



Preserving America's Heritage

Ms. Sharon Park, FAIA
Associate Director
Architectural History and Historic Preservation
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Washington, D.C. 20013-7012

Ref: *Comments on the South Mall Campus Master Plan Consultation
Smithsonian Institution
Washington, D.C.*

Dear Ms. Park:

Thank you for continuing the Section 106 consultation process on the Smithsonian's South Mall Campus Master Plan (Master Plan). Based upon review of this matter, the Advisory Council on Historic Preservation (ACHP) has determined that it should enter consultation to ensure that the procedural issues raised by consulting parties are properly addressed. In accordance with Section 800.2(a)(1) of our regulations "Protection of Historic Properties," (36 CFR Part 800), we will enter consultation and notify the Secretary of the Smithsonian Institution (SI) accordingly.

Since December 2014, SI has held several Section 106 consultation meetings during which SI has provided background information regarding the purpose and need of the proposed undertaking, historic property identification and evaluation efforts, master plan alternatives, and related studies and reports that address building and landscape conditions. While these documents have been helpful, consulting parties continue to express concerns to the ACHP about SI's overall Section 106 consultation efforts to date, including SI's delineation of the undertaking; the completeness of SI's historic property identification and evaluation efforts; and the SI's assessment of the adverse effects on the historic properties resulting from the various master plan alternatives. We share those concerns.

More specifically, the consulting parties are concerned about the proposed seismic retrofit of the iconic Castle Building, the related new construction underneath that property, and SI's reasoning for excluding the Arts and Industries Building (AIB) from consideration in the Master Plan's goals. Both the Castle Building and AIB are National Historic Landmarks (NHL). SI is required, under Section 110(f) of the National Historic Preservation Act (NHPA), to the maximum extent possible to undertake such planning and actions as may be necessary to minimize harm to NHLs that may be directly and adversely affected by this undertaking. Regrettably, SI's failure to clarify the steps it will take to comply with Section 110(f) has resulted in confusion and frustration among the consulting parties.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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SI has communicated the Master Plan's goals in great detail. However, the undertaking, as currently defined, needs more elaboration of the basis and reasoning for the projected spatial and program needs. For instance, SI proposes to distribute the information in a piecemeal manner as individual buildings within the campus are considered under Section 106. However, all of these properties are related and contribute to the National Mall Historic District. SI should provide comprehensive information on the proposals and the collective effects of the Master Plan on the National Mall Historic District in order to properly address this issue in the consultation process.

With regard to the four Master Plan alternatives, it is unclear how SI has applied the ACHP's criteria of adverse effect to each of the alternatives. Likewise, SI has not made clear how it considered the consulting parties' comments that have been provided during the last year. It is essential for SI to determine the potential adverse effects on historic properties resulting from each of the alternatives that have been proposed. A thorough analysis must be the basis for productive consultation among the consulting parties regarding measures to avoid, minimize or mitigate potential adverse effects.

As noted above, there is widespread concern with the issue of seismic retrofit of the Castle Building. SI's consideration of consulting parties' comments to the proposed alternatives will be especially important as it refines these plans and the plans for the proposed underground construction beneath the Castle Building. It remains unclear if the seismic retrofit of the Castle Building and the proposed construction underneath the Castle Building are related and how they will proceed. We understand SI is currently reviewing its seismic retrofit analysis, so we look forward to its conclusions and hope this will clarify the relationship between the retrofit and the underground construction. We urge you to include in this analysis relevant input and recommendations received from the consulting parties.

SI has indicated that it will develop a programmatic agreement for this undertaking and also that SI will conduct NHPA and NEPA compliance concurrently. Therefore, it is important for SI to ensure that the NHPA and National Environmental Policy Act (NEPA) requirements are aligned so that SI can prepare a Record of Decision in a timely manner. In order to assist SI with the coordination of NEPA and NHPA, we refer you to the NEPA and NHPA Handbook for Integrating NEPA and Section 106, issued jointly by the ACHP and the Council on Environmental Quality (<http://www.achp.gov/nepa106.html>).

We thank you in advance for your consideration of the concerns addressed in this letter. If you have any questions or would like to discuss our comments, please contact Brian Lusher at 202-517-0221 or via e-mail at blusher@achp.gov.

Sincerely,



Reid J. Nelson
Director
Office of Federal Agency Programs