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945 G Street, N.W.

Washington, D.C. 20001

202.681.0225

info@committeeof100.net

June 30, 2016

Mr. Robert Vogel
Regional Director -- National Capital Region
National Park Service
1100 Ohio Drive, S.W.
Washington, D.C. 20242

RE: C100 Comment on National Park Service Proposed Revisions and Update
of National Mall Historic District National Register Documentation

Dear Mr. Vogel:

Thank you for the opportunity to comment on the proposed amendments to the National Register of Historic Places documentation for the National Mall in Washington, D.C. This is a much anticipated effort. The draft is academically rigorous, well researched and documented, thoughtful, and, most importantly, highly readable. Congratulations! Having said that, however, we believe there is a critical property type significance assessment “gap” in the draft for an entire class of historic properties - Designed Landscapes. We recommend strongly that the Service remedy this before finalizing the document and submitting it to the District of Columbia Office of Planning and the Keeper of the National Register of Historic Places.

Established in 1923, the Committee of 100’s core mission is advocacy and safeguarding the 1791 L’Enfant City Plan as well as the 1901-02 McMillan (Senate Park) Commission Plan that produced the current physical expression of the National Mall. You understand, then, our deep interest in your important and well-timed document.

As the current Section 106 / NEPA consultation process on the Smithsonian Institution’s South Mall Campus undertaking painfully shows, the need for

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definitive findings of National Register eligibility / contributing status of designed landscapes within the National Mall Historic District in advance of planning and decision-making is critical. One and a half years into this process, consulting parties still await an informed discussion whether or not the Enid Haupt Garden and its component elements is eligible / a contributing feature of the National Mall Historic District. We were, therefore, perplexed why the draft NPS document is largely silent on the eligibility of this historic landscape complex as well as the many other designed landscapes throughout the National Mall Historic District such as the Dan Kiley / I.M. Pei gardens and pedestrian plaza between the West Building of the National Gallery of Art and the Pei "East Wing". Similar questions are arguable for other designed landscapes within the National Mall precinct including (but not limited to): the Folger Rose Garden, Mary Livingston Ripley Garden, Walker Cain's garden designs at the National Museum of American History, the landscape associated with National Museum of the American Indian, or the Lincoln Memorial Circle landscape by James L. Greenleaf. There are, of course, others.

Throughout this well-prepared draft, architecture and objects (e.g., sculpture or markers) are prominently described, evaluated, and labeled "contributing" or "non-contributing". But similar assessments for designed landscapes are omitted. The National Register of Historic Places is first and foremost a "planning tool". The unnecessarily drawn out and contentious current consultation process for the Smithsonian South Mall project underscores the need for these determinations to be made in advance of project planning. Given that the Service's proposed amendment to the National Mall National Register listing is the first such "updating" effort in 30-some years, we should not wait another 30 years to address this issue. To consign an entire property type to ancillary or unimportant status in the National Mall Historic District devalues a class of historic properties now universally regarded as significant. Landscapes (designed or vernacular) are now understood and accepted nationwide, both professionally and by the public, as significant expressions of America's history and significant material culture. In fact and as your doubtless know, the National Park Service led this movement now some 30 years ago. We strongly urge your continuing that Service tradition and revising the current draft accordingly.


We recognize that this will necessarily slow the process of amending the National Register documentation. But it is a worthwhile endeavor to get it right and then to give the public and interested parties ample opportunity to comment. Given the magnitude of this one issue and recognizing that another opportunity to comment on the draft is on the horizon, we are not now providing detailed comments on other aspects of the draft. And while we believe the current draft is an excellent effort, we suspect we will have more detailed comments with the next round.

Thank you again for the opportunity to comment on this important effort. The Committee of 100 appreciates and values our long-standing and positive relationship with the National Park Service.

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Please contact us if you wish to discuss any of the points in this letter further. We look forward to hearing back from you and seeing the next iteration of the revised nomination documentation which we hope includes the historically significant designed landscapes of the National Mall.

Sincerely,



Nancy J. MacWood, Chairman

cc: Catherine Dewey, NPS, NCR, catherine-dewey@nps.gov
Stephanie Toothman, NPS, Keeper of the National Register of Historic Places, NPS, stephanie_toothman@nps.gov
Rebecca Miller & John Sandor, DC Preservation League, rebecca@dcpreservation.org, john_sandor@nps.gov
Sandra H. Robinson, Garden Club of America, gca@gcamerica.org
Richard W. Longstreth, George Washington University, rwl@gwu.edu

Rob Niewig, Betsy Merritt, & Will Cook, National Trust for Historic Preservation, emerritt@savingplaces.org, rnieweg@savingplaces.org, wcook@savingplaces.org
Judy Feldman, National Mall Coalition, jfeldman@savethemall.org
Peggy McGlone, The Washington Post, peggy.mcglone@washpost.com
Charles Birnbaum, Cultural Landscape Foundation, info@tclf.org news@tclf.org
Thomas Leubke, Fine Arts Commission, tlaubke@cfa.gov
Ann Trowbridge & Sharon Park, Smithsonian Institution, parks@si.edu, trowbridgea@si.edu
Matt Flis & Jennifer Hirsch, NCPC, jennifer.hirsch@ncpc.gov, matthew.flis@ncpc.gov
Judy Robinson, Robinson and Associates, jrobinson@robinson-inc.com
Bryan Lusher & Charlene Dwin Vaughn, Advisory Council on Historic Preservation, blusher@achp.gov, cvaughn@achp.gov