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April 13, 2008

Susan Spain, Project Executive  
The National Mall Plan  
National Mall & Memorial Parks  
900 Ohio Drive, S.W.  
Washington, DC 20024-2000

Re. National Mall Plan maps and matrix

Dear Susan:

Thank you for providing maps and other materials relating to the National Park Service's National Mall Plan. We appreciate that the two maps are intended to help clear up the questions, raised by several consulting parties during over the first National Historic Preservation Act Section 106 meeting on March 19, over the scope of the undertaking and the historic properties that will be affected by it. They are helpful in delineating the ways in which NPS divides up parcels of the Mall for administrative purposes and classifies individual "cultural landscapes" for the various parcels and memorials.

However, the maps fail to acknowledge the historic L'Enfant Plan of 1791 and the McMillan Plan of 1901-1902, which are the historical, symbolic, and design basis for the National Mall as a historic property and resource of national significance. The Mall is not simply a collection of individual "memorial parks", each with its own separate historical and cultural significance.

At the first Section 106 meeting on March 19, despite attempts by consulting parties to discuss the L'Enfant and McMillan plans as the preeminent historical "documents" that should define the geographical and historical basis of any "National Mall Plan", NPS representatives did not respond by taking up this fundamental topic. As such, we strongly feel that the "undertaking" has not yet been defined in any historically feasible or accurate way. NPS management and administrative divisions do not trump history and cannot be the basis of any Section 106 process for a historic property, least of all for one of such surpassing national importance as the National Mall.

This begs the question: What is the historical basis for NPS's "Overall Concept" (p. 1) that the Mall is a "completed work of civic art"? This is a question of historic plan and design, but also of the Mall's historic purpose. What is the historical "glue" that holds together—in terms of definition and purpose—the various cultural landscapes in a unified whole "National Mall"?

Without having any clarity about the historical basis for the Mall plan, we are alarmed to see that in Alternatives B and C NPS proposes "redesigning some areas"? Is the Mall "completed" or not? On what basis does NPS propose to alter the historic resources? One does not simply redesign historic landscapes for management purposes unless and until a thorough evaluation is made. To approach planning for the Mall in terms of changes to individual parcels threatens the very integrity of the Mall as a

“completed work of civic art” with its origins in the historic L’Enfant Plan and its redesign by the McMillan Commission.

The present plan as currently defined simply cannot be a “National Mall Plan” without incorporating the historical basis of the National Mall as a historical and cultural resource. Otherwise, this should be called what it appears to be – a “*National Mall & Memorial Parks* Management Plan” for properties under NPS jurisdiction. Given that each “memorial park” and historic parcel has, as NPS’s cultural landscape reports document, its own history and cultural value, each of those parks could be evaluated within the context of its special history and cultural value, not lumped together as though they represent a unified historical whole.

Before NPS moves forward with any further development of “alternatives”, we request that NPS prepare at least one additional map, and make modifications to the current maps, that identify the following cultural and historical resources:

- A map that delineates the boundaries of the historic L’Enfant Plan – not solely as defined by the NPS but as shown and described in the original L’Enfant Plan manuscript itself and other sources – and the historic McMillan Plan, both plans of which are listed on the National Register of Historic Places
- West Potomac Park and East Potomac Park Cultural Landscapes, which include in their areas the Lincoln Memorial, Jefferson Memorial, and hundreds of acres of public parkland
- Cultural landscapes areas for the Capitol and White House and Ellipse, which are part of the Mall as a whole
- Any cultural landscape reports for the National Mall as a whole
- Any cultural resource reports for the parcel of land beyond the Mall and near the Kennedy Center

Another critical aspect of the Mall’s historical significance that is not given due attention is the Mall’s purpose and function—both as intended in the historic plans and as evolving over the course of more than two centuries. Although the Mall was intended by L’Enfant as a “public walks” and “place of general resort,” and the McMillan Commission envisioned a grand public park with plentiful recreation, these seminal aspects are not given the required weight in NPS’s description of its “Overall Concept” on p. 1, which instead treats the Mall as a collection of memorial parks.

That concept describes “a historic open space...setting for memorials...setting to showcase federal buildings and branches of government, as well as the great cultural institutions of our nation.” Public activities and functions come across as a secondary purpose rather than an essential purpose since 1791: “The National Mall accommodates First Amendment demonstrations, special events, and national celebrations.” The “Overall Concept” simply fails to recognize the historical and cultural purpose that is the legacy of L’Enfant and McMillan: urban park and recreational space in the heart of the capital city. This needs to be incorporated into the concept to ensure that this National Mall Plan does not alter and degrade the historic integrity of the National Mall.

Another consequence of this approach to the Mall as a collection of memorial parks, instead of a public park and promenade, seems to be the way it addresses – or not – the pedestrian experience. For example, the discussion about relocating the blue tent food concession at the Washington Monument has focused on locations that would align with Tourmobile stops. But as several participants in earlier public meetings stated, the public needs food and other amenities on the open space, for pedestrians who choose not to take the Tourmobile. There is a disconcerting sense that NPS concessions for food and

interpretive transportation are guiding planning instead of historic preservation and public need taking priority as they should.

Finally, there was good attendance by about 40 consulting parties but it became clear during the course of the four hour meeting that most of the non-government consulting parties (and some of the governmental parties) were not at all familiar with the history of the National Mall and so were at a loss to participate. The Section 106 consulting parties need information about the Mall's cultural role through history and this needs to become part of any discussion before the modern changes proposed by NPS can be discussed, let alone evaluated, for this historic resource.

Therefore, we recommend that NPS remedy this situation by opening the April 16 meeting with a brief slide history of the Mall, including the L'Enfant Plan, the Downing Plan, the McMillan Plan, and the Mall's evolution to the present.

We have been raising serious concerns about the ill-defined scope of this undertaking since it was announced in November 2006 and still are frustrated that the NPS does not take these concerns seriously. At the very least, the National Register of Historic Places documents for the L'Enfant Plan and the McMillan Plan should be included as critical documents to defining the scope of the current "National Mall Plan."

We hope that the April 16 meeting will function truly as a Section 106 historic preservation review, with all that entails, instead of a continuation of the management-driven agenda that occupied much of the first meeting.

We are asking the Advisory Council on Historic Preservation to take a leadership role in advising the National Park Service about the purpose, requirements, and goals of the Section 106 historic preservation consultation process. In addition, we will ask the State Historic Preservation Office to update and provide to all consulting parties its documentation on the definition and purpose of the National Mall through history to the present. The National Mall requires the most scrupulous attention to the laws and public consultation process, not a disregard of critical historical information and a rebuff of substantive public concerns.

Sincerely,

A handwritten signature in cursive script that reads "Judy Scott Feldman".

Judy Scott Feldman, PhD  
Chair and President

cc. Consulting Parties for the Section 106 process  
Kent Cooper, George Oberlander, Tom Jensen