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May 19, 2008

Judy Scott Feldman, Ph.D.
Chair
National Coalition to Save Our Mall
9507 Overlea Drive
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RE: National Mall Plan Matrix

Dear Susan:

The NPS bus tour on May 7 was useful in highlighting NPS's proposals in the matrix for the Mall. They also point out how complex the issues are. We welcome NPS' planning efforts but agree with the National Trust for Historic Preservation that there is a lot to digest and major concerns and issues to consider that we have not had time to discuss yet in the Section 106 process.

We are disappointed NPS has rejected the Trust's request for an extension of the comment deadline to the end of the month so that the various nonprofit groups involved in the Section 106 process could pool their resources to review the matrix. Our group meeting will not occur until later this week. We are submitting brief comments today and hope to send more detailed comments in coming days.

We are interested in hearing your response to Kelly Fanizzo's email of May 6 in which she asked for clarification about development of the first preferred alternative. Will it be a single approach, a narrowed down selection, and how broad will a preferred alternative be? It is difficult to know how to comment on the matrix without knowing what NPS is looking for as it moves forward.

We have three concerns that came out of the bus tour which we believe should be addressed and clarified as soon as possible, and certainly in advance of the next 106 meeting: 1. The need for integrating the matrix with transportation and other issues and discussing them in the 106 process before a preferred alternative is developed by NPS, 2. The confusion about which historic plans and properties are to be considered as "contributing elements" as we evaluate the alternatives, and 3. Management planning goals versus a long-range "vision" for the Mall.

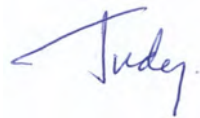
1. Questions and discussion during the tour made evident that changes proposed to the landscape, design, and visitor amenities at Union Square, at the Washington Monument grounds, Lincoln, and Constitution Gardens depend on a mix of considerations which we have not yet had the opportunity to discuss during the Section 106 process. These include

potential changes in public use resulting from proposed transportation and circulation options. Without a discussion that integrates transportation alternatives into the Mall plan, it is difficult to assess which options in the matrix might work better than others.

2. During the stop at Union Square it was evident once again that there is confusion about how the NPS plan relates not only to NPS's management divisions and individual "cultural landscapes" but also to the historic L'Enfant and McMillan Commission plans for the Mall. This makes it difficult to evaluate the matrix alternatives in terms of what constitutes a "contributing element" and what the "effects" of the different alternatives could be. For example, discussion of the landscape design focused on the parcel as "Union Square" but not on its integral relationship to the National Mall as a whole. This happened at other locations as well. Are these parcels being considered by NPS in isolation or are they contributing elements in the larger National Mall context? We also were confused when Steve Lorenzetti made the point several times that 106 only deals with things actually built—and not the ideas or designs of the historic plans. We were given examples of older plans for the Mall that included the 1939 NCPC proposal and the 1960s Skidmore Owings Plan as examples of the various ideas proposed over the past 100 years. But those plans were developed by individual agencies for their own planning purposes. Are they being given equal weight to the historic L'Enfant and McMillan Plans which are on the National Register?
3. During the bus tour it became clearer than ever that the NPS's major priorities remain management and maintenance issues for grass, trees, pathways, and restrooms. If there is a long-range vision, as NPS states in its planning documents and during Section 106 sessions, it is not clear what that larger context is. So far, discussion during the public consultations and Section 106 meetings have focused primarily on management concerns, and in particular on NPS priorities. On what basis will NPS weight its own priorities against the comments proposed by consulting parties, many of which may conflict or disagree with NPS goals?

We would appreciate your response to these questions and concerns.

Best regards,



Judy Scott Feldman, Ph.D.
Chair