

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
STATE HISTORIC PRESERVATION OFFICER



August 17, 2012

Mr. Robert A. Vogel  
Superintendent  
National Mall and Memorial Parks  
National Park Service  
900 Ohio Drive, SW  
Washington, DC 20024-2000

RE: Proposal to Install Irrigation, Drainage, Water Collection Systems and Relandscape the Mall;  
Phases 2 and 3

Dear Mr. Vogel:

Thank you for continuing consultation with the DC State Historic Preservation Office (DC SHPO) regarding the above-referenced undertaking, which was formerly referred to as the “National Mall Turf and Soil Reconstruction Project.” We understand that Phases 2 and 3 will extend the renovations currently underway on the eastern end of the Mall to the lawn panels located between 7<sup>th</sup> Street and 14<sup>th</sup> Street. This letter provides further comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

The majority of the proposed work, including the installation of granite curbs, automatic sprinklers, underground cisterns, water lines, the “crowning” of the panels to improve drainage and related actions, was previously determined to have “no adverse effect” on the historic built environment and we see no reason to revise that determination for the next two phases of the project.

The National Park Service (NPS) developed three design concepts to evaluate the potential effects of the remaining work to be carried out. These concepts evaluated alternative dimensions and layouts for the lawn panels, the north-south walkways and a few of the Mall’s side panels. All three concepts varied in the manner in which they responded to the surrounding historic and urban contexts but, as indicated in your letter, one of the ultimate goals of each scheme was to respect the historical precedent of the continuous green or *tapis vert* that is such a critically important character-defining feature of the Mall.

With this goal in mind, we considered the possible effects of each of the three schemes in consultation with representatives from the NPS, the National Capital Planning Commission (NCPC), the Commission of Fine Arts (CFA) and others. Although each design concept would clearly alter the Mall by revising the dimensions and layout of the lawn panels, north-south walkways and/or side panels, we believe that none of the proposed alterations are likely to meet the criteria of adverse effect outlined at 36 CFR 800.5(a)(1).

We understand that Scheme 1 was recently endorsed by CFA with the caveat that the NPS reduce the width of the north-south walkways to less than the 120’ proposed in that design concept. We support this approach since reducing the width of the walkways will only further reinforce the *tapis vert* and help to ensure that no adverse effects will result.

With regard to archaeology, our previous “no adverse effect” determination was conditioned upon completion of the additional geoarchaeological investigations recommended in the Environmental Assessment. We understand that the work was completed last spring but, as of the date of this letter, we have not received a report on the additional investigations.

For the reasons outlined above, we have determined that Phases 2 and 3 of the undertaking will have “no adverse effect” on historic properties provided that:

1. the NPS will keep the DC SHPO informed as the designs are refined and will provide additional opportunities for us to comment if any revisions are proposed that would represent a significant departure from the three design concepts (e.g. walkways that are of greater width than any proposed in the three design concepts); and
2. the NPS will complete the archaeological investigations and forward draft and revised final reports to the DC SHPO in accordance with District of Columbia archaeological guidelines.

We appreciate the opportunity to continue consultation with the NPS and others on this important project and we look forward to the improved appearance and durability of the Mall that will eventually result. If you should have any questions or comments regarding the historic built environment, please contact me at [andrew.lewis@dc.gov](mailto:andrew.lewis@dc.gov) or 202-442-8841. Questions relating to archaeology should be directed to Ruth Troccoli at [ruth.troccoli@dc.gov](mailto:ruth.troccoli@dc.gov) or 202-442-8836.

Sincerely,



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