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Comments:

The National Coalition to Save Our Mall (the Coalition) appreciates this opportunity to comment on the scope and design concepts for the Smithsonian South Mall Campus Master Plan. The Coalition is dedicated to advancing the legacy of the National Mall through sound public policy, innovative ideas, and comprehensive visionary planning that will ensure the vitality of this historic national treasure for future generations.

The Coalition understands that the Smithsonian Institution (SI) is approaching this planning process with the goal of better unifying the various above ground and underground museum and education spaces in this part of the Mall in terms of design, visitor movement, and programming of Smithsonian functions. We appreciate SI's comprehensive approach to the entire group of buildings and gardens instead of simple building-by-building changes. However, our major concern is that the design concept, SI planning goals, and public materials fail to frame this project in the larger context of the entire National Mall, a historical and cultural resource of national importance, of which it is a part.

In addition, the three options provide only one example with modern geothermal technology, the SI's "preferred alternative." Yet geothermal and other renewal energy sources are a requirement for any new construction by federal buildings, so this presents the public with a pre-determined choice – and no realistic alternative. We suggest that SI open the review of alternatives to a whole range of mix and match features – including geothermal in all three options, or adding additional options that make use of resilient and sustainable technology.

The Smithsonian museums on the Mall's south side are an integral part of the National Mall as defined by the 1791 L'Enfant Plan and the 1902 McMillan Plan, which affects the design of the Mall, its symbolic meaning, and public use aspects of the Mall's role in our nation's public life as well as the life of the local community. The Coalition is concerned that the design concepts recently made public, the goals to unify these museums to one another but not to the Mall open space just north of this area, as well as the planning materials put out for public comment appear to treat this segment of the Mall as a separate and distinct environment unrelated to the larger Mall context. Planning for any section of the Mall, particularly the core Smithsonian area, must acknowledge and support the larger historic planning legacy and provide materials to the public that promote a comprehensive view of the Mall beyond the jurisdictional needs and authority of a single entity. We therefore offer the following comments:

All planning concepts, designs, and materials provided to the public must

acknowledge and give due historic preservation value to the visionary L'Enfant and McMillan plans that are the basis for the National Mall's design and symbolic unity. To ignore this important unifying Mall concept is to degrade the Mall's historical integrity and future unified quality.

- The SI consultant at the public meeting said he would be consulting with NPS regarding the National Register nomination for the L'Enfant Plan; however, that report is only one approach to interpreting the historic legacy and is not complete or definitive for purposes of this project. In fact, the "National Mall" nomination prepared by NPS defines the Mall narrowly as the area between 1st and 14th Streets, which is incompatible with the historic plans and as most visitors' experiences include the historically extended Mall. The Coalition pointed this out in 2009 to NPS and since that time NPS has said they are revising the nomination. Until we can see the revised nomination, we believe the National Register should be used with caution.
- We emphasize that the primary resource for definition and planning is the L'Enfant Plan itself and the McMillan Plan and report issued in 1902 describing that plan's inspiration, goals, and design concept.
- The "area of potential effect" for this plan must include the entire National Mall of which it is a part, from Capitol Hill to the Lincoln Memorial, and from the White House to the Jefferson Memorial.
- While it is a good idea to focus some attention on the relationship of the South Mall area to future development in the SW Ecodistrict, it is equally important to focus attention on the relationship of the South Mall to the main public space panel of the Mall – to the north. The fact that SI does not have jurisdiction, and NPS does, is no reason to ignore the crucial fact that the Mall's public activity has historically been focused on the Mall's open grassy areas between the museums.
- Given the need for the larger Mall in general to be more welcoming, the SI should comment on and advocate for the creation of a more comprehensive Mall-wide plan that supports SI needs in this Master Plan and future Master Plans for museums on the north Mall, namely for public use of the grass and open space between museums currently under National Park Service jurisdiction.
- In addition to promoting the need for a third century plan for the National Mall, the Coalition has been diligently developing plans for a multi-use facility under the grass panel adjacent to Smithsonian Castle. This National Mall Underground would provide desperately needed visitor services, such as car and bus parking, restroom facilities and a visitor center, as well as increasing resilience for the National Mall through flood control, irrigation cisterns and geothermal wells. We ask that this multi-use facility be considered in the SI's evaluation of its Master Plan, particularly how it can serve some of SI's future needs and the more immediate requirements that are not being addressed currently.
- The existing Haupt Garden, only 30 years old, is one of the most beautifully designed and private areas of the Mall beloved by many visitors and locals. The Coalition understands the need to repair the leaking roof for the underground buildings on which the garden sits, but the whole concept of transforming this oasis into a lively public area intended to draw people and activity violates that inherent quality. The purpose of the Quadrangle area should not be pre-

determined, rather it should be part of the public conversation about SI goals in the context of the larger Mall design, symbolism, and public use function.

In conclusion, the Smithsonian has developed some interesting ideas but seems too prepared to make major changes that only after the fact are open to public comment and review. We hope that the NEPA and Section 106 process will open all the questions of why and how to change this part of the National Mall suits the larger public interest, against which all decisions should be made.