



The Committee of 100  
on the Federal City



February 19, 2016

Chairman Milford Wayne Donaldson  
Advisory Council on Historic Preservation  
401 F Street NW, Suite 308  
Washington, DC 20001-2637

RE: Smithsonian South Mall Campus Master Plan—Request to Advisory Council on Historic Preservation to Ensure Protection of National Historic Landmarks Under 36 CFR Part 800, Subpart B, §800.10, and of Important Historic Properties Under Appendix A to Part 800

Dear Chairman Donaldson:

The Committee of 100 on the Federal City (C100) and the DC Preservation League (DCPL) urge the Advisory Council on Historic Preservation to enter consultation on the Smithsonian Institution's proposed South Mall Campus Master Plan to ensure resolution of the Plan's potential adverse impacts on National Historic Landmark buildings, buildings listed in the National Register of Historic Places (National Register), and potentially eligible historic properties. **We are concerned that the Smithsonian Institution's proposal may adversely impact two National Historic Landmark buildings—the Castle, and Arts and Industries Building— may adversely affect the Freer Gallery listed on the National Register, and may destroy several designed landscape gardens and structures potentially eligible for the National Register: the Quadrangle and its Pavilions, the Renwick Gates, and the Haupt, Folger,**

**and Ripley Gardens.** Despite over a year of “public consultation,” the Smithsonian has acted in compliance with neither Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations nor Section 110 of the NHPA which accords a high standard of treatment for National Historic Landmarks.

The Smithsonian has marched Consulting Parties along a 14-month timeline that purports to comply with Section 106 of the NHPA, and the National Environmental Policy Act (NEPA). Yet, despite a number of public meetings and presentations, the Smithsonian has provided little more than basic concept schematics, some historical research, and virtually no answers to participants’ many questions about what appears to be a \$5 billion dollar capital project involving significant demolition and construction. This lack of information has resulted in the general public’s ignorance of this enormous proposal and the threats it poses to iconic historic properties.

Specifically, and at minimum, the Smithsonian has not provided:

- Determinations of National Register eligibility for the properties listed above, threshold information required by Section 106. Indeed the Smithsonian informed consulting parties that it won’t even have contracts in place to begin those eligibility determinations until Spring 2016. The Smithsonian also stated that it does not find the Folger and Ripley Gardens eligible despite earlier statements saying the opposite and absent any research or determinations, and that the Haupt Garden’s individual eligibility is questionable.
- Compliance with the NHPA or NEPA beyond announcing that it finds its proposal will adversely affect the Castle and Arts and Industries Building—both NHLs—and consequently will prepare a Draft Environmental Impact Statement instead of the Environmental Assessment originally planned.
- Consistent descriptions of the proposed Master Plan and its alternatives (e.g., drawings do not match verbal explanations).
- Discussion of the proposed Master Plan as an integrated whole. Instead, meeting agendas have been restricted and participants are prohibited from
- raising questions about more than a single segmented topic (the Smithsonian calls these “Concept Phases”) per meeting. For example, to date the Smithsonian refuses to discuss the indirect or direct impacts of the Castle seismic retrofitting on the Quad, Pavilions, Gates, or Gardens.

- Justification of why the Castle--alone among all of the Capital's many cultural treasures including the White House, Washington Monument, Union Station, and U.S. Capital--needs the most radical and most costly seismic retrofitting approach. Base isolation would require significant digging beneath and around the Castle, literally to lift it up and place it on rollers.
- Complete descriptions of the four identified alternatives that include both 1) risk analysis of the risk posed by each proposed alternative's seismic approach to the Castle's structure and stability, and 2) comparative risk analysis between the alternatives. Risk analysis of seismic approaches also should address any risks posed by each to any of the other NHL, National Register, or potentially eligible properties in the Project Area.
- Complete explanation of the costs and benefits of each alternative for the Castle, in addition to the costs and benefits of alternatively using the Arts and Industries Building as part of the project.
- Justification for the proposed elimination of the potentially eligible Haupt, Folger, and Ripley Gardens, Renwick Gates, and Pavilions that visitors to the Castle, Sackler Gallery, National Museum of African Art, and S. Dillon Ripley Center consider part of the Smithsonian experience. We understand that the membrane roof beneath the Quad area that serves as the roof of the underlying S. Dillon Ripley Center requires significant repair and/or replacement. However, this does not justify eliminating rather than restoring the Quad area and its gardens, pavilions, and gates.
- An understandable project timeline for completion of Section 106 and NEPA compliance. The Smithsonian recently stated (at the January 27, 2016 public meeting) that it hopes for completion of the Final EIS by Summer/Fall 2017, with Section 106 compliance occurring "building-by-building" under a Programmatic Memorandum of Agreement that would endure for the next "20 to 30 years." Consulting parties cannot understand how meaningful consideration of buildings and properties can occur in such a timeline, or how Section 106 and 110 compliance can be adequate.

We must note the irony that the Smithsonian was established to promote knowledge of arts, science, and other intellectual pursuits, yet so cavalierly treats the most iconic of structures under its stewardship, beloved both nationally and by the U.S. Capital's international visitors. These properties are integral to our Capital City's monumental core, and emblematic silhouettes in this skyline admired world-wide.

We look to you, Chairman Donaldson, to ensure sincere, informed, and transparent consideration and resolution of the potential adverse impacts of the Smithsonian's South Mall Campus Master Plan on two of our nation's most recognizable historic structures--the Castle Building and Arts and Industries building, as well as on other potentially eligible historic properties within the Project Area. The Council's participation will allow project consideration to be conducted with the wisdom, research, and facts that these cultural properties deserve.

Sincerely,



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