

May 15, 2009

Susan Spain, Project Executive The National Mall Plan National Mall & Memorial Parks 900 Ohio Drive, S.W. Washington, DC 20024

Re: National Mall Plan Preliminary Preferred Alternative

Dear Ms. Spain:

The National Association for Olmsted Parks (NAOP) appreciates the opportunity to participate as a consulting party in the National Mall planning, pursuant to Section 106 of the National Historic Preservation Act, and to comment on the National Mall Plan Preliminary Preferred Alternative.

NAOP continues to see the need for a **multi-agency**, **long-term comprehensive vision** for the National Mall as the nation's symbol of democracy and one of the country's greatest works of civic art.

This vision should evolve from the principles embedded in the L'Enfant and McMillan Plans and include the areas that, historically, were designed to complete the experience and purpose of the Mall – the Capitol Grounds, the grounds of the White House, President's Park, as well as the land held by agencies and organizations between Constitution Avenue and Independence Avenue and 1<sup>st</sup> and 14<sup>th</sup> Streets, and areas of the city immediately surrounding the Mall, integrated with it through roads, natural systems, view sheds and vistas.

In contrast, we believe that the National Park Service's National Mall Plan which is currently being developed will best serve as a management plan for the portions of the Mall that are under National Park Service jurisdiction.

A formal definition and recognition of the National Mall—i.e., through a National Historic Landmark nomination as proposed by the National Trust for Historic Preservation— accompanied by a vision statement and a set of guiding principles would help direct the visionary planning process, clarify the goals and scope of the undertaking, and assist with prioritizing decision making and resource allocation.

An independent commission, chartered by Congress, may be best suited for leading the multi-jurisdictional long-range planning effort.

With regards to visitor amenities, specifically for the portion of the Mall between 3<sup>rd</sup> and 14<sup>th</sup> Streets, NAOP believes the National Park Service should more strongly collaborate with the Smithsonian Institution, National Gallery of Art, USDA, and other relevant stakeholders to determine what visitor amenities could be offered through existing facilities and cooperative visitor services agreements, and through the restoration and reuse of the Arts & Industries building. As the most formal historic area of the Mall, any design changes in this area should reinforce and not detract from the formality and symmetry of the space.

With regards to Union Square, NAOP agrees with the National Park Service's assessment that Union Square should be redesigned to strengthen its design, usefulness and, above all, its function as a transition element between the National Mall and the Capitol Grounds. However, visitor activities, facilities and amenities should not overshadow the dignity and symbolism of this significant historic landscape. We recommend that the National Park Service identify Union Square as an area in need to be re-designed, and that the design be considered as part of a comprehensive, multi-agency vision plan.

Thank you for considering our comments. The National Association for Olmsted Parks looks forward to continuing involvement in the Section 106 consulting process.

Sincerely,

Iris Gestram Executive Director