park or San Francisco’s Golden Gate Park, both of which are distinguished both by their fully executed comprehensive design plans and their clear identity in name and extent. Additionally, the National Mall has over time become more fragmented by a grid of increasingly busy city streets and ill-conceived highway intrusions.

This lack of clarity about what constitutes the “National Mall” is an issue of more than semantics. It reflects some of what is lacking about the present condition and image of the National Mall, and suggests some of the physical and functional attributes the National Mall Plan should focus on in attempting to establish a more integrated landscape and a richer visitor experience. There are several key areas in which we believe the National Mall Plan should provide specific guidance for the future:

- Establishing a comprehensive design approach for key areas in need of improvement. Some of these are areas that have never been fully landscaped, whose historic design has been disrupted by later alterations, or that could provide better transitions between landscapes of different design character (e.g., Union Square, Ash Woods, the Constitution Avenue terminus at the Belvedere, the Sylvan Theater/South Grounds area, the levee area, and the base of the Lincoln Memorial steps);
- Serving as a framework to consider nearby projects in coordination, rather than as separate isolated improvements;
- Improving and strengthening the coherence of the pedestrian circulation system as it is adjusted to accommodate new facilities and needs; and
- Balancing the monumental and naturalistic features of the National Mall, particularly as a means of accommodating more visitor amenities in addition to civic grandeur.

Given the volume and complexity of the suggested approaches, this letter does not address every topic covered in the Alternatives Matrix or categorize every alternative into a “recommended” or “not recommended” category. Instead, it identifies many of the most substantial proposals that we anticipate will have a significant impact on the National Mall and/or constitute an adverse effect on historic properties regardless of which alternative is ultimately selected. It is our position that these proposals will require further study and additional consultation before informed decisions can be made regarding the most appropriate courses of action. We encourage the NPS to maintain as much flexibility as possible regarding the range of alternatives available for these very substantial projects. For most of the other proposals not specifically addressed in this letter, we believe that any unavoidable adverse effects can be minimized and mitigated through the development of a Programmatic Agreement for implementation of the National Mall Plan.

RECOMMENDED:

Section 7.1 – Visitors Facilities/Architectural Character: This is an area where it may be appropriate to combine aspects of all three proposed alternatives. Alternative A recommends developing new visitor service facilities to be “compatible with timeless visitor facilities (e.g. the Mall and Lincoln refreshment stands), making them more identifiable for visitors, strengthening the NPS identity, and denoting that they are secondary to memorials.” This appears to be appropriate because it could mitigate the adverse visual effects caused by an excess of architectural styles. Yet, it may also be suitable to develop “a limited number of architecturally significant destination visitor facilities in certain locations” (e.g., Constitution Gardens, Tidal Basin) as recommended in Alternative B and to incorporate “cutting-edge sustainable design solutions” into the visitors facilities Alternative C recommends.

Section 7.4 – Visitor Facilities/Lighting Hierarchy and Guidelines: Developing and implementing comprehensive lighting guidelines for the monumental core as recommended by all three alternatives could enhance the National Mall’s nocturnal “sense of place” and possibly decrease some concentrated use during daylight hours by encouraging nighttime visitation.

Section 13.3 – The Mall/Natural Resources/Other Trees: While the elm tree panels are a primary feature of the McMillan plan for the Mall, the few “non-contributing” specimen trees at the Smithsonian Grounds and Union Square should probably be recognized as historic landscape features in their own right. Retention of these trees could help to balance the rigid formality of the Mall and recollect the former naturalistic landscape that is part of the Mall’s historic evolution.

Section 14.2 – Washington Monument/Security Checkpoint: All three alternatives recommend replacing the temporary security checkpoint on the east side of the monument. We concur and recommend that this be carried out as soon as possible in order to eliminate the existing adverse visual effect. If it becomes necessary to construct a new pavilion as a security checkpoint, it may be appropriate to consider working with the Smithsonian to relocate the historically related Horatio Greenough statue of Washington into such a pavilion.

Section 15.5 – Washington Monument Grounds/Visitors Facilities: Based upon the success of the recently renovated Monument Lodge, it seems appropriate to rehabilitate the Survey Lodge in order to improve the existing visitors facilities and maximize the use of historic buildings. Perhaps, the rehabilitation efforts could be expanded beyond making the historic building accessible for persons with disabilities as suggested in Alternative B. Improved pedestrian access might also be provided in conjunction with other plans for the Monument’s south grounds.

Section 17.1 – Constitution Gardens/Vision Emphasis: This is one of the most underutilized areas of the National Mall. Developing a “garden restaurant” as proposed in Alternatives B and C and adding “recreation rentals” (e.g. model boats) as discussed in Alternative C could attract more people to relieve congestion in other areas of the National Mall. In turn, this could provide more opportunities for education of the public at some of the Mall’s lesser-known resources (i.e. the Lockkeeper’s House and the Declaration of Independence Signers Memorials).

Section 22.6 – Lincoln Memorial Grounds/Memorial Circle and Radius Roads/Perimeter Security: We recommend redesigning the area at the base of the Lincoln Memorial steps to accommodate security, use as a performance area and improved circulation patterns.

Sections 23.1 & 23.4 – Lincoln Memorial Grounds/Watergate Area/Historic Landscape Features and Public Access and Parking: The removal of Constitution Avenue from 23rd Street to the Potomac Belvedere is probably the most disruptive and unfortunate of the highway-related alterations to the National Mall, severing this monumental boulevard from its intended terminus at the river. The SHPO strongly recommends that the Mall Plan call for restoration of this segment of the Avenue.

Section 25.1 – DC War Memorial/Ash Woods: We recommend that the *Historic Structures Report* be implemented so that this memorial can serve both its functional and commemorative uses. Any significant alterations to the memorial’s surroundings should be closely coordinated with our office.

Section 25.6 – DC War Memorial/Ash Woods/Operations – United States Park Police Stables: As described in the “existing conditions” section of the Matrix, these facilities are “not in keeping with the historic character of the National Mall.” We recommend that Alternative C be implemented so that the stables are reconstructed in keeping with the historic character of the Mall.

Section 26.7 – Tidal Basin Area/Visitors Facilities: It appears appropriate to redesign the existing refreshment facility to accommodate the need for a new visitors facility that would blend in with the historic character of the National Mall.

Various Sections/General Recommendations: We acknowledge that more restroom and food facilities are necessary. We maintain that they can be successfully incorporated onto the National Mall through careful planning and design. The “Circular Restrooms” should be replaced with new restrooms that blend in with the historic character of the National Mall; the “Mall Bench” and mall lighting standards should be utilized to the maximum extent feasible and appropriate.

NOT RECOMMENDED:

Section 13.2 – The Mall/Historic Landscape: Alternative B recommends adding a “decorative and interactive water play feature at the 8th Street cross axis” because the McMillan Plan proposed such a feature in this location. As previously mentioned, the National Mall is not the embodiment of the McMillan Plan or any other plan. As the McMillan Plan’s concepts evolved during implementation, the idea of adding a feature on the 8th Street cross-axis was discarded on more than one occasion.

Section 13.6 – The Mall/Public Access and Parking: Alternative B recommends constructing an underground visitor parking facility between 15th and 12th Streets.” In addition to the numerous adverse effects that would result from constructing such a significant facility, the provision of a substantial number of additional parking spaces directly under the Mall would exacerbate the audible and visual adverse effects that are caused by the already overwhelming traffic conditions. It could also discourage the pursuit of alternative approaches for Mall access such as public transportation.

Section 15.4 – Washington Monument Grounds/Public Access and Parking: Alternative B proposes an underground visitor parking facility. This facility would cause adverse effects similar to those specified in Section 13.6 above – The Mall/Public Access and Parking.

Section 15.5 – Washington Monument Grounds/Visitors Facilities/Food & Gifts: If it is essential for a food and gift facility to be located on the Washington Monument Grounds, we recommend that it not be located on a permanent, partially underground, grass-roofed facility between 14th and 15th Streets as suggested in Alternative A because doing so would also likely constitute a permanent adverse visual effect on the Washington Monument and the surrounding historic properties.

Section 26.3 – Tidal Basin Area/National Resources/Tidal Basin Function and Walls: We recommend against the portion of Alternative C that suggests eliminating the bay north of Kutz Bridge to provide additional recreation space. The north bay of the basin is an important design feature and part of the backdrop for the monument to naval hero John Paul Jones at the terminus of 17th Street.

SUBSTANTIAL ACTIONS REQUIRING FURTHER CONSULTATION:

Section 6.3 – Getting Around/Public Access & Wayfinding: The proposal to “tunnel some roads to improve vehicular circulation” as recommended in Alternative C would require significant consultation.

Section 7.3 – Visitors Facilities/Paving: Several different approaches are identified to address the issue of paving. Alternative B proposes that “paving should simulate the appearance of gravel.” This may be suitable in many cases but the “coordinated paving plan” that is recommended in Alternatives B and C would probably have to be developed in order to make informed decisions about this and other paving-related issues such as curbs etc. Additional analysis and through further consultation are recommended.

Section 12 – Union Square: This section arguably represents the most significant changes proposed for the National Mall including redesign or removal of the reflecting pool, redesign of the entire square and possibly providing for a multipurpose visitors center along important view sheds such as Pennsylvania Avenue. Although the reflecting pool has not been formally evaluated for the National Register, it is likely eligible. A determination of eligibility would not necessarily imply that we would argue for preservation of the current feature but we do

advocate that some sort of additional historical landscape research be conducted to identify as many of the historical designs that have existed on this site to date – including the work completed in the 1930s. Such research may determine that the approach described in Alternative C – “redesigning the reflecting pool as a shallow pool that could be drained for demonstrations and events or frozen for ice skating” – is appropriate. On the other hand, the McMillan Plan, the Frederick Law Olmstead Jr. design and other historical precedents could be used to argue against including a water feature at all. The same precedents could be used to advocate a variety of approaches for redesign of the entire square. The possible inclusion of a multipurpose visitors center that could impede important views may complicate matters even further. Given the complexity of the issues involved in Union Square, we strongly recommend that no approach be excluded from further consideration and that no single approach be endorsed for this particular aspect of the National Mall Plan. Instead, more detailed alternatives should be developed and further consultation should be conducted in order to fully define the preferred alternative.

Section 13.6 – The Mall/Public Access and Parking: Alternative C recommends constructing a 14th Street vehicular tunnel to improve pedestrian movement and safety. This proposal, which is identified as one alternative in the *14th Street Bridge Corridor Study* may be appropriate but it would constitute an adverse effect that would have to be minimized and mitigated. The degree to which 14th Street currently does or could serve as a “monumental approach” to the National Mall would have to be considered.

Section 15.4 – Washington Monument Grounds/Public Access and Parking: Alternative B contemplates constructing pedestrian underpasses or bridges between 14th and 15th Streets near Jefferson and Madison Drives. The pedestrian underpasses and/or bridges have the potential to constitute permanent adverse visual effects on the Washington Monument and the surrounding historic properties if not carefully planned and designed. Further consultation is recommended.

Section 15.5 – Washington Monument Grounds/Visitors Facilities/Food & Gifts: Alternative B recommends a new multipurpose facility on the site of the Sylvan Theater while Alternative C recommends the same facility be located north of Independence Avenue between 14th and 15th Streets. Both of these sites are potentially suitable for a new facility but a number of design issues (e.g. possible reorientation of the Sylvan Theater; consideration of existing on-site trees, visual effects on the Washington Monument etc.) would have to be examined and further consultation carried out before one site is selected over another.

Section 15.6 – Washington Monument Grounds/Operations-Heliport: Reconfiguring the walkways and paving a grassy area to provide for a heliport that is only used “for emergencies and occasionally for state arrivals” would appear to constitute an unnecessary adverse effect. However, it may be possible to design a feature that serves additional functions (e.g. staging area, seating etc.) and blends in with the historic character of the National Mall. Additional planning and consultation would be required to determine if such a multi-purpose function could be appropriately designed on the Washington Monument Grounds.

Section 17.2 – Constitution Gardens/Lockkeeper’s House: Alternatives A proposes reuse of the Lockkeeper’s House as a visitor information station while Alternatives B & C suggest relocating the building in order to eliminate “safety hazards for turning vehicles.” We believe that the Lockkeeper’s House is underutilized and we are concerned about the potential for damage given the building’s proximity to Constitution Avenue. Although a decision regarding whether or not the Lockkeeper’s House should be relocated will require the development and evaluation of various design alternatives, we have already suggested our conceptual support for the proposal to relocate the Lockkeeper’s House. We recommend that it should not be planned in isolation, however, but rather as an element of a coordinated plan for the levee, restaurant, and other features of this area of Constitution Gardens

Section 21.2 – Lincoln Memorial Grounds/Reflecting Pool: Several significant changes are also being considered for this end of the National Mall. Nearly every one of the approaches identified in all three alternatives (e.g. reconstructing the reflecting pool, establishing a seat wall, constructing a 16’ wide paved walk and 3’ wide jogging surface etc.) would constitute an adverse effect on the historically significant property and yet some of

these actions may ultimately improve the functionality of the resource. As in the case of Union Square, we recommend that more detailed alternatives be developed and that further consultation be conducted in order to fully define the preferred alternative

Section 26.3 – Tidal Basin Area/National Resources/Tidal Basin Function and Walls: The deteriorating conditions of the Tidal Basin clearly establish a need for some type of intervention but the recommended engineering studies must be completed before decisions can be made about appropriate design changes.

In closing, we again thank the NPS for providing this opportunity to comment on this extremely important undertaking and we look forward to working with you and the other consulting parties to continue our efforts to develop a truly exceptional National Mall Plan. If you should have any questions or comments regarding this matter, please contact me at david.maloney@dc.gov or 202-442-8850. You may also contact Andrew Lewis at andrew.lewis@dc.gov or 202-442-8841. Otherwise, we look forward to receiving more information on this important undertaking as it becomes available.

Sincerely,

Mr. David Maloney
State Historic Preservation Officer