

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



December 22, 2010

Ms. Maria Burks
Acting Superintendent
National Mall and Memorial Parks
National Park Service
900 Ohio Drive, SW
Washington, DC 20024-2000

RE: Proposed National Mall Turf and Soil Reconstruction Project

Dear Mr. Piltzecker:

Thank you for contacting the DC State Historic Preservation Office (DC SHPO) regarding the above-referenced undertaking. We have reviewed the project information in accordance with Section 106 of the National Historic Preservation Act and are writing to provide our comments regarding effects on historic properties.

We appreciate the opportunities that the National Park Service (NPS) has provided to comment on this critically important undertaking. Over the last year or so, the DC SHPO, other review agencies and various interested parties have consulted by taking part in informal discussions on the design concepts, participating in public meetings, reviewing information on the "PEPC" website and by commenting on the Environmental Assessment (EA). Throughout this consultation, it is our understanding that comments have been overwhelmingly favorable and in strong support of the project. We also endorse the project because it will dramatically improve the appearance and durability of the National Mall lawn panels.

With regard to effects on historic properties, we note that the introduction of the proposed granite curbs with rounded, 15-foot radius corners will alter the metal edged, rectangular lawn panels that were designed by Skidmore, Owings and Merrill (SOM) in the 1970s. As indicated in prior correspondence on other National Mall-related projects, the SOM plan for the National Mall may be eligible for listing in the National Register of Historic Places. Some elements of the SOM Plan (i.e. Constitution Gardens) have already been determined to be historically significant.

We understand that the first phase of the project will be limited to the three, eastern-most lawn panels and that the small, SOM-designed sidewalks which cross the Mall between 3rd and 7th Streets will be retained as is. To guide future phases of work, the NPS will conduct a study to evaluate a range of alternative treatments for the smaller SOM-designed sidewalks that cross the Mall further to the west.

Even if the SOM Plan is eligible, the corners of the lawn panels have been so eroded by "social paths" that the 90-degree angles no longer exist. And when considered in light of the National Mall's enormous scale, the introduction of rounded corners and granite curbs will only be slightly perceptible. All of the other visual intrusions associated with the project, such as the "crowning" of the panels to improve drainage, automatic sprinklers, underground cisterns and related equipment will also be only slightly perceptible or not noticeable at all.

Pages 4-55 and 4-57 of the EA commit NPS to conducting additional archaeological investigations, specifically a geoarchaeological or geomorphological study of the loess deposits near 4th St. These deposits were identified during an archaeological study by Berger (LeeDecker 2010). Given the limited window into the deeply buried deposits offered by the mechanical coring method used for the study, it is impossible to say with certainty that no archaeological resources are present in the project area. Completion of the recommended additional study is needed to ensure that resources are not adversely impacted but the project.

For the reasons outlined above, the DC SHPO concurs with the NPS determination of “no adverse effect” for the undertaking, conditioned upon further consultation regarding the appropriate treatment of the smaller sidewalks associated with the SOM Plan, and completion of the recommended additional geoarchaeological investigations.

If you should have any questions or comments regarding the historic built environment, please contact me at andrew.lewis@dc.gov or 202-442-8841. Questions relating to archaeology should be directed to Ruth Troccoli at ruth.troccoli@dc.gov or 202-442-8836. Otherwise, thank you again for providing this opportunity to review and comment on this important project.

Sincerely,



C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office