Consulting Parties Role Questioned

Section 106 of the National Historic Preservation Act of 1969 establishes a consulting process for "seeking, discussing and considering the views" of parties on projects related to that Act. SI staff contends that it is "not" the role of the Consulting Parties to evaluate program needs “but [it] is rather to comment on the potential effects of the project on historic resources and how best to mitigate or avoid them."

Yet separating these two linked roles seems unrealistic as all programming ultimately depends on the resolution of the historic issues involving any reconstruction or modification of older structures.

While I understand that Section 106 is a regulatory process that must be conducted, my decision to become a consulting party is based upon my long-time interest in historic preservation—both in my private projects (houses and gardens in Key West, Savannah, Upperville and Paris Virginia, and Washington, DC., and as a participant in such influential groups as the American Friends of Attingham and the Hillwood Estate. I am also a former Smithsonian staff member and a long-time donor to the American Art Museum’s programs and collections.

I hope my comments here reflect the many concerns about the South Campus Master Plan expressed to me by friends and professional colleagues throughout the country, including both former and current Smithsonian staff members.

Visitors' Center "Consensus"
Discussion at the Oct. 7 meeting, and previously, has focused on a varying list of topics, including new visitor signage, "interconnectivity" of the South Campus buildings and their facilities, and the feasibility of retrofitting the Castle for its protection from possible earthquakes and the safety of visitors and staff. At the basis of ALL 106 discussion to date is the contention of Smithsonian staff that the Castle IS iconic--that it is an intrinsic benefit for the public. "People want to come to the Castle...and the Smithsonian has made the decision to keep the Visitor Center in the Castle," said Sharon Park.

Another key project staffer has stated that "a very wide consensus has emerged at the Smithsonian that the Castle should remain our Visitor Center."

Several questions arise from these statements:

* Who participated in the "wide consensus" and who made the decision "to keep the Visitor Center in the Castle"? When was this decision made? Documentation of this decision is requested by 106 consultants.

* Has the public been asked through focus groups, surveys or other forms what it expects from an enlarged Visitor Center? Or is the public simply expected to show up at the new facilities to be introduced to the Smithsonian, to shop, dine, etc.? Today only 17% of SI visitors actually head to the Castle, the majority by far going directly to a Museum, the National Zoo or a program of specific interest.

It should be emphasized that various visitor centers throughout the US have been located outside the “iconic" buildings they serve. A few examples here to be considered are: the US Capitol Building, Mt. Vernon, Monticello, Falling Water, the Hillwood Estate and most National Trust properties.

Recently, as reported in The New Times and The Wall Street Journal, among other sources, the proposal to convert book storage at the New York Public Library to a reading/public center was cancelled due to controversial, structural issues and increasing cost estimates. ( $8.6 million preparatory expenses has been reported.)

**Background of the Castle as Visitor Center**

The role of the the Castle as a Visitor Center is fairly recent and and should not be considered justification for its expansion underground, which, according to Kirk Mettam, a Silman engineer, involves "some amount of (construction) risk.”
Until World War II, according to SI historians, the Castle was used almost exclusively as the Smithsonian's administrative center along with laboratory functions, reference resources and exhibit display cases. (In fact, as often noted, Joseph Henry's family lived in the Castle following its completion in 1855.) In 1971, a small visitor's service facility was expanded into the Great Hall and expanded again in 1976. In 1989 the Great Hall was renovated and formally became the Visitor's Information and Reception (VIARC).

After long-delayed maintenance of the Castle is complete, the Great Hall should continue to serve as an "orientation" point for visitors needing guidance to the entire Smithsonian complex with a "sampler" of SI "treasures" continuing for those desiring a quick "tour" of the entire complex.

Questions about the Master Plan's Origin

Background materials provided the public in 2104 state that "In 2012, the Smithsonian Steering Committee developed project goals and priorities for the South Campus area.

1. Who were the members of the Steering Committee? Did SI staff attend these meetings? Which offices?

2. What were the priorities recommended?

3. How much private money has been raised to date for developing the Master Plan? What is Robert Kogod's role in the process and how much in seed funds has he contributed?

4. What was the process for selecting the lead architectural firm that prepared the project reports and 4 options for implementing the Committee's goals? What criteria were used in the firm's selection and how were they weighted? What major completed projects by the firm were reviewed and evaluated by the Committee? Are the minutes of the committee available for public review?

5. Was consideration given to the controversy surrounding the “closed” selection of the architect Frank Gehry for the proposed Eisenhower Memorial

6. What are the costs to date for contracts let by the Smithsonian for planning?

7. Have discussions been held with pertinent congressional appropriation and authorization committees. What did the Members recommend/decide?
8. What is the estimated federal/Smithsonian share of projected costs to date?

2011 Earthquake Assessment

In his 2014 report (Back to Back: The Earthquake and Hurricane of 2011), Secretary Clough gave a detailed description of his experience in the Castle during the earthquake. Afterwards, he wrote, "the Parlor was filled with a light haze from the plaster and mortar particles that suffused the room.... Sand and mortar particles covered my desk and computer equipment."

Clough then states: "An engineering assessment showed that the wall and floor were still tied together and the damage was largely superficial, for which I was grateful." Bricks did not fall into the Secretary's fireplace, as mentioned by SI staff. The Castle, which "did not suffer much damage," Sharon Park said Oct. 7, "necessitated several hundred thousand dollars' worth of repair."

Apparently, the damage to the Castle chimneys and walls was caused by long-delayed maintenance of its towers and chimneys. In the 1990s, according to an SI historian, mortar was replaced on the Castles only on the building's central block. Still, "the full assessment of damage cannot be known given the structural design of the building," Christopher Lethbridge said Oct. 7. This should give serious pause to a major underground expansion project.

Castle Earthquake Retrofitting

Cynthia Field March 7 encouraged SI to consult experts in historic engineering (such as the Historic American Engineering Record (HAER). (Rob Nieweg and Tom Luebke) called for risk and cost analysis of alternative seismic retrofitting approaches.

Saved by (a) HAER: True story

In 1978, members of the Florida State Legislature proposed that the old Capitol Building be demolished or its dome removed because of the contention that the dome was too fragile to withstand a high-category hurricane. Douglass Griffin, a structural engineer and the then director of HAER, inspected the dome's construction and anchorage, concluding that the building could withstand severe hurricane winds.
It is imperative that SI, per Cynthia Field, et. al, employ independent engineers or their associations to provide a "second opinion" the the Castle's vulnerability to any future earthquake damage.

Some questions that need answers, according to Smithsonian staff itself.

*How will the Castle be supported during excavation ?

*Will deep piers be placed along the Castle while a new slurry wall is constructed?

*What might happen when the compressed earth is removed for the base isolation (moat) surrounding the Castle.

Risk Assessment

At the Oct. 7 meeting, Kirk Mettam stressed the importance--the priority of protecting Smithsonian Castle staff and visitors from damages caused by a future earthquake. The question of course is what would be the level of risk without preventatively retrofitting the Castle structure by any method. (No persons were injured in the 2011 quake, and technological advances should be available to predict and prepare for the next "80-year quake" in the mid-Atlantic area.)

The Castle of course is one of many "iconic" buildings in Washington. The Renwick, for one, has just opened after a 2-year renovation without an earthquake retrofitting program. Would it be closed again for retrofitting should its structure and staff/visitors be at risk? The Patent Office building was renovated 2000-2006 without earthquake damage controls. Would it also be a candidate for retrofitting? The White House, Supreme Court and Capitol Building are the most iconic buildings of all. Shouldn't these be priorities considering their functions and available resources for damage prevention. What about the other Smithsonian buildings? Should not staff and visitors there also “deserve” protective measures equivalent to staff and visitors at the Castle. Have these questions even been discussed?

First Things First: Urgent Castle Priorities.

The Castle has had no significant systems updating for more than 40 years. As its underground passageways reveal, decades of wiring, pipes and other conduits
weave through the area, some of these unknown and some with no current
function. Resolution of the South Campus Master Plan could take years (decades?)
delaying any remedial work required to bring the Castle building into the 21st
Century.

This work requires re-pointing the entire building’s exterior masonry, updating all
mechanical systems, including air, electrical and data delivery systems, roofing
repairs and window replacements, and the removal of various 20th-century
outmoded “improvements.”

As one historian noted, The Castle “should be brought back to the basics,” serving
as the Smithsonian’s central “headquarters,” the purpose for which it was intended.
And, the related question becomes whether the Castle and the A&I Building could
be linked together, sharing new mechanical systems, rather than being tied into a
complex support network extending to the Hirshhorn Museum and Sculpture
Garden.

To the suggestion that potential donors would be unwilling to support such
imperative upgrades, the argument can be made that contributions could be
acknowledged by naming rights in the Great Hall such as they are at other
Smithsonian buildings nowadays.

A Final Word

For the Smithsonian to be fully responsive to its constituents and its consultants, it
must be fair and accurate in its statements about the Master Plan. For example,
staff has asserted that the need for a new loading facility, now located east of the
Freer building, is required because of the inadequate turnabout space underground
for large delivery vehicles. Yet simple observation shows that most of that space is
now used as parking for a variety of SI utility vehicles.

Further, according to the DOT 106 representative, relocation of the existing ramp
would be a severe “pinch” because of the existing entryway to the 12th St.
derpass and the attendant traffic turning into and entering the ramp to the tunnel.
At the least, a simple visual examination of this very tight space envisioned as an
alternative SI service ramp, and serious consideration of the complexities of
construction and long-term access outlined by DOT, should be a priority concern
for the advocates of the Smithsonian South Campus Master plan.

End

6 of 6
Dear Mr. Maxfield:

Thank you for your comments submitted on December 2, 2015, regarding the South Mall Campus Master Plan of the Smithsonian. You have several very specific questions which we are trying to answer as completely as possible within the Section 106 Historic Preservation Review process. As we are still in a Master Planning phase, however, many of your questions cannot be answered right away, but they are definitely questions that we will be asking our consultants when we move into a more developed design stage.

The areas of your concern deal with the origination of the program for the Master Plan, who made the decisions to keep the Castle as the Visitors' Center, what surveys were done to establish the need for visitor amenities, the loading dock and central HVAC systems, what was the selection process for the architectural firm, and how will we manage to preserve the Castle as a priority while considering options for new excavations. In an effort to provide answers to that series of questions, and others that you posed, we will be posting/have posted a number of reports that I believe will inform many in the Consulting Parties on the relevant issues.

The most comprehensive is the Campus Master Plan Retreat Report of June 2012 which set the framework for the development of the program for the South Mall Master Plan. This retreat was attended by members of the Board of Regents, the Secretariat, and staff of the museums. Many of the attendees constituted the Steering Committee which followed up with a number of planning meetings, surveys and workshops. We will post excerpts of that report on our website www.southmallcampus.si.edu in time for the next Consulting Parties meeting.

The next Consulting Parties meeting will be held on January 27th, 3:00-5:00 pm in the Castle Commons. What I would suggest is that several members of our team meet with you before that next Consulting Parties meeting to go over the materials we plan to post and to elaborate on some of your concerns so that we can share your questions and concerns with the consulting parties. We are available from 11:00 – 12:00 noon on Thursday, January 14th or Friday January 15th to meet with you, with Thursday as a slight preference for us. Please let me know of your availability for a meeting in our offices at 600 Maryland Avenue SW suite 5001 for either time.

Sincerely,

Sharon C. Park
Associate Director Architectural History and Historic Preservation
Office of Planning, Design and Construction
December 5, 2015

Ms. Ann Trowbridge
Associate Director for Planning
Office of Planning, Design, and Construction
Office of Facilities, Engineering, and Operations
Smithsonian Institution
600 Maryland Avenue, SW - Suite 5001
Washington, DC 20013-7012

RE: Smithsonian South Mall Campus Master Plan – Compliance with 36 CFR Part §800, Subpart B, §800.4(c)(2) - Identification of Historic Properties

Dear Ms. Trowbridge:

Last month marked the first anniversary of the Smithsonian Institution’s public unveiling of the proposed South Mall Campus Master Plan (SMCMP). Last month also marked the first anniversary of the Smithsonian Institution’s initiation of the public consultation process for the SMCMC pursuant to 2 of 54 U.S.C. 306108 (Section 106) of the National Historic Preservation Act – our Nation’s preeminent federal historic preservation law. A critical first step component of effective consultation under that law is identification of all historic properties in the affected Project Area as detailed in 36 CFR Part §800, Subpart B, §800.4(c)(2). One year into the consultation process, the Smithsonian Institution has not yet fully complied with this important regulatory requirement.

We recognize, of course, that certain properties or objects within the SMCP Project Area are already individually “identified as historic” for purposes of the law and regulation either designated as National Historic Landmarks, individually listed on the National Register of Historic Places, or listed as contributing to the National Mall Historic District on the National Register of Historic Places. However, based upon the information which has been shared with the Consulting Parties, critical properties remain to be evaluated within the Project Area including: 1) The Enid Haupt, Foley, and Mary Livingston Ripley Gardens; 2) the Pavilion entrances to the Sackler Gallery, National Museum of African Art, and the S. Dillon Ripley Center; and, 3) the James Renwick-designed Independence Avenue Gates. These properties are both literally and figuratively at the heart of the South Mall Campus Master Plan – whichever option is ultimately selected. Accordingly, a formal assessment of their historic significance is mandatory and long overdue in the SMCMC consultation. One year into the consultation process, the Consulting Parties have not been given information or allowed to discuss potential SMCMC effects on these critical properties.

Moreover, the June 2015, one-page briefing paper issued by your office in reference to this matter does not suffice. It states, “It is anticipated that the revised National Mall Historic District will be accepted by the National Register of Historic Places by the end of the year. As such, the Consulting Parties should view all the properties [including those cited above in this letter] within the site as ‘contributing’ for purposes of evaluating impacts from the proposed Alternative Master Plans.” To date, the Smithsonian has shared no evidence of research, analysis, or other documentation demonstrating the eligibility of the properties referenced above. Such an effort is essential to meaningful consideration of the potential effects of the SMCMC. And yet the Smithsonian continues to march the Consulting Parties along their “compliance” timeline.
In fact at the public meetings held to date, the Consulting Parties have been told conflicting information about who is determining eligibility and the stage of that process. We have been told that the National Park Service, National Capital Region is responsible and working on it — though we are also told that the Park Service has been working on it for more than three years and it is uncertain when (or if) the task will be completed in the foreseeable future. Alternatively, the Washington, DC Office of Historic Preservation, Office of Planning is purportedly to be working on it as is the National Capital Planning Commission.

We cannot overemphasize the importance of making these "formal" historic significance findings as the basis for informed and rational decisions about the SMCMFP. The Gardens, Pavilions, and Gates are potentially affected — indeed, adversely affected — by all the proposed SMCMFP alternatives. Consideration of the alternatives must include factoring their potential effects on all properties in the "South Mall Campus." Therefore, we urge that these determinations of historic eligibility must be made now and must be made part of the official record. The Smithsonian may be in a unique position as a Trust Instrumentality of the U.S. Government under 9 Stat. 102, but it is no less subject to Section 106 requirements. Because your office has been the "public face" of the SMCMFP consultation process, and as your office has led the several consultation meetings over the last year, we turn to you for clarity and detail in this matter.

We look forward to a timely and detailed response. If we may clarify any matter or to provide additional information, please do not hesitate to contact us.

Sincerely,

Nancy J. MacWood
Chair
Committee of 100
945 G Street, NW
Washington, DC 20001
(202) 681-0225
info@Committeeof100.net

Rebecca Miller
Executive Director
DC Preservation League
1221 Connecticut Avenue NW
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cc: 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, NPS, Associate Director, Cultural Resources, Partnership and Science, Robert Vogel, Susan Spain, Peter May, NPS, National Capital Region
    David Maloney, Andrew Lewis, DC SHPO, DC Office of Planning
    Thomas Luebke, Commission of Fine Arts
    John Fowler, Brian Lusher, Reid Nelson, Advisory Council on Historic Preservation
    Lucy Kempf, Elizabeth Miller, Cheryl Kelly, Jennifer Hirsch, National Capitol Planning Commission
January 4, 2016

Nancy J. MacWood, Chair
Committee of 100

Rebecca Miller, Executive Director
DC Preservation League

Robert Nieweg, Field Director and Attorney
National Trust for Historic Preservation

Dear Signatories:

Thank you for your letter of December 5, 2015, addressed to Ann Trowbridge, Associate Director of Planning at the Smithsonian, regarding concerns with the lack of formal historic preservation designations for some properties within the South Mall Campus Master Plan area. Thank you also for meeting with our team on December 21, 2015 to discuss these issues.

You, as members of the Consulting Parties for the South Mall Campus Master Plan, have asked why it is taking so long to develop designations of historic significance for all the properties within the project area and what efforts we are making towards research and listing of these properties in the National Register of Historic Places? The South Mall Campus already contains the National Historic Landmark buildings of the Castle (1855) and the Arts and Industries Building (1881) along with the individually listed Freer Gallery of Art (1923). This leaves the Quadrangle (1987) and its rooftop the Haupt Garden, the Hirshhorn Museum and Sculpture Garden (1974), the Mary Ripley Garden (1981) and the Folger Rose Garden (1998) unevaluated in their own right. The Haupt Garden contains a number of elements that you have requested to be evaluated, including the three Quadrangle pavilions that serve as entrances to the museums and education center below as well as the Renwick Gates.

While the Smithsonian publicly stated in the 3rd Consulting Parties meeting that all properties within the campus area should be considered historic as contributing to the National Mall, and, therefore, subject to Section 106 Historic Preservation Review, you have asked for more specific research to establish eligibility for inclusion individually in the National Register of Historic Places. It had been expected that the investigative analysis undertaken for the Cultural Landscape Report (fall, 2015) would play a role in establishing the significance of the site and gardens. The recommendations within the report, posted on our website, however, indicated that additional research would need to be done on the formerly unlisted facilities and gardens to establish their significance within the context of architectural and/or horticultural properties less than 50 years of age. This requires a more intense contextual study to evaluate the properties in order to meet a threshold of extraordinary significance as set out in the National Register of Historic Places criteria.

The Smithsonian is following up on those recommendations. To date, a Determination of Eligibility (DOE) has been completed on the Hirshhorn Museum and Sculpture Garden and it will

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soon be shared with the Consulting Parties. The findings are supportive of listing this property individually in the National Register of Historic Places. The Smithsonian is in a process of procuring services for the evaluation of the Quadrangle Complex and the gardens mentioned above. It is expected that these DOEs will be completed in a timely manner and will be presented to the Consulting Parties as soon as they are completed.

The next Consulting Parties meeting will be held on January 27th 3:00-5:00 pm in the Castle Commons and we will bring this matter to the attention of the Consulting Parties with a briefing on our continuing efforts to inform and respond to comments regarding the South Mall Campus Master Plan.

Sincerely,

Sharon C. Park  
Associate Director Architectural History and Historic Preservation  
Office of Planning, Design and Construction

Cc:  
Smithsonian: Nancy Bechtol; Walter Ennaco, Ann Trowbridge, Michelle Spofford, Christopher Lethbridge, Barbara Faust  
NPS: Stephanie Toothman, Robert Vogel, Susan Spain, Peter May  
DC Office of Planning: David Maloney, Andrew Lewis  
Commission of Fine Arts: Thomas Luebke  
Advisory Council on Historic Preservation: John Fowler, Brian Lusher, Reid Nelson,  
NCPC: Lucy Kempt, Elizabeth Miller, Jennifer Hirsch, Matthew Flis
Dear Ms. Kessel:

Thank you for the follow up to your prior comments made at the time of the Scoping Meeting for the Smithsonian’s South Mall Campus Master Plan. We have taken those comments into consideration as we have planned for the Consulting Party Meetings to address concerns brought up at the time of the Scoping Meeting.

However, to your specific concerns raised in your e-mail of February 15th and responding to the 5th Consulting Parties Meeting of January 27, 2016, please accept these observations.

The intent of the Master Plan is not to eliminate the Haupt Garden, but to expand the garden and implement a variety of improvements to accommodate many of the programs of the Smithsonian Gardens. The Haupt Garden is the rooftop of the Quadrangle Complex and, as it is leaking, major interventions are necessary to make repairs. Smithsonian Gardens will work with horticultural specialists on their staff to determine which plants are viable to replant or to replace. Likewise the elements in the Haupt garden will be considered for reuse or relocation as the plan evolves. Currently, the project is in a Master Plan phase and individual designs and plant selection have not been made. At this time, the plan for the Ripley Garden and the Folger Garden are to retain them with minimal reconfiguration. The Ripley Garden may even expand as the parking lot east of the Arts and Industries is proposed to be removed.

As to the eligibility and historic significance of the Quadrangle pavilions and the Haupt garden, the Cultural Landscape Report, posted on our website, [www.southmallcampus.si.edu](http://www.southmallcampus.si.edu), undertook a preliminary review of the potential for these to be considered individually for the National Register of Historic Places. As the Haupt Garden is the roof of the Quadrangle Complex, it must be evaluated along with the building itself for evidence of extraordinary significance since it is part of a property of less than 50 years of age. As the Cultural Landscape Report indicated, it would be necessary to undertake, at a greater depth, the significance of both the Quadrangle Complex/Haupt Garden and the Hirshhorn Museum and Sculpture Garden. It is anticipated that the preliminary results of the determination of eligibility for the Quadrangle Complex/Haupt Garden will be available for the next Consulting Parties Meeting in April.
As stated in the January 27th Consulting Parties Meeting, the Smithsonian is committed to providing outstanding gardens for the public to enjoy regardless of their historic standing. The gardens have not been design beyond a planning stage as it is not anticipated that funding will be available for at least five years. A study is underway to identify the characteristics of the Haupt Garden that can be respected in a new garden design which also addresses the program needs of Smithsonian Gardens for educational spaces as well as visitor enjoyment of both contemplative as well as communal areas.

The Smithsonian continues to undertake additional research and investigation on all aspects of the impacts to historic resources, all of which does take time. Our future meetings will be scheduled as necessary and efficiently as possible to present our findings. Please note that these meetings are now being webcast to broaden outreach to a wider audience.

Our office will make certain that you are on the distribution list to be notified of meetings or posting of documents to our website. I hope that this information has been helpful to you and your organization.

Sincerely,

Sharon C. Park, FAIA
Associate Director,
Architectural History and Historic Preservation

Cc: SI staff – Spofford, Lethbridge, Trowbridge, Faust, Donnelley
National Capital Planning Commission – Matthew Flis, Jennifer Hirsch
Last winter the 93-year old Bethesda Community Garden Club wrote to you expressing our concern about the South Mall Campus Plan and the intent to destroy/replace the Enid Haupt, Mary Livingston Ripley and Folger gardens. The environmental impact and the destruction of those plants and their special green spaces on our mall is devastating to consider.

Yet one year into the process, the consulting parties have not been given information or allowed to discuss potential SMCMP effects on these critical properties. How can they be ignored, considering the stature and expertise of such eminent organizations as The National Trust for Historic Preservation, the DC Preservation League and the Committee of 100 on the Federal City? Those beloved gardens as well as the pavilion entrances to the Sackler Gallery, National Museum of African Art, the S. Dillon Ripley Center and the Renwick Gates are at the heart of the South Mall Campus Master Plan. They cannot be overlooked.

We're a group of 112 ordinary citizens, many of whom are public garden volunteers and master gardeners, and our knowledge is limited. So we're relying on the unbiased consulting parties to keep us informed. It's most unsettling that public meetings have been postponed repeatedly, promised information not delivered and conflicting answers given about who is determining historic eligibility.

A June 2015 briefing paper from your office indicated that “It is anticipated that the revised National Mall Historic District will be accepted by the National Register of Historic Places by the end of the year. As such, the Consulting Parties should view all the properties within the site as ‘contributing’ for purposes of evaluating impacts from the proposed Alternative Master Plans.” To date, the Smithsonian has shared no evidence of research, analysis or other documentation demonstrating eligibility of those properties. Yet your process is moving forward despite failure to provide promised documentation.

Even from our general public perspective, the historical significance of those unique properties cannot be minimized. Given their location at the heart of our mall, shouldn't those properties and their historical status be the foundation for decisions of this magnitude?

Cordially,

Bethesda Community Garden Club
Candace Kessel, President
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Candace Kessel, President
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Sincerely,

Sharon C. Park, FAIA
Associate Director,
Architectural History and Historic Preservation

Cc: SI staff – Spofford, Lethbridge, Trowbridge, Faust, Donnelley
National Capital Planning Commission – Matthew Flis, Jennifer Hirsch
Dear Mr. Maxfield:

Thank you for your follow up emails, one received on January 27, 2016, just prior to the 5th Consulting Parties Meeting for the South Mall Campus Master Plan, and the second on February 3rd to the National Capital Planning Commission inquiring as to the status of your answers on previous correspondence.

The e-mail we sent to you in regards to your submitted questions on December 2, 2015, was sent on January 7, 2016, and is attached for your reference. As with a number of other incoming questions, yours will be posted soon on the website. Your questions in the email of January 27th were used as part of the 5th Consulting Parties discussion which was webcast.

Your questions from January 27th and our answers are as follow:

Q. What is it exactly that the consulting parties are commenting on: A master plan, or specific elements of same-- seismic retrofitting, destruction of the two pavilions, a substantial redesign of the Haupt Garden and so on?

A. The Master Plan is a complex set of goals and objectives to meet the purpose and need of the Institution. As a planning document it outlines alternatives for interconnecting existing buildings, providing better accessible entrances both above and below grade, possibly repositioning of existing entrances in the Quadrangle/Haupt Garden area and developing a new underground central delivery and central mechanical plant. This would consolidate and improve visitor amenities, improve the performance of our facilities for energy efficiency, improve our sustainability efforts, improve security, and finally expand gallery and garden spaces.

The project is in a Master Plan phase and the discussions should focus on these planning issues. The specific design issues, beyond the planning issues, will be addressed in the future for each project element as funding is available and designs are undertaken over the next 20-30 years.

The role of the Consulting Parties in this Master Plan Section 106 process is to evaluate effects on historic properties. The site contains two National Historic Landmarks - the Castle and the Arts and Industries Building - along with the individually listed Freer Gallery of Art. In addition, the Quadrangle Complex and the Hirshhorn Museum and Sculpture Garden are considered...
contributing resources to the National Mall Historic District. As the Smithsonian further develops the master plan alternatives and describes the proposed changes to the campus for each alternative there is an opportunity to evaluate their effects on the adjacent historic resources.

As presented in earlier Consulting Parties meetings and reinforced on January 27th, the Arts and Industries Building is not available for a permanent visitors' center. It may be possible to utilize the Arts and Industries building as a temporary visitors' center while the Castle is under rehabilitation as we await a final determination of its use by Congress. As to seismic issues for the Castle, the Smithsonian will continue to assess options for the seismic retrofit of the Castle.

The proposal in two of the alternatives to remove the pavilion entrances to the Sackler Gallery and National Museum of African Art is to consolidate visitor amenities closer to the Castle, to open up the views of the major historic buildings in the complex and to expand the garden area. The Quadrangle Complex, which includes the Haupt Garden, is considered a contributing element to the National Mall Historic District. In order to fully evaluate the impact of proposed changes, the Smithsonian is contracting for a Determination of Eligibility (DOE) for the Quadrangle Complex to see if it would be eligible in its own right to be listed in the National Register of Historic Places. As a building of less than 50 years of age, it will need to be evaluated under the criterion of exceptional significance. Regardless of the ultimate finding on significance using National Register Criteria for Individual listing, there are many important qualities of the current Haupt Garden that the Smithsonian intends to capture in a new garden plan once the Quadrangle roof is repaired.

Q. Since the Castle is acknowledged to be in such bad shape, shouldn't SI restore it first, use A&I for swing space and repair the Quad roof, then replacing the existing garden as it is?

A. The Smithsonian is looking at all options for phasing the rehabilitation of the Castle and wants to make sure that, as part of a phasing plan, the goals and objectives of the Master Plan can still be met in the long run. Efforts are underway to make many exterior masonry repairs to the Castle in the next few years in anticipation of a full rehabilitation project 2020-2022. The A&I may be used as a temporary visitor center during the major Castle rehabilitation project as part of its interim use status. Once the Quad roof is repaired, a new garden, with many of the characteristics of the current garden, will be installed.

Q. What is the assurance that the Castle will not be harmed by any proposed seismic work when the studies are inconclusive and independent engineers have not been consulted? Is there justification for using one of the country's most iconic buildings as a precedent, a test case, for later retrofitting projects on the East Coast, as mentioned in previous 106 meetings.

A. There is quite a bit of documentation in the engineering profession about both seismic retrofit approaches and sub-basement excavations to iconic buildings. The State House in Columbia, South Carolina had a base isolation system installed in 1997 that is functioning well, so the Smithsonian is not the first in the east to undertake a base isolation approach. Also, the
Rijksmuseum in Amsterdam as well as our own Court House here in DC have had sub-basement excavations to existing historic buildings to accommodate central mechanical services. So again, we are confident that our research and the use of specialized engineers and contractors can provide a safe project for the Castle, should we move forward with this approach. The goal of a consolidated central mechanical plant, perhaps under the Castle, is not dependent on a specific seismic method for reinforcement for the Castle.

I hope that has helped you in terms of answering your questions. As the consulting parties meetings progress, there will be more opportunity to evaluate the impacts to historic resources.

Sincerely,

Sharon C. Park, FAIA
Associate Director
Architectural History and Historic Preservation

Email to be posted to www.southmallcampus.si.edu

Cc by e-mail to:
National Capital Region
DC Historic Preservation Office
Commission of Fine Arts
Web posting to www.southmallcampus
Comments of The Garden Club of America

We are writing with considerable concern regarding the Smithsonian Institution’s plan to demolish the beloved Enid A. Haupt Garden adjoining the Castle.

The Haupt Garden is a favorite “outdoor museum” and center of activity on the Smithsonian grounds. It is a remarkable and joyous introduction to Victorian and other garden design. Thousands of visitors to this garden and the three museums which surround it enjoy its unique rooftop garden and outdoor complex singled out by the American Institute of Architects in 1987 as a masterful blending of old and new.

While the Haupt garden was completed in 1987, it is noteworthy that Messrs. Carlhian and Collins designed it, not as a new garden, but as a renewal and enhancement of the Victorian garden installed in 1976 in celebration of the nation’s bicentennial. Indeed, records indicate that the Haupt Garden was created to respond to a major public outcry over the Smithsonian’s announcement that it planned to destroy the Victorian garden then on site.

We are concerned as well that the Master Plan, with many positive internal features, appears to engage the landscape as an afterthought. The report analyzing and supporting the Smithsonian’s billion dollar South Mall Campus plan fails to adequately and fully address the postmodernist significance of the Haupt garden or to ascertain its broader cultural significance. We believe that further study is necessary 1) to assess and address the period of significance for this garden; 2) to revisit whether the garden should indeed be included on the National Register of Historic Places; and 3) to honor the terms of Mrs. Haupt’s gift. Because the Smithsonian depends upon the generosity of donors, remaining true to donor intent should be an essential consideration.

We raise these issues as long-time friends and supporters of the Smithsonian. The Archives of American Gardens constitute a major horticultural collection whose core images and slides were made possible by a gift from The Garden Club of America in 1992. The Pollinator Garden, adjoining the National Museum of Natural History, was created in 1995 and significantly expanded in 2000, thanks to funding from the GCA and the Smithsonian Women’s Committee in conjunction with the Smithsonian’s Horticulture Services Division. Many of our members serve on the Women’s Committee and in other professional and volunteer positions. In 2004, our Annual Meeting brought delegates to the Haupt Garden to see it and other outdoor displays. The 200 member clubs of the GCA across the country—with nearly 18,000 members—are amongst the millions of local, national, and international visitors attracted to the Smithsonian’s world class indoor and outdoor collections. We will be attending the Smithsonian’s exhibit opening in 2017 entitled Cultivating America’s Gardens and focusing on the work of garden clubs around the country.

At a time when the American people are rightly focusing on a healthy and green environment, it would be ironic indeed for the Smithsonian to destroy a peaceful and beautiful green space and replace it with a cold space of steel and lights. We understand that institutional needs must change over time. However, we believe that the Smithsonian’s proposed Master Plan for the South Mall Campus would wrongly eliminate a unique and historic garden--yes, an “outdoor museum”--in the heart of the nation’s capital.

Thank you for your consideration.

On behalf of the Executive Board of The Garden Club of America,
Anne P. Copenhaver
President, The Garden Club of America
Dear Mrs. Copenhaver:

Thank you for taking the time to voice your concerns and those of The Garden Club of America’s Executive Board with regard to the Smithsonian’s South Mall Master Plan and its possible impact on the present configuration of the Enid A. Haupt Garden. The Smithsonian is extremely grateful for The Garden Club of America’s long-time friendship and support and, with that in mind, I wanted to personally respond to your letter.

I strongly agree with your observation that the Haupt Garden is a remarkable garden enjoyed by many visitors from across the nation and the world. I am particularly fortunate because my office window overlooks the Garden and I can see how appreciated this space is by so many.

Because the Haupt Garden was built over an underground museum complex (the “Quadrangle”), the Smithsonian has expected that at some point we would have to repair and eventually replace the Quadrangle’s roof. We also have known that the Castle, the Hirshhorn Museum and Sculpture Garden, the Arts and Industries Building and the Freer Gallery would be subject to major renovations. With the many buildings on the Smithsonian’s South Mall campus requiring attention in the future, we determined that the best way forward was to develop a comprehensive master plan.

The initial phase of the plan, which is under review by the National Capital Planning Commission and currently in an extended public comment period, anticipates enlarging the gardens by relocating driveways for delivery trucks and eliminating the parking lot on the east side of the Arts and Industries Building.

Some of the illustrations accompanying the draft master plan suggest a very different design from the Garden’s current configuration and have understandably raised concerns that its unique qualities may be lost. However, the Garden’s final design is not part of the master plan currently under consideration. The illustrations represent just one of many alternatives that may be considered in the future. The ultimate design will
David J. Skorton  
Secretary

not be developed until renovation of the Quadrangle begins in the next five to ten years to replace its leaking roof. The design process will include meaningful opportunities for public participation.

We at the Smithsonian are committed to providing a handsome garden that will sustain the elements that have made the current configuration of the Haupt Garden so special: private, contemplative spaces; horticulturally rich specimen plantings; and beautiful vistas that respect the Garden’s historic location and honor Enid A. Haupt and her generous gift to the Smithsonian and the nation.

On behalf of the Smithsonian, let me note once more our gratitude for our long association with The Garden Club of America. We appreciate hearing your concerns for the Enid A. Haupt Garden and its future. As a national leader in the fields of horticulture, conservation, and civic improvement, your views on behalf of the GCA are extremely valuable. I look forward to your participation as the planning process continues to evolve.

Sincerely,

David J. Skorton

cc: Barbara Faust, Director, Smithsonian Gardens
28 March 2016

Sharon C. Park, FAIA, LEED AP
Associate Director
Architectural History and Historic Preservation
Smithsonian Institution
600 Maryland Avenue, S.W., #5001, MRC 511
P.O. Box 37012
Washington, D.C. 20013

Dear Associate Director Park,

I very much appreciate the opportunity to comment on the historical significance of the complex originally known as the Quadrangle (the Sackler and African museums, Ripley Center, and Haupt Garden). For the record, I do so an architectural historian who has devoted more than forty-five years to the study of architecture, landscape, and urbanism, focusing on (but by no means exclusive to) work in the United States during the nineteenth and twentieth centuries. Since 1983 I have taught architectural and urban history and directed the Graduate Program in Historic Preservation at George Washington University. I am a past president (and soon to be named Fellow) of the Society of Architectural Historians and have only recently stepped down as president of the Frank Lloyd Wright Building Conservancy. I have chaired the Maryland Governor’s Committee on the National Register of Historic Places for nineteen years. Most of my extensive writings have of late focused on twentieth-century topics, but I did contribute a key essay on the Washington architecture of Adolph Cluss in the first detailed exploration of his life and work to be published (2005).

Has sufficient time passed to evaluate this property from a historical perspective? Without question. It is the work of our parents’ generation – or grandparents’ generation for many adults today. The outlook and the approach to design of those involved in this project was decisively different from what we find today. Moreover, the caliber of the work sets it apart at a level of distinction that allows historical assessment more readily than if the resource in question was a more broadly representative one of the period – say, a 1980s speculative office building with no singular characteristics.

From a historical perspective I find the Quadrangle complex an exceptional design on several grounds. First, it ranks among the largest and most complex example in
a series of projects in the U.S. that sought to preserve significant open spaces and building exteriors by expanding facilities underground. Second, its design, as a work of architecture and as a landscape, is of unusually high caliber both in terms of its intrinsic qualities and in fresh, vigorous, and respectful responses to the multi-faceted urban context. Third, it is an important work of its architect, Jean Paul Carlhian, and its principal landscape architect, Lester Collins, both distinguished figures nationally. Fourth, it represents a significant broadening of the Smithsonian’s program to embrace non-Western cultures fully through collections and the mounting of exhibitions. Finally, it is among the most important physical manifestations of the unprecedented expansion program undertaken by S. Dillon Ripley, one of the Smithsonian’s greatest directors. The fourth category and, at least part of the fifth are associational and, since the museums will remain in operation, if in new quarters, are not pertinent to whether the building is retained or not. I will thus focus on the first three categories, but would like to return to the fifth at the conclusion of my assessment.

As an underground complex, the Quadrangle was one of a relatively small number of projects shaped by the objective of preserving historic settings. Most of this work was done on university campuses (underground parking facilities such as that at the Boston Common really lie in a different realm). Cornell was perhaps the pioneer with Earl R. Flansburgh & Associates’ University Campus Store of 1970, a rather stridently abstract work that, given its function, has a strong aboveground presence. Later, as head of the buildings and properties committee of the university’s board of trustees, Flansburgh, an alumnus, pushed for a much less obtrusive addition of the Uris Library (special collections) and for the Kroch Library, a five-underground-story addition to Olin (the main) Library. At Harvard, Hugh Stubbins’ 1976 Nathan Marsh Pusey Library was designed as a mostly underground facility, with its top floor rising partially aboveground and capped by a landscaped terrace – a solution that effectively preserved open space and views from Houghton Library and other nearby buildings, while also having a clear, aboveground presence. Alexander Kouzmanoff’s 1977 underground addition to Avery Hall at Columbia provided much needed library and lecture space, with very little aboveground presence save for the landscaped terrace that forms its on-grade roof.

The Quadrangle also begs comparison to I. M. Pei’s slightly later design for the large underground addition to the Louvre. Here, of course, the setting is a strongly unified one – the court enframed by various components of the museum – and the program was somewhat different: creating a new, grand entrance. Although he is
generally not considered in these terms, Pei was often responsive to historic contexts, as exemplified by Society Hill Towers in Philadelphia and the East Building of the National Gallery. As in such projects, his solution at Paris was to create a scheme of arresting contrast, yet one that enriches the attributes of old and new alike. Carlhian’s design also achieves a constructive dialogue, but through a very different approach, one that makes references to both purpose and setting. Considered together, the two projects offer insightful illustration of a great scope of design approaches and forms of expression that existed in Modern architecture during the last quarter of the twentieth century.

(One is tempted to make a further comparison with Roche & Dinkeloo’s Oakland Museum of the 1970s; however, that building, splendid as it is, completely ignores the urban context and instead creates an inner sanctum of terraced gardens. Moreover, most of the building lies aboveground; it is only the unorthodox massing that makes it seem as if it might be below grade.)

The design of the Quadrangle is an exceptional one in its own right. The two entrance pavilions are at once treated as secondary components of the urban landscape when viewed from Independence Avenue and as monumental portals when approached within the precinct’s confines. Each obliquely refers to the non-Western nature of its contents, but, like some of the work of Sir Edwin Luytens in India, couches such allusions firmly in the classical tradition. Another play with dualities occurs inside where axiality and circuitous movement conspire to make the entrances seem larger than they really are. The stair towers are the tours de force of these buildings where criss-crossing stairs descend to the lower levels. In form and motif these towers, again, vaguely suggest non-Western origins, but the experience invokes the dignified, even the magisterial effect of ascending the front stairs of a grand, Beaux-Arts building. This is no mean feat given the actual path. The museum spaces are laid out in ways that render their below grade locations far more intriguing than confining. (I confess the Sackler is one of my favorite museums, both for the caliber of its exhibits and for the experience of being there.)

For all their attributes, the aboveground portions of the building are really but a small portion of its exterior presence of the complex. I admit to giving little thought to the garden when it was completed, but have come to find it a very significance part of the conception. Perhaps the overriding quality that gives it significance as a landscape design is how at once it is comprised of a quilt of varied parts and at the same time offers an experience that feels seamless. The spatial anchor, of course, is the gardenesque-inspired parterre, giving the Smithsonian Institution Building a foreground that is consonant with the period of its construction. Then, to either side, the configuration changes markedly, the spaces becoming much more intimate, varied, and incorporating features that evoke the museums’ non-Western orientation. Beyond, alongside the Arts and Industries Building and the Freer, are passages that differ yet again, from those they border and also from each other. They connect to spaces that are treated in the picturesque manner of Downing and Olmsted, complementing the characteristics of Renwick’s building. This intricate, compact interweaving of multiple forms, spaces, and references to landscapes past – all superbly related to the buildings that rise amid and around them – form a landscape that is fresh and very original. The ensemble provides an intimate, tranquil
counterpoint to the vast expanses of the Mall. Not the least remarkable aspect of the garden is that it exists at all; that instead of the hardscape or simple lawn that caps other underground projects of this general kind, it is a space dominated by lush vegetation.

While never widely known outside the profession, Jean Paul Carlhian was an architect of unusual distinction, who enjoyed an international reputation during the second half of the twentieth century. A graduate of the Ecole des Beaux Arts, he also received a Masters in city planning from Harvard’s Graduate School of Design. His record as an educator was substantial. At the invitation of Walter Gropius Carlhian taught at Harvard under him and Josep Lluis Sert (1948-55), then at Yale under Paul Rudolph (1958-61, 1963-64), as well as serving as a visiting lecturer at numerous architecture schools in the United States and Canada. He joined the Boston firm of Coolidge, Shepley, Bulfinch & Abbott in 1950, where he remained for over four decades, becoming a partner in 1963. (Founded by Henry Hobson Richardson in 1874, the firm is probably the oldest one in continuous existence in the United States. In 1952 the name was changed to Shepley, Bulfinch, Richardson & Abbott and in 2000 became Shepley Bulfinch.)

Throughout his long career Carlhian was an outspoken advocate for design of high caliber – within his firm, in teaching, and among members of the profession at large.

Much of Carlhian’s work entailed buildings for institutions of higher learning. Among the work he did for Harvard were Quincy House (1958), the first residential complex to break the university’s traditional skyline; Leverett House (1958-59); and Mather House (1968), residential complexes that rank among the prominent examples of Harvard’s ongoing program to commission distinguished works of Modern architecture. He designed the Graduate Center (1968) and Bio-Medical Center (1970) at Brown; the Johnson Music and Arts Center (1968) at Middlebury; Terrace Apartments (1972) and College Center addition (1975) at Vassar; and buildings for at least a half dozen other colleges and universities. Throughout Carlhian was a confirmed modernist, and it is clear that his time at Harvard – as a student and as a member of the faculty – as well as practicing in Boston had a decisive impact on his work.

Within this context, the Quadrangle is something of a departure in its mostly subterranean configuration and in its oblique traditional references. The underlying concept, it can be argued stemmed from the project’s original architect, Junzo Yoshimura, who suffered a stroke before the scheme progressed beyond a very preliminary stage. At the same time a comparison of his sketches and the executed work only underscores how Carlhian transformed Yoshimura’s parti into something very much his own. Relating Modern design to historic contexts was by no means a new concern for Carlhian. His rear addition to the main building at Vassar of the previous decade achieves a respectful, enriching relationship between the two parts. That concern was spelled out in considerable detail in his essay “Guides, Guideposts and Guidelines” in the landmark study, Old & New Architecture: Design Relationship, published by the National Trust for Historic Preservation in 1980. A vigorous approach to compatibility was further manifested in Carlhian’s Billings Student Center at the University of Vermont (1984), which entailed joining Richardson’s Billings Library (1883-85) and McKim, Mead & White’s Ira Allen Chapel (1925-26). Here, he took advantage of the topography, placing
a large new building that is both robust and unobtrusive, behind the older ones and below the ridge on which they sit. The importance of working within historical contexts for Carlhian is reflected by the fact that late in life he stated that the Quadrangle was among his finest accomplishments.

Lester Collins also attained distinction in his career. He went to Harvard both as an undergraduate and a graduate student, receiving his M.L.A. in 1940. Immediately thereafter he traveled with John Ormsbee Simonds, a classmate who would likewise become a celebrated landscape architect, to Asia, visiting China, Japan, India, and Tibet. The experience would have a profound effect upon his career. Like Carlhian he returned to Harvard as an instructor (1945-50), and then served as the landscape architecture department’s chair for three years. In 1954 he traveled again to Japan and China as a Fulbright Scholar to make a detailed study of traditional gardens. He also collaborated with a Japanese scholar on translating Sensai Hisho (Secret Garden Book), an ancient text on principles of garden design.

Collins established a practice of his own when he moved to Washington with his family in 1955. From then until 1970, he was a partner in the office of Collins, Simonds & Simonds (the Simonds ran the Pittsburgh office; Collins that in Washington.) His work was wide-ranging, from small parks along Pennsylvania Avenue, S.E., for the National Park Service to the grounds of Cesar Pelli’s pathbreaking Comsat Laboratory in Clarksburg, Maryland (1969); from the redesign of the Hirshhorn Museum Sculpture Garden (1977) to the Market Square Plaza in Alexandria. His most consuming project was working on the Innisfree Garden at Millbrook, New York. His role began in 1950 as a consultant to Marion and Walter Beck in developing their great Westchester County estate. Walter Beck’s interest in the arts had come to focus on the eighteenth-century Chinese gardener Wang Wei. Collins’s knowledge of Chinese gardens led to a forty-year involvement in scheme, including its transformation to a public site.

The depth of Collins’ knowledge in Asian traditions and the range of his work made him a strong candidate for the inevitable challenges of designing the Haupt Garden. It was, of course, a collaborative enterprise, in which Carlhian himself was an active participant who delineated many of the scheme’s basic components. And the patron, Enid Haupt, was an avid horticulturist who also left her imprint. Furthermore, some characteristics of the plan can be seen in an only partially realized “temporary” design by Dan Kiley in the mid-1970s. (Hideo Sasaki’s renowned firm was the landscape architect of record, but I doubt if it played any substantive role in the design.) But it was Collins’s many talents that were able to weave together so many particular attributes into a coherent and meaningful whole.

The Quadrangle is an anomaly. It stands apart from other underground “additions” of the period. It stands apart from other museums of the period. It stands apart in its language – as architecture and as landscape. It stands apart from other works created by its designers. Its singular qualities are among the factors that make it so significant. In this respect it bears analogy to Bernard Maybeck’s First Church of Christ,
Scientist in Berkeley or to Beatrix Farrand’s gardens at Dumbarton Oaks. The Quadrangle is a stand-alone work.

That gets me back to the fifth factor I mentioned above, the association with Dillon Ripley. No other Secretary of the Smithsonian accomplished more in terms of expanding the institution’s facilities. Major new buildings included the Air and Space Museum and the Hirshhorn, as well as five new edifices at the National Zoo. During his tenure, the former Patent Office Building became the National Portrait Gallery and National Museum of American Art. The original Corcoran Museum for the first time started to serve its intended function, re-christened the Renwick. The Anacostia Neighborhood Museum was launched and in New York, Andrew Carnegie’s grand 5th Avenue house became the Cooper-Hewitt. The Quadrangle was billed as Ripley’s “final coup.” It is clear that so remarkable a design would never have occurred without his vision and commitment to excellence. This was indeed his idea, broadly speaking. Among his many projects “building” the Smithsonian, this ranks not only as one of the most ambitious, but also as one of the most significant in its design. It is, in my view, one of the most important designs the Smithsonian has ever commissioned. We seldom achieve that level of attainment. Determining “exceptional importance” for a property less than fifty years old, of course, must meet that threshold at the local level. Without question, the Quadrangle merits consideration well beyond the local context.

By comparison, the proposed Bjarke Ingels scheme seems little more than a raucous gesture that, were it realized, would soon seem dated and trivial. No ties to Dillon Ripley left here. I am using this case in one of my classes and in papers delivered elsewhere as a textbook example of flagrant disregard for historic context. Consider it in comparison to Toshiko Mori’s masterful response to the constricted and otherwise very demanding site for the visitor center at the Darwin Martin house in Buffalo. The degree of the visual assault of the proposed Ingels scheme on the Smithsonian Institution and Arts and Industries buildings could call into question their integrity as national historic landmarks. If, as Philip Kennicott suggested in his critique of public works in the Washington Post on 17 March, we cannot live up to the achievements of the previous generation, can we at least stand as good stewards?

I hope these comments will be of help in your deliberations.

Yours very sincerely,

Richard Longstreth, Professor
Dear Michelle:

This message is to follow up on specific questions I raised in last Wednesday evening’s meeting on the proposed South Mall Campus Master Plan Section 106 consultation meeting. Can you please provide answers regarding questions?

1) • For all four alternatives presented, please provide the approximate depth of excavation envisioned below the existing Castle basement (i.e. the main, unmodified section). These dimensions do not have to be precise, but reasonably predictable given the programmatic functions proposed and the alignments as necessary to adjacent underground structures in the Quadrangle. Also, please provide the approximate square footage of excavation below the Castle in each alternative. For example, I believe the team said that Alternative A would involve excavation only under the existing Castle itself, roughly 30,000 s.f., and Alternative D would extend excavation in all directions around the perimeter of the existing Castle for a total of roughly 70,000 s.f., but it would be very helpful if these verbal responses were verified and/or quantified.

2) • Given the possible extent of excavation under the Castle—some justification for which is connected to the need to improve seismic performance—can you please provide examples of similar extensive excavation beneath unreinforced load-bearing masonry historic buildings? By similar, I mean excavation that goes a minimum of 30 feet below the existing foundations, and is at least twice the footprint of the historic building extending in all directions from the existing perimeter of the building. If the examples include seismic retrofitting with base isolation, please indicate the USGS (or similar government entity) seismic zone relative to that of Washington, D.C. (For reference, I understand that the zone for D.C. is Zone 1, indicating a low hazard, and coastal California is Zone 4, indicating the highest hazard.)

3) • As we are involved collectively in a multi-year, public historic preservation consultation process mandated by federal law, it would be extremely useful in weighing the Smithsonian’s stated purpose and need with regard to its use of existing resources. As I mentioned in the meeting, the stated need for visitor experience and support is a primary driver of programming, and it is generally being proposed to be accommodated by extensive—and expensive—construction underneath the Castle. However, I noted that the Arts & Industries Building adjacent to the Quadrangle is not being considered for this purpose, although it offers roughly 100,000 s.f. of mostly at-grade space, and is adjacent to the Quadrangle, the Castle, the Hirshhorn, and the National Mall. With its high ceilings, plentiful natural light, and multiple points of access, the Arts & Industries Building would ideally be used for visitor orientation and support services, but it would function poorly as a collections-based exhibit space. The SI staff has repeatedly said that this NHL property is under consideration as a possible location for a new museum, but we collectively clarified in the meeting that no such legislation has been introduced in the current Congress. At the last Section 106 Consulting Parties meeting on January 27, Mr. John Lapiana explained that the SI senior staff had “made a promise” to a member or members of the Smithsonian Board of Regents not to consider this property for another purpose (this is recorded in your minutes which are available on line, and presumably in the video recording of that meeting, which is no longer posted).

The SI South Campus Master Plan is an undertaking that will require several billion dollars, presumably much of it taxpayer funded, involving numerous National Historic Landmark properties such as the Castle and the Arts &
Industries Building. The reuse of the Arts & Industries Building may avoid costly, extensive, invasive excavation and construction below the Castle itself, for the most obvious reason that underground construction is significantly more expensive than would be interior fit-out for the existing building, which has recently received more than $50 million in renovation funds. Can you please provide the consulting parties of this public process with more information documenting any agreement or promise made by SI staff to its board regarding the exclusion of the Arts & Industries Building in addressing the purpose and need of this undertaking?

I look forward to your response to these questions, and thank you for your work in protecting these nationally significant resources which are under the Smithsonian Institution’s stewardship. Best regards, Tom

Thomas Luebke, FAIA
Secretary, U.S. Commission of Fine Arts
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Suite 312
Washington, DC 20001

(202) 504-2200
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May 5, 2016

Ms. Sharon Park, FAIA
Associate Director
Architectural History and Historic Preservation
Smithsonian Institution
600 Maryland Avenue, SW, Suite 5001, MRC511
Washington, D.C. 20013-7012

Ref: Proposed Smithsonian Institution South Mall Master Plan
Washington, D.C.

Dear Ms. Park:

Thank you for convening the Section 106 consultation meeting on April 13th, 2016 for the Smithsonian Institution’s (SI’s) South Mall Master Plan (Master Plan). The meeting was productive and the room’s set up facilitated meaningful consultation. We appreciate SI’s efforts to address many of the concerns raised in our February 19th, 2016 letter to you but recognize many outstanding issues remain. We think that resolving these issues is critical to Section 106 consultation moving forward and therefore provide the following comments to assist SI in meeting that goal.

Purpose and Need
The Purpose and Need statement lacks the background information necessary to ensure that the context of the project is understood by consulting parties. On April 13th, SI provided the Purpose and Need which states that the SI intends to implement the South Mall Master Plan with the goal of preserving and reusing historic resources “to the maximum extent possible” and also integrate “existing buildings and new program space to create a campus that is visually, spatially, and functionally unified.” Regrettably, it is unclear how SI derived the long term space requirements that resulted in a projected need for 200,000 square feet of new space. It is important that SI share the analyses that support the “collective and component needs of the various museums” identified in the master plan with consulting parties. This will allow them to provide comments related to both SI’s mission needs and its Section 106 review. We would appreciate knowing when this information will be disseminated, and when comments must be submitted.

Adequacy of Background Documents
The clarification of SI’s schedule for completing its analysis of properties that qualify for listing in the National Register of Historic Places (NRHP) was helpful. While it appears that a substantial amount of the work is complete, consulting parties await the results of SI’s efforts to amend and expand the boundaries of the National Mall Historic District; to determine the eligibility of the Quadrangle Complex; and to determine the Hirshhorn Museum and Sculpture Garden’s individual eligibility for listing in the NRHP.
Considering the magnitude and nature of the undertaking, the degree of federal involvement, and the extent of potential effects on historic properties, including National Historic Landmark properties, SI’s level of effort seems appropriate. A swift conclusion to this phase of the Section 106 process would enable SI to proceed more efficiently with the remaining steps of the Section 106 review process. What is SI’s schedule for concluding the identification and evaluation step?

**Analysis of Alternatives**

By continuing to work with the consulting parties, SI can begin to identify effects to historic properties related to each of the alternatives. In further developing the alternatives, SI should consider the information, suggestions, and creative options consulting parties have provided and will continue to provide throughout the process. Likewise, SI should be prepared to re-evaluate, revise, or modify the alternatives to reflect any additional information about historic properties and effects that is produced. In addition to refining the alternatives, SI should clearly communicate its Section 106 consultation schedule, as it is related to its National Environmental Policy Act (NEPA) review. Establishing these milestones for developing and finalizing the reviews that will inform the PA is essential. Further, doing so will establish a clearer framework for meaningful consultation.

**Role of Consulting Parties in Resolving Adverse Effects**

In accordance with 36 CFR 800.5(a), federal agencies are responsible for applying the criteria of adverse effect to historic properties within the Area of Potential Effect (APE), and for considering any views concerning such effects which have been provided by consulting parties and the public. Consulting parties already have provided comments on numerous aspects of the Master Plan alternatives. It remains unclear how, or if, SI has taken these comments into consideration and intends to revise the Master Plan to reflect its consideration of these comments. For instance, SI shared during the meeting that it has reconsidered the proposal to remove the walls from the Hirshhorn Museum and Sculpture Garden. However, that change is not reflected in the alternatives discussed on April 13th. We therefore urge SI to provide an analysis of all the comments it has received and to explain how they were considered and whether revisions were made to the alternatives.

**Next Steps**

Consulting parties remain unclear about how SI developed the Purpose and Need statement and whether it intends to change the Master Plan based on comments provided by consulting parties. Without a clear understanding of how SI is proceeding, consulting parties and the public continue to be confused about the Master Plan for the South Mall and how Section 106 consultation will inform changes to it. Accordingly, we urge SI to provide a detailed schedule and milestones to address historic properties and refinements to the Master Plan alternatives.

In closing, we recommend that SI clarify to consulting parties how it intends to more regularly engage them in the future about each aspect of this complex undertaking, including discreet projects that may have effects on highly significant historic properties. We remain available to advise you on how best to meet this objective and urge you to share your plans for engaging consulting parties as soon as possible to avoid further confusion.

If you have any questions or require our further assistance, please contact Brian Lusher at 202-517-0221 or via e-mail at blusher@achp.gov.

Sincerely,

Reid Nelson
Director
Office of Federal Agency Programs
Dear Mr. Nelson:

Thank you for your letter of May 5, 2016, offering assistance to the Smithsonian Institution as we move forward with the South Mall Campus Master Plan Section 106 process. We agree that the recent consulting parties meeting has been helpful in obtaining comments from the consulting parties on impacts to historic resources. It is also clear that the consulting parties continue to have concerns over the Purpose and Need statement for additional ranges of square footage, the impact to historic resources within the campus area, and the format and effectiveness of responses to comments as they affect the alternatives.

As the Lead Agency for the NEPA process, the National Capital Planning Commission (NCPC) had requested a general Purpose and Need statement, one that was not specific on finite details, as this is a Master Plan. However, we agree that a more effective document will clarify the size of spaces required for our programs. We are currently preparing this material for presentation at our next consulting parties meeting.

We currently have a contract to prepare a Determination of Eligibility (DOE) for the 1987 Quadrangle Complex which includes the Enid Haupt Garden as its rooftop. This document will be ready for preliminary review towards the end of summer and we will continue to work with the DC Historic Preservation Office as information on this resource is received. We agree that having a DOE on the Quadrangle Complex will assist the process of analysis of impacts and it will be posted prior to the next consulting parties meeting.

We appreciate your guidance and the offer to continue to assist our team as information is generated responsive to the Section 106 process. As we have quite a bit of material to research and prepare, we do not expect to have another consulting parties meeting until the fall. We will inform the consulting parties of this change in schedule, we will be consolidating and posting comments and considering revisions to the alternatives over the summer.

Sincerely,

Sharon C. Park, FAIA
Associate Director,
Architectural History and Historic Preservation

Cc; Brian Lusher, Matt Flis, Jennifer Hirsh, Andrew Lewis, Tom Luebke,
April 27, 2016

VIA EMAIL: SpoffordM@si.edu

Michelle Spofford,
Architect & Senior Planning Manager
Smithsonian Institution
600 Maryland Ave.; Ste. 5001
Washington, DC 20013-7012

Re: Smithsonian Institution South Mall Campus Master Plan | Comments in Response to April 13, 2016 Consulting Party Meeting

Dear Ms. Spofford:

We appreciate the opportunity to provide additional comments in regards to the Smithsonian Institution’s ongoing review of its South Mall Campus Master Plan. The National Trust has participated at every step of this consultation process, including attendance at all meetings convened by the Smithsonian Institution. In addition, we have reviewed all documents that the Smithsonian has released. We continue to believe that the Master Plan, if approved as currently envisioned, will adversely affect historic and cultural resources. Specifically, we note our ongoing concerns regarding the impact of all proposed alternatives on the Smithsonian Institution “Castle” Building, the Arts & Industries Building, the Hirshhorn Museum and Sculpture Garden, and on the National Mall Historic District as a unified whole. Our more detailed concerns are set forth below.

Purpose & Need. Throughout the review process, which has been ongoing for over one year now, we have requested on several occasions—along with other consulting parties—that the Smithsonian provide support for the proposed Master Plan’s purpose and need, specifically with respect to the large quantity of additional visitor and education space. Nevertheless, supporting information has not been forthcoming. Specific details and studies should have been provided to the consulting parties at the start of the Section 106 process in order to justify the collective and component needs of the various museums. It is not sufficient to rely merely on the wish lists of visitor service managers or curators for additional space, especially for a project of this magnitude and enormous cost. To the contrary, the fundamental assumptions about the need for 200,000 square feet of space appear to be relatively arbitrary. This arbitrary number then results in a biased evaluation of all the less harmful alternatives as creating a dramatic “shortfall” of program space. The Smithsonian has an obligation to produce
supporting information so that consulting parties may evaluate it as part of the planning and consultation process.

**The Castle.** Restoration of the Castle, a National Historic Landmark, and improving public access to the Castle are laudable goals. We remind the Smithsonian, however, of its obligations under Section 110(f) of the National Historic Preservation Act, which requires the Smithsonian to minimize harm “to the maximum extent possible.” In light of the massive excavation that the Smithsonian intends to undertake, the Smithsonian has a duty to provide additional analysis that the proposed excavation is necessary and feasible. To date, the Smithsonian has not supplied this information, thereby undermining purported needs. Likewise, consulting parties and the public require additional information about adverse impacts of the proposed sloping entrance to the Castle, Great Hall, and gardens. Without this information, Section 106 review will not be meaningful.

**Arts & Industries Building.** The National Trust has a longstanding and ongoing interest in the preservation of this building, which we featured in 2006 on our list of America’s 11 Most Endangered Historic Places. Since that time, we have regularly inquired about the building’s vacant status and future use. At the most recent consultation meeting, Tom Luebke from the Commission of Fine Arts aptly characterized the A & I Building as the “elephant in the room.” This National Historic Landmark building provides 100,000 square feet of usable space, yet the Smithsonian has inexplicably omitted it from consideration for the additional space requested for expanded visitor and education services. The Smithsonian has a duty to consider all alternatives for the Arts & Industries Building, rather than merely proposing that it be used for temporary swing space or as a hallway or walkway between other buildings in the name of greater “connectivity.” Congress’s alleged interest in considering the building for a Latino museum is not a sufficient reason to remove the building from consideration for other alternatives as part of the master planning process and Section 106 review. Full and transparent master planning now for the Arts & Industries Building can remedy the long-term and avoidable problem of this National Historic Landmark’s vacancy.

**Hirshhorn Museum & Sculpture Garden, Freer Gallery, and Retention of Existing Gardens.** In addition to the issues raised above, the National Trust objects to changes to the walls on the plaza surrounding the Hirshhorn Museum & Sculpture Garden insofar as these walls are unchanged parts of the architect’s original design. Because we also believe that the Hirshhorn merits designation and treatment as a National Historic Landmark, the Smithsonian should retain the plaza walls as-is and explore other options for improving accessibility and visibility—options which so far have not been explored with consulting parties. Likewise, the Smithsonian has not explained why it is necessary at the Freer to change existing windows to doors in order to improve accessibility. Clearly, other options exist that would have less impact on the Freer’s historic building, but the Smithsonian has either not considered them or not made those options public. We are also concerned about the adverse effects of the proposed relocation of the loading entrance to the west side of the Freer Gallery. Finally, the Smithsonian has not analyzed ways to incorporate
existing gardens, such as the Enid Haupt Garden, even though consulting parties have pointed out the need for a maintenance alternative.

In summary, the suggestions above arise primarily from a lack of documentation and analysis concerning purpose, need, and consideration of a full range of reasonable alternatives. Meaningful consultation depends upon consulting parties having access to this information. Once this information is provided, the National Trust and other consulting parties will be in a better position to assist the Smithsonian with developing a master plan that will protect these unique and irreplaceable historic properties while attempting to accommodate the Smithsonian’s desire for expansion.

We look forward to a full and detailed response in advance of the next consultation. Please let us know if any clarification is needed or if you would like to schedule a meeting to discuss the issues we have raised.

Sincerely,

William J. Cook
Associate General Counsel

cc: John M. Fowler, Brian Lusher, Reid Nelson, and Tom McCulloch, Advisory Council on Historic Preservation
    Stephanie Toothman, National Park Service Historic Preservation Program
    Tom Leubke, U.S. Commission on Fine Arts
    Jennifer Hirsch, National Capital Planning Commission
    David Maloney & Andrew Lewis, D.C. Historic Preservation Office
    Rebecca Miller, D.C. Preservation League
    Nancy J. Macwood, Pat Tiller, and Kate Perry, Committee of 100 on the Federal City
    Judy Feldman, National Coalition to Save Our Mall
    Sharon C. Park, FAIA, Chief, Architectural History & Historic Preservation Division, Smithsonian Institution
July 25, 2016

Via Email: law@savingplaces.org

William J. Cook
Associate General Counsel
National Trust for Historic Preservation
2600 Virginia Avenue NW, suite 1100
Washington, DC 20037

Dear Mr. Cook:

This is in response to your email letter to Michelle Spofford on April 27, 2016, regarding your organization’s concerns that the Smithsonian Institution’s South Mall Campus Master Plan will have several adverse effects on significant historic and cultural resources. You also express concern that there is a lack of documentation in which consulting parties can assess the impacts to historic resources as illustrated in the current alternatives. We appreciate the specific nature of the comments which are helpful in directing our response.

As the project is quite complex with many interrelated parts, the Smithsonian intends to take into consideration these comments and to modify or further clarify, where possible, elements of the master plan alternatives in order to avoid, minimize or mitigate adverse effects. We are at the phase of the review process where we are compiling these effects and evaluating them based on our purpose and need. As many of the comments hinge on the outcome of completing the historic preservation identification through a Determination of Eligibility for the Quadrangle Complex, we will not be scheduling our next consulting parties meeting until the fall when we anticipate the draft of the Determination of Eligibility will have been posted for review.

Summarized below in italics are your concerns with our responses below.

1. **Please justify the programmatic need for the large quantity of additional visitor and educational space.** The Smithsonian will reformat its program breakdown to include the identified program elements with clarification for the space needs over the next 20-30 years. While we have listed our programmatic needs and discussed them in earlier meetings, it is clear from comments from consulting parties that this has not been adequately explained or analyzed. As such, we will look at each alternative comprehensively and clarify the program needs and associated space requirements and adjacencies in order to fulfill our mission. This programmatic analysis is expected to be available for the next consulting parties meeting in the fall.

2. **Please provide additional analysis for the necessity and feasibility of the extensive excavation under the Castle which is a National Historic Landmark.** The Smithsonian’s consideration of alternatives which include underground space is driven by the need to facilitate a central utility plant, central delivery and other service spaces that could be best accommodated in excavated space. The site is very tight and to avoid impacts to above grade space, the structural engineering firm of Robert Silman Associates has a preliminary finding that it is feasible to excavate safely under the Castle. To facilitate the process of design concepts for the restoration of the Castle, we are documenting the Castle, its existing condition and its foundations using a BIM model that will serve to further analyze and inform the best configuration for excavated space under and around the Castle.

3. **Please consider the Arts & Industries Building as space for expanded visitor and educational spaces, not just as a means of connectivity of spaces within the campus.** The Board of Regents in 2007 promised the Congress and also promised the Obama Administration subsequent to that, that we would not do anything in the building that would preclude the use of it at some point as a Museum if Congress so determines. Until a permanent use for the Building is identified, the Smithsonian intends to open the Arts and Industries Building to as many mission-related activities as possible. For example, over the past Memorial Day weekend, our Asian and Pacific American Center invited the public to a “culture lab on...
4. Please evaluate adverse impacts for sloped lower entrance to the Castle. Additional planning concepts for integrating grade changes and code required egress that avoid or minimize adverse effects will continue to be developed and presented to the consulting parties.

5. Please avoid changes to the Hirshhorn Museum and Sculpture Garden now that a Determination of Eligibility for Individual Listing on the National Register has been received. This concern was specifically addressing the perimeter walls and we agree that these are important Character-Defining Features that must be carefully considered prior to recommending changes. After consultation with others at the Smithsonian, we will look at the program and needs to evaluate ways to minimize impacts, where possible.

6. Please avoid modifications to the Freer for an accessible entrance and service loading. The Smithsonian has in the past evaluated exterior ramps to meet accessibility (ADA) requirement which have a far greater adverse effect than an at-grade change, as proposed. The current ADA entrance is through a service and staff entrance to the Freer which does not present an adequate universal entrance alternative. The least impact to the building is to alter an area where windows currently exist for an at-grade entrance. Design studies will be done to consider how best to integrate a simple, appropriately scaled entrance from the garden with the least visual impact to the façade. For the access road for central delivery on the west of the building, engineering studies will be developed to safely consider ways to avoid or minimize impacts to the building’s structure.

7. Please analyze ways to incorporate existing gardens as recommended by consulting parties using a maintenance alternative. The Smithsonian is committed to both repairing the Quadrangle roof and providing excellent gardens for the public to enjoy both as contemplative spaces and as part of the Smithsonian Garden’s education programs. The qualities of the garden for reflective, quiet spaces and open views and vistas of historic buildings and the Mall will be retained after the Quadrangle roof is repaired and intrusive driveways are removed. The new expanded garden can and will be replaced representing the qualities found in the current garden.

The Smithsonian has an extensive amount of information on the web at our website, www.southmallcampus.si.edu. We will be adding information over the summer and prior to the next consulting parties meeting. We are evaluating how best to list the comments and concerns with a response to how these can be incorporated into the various alternatives or inform a new alternative.

Again, thank you for your comments.

Sincerely,

Sharon C. Park, FAIA, LEED AP
Associate Director, Architectural History and Historic Preservation
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Cc: Diane Sullivan, Matt Flis, Jennifer Hirsch; John Fowler, Brian Lusher, Reid Nelson; David Maloney, Andrew Lewis; Tom Luebke; Rebecca Miller, Nancy McWood; Judith Feldman; D. Nauta-Rodriguez; M. Spofford, A.Trowbridge, C. Lethbridge; J.lapiana;