

# National Mall Coalition

formerly National Coalition to Save Our Mall

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January 10, 2018

Bob Vogel, Regional Director  
National Capital Region  
National Park Service  
1100 Ohio Drive, SW  
Washington D.C. 20242

Dear Director Vogel:

On November 9<sup>th</sup>, *The Washington Post* reported that the National Park Service intends to close large sections of the National Mall to recreational use. If this report is accurate, the National Mall Coalition is deeply concerned about this proposed undertaking, which we believe will fundamentally alter the historic and cultural character of the National Mall. Clearly this undertaking requires review under Section 106 of the National Historic Preservation Act (NHPA), and we recommend that NPS initiate that process immediately.

The NPS proposal is contrary to several adopted policies in the Federal "Parks and Open Space" Element of the Comprehensive Plan for the National Capital:

- Page 107 states "... the National Mall is a monumental open space... **It also serves as an educational resource and a place of active recreation and contemplative reflection for both residents and visitors.**" (Emphasis added)
- Page 109 provides a specific policy for Monumental and Designed Landscape Parks Plan covering the National Mall. Policy 8 states "Maintain East and West Potomac Park as an extension of the Mall, as a valuable **recreational open space**, and as a space that can be used for outdoor cultural events, gatherings and celebrations."

We are aware that your NHPA Section 106 programmatic agreement (PA) allows NPS to "streamline" the review of many types of undertakings. The proposed closure, however, would have major long-term policy implications, and would significantly impact the cultural interests of thousands if not millions of American citizens. Moreover, it would contribute in a major way to an ongoing pattern of cumulative impacts that threatens the National Mall's very purpose as, in the words of Peter (Pierre) Charles L'Enfant, a "place of general resort." Accordingly, we strongly recommend that its review not be streamlined, and that NPS instead subject it to full consultative review under the Section 106 regulations.

We are also aware that public recreation is not clearly identified by NPS as an element that contributes to the National Mall's character. As argued in the attached paper, we believe that the failure to recognize such public uses as contributing elements reflects flaws in the form used to nominate properties to the National Register of Historic Places. These flaws systematically undercut the national purpose set forth in Section 1(b)(2) of the NHPA – that "the historical and cultural foundations of the Nation should be preserved as a living part of our community life ..." (emphasis added). As you know, the NHPA Section 106 regulations, at 36 CFR § 800.4(c)(1), note that "...changing perceptions of significance,

or incomplete prior evaluations may require the agency official to reevaluate properties...” with respect to their eligibility for the National Register. We suggest that prior evaluations of the National Mall have been incomplete because they failed to consider ongoing human use as a contributing element. This flaw needs to be corrected, in the public interest. Therefore we also recommend that a full Section 106 review include a re-evaluation of the National Mall’s eligibility for the National Register with reference to ongoing public uses.

The National Mall has been truly called a “stage for our democracy.” A stage without people is only a bare floor. We insist that you review the impacts of the proposed closure, and related actions, under Section 106 of the NHPA, and request that the National Mall Coalition be recognized as a consulting party in this review.

Sincerely,



Judy Scott Feldman, PhD, Chair

Attachment: Feldman/King paper

Cc: ACHP, DC SHPO, NTHP, Rep. Eleanor Holmes Norton, Mayor Bowser, DC Preservation League, National Trust for Historic Preservation, National Parks Conservation Association, Congressional Softball, DC Fray