

The Committee of 100 on the Federal City



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February 18, 2016

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Marcel Acosta
Executive Director
National Capital Planning Commission
401 9th Street, NW, North Lobby, Suite 500
Washington, DC 20004

RE: Response to Notice of Intent to Prepare an Environmental Impact Statement for the Smithsonian Institution's South Mall Campus Master Plan

Dear Mr. Acosta:

The Committee of 100 on the Federal City previously submitted comments during the scoping process for the originally announced Environmental Assessment for the Smithsonian Institution's South Mall Campus Master Plan. We are sufficiently troubled by what we have learned and by the rigidly constrained public meetings we have endured that we must again voice our significant concerns on the public record. Fourteen months of so-called consultation has left us with more questions and greater awareness of process inadequacies than when it began.

First, we are extremely disappointed that the Smithsonian Institution has not taken the required threshold step in the compliance process for Section 106 of the National Historic Preservation Act. Despite the declared adverse effects of the Master Plan on the National Historic Landmarked Castle and the Arts and Industries Building, and the wealth of affected historic treasures potentially eligible for the National Register of Historic Places, the Smithsonian Institution has yet to do necessary research and analysis. At the most recent public meeting, representatives declared that they don't believe that the Ripley and Folger Gardens are eligible, and that that of the Haupt Garden is dubious. All three Gardens as we know and cherish them, including the Quadrangle's pavilions, ornamentation, water features, and Renwick Gates, would be decimated in the Smithsonian's Preferred Alternative D in addition to Alternative C. Together with the DC Preservation League and National Trust for Historic Preservation, we wrote to the Smithsonian Institution on December 5, 2015, on this matter. We have yet to receive the courtesy of a letter response with firm commitments.

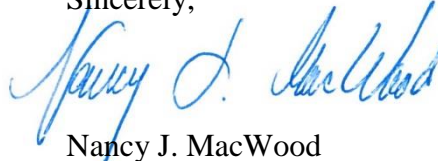
Marcel Acosta
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Second, following a series of non-responses and failure to provide information in response to specific requests by respected national and local experts, we and DCPL have taken the step of requesting the participation as a Consulting Party of the Advisory Council on Historic Preservation. We believe that the historic significance of the properties at stake, plus procedural confusion and inconsistencies of the Smithsonian Institution's consultation process thus far, require the Council's involvement to ensure respect for and compliance with not only the NHPA but also the National Environmental Policy Act.

Finally, we are troubled by important information gaps in the Master Plans presentations and documentation. Perhaps most significant of these have resulted from the Smithsonian Institution's insistence on discussing a single pre-determined "Concept Phase" per meeting, instead of allowing discussion of the Master Plan as an integrated whole. To date we have not been allowed to discuss the indirect or direct impacts of the Castle seismic retrofitting on the Gardens, Pavilions, Gates, or Quad in its entirety. Please see our letter (attached) to the Council for more such gaps.

The EIS process is the Smithsonian Institution's opportunity to finally act appropriately and in compliance with the law, and to respect iconic historic properties.

Sincerely,



Nancy J. MacWood
Chair

Attachment

cc:

Anne Schuyler, Matt Flis, Lucy Kempf, Elizabeth Miller, Cheryl Kelly, Jennifer Hirsch, National Capitol Planning Commission

Nancy Bechtol, Director, Office of Facilities, Engineering, and Operations, Smithsonian Institution

Walter Ennaco, Acting Director for Office of Planning, Design, and Construction, Smithsonian Institution

Stephanie Toothman, National Park Service, Associate Director, Cultural Resources, Partnership and Science

Robert Vogel, Susan Spain, Peter May, National Park Service Capitol Region

David Maloney, Andrew Lewis, DC SHPO, DC Office of Planning

Rebecca Miller, Tisha Allen, DC Preservation League

Thomas Luebke, Commission of Fine Arts

John Fowler, Charlene Dwin Vaughn, Brian Lusher, Reid Nelson, Advisory Council on Historic Preservation