

National Mall Coalition

formerly National Coalition to Save Our Mall

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October 4, 2017

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401 9th Street, NW, Suite 500

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Dear Chairman Bryant and Commissioners:

Lisa Benton-Short, PhD
Secretary

The National Mall Coalition appreciates this opportunity to provide comments regarding final approval of the Eisenhower Memorial. The Coalition is an all-volunteer nonprofit organization of architects, historians, urban planners, and concerned citizens that advocates comprehensive, visionary planning for the Mall – and all Washington DC -- to ensure the vitality, beauty, and continued active role of this stage for Democracy in the capital and in American life.

M.J. "Jay" Brodie, FAIA
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In the 1850s, Maryland Avenue south of the Mall was a functioning avenue as intended in the 1791 L'Enfant Plan for the nation's capital but by the 1860s railroad tracks laid on portions of it broke its continuity, a sorry condition that persists today. In recent years plans by CSX and architect Arthur Cotton Moore to restore Maryland Avenue to its intended role as L'Enfant's grand avenue and the south-of-the-Mall counterpart to Pennsylvania Avenue have been slowly proceeding.

Ellen Goldstein
Director

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The National Mall Coalition since 2006 has made the case that a meaningful Eisenhower memorial could be designed for this space, while also advancing the restoration of Maryland Avenue to L'Enfant's original intended concept of a grand avenue and continuous thoroughfare open to vehicular traffic from the Capitol to the Tidal Basin area. Our letters to that effect were published in 2012 in The Washington Post and The New York Times (and are attached for your reference). While the current design has been modified to reduce the tapestry and column intrusion into the Maryland Avenue right-of-way, it creates a memorial "park" that is closed to vehicular movement and contrary to L'Enfant's original intention for a "grand avenue" and mirror image of Pennsylvania Avenue.

Albert H. Small
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Gate National Recreation Area

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Former Administrator, EPA

Early on in the Eisenhower Memorial process, in 2006, federal and DC preservation entities, without meaningful public involvement or full consideration of the L'Enfant plan, decided with little factual basis that Maryland Avenue "lacks integrity" and so did not warrant restoration in keeping with L'Enfant's concept of an avenue or "carriageway" open to vehicular traffic. NCPC then created the "2006 Site Selection Design Principles" (Executive Director's Recommendation, page 12) that, while mentioning L'Enfant reciprocal views, calls for "the memorial site as a separate and distinct public space" – a requirement wholly inconsistent with L'Enfant's concept of a "grand transverse avenue."

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Sadly, this decision, which we believe was a mistake both in terms of substance and in terms of legal process -- and said so in written and oral testimony --, has led government review agencies including your Commission to approve a design that permanently closes an important section of what could have become L'Enfant's grand Maryland Avenue, and unnecessarily restricts views and vistas to a narrower "historic cartway" instead of L'Enfant's intended 160' right-of-way, as inscribed on the L'Enfant Plan itself and documented in the National Park Service's HABS survey.*

The Coalition is dismayed by what we believe is a failure by the government agencies to initiate the public process mandated by the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act until after key decisions had been made by agencies including the National Park Service and the National Capital Planning Commission. This was and is contrary to the explicit requirements of both the NEPA and Section 106 regulations that public review and consultations occur prior to agency decision making.

The sensitive Maryland Avenue site already had been selected by the National Park Service and the National Capital Planning Commission before the public was invited to participate. As the Coalition stated in our 2006 letter to NPS then-Superintendent Vikki Keys, in which we contested the “lost integrity” decision, “We believe the NPS acted prematurely in seeking site approval from NCPC and CFA before the Section 106 process and meaningful public consultation could begin.” Once Maryland Avenue had been declared to lack integrity, before the 106 process began, our efforts to make the case for L’Enfant’s plan could have no meaningful impact.

The National Mall Coalition strongly believes that the Commemorative Works Act, the Comprehensive Plan, and environmental and Historic Preservation laws provide a strong basis for government to give priority to the visionary 1791 L’Enfant Plan and 1902 McMillan Commission Plan when new projects such as the Eisenhower Memorial are proposed. We are saddened that – unless your Commission acts -- the opportunity to create a Memorial while also restoring L’Enfant’s grand avenue has been lost.

We urge you, at this eleventh hour, to reconsider your approval of this project; instead take the responsible action and remand it for public review in accordance with the relevant laws.

**The historical data is provided in the National Park Service HABS NO. DC-702 report on Maryland Avenue: “On Pierre L’Enfant’s 1791 plan of the city, Maryland Avenue is the mirror image of Pennsylvania Avenue delineating the southeast side of the Mall and bisecting the Capitol Grounds. . . . In 1857 Maryland Avenue was among the four important avenues in the city that had at least been partially graded and opened. . . The right-of-way is 160-wide from building line to building line.”*

Sincerely,

A handwritten signature in blue ink that reads "Judy Scott Feldman". The signature is written in a cursive, flowing style.

Judy Scott Feldman, PhD
Chair

Attachment

cc. Tom Luebke, Commission of Fine Arts