Executive Director’s Recommendation
Commission Meeting: June 7, 2018

PROJECT
South Mall Campus Master Plan
National Mall, between 7th Street, SW,
Jefferson Drive, SW, 12th Street, SW, and
Independence Avenue, SW
Washington, DC

SUBMITTED BY
Smithsonian Institution

REVIEW AUTHORITY
Approval of Master Plans for use by the
Commission
per 40 U.S.C. § 8722(a) and (b)(1)

NCPC FILE NUMBER
7630

NCPC MAP FILE NUMBER
1.41(05.00)44755

APPLICANT’S REQUEST
Approval of final master plan

PROPOSED ACTION
Approve final master plan with
comments

ACTION ITEM TYPE
Staff Presentation

PROJECT SUMMARY
The Smithsonian Institution (SI) has submitted the final South Mall Campus Master Plan for the
Commission’s review and approval. The purpose of the proposed Master Plan is to guide future
short-term and long-term renovation and development of the 17-acre campus that includes the
Smithsonian Institution Building (the Castle), the Quadrangle Complex (the Ripley Center, the
Arthur M. Sackler Gallery, the National Museum of African Art, and the Enid A. Haupt Garden),
the Freer Gallery of Art, the Arts and Industries Building, the Hirshhorn Museum and Sculpture
Garden, the Kathrine Dulin Folger Rose Garden and the Mary Livingston Ripley Garden.

SI proposes the Master Plan to meet its long-term space requirements and to address physical and
operational deficiencies across the campus that impact visitor use and experience as well as the
Smithsonian’s ability to effectively and safely implement its programs. This effort is a result of
work that began in 2012, at which time SI identified comprehensive goals and priorities for the
South Mall Campus.

NCPC is the lead agency under the National Environmental Policy Act (NEPA). To meet its NEPA
responsibilities, NCPC along with SI as the project owner, prepared a Draft Environmental Impact
Statement (DEIS). Public comments were received regarding the NEPA alternatives and impacts
through January 16, 2018. Three action alternatives (B, D, and F) were analyzed in the DEIS, in
addition to the no action alternative. SI, as project owner, has indicated that Alternative F best
meets their needs. At the April review of the draft master plan, the Commission expressed support
for SI’s preferred alternative. The Final EIS was released for a 30-day review period, which
concluded on May 21, 2018.
KEY INFORMATION

- The Smithsonian Institution is the world's largest museum, education, and research complex.
- The South Mall Campus is located on the National Mall, generally between Independence Avenue, Jefferson Drive, 12th Street and 7th Street, SW in Washington, DC.
- The campus includes a collection of world-renowned museums, anchored by the Smithsonian Institution Building, also known as the Castle.
- The proposed master plan will guide the development of the South Mall Campus over the next 20 to 30 years.
- Individual projects within the master plan will be designed and implemented when funding becomes available. The Smithsonian Institution will submit each project to the Commission for review and approval.
- The campus is 17 acres in size, and includes the Smithsonian Castle, Freer Gallery, Arts and Industries Building, Hirshhorn Museum and Sculpture Garden, the Quadrangle Building, the Sackler Gallery, the National Museum of African Art, the Haupt Garden, Ripley Garden, and Folger Rose Garden.
- The Quadrangle Building includes three below-grade levels, and access is provided to the Ripley Center, Sackler Gallery and National Museum of African Art through three separate pavilions.
- The Castle and Arts and Industries Building are National Historic Landmarks; the Freer Gallery is individually listed on the National Register; and the Hirshhorn Museum has been determined eligible for listing. The entire campus is within the National Mall Historic District.
- Twelve public and consulting parties meetings have been held over the last three years, and public input has assisted in the development of master plan alternatives.
- The Smithsonian Institution provided information presentations to the Commission in April 2016 and September 2017.
- The Commission reviewed the Concept Master Plan in January 2018, and provided comments on the draft master plan in April 2018. At that time, the Commission expressed support for SI’s preferred alternative as the basis of the master plan.
- The U.S. Commission of Fine Arts reviewed and approved the master plan on April 19, 2018.
- The Final EIS was released for a 30-day public review period that concluded on May 21, 2018.
- A programmatic agreement (PA) was prepared that outlines the process for subsequent consultation of individual projects implemented under the master plan, pursuant to Section 106 of the National Historic Preservation Act.
RECOMMENDATION

The Commission:

Approves the final South Mall Campus Master Plan as a guide for the development of the campus over the next 20 to 30 years.

Supports the goals of the South Mall Campus Master Plan, which address the Smithsonian’s need to meet its long-term space requirements and address physical and operational deficiencies across the campus that impact visitor use and experience as well as the Smithsonian’s ability to effectively and safely implement its programs.

Finds the master plan seeks to increase campus functionality, improve the visitor experience, and enhance connectivity both within the site and to the surrounding city and neighborhoods, while balancing planning, urban design and historic preservation goals.

Notes the Master Plan identifies elements and general locations of projects to be implemented over time; and further, that individual projects contained within the Master Plan, including new pavilions and gardens, will be subject to additional Commission review and approval at the time when detailed designs are developed.

Notes that at the April 5, 2018 meeting, the Commission supported SI’s preferred Alternative F as the basis for the master plan and the preferred alternative to be identified in the Final Environmental Impact Statement.

Notes that pursuant to the National Environmental Policy Act, the Final Environmental Impact Statement was released on April 20, 2018 and a Record of Decision (ROD), based upon the preferred alternative, was prepared.

Adopts the Record of Decision (ROD) for the South Mall Campus Master Plan Final Environmental Impact Statement.

Notes a Programmatic Agreement (PA) was prepared pursuant to Section 106 of the National Historic Preservation Act that describes the process and steps necessary for further consultation regarding the individual projects implemented as part of the master plan. The Smithsonian Institution will consult with the National Capital Planning Commission, District of Columbia State Historic Preservation Officer, National Park Service, and the Advisory Council on Historic Preservation, as well as other consulting parties, as the designs of individual projects are developed in order to avoid, minimize, and mitigate adverse effects to historic properties.

Finds that throughout the development of the master plan, many public comments were received, with a focus on retention of the campus gardens and preservation and protection of the historic buildings.
**Finds** that in response to those comments, the Smithsonian altered the initial master plan design to remove the large dip in front of the Castle, retain a garden setting in lieu of an expansive open lawn, include only minimal changes to the Hirshhorn site walls, eliminate the proposed realignment of Jefferson Drive, and reduce the proposed sub-basement excavation below the Castle.

**Notes** the U.S. Commission of Fine Arts reviewed and approved the master plan at its April 19, 2018 meeting.

**Reiterates** the findings that were the basis for the Commission’s support of the draft master plan:

- The Master Plan must consider the context of a changing city, particularly the SW Ecodistrict and Southwest Waterfront, which will change the character of Independence Avenue and the southern approach to the campus.

- The South Mall campus provides an important physical and cultural link between the Smithsonian Institution, the National Mall and Southwest Washington, DC; and further, this connection will be strengthened with the implementation of the master plan and continued coordination and collaboration among all stakeholders.

- The Castle is the physical and symbolic center of the Smithsonian Institution as well as the South Mall Campus, and therefore is the more appropriate location for a centralized visitor center.

- The relocation of a number of support facilities for the visitor center to an adjacent below-grade space will allow for the restoration of the Castle, including the Great Hall, to its period of significance while improving the visitor experience.

- The Smithsonian Institution has a need for large-scale event and exhibition space that does not exist elsewhere on the campus, and further, the Arts and Industries Building can provide that space in a way that is consistent with its historic use and character.

- Adding a visitor center and related uses into AIB would require adding new walls, rooms and other elements that would be inconsistent with the goals of the building restoration.

- The relocation of the pavilions will help improve the functionality of the below-grade Quadrangle Building spaces, and notes the new facilities and improved spaces will help provide additional programming, events and educational opportunities for residents and visitors.

- The relocation of the pavilions opens up the Haupt Gardens, the Smithsonian Castle, and the National Mall to Independence Avenue and the rapidly evolving southwest neighborhood.
• The relocated pavilions and addition of large-scale ramps to a lower level could alter the setting of the Castle and the Arts and Industries Building and may have undesirable effects on these two National Historic Landmarks.

• The Haupt Garden provides a view to and setting for the Castle as seen from the south; and further, the intimate character and scale of the existing garden is a beloved component of the South Mall campus, and is an important counterpoint to the scale and openness of the National Mall.

Requires that at the time of planning and design of the individual projects implemented under the master plan, the Smithsonian shall:

• Evaluate the size and scale of any proposed ramps or stairs to help minimize their impact on the setting of the Castle while balancing circulation and access needs. SI will further engage the relevant review agencies and consulting parties through the Section 106 process.

• Retain the parterre, and maintain a high-quality landscape for the Haupt Garden, along with its intimate character, when the exact design and layout of the remainder of the garden is determined. The design of the future garden should balance the desire to maintain a space of intimate character and scale, commensurate with its importance and prominence, with the need to improve the Quadrangle Building, and desire for greater access and visibility across the campus.

• Consider opportunities to reuse existing garden elements, where appropriate, to provide a link between the history of the garden and its future iterations.

• Evaluate opportunities to save, store and replant trees and other plantings after construction has been completed.

• Ensure the gardens will continue to accommodate a variety of native plants as well as those that will help support pollinator health.

• Ensure the garden design will prevent net loss of tree canopy in accordance with the policies set forth in the Comprehensive Plan for the National Capital.

• Ensure future project submissions for the sculpture garden describe the proposed program needs, the existing and proposed functionality of the space, and how the project might affect the garden’s original design intent.

Notes the Smithsonian has acknowledged they will use the Commission’s recommendations to inform the planning and design of the individual projects at the time of their development.
Notes that any changes to the master plan in the future will require review and approval by the Commission.

Notes the Smithsonian must coordinate with the National Park Service regarding any actions involving National Park Service land, including obtaining any necessary permits.

Notes that the Smithsonian must obtain from the District of Columbia all necessary permits for the temporary occupancy of, and permanent alterations to, public space under the jurisdiction of the District of Columbia.

PROJECT REVIEW TIMELINE

<table>
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<tr>
<th>Previous actions</th>
<th>April 2016 – Information Presentation</th>
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<tr>
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<td>September 2017 – Information Presentation</td>
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<td>January 2018 – Concept Review of Master Plan</td>
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<td>April 2018 – Review of Draft Master Plan</td>
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| Remaining actions (anticipated) | – Review of individual projects identified within the master plan, including further Section 106 consultation and NEPA review, when necessary |

PROJECT ANALYSIS

Executive Summary

Beginning in 2012, the Smithsonian Institution undertook an effort to identify comprehensive goals and priorities for the South Mall Campus. These goals focused on improving visitor service and education, creating clear entrances and connections between the museums and gardens, National Mall, and surrounding neighborhood, replacing aging building systems, and protecting the historic buildings and features of the campus. The master plan is intended to support the mission, responsibilities and functions of the SI, and provide a framework to guide future development.

These goals are generally consistent with many of the policies identified in the Visitors and Commemoration, Urban Design and Historic Preservation Elements of the Comprehensive Plan. The master plan must also consider how to accommodate change and modernization which considering the important buildings and landscapes found within the campus. As such, staff recommends the Commission supports the goals of the South Mall Campus Master Plan, which address the Smithsonian’s need to meet its long-term space requirements and address
physical and operational deficiencies across the campus that impact visitor use and experience as well as the Smithsonian’s ability to effectively and safely implement its programs.

At the April 2018 review of the draft master plan, the Commission indicated support for the Smithsonian Institution’s preferred Alternative F as the basis of the campus master plan and the preferred alternative to be identified in the Final Environmental Impact Statement (FEIS). The Commission also provided additional comments to be considered for the final master plan and as individual projects are developed. SI has reviewed and has concurred with the comments and acknowledges additional design analysis for each project will be necessary. Staff further notes that the Commission of Fine Arts reviewed and approved the master plan at their April 19, 2018 meeting.

The Final EIS was released for a 30-day public review period, and a record of decision (ROD) was prepared to conclude the NEPA process. In addition, pursuant to Section 106 of the National Historic Preservation Act, a programmatic agreement (PA) was prepared that outlines the review process for future project implementation under the master plan. Signatories to the PA include SI, NCPC, the District of Columbia State Historic Preservation Officer (DC SHPO), the National Park Service (NPS) and the Advisory Council on Historic Preservation (ACHP). The PA describes the process and steps necessary for further consultation regarding the individual projects implemented as part of the master plan. The Smithsonian Institution will consult with NCPC, DCSHPO, NPS, and ACHP, as well as other consulting parties, as the designs of individual projects are developed in order to avoid, minimize, and mitigate adverse effects to historic properties.

The master plan will provide a framework for the future development of the South Mall campus over the next 20-30 years. Future consultation on the individual project designs, pursuant to the Section 106 PA, as well as continued inter-agency and public participation will continue to inform implementation of the master plan. As such, staff recommends the Commission approve the final South Mall Campus Master Plan as a guide for the development of the campus over the next 20 to 30 years.

**Analysis**

**Overview**

The South Mall Campus Master Plan must respond to the Smithsonian’s current and anticipated needs, while balancing functionality, historic preservation and other goals. The master plan must also respond to a changing context, within a growing city with thriving neighborhood and residents, while remaining an international destination and flagship for the Smithsonian Institution.

As with other master plans reviewed by the Commission, the Master Plan identifies elements and general locations of projects to be implemented over time; and further, that individual projects contained within the Master Plan, including new pavilions and gardens, will be subject to additional Commission review and approval at the time when detailed designs are developed. While the master plan includes conceptual renderings and graphics of proposed improvements, the
Smithsonian will develop specific designs at the individual project stage. As the phasing of projects many impact implementation, the Commission requested a phasing plan be included in the draft master plan. SI has provided that plan to outline the expected timing of the major projects. The Castle and Hirshhorn restoration are expected to occur first.

The master plan is intended to support the mission, responsibilities and functions of the SI, and provide a framework to guide future development. The master plan emphasizes the importance of the South Mall in strengthening the connection between Southwest Washington, DC and the National Mall. The Castle, in particular, is highlighted as a “hub” for the campus, and a nexus of cultural connections for residents and visitors. Improvements to the physical link are proposed through the more open approach to the campus, while other connections to the community will be enhanced through improved operations and collaboration in the surrounding community. The much-loved gardens will continue to retain their character, even as improvements are made to below-grade spaces. As such, staff recommends the Commission find the master plan seeks to increase campus functionality, improve the visitor experience, and enhance connectivity both within the site and to the surrounding city and neighborhoods, while balancing planning, urban design and historic preservation goals.

**Master Plan Development**

The development of the master plan required compliance with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act. Through these concurrent processes, several master plan alternatives were developed, each attempting to achieve SI’s goals while considering impacts to the existing campus, including its setting and historic buildings. Alternative D formed SI’s initial concept of the master plan, and included the most dramatic changes to the campus, altering the character of the garden, the setting of the Castle and maximizing excavation under the Castle. Alternative B included more minimal changes to the campus, but it did not best achieve the goals of SI. In particular, it did not greatly improve the visitor experience, which is critical to the Smithsonian’s mission. Alternative F was then developed to balance changes to the campus with the need to meet the master plan goals. Alternative F retains the character of the gardens, reduces excavation under the Castle and maintains its setting.

NCPC, along with SI prepared a Draft Environmental Impact Statement (DEIS). Three action alternatives (B, D, and F) were analyzed in the DEIS, in addition to the no action alternative. Public comments were sought on the NEPA alternatives and impacts during a 60-day public comment period that ended on January 16, 2018. Nearly 100 comments were received, with a majority focused on maintaining the Haupt Gardens. Other comments focused on the future use of the Arts and Industries Building and the proposed changes to the Quadrangle pavilions.

At the April 2018 review of the draft master plan, the Commission indicated support for the Smithsonian Institution's preferred Alternative F as the basis of the campus master plan. The Commission supported the restoration of the Castle and acknowledged that as the physical and symbolic center of the Smithsonian, it is the appropriate location for a centralized visitor center. The Commission supported the restoration of the Arts and Industries Building, finding that SI had a need for large-scale event and exhibit space that could be accommodated there. The Commission
also supported improving the Quadrangle Building, and indicated that relocated pavilions and stairs may have undesirable effects on the National Historic Landmarks, and that further consultation is necessary in the development of individual designs. The Commission noted the master plan’s acknowledgment of the changing context, including a growing Southwest Waterfront, and provided a series of comments related to preserving the character and qualities of the campus gardens.

On April 20, 2018, the Final EIS was released for a 30-day review period. During that time, sixteen comments were received. Several comments expressed support for commitments to retaining the character of the gardens and preserving tree canopy, as requested by the Commission. Other commenters reiterated their previous concerns and opposition to changes to the gardens and pavilions. Recommendations regarding mitigation measures were also provided.

Staff recommends the Commission find that throughout the development of the master plan, many public comments were received, with a focus on retention of the campus gardens and preservation and protection of the historic buildings. Further staff recommends the Commission finds that in response to those comments, the Smithsonian altered the initial master plan design to remove the large dip in front of the Castle, retain a garden setting in lieu of an expansive open lawn, include only minimal changes to the Hirshhorn site walls, eliminate the proposed realignment of Jefferson Drive, and reduce the proposed sub-basement excavation below the Castle.

A record of decision (ROD) was prepared to conclude the NEPA process. Staff notes that while Alternative D was the Smithsonian’s initial concept, SI believes Alternative F, which takes into account the feedback received throughout the planning process, is the best approach, and as a result, forms the basis of the master plan. Alternative F was chosen as the Selected Alternative in the ROD, because it meets the project’s purpose and need, and best improves the visitor experience while balancing impacts to other resources. The Selected Alternative restores two National Historic Landmark buildings, maintains the character of the gardens, as well as the flat ground plane that forms the southern approach to the Castle. The Selected Alternative also reduces sub-basement excavation beneath the Castle and minimized changes to the site walls of the Hirshhorn Museum. It also enhances connections to the south by improving views and accessibility.

At the April 2018 review of the draft master plan, the Commission also provided additional comments to be considered for the final master plan and as individual projects are developed. SI has reviewed and has concurred with the comments and acknowledges additional design analysis for each project will be necessary. Staff believes reiterating these comments is appropriate, and therefore recommends the Commission require that at the time of planning and design of the individual projects implemented under the master plan, the Smithsonian shall:

- Evaluate the size and scale of any proposed ramps or stairs to help minimize their impact on the setting of the Castle while balancing circulation and access needs. SI will further engage the relevant review agencies and consulting parties through the Section 106 process.
• Retain the parterre, and maintain a high-quality landscape for the Haupt Garden, along with its intimate character, when the exact design and layout of the remainder of the garden is determined. The design of the future garden should balance the desire to maintain a space of intimate character and scale, commensurate with its importance and prominence, with the need to improve the Quadrangle Building, and desire for greater access and visibility across the campus.

• Consider opportunities to reuse existing garden elements, where appropriate, to provide a link between the history of the garden and its future iterations.

• Evaluate opportunities to save, store and replant trees and other plantings after construction has been completed.

• Ensure the gardens will continue to accommodate a variety of native plants as well as those that will help support pollinator health.

• Ensure the garden design will prevent net loss of tree canopy in accordance with the policies set forth in the Comprehensive Plan for the National Capital.

• Ensure future project submissions for the sculpture garden describe the proposed program needs, the existing and proposed functionality of the space, and how the project might affect the garden’s original design intent.

Because the comments will help inform the future project development, staff also recommends the Commission reiterate the findings that were the basis for the Commission’s support of the draft master plan.

Future Master Plan and Project Review

As the master plan is a guide for future development, individual projects contained within the Master Plan, including new pavilions and gardens, will be subject to additional Commission review and approval at the time when detailed designs are developed. NCPC, in consultation with SI, will also determine if additional NEPA analysis is necessary at that time. Projects will also be subject to review by the U.S. Commission of Fine Arts.

In addition, a Programmatic Agreement (PA) was prepared pursuant to the National Historic Preservation Act that describes the process and steps necessary for developing and evaluating the detailed designs for individual projects. The process seeks to further avoid, minimize and mitigate adverse effects on historic properties through additional consultation with the appropriate consulting parties and other agencies. Signatories to the PA include SI, NCPC, NPS and the Advisory Council on Historic Preservation (ACHP). The consulting parties provided comments for incorporation into the PA at a May 9, 2018 meeting.
Staff notes that any changes to the master plan will require review and approval by the Commission. These revisions may result from new program needs, or from changes resulting from the consultation process. The Smithsonian will need to continue coordinating with NPS regarding any actions that may involve NPS land, including permits. Further, SI will need to obtain from the District of Columbia all necessary permits for the temporary occupancy of and permanent alterations to public space under the jurisdiction of the District of Columbia. This will include approvals for the new Independence Avenue curb cut from the District’s Public Space Committee.

**CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE**

**Comprehensive Plan for the National Capital**

Staff has reviewed policies from the Urban Design, Historic Preservation, Parks and Open Space, and Visitors & Commemoration Elements, and the analysis and recommendations are intended to support consistency with the Comprehensive Plan.

**SW Ecodistrict Plan**

As noted previously, SI has considered the future implementation of the SW Ecodistrict Plan when considering the future context of the campus. The SW Ecodistrict Plan seeks to achieve a revitalized, mixed-use neighborhood and cultural destination; a well-connected community; a high performance environmental showcase, and an economically successful partnership for the area located just south of Independence Avenue.

**National Historic Preservation Act**

Pursuant to Section 106 of the National Historic Preservation Act, SI convened consulting parties to identify historic properties and assess adverse effects for the EIS alternatives. Input from the public has informed the alternatives. Many comments and concerns have focused on protecting the gardens and pavilions, as well as understanding the future of the AIB. As many effects from implementation of the master plan will not be identified until the individual projects are developed, a Programmatic Agreement (PA) was prepared that describes the process and steps necessary for addressing the specific impacts for those individual projects at the time of their implementation. The consulting parties reviewed the draft PA on May 9, 2018 and provided comments. It was noted that as the master plan is a framework for development, future projects must first seek to avoid adverse effects. Signatories to the PA include SI, NCPC, NPS and the Advisory Council on Historic Preservation (ACHP). Additional Section 106 consultation will be required throughout the life of the master plan.

**National Environmental Policy Act**

NCPC has approval authority over the individual projects included in the master plan and therefore NCPC is the lead federal agency for compliance with the National Environmental Policy Act.
(NEPA). NCPC has worked with SI to prepare a Draft Environmental Impact Statement (DEIS) to evaluate the potential environmental impacts resulting from implementation of the Master Plan. NCPC acts as lead federal agency for NEPA compliance and SI is the project owner. SI works with federal agencies on NEPA compliance when, as here, an SI project requires federal agency approval. The DEIS was available for public comment for a period of 60 days, ending on January 16, 2018. Nearly 100 public comments were received, many of which focused on retaining the Haupt Garden. In response, SI provided supplemental information for inclusion within the master plan that highlights the current issues with the Quadrangle Roof. In addition, a series of garden imagery was prepared that describe the expected design characteristics that would be employed when the project is developed.

Following the Commission’s April 2018 action, the Final EIS was released for a 30-day review period. During the review period, sixteen comments were received. Several commenters reiterated their previous concerns and opposition to changes to the gardens and pavilions. Other comments expressed support for commitments to retaining the character of the gardens and preserving tree canopy, as requested by the Commission.

Record of Decision

A record of decision (ROD) was prepared to conclude the NEPA process. The ROD describes the purpose and need for the master plan; the alternatives that were developed and analyzed; the selected alternative; and the proposed mitigations. The ROD also describes the review process and decision-making. A series of mitigation commitments are also provided, which SI will undertake as implementation commences. Mitigation measures relate to a variety of resource topics, including cultural resources (addressed through the PA) and transportation (as recommended by the District Department of Transportation (DDOT) in their FEIS comment letter). SI will develop a mitigation plan for each project that will describe how and when these measures will be implemented, as well as a monitoring strategy. The EIS and ROD will form the basis for future Commission reviews of individual projects submitted under the master plan. However, additional NEPA analysis may be required for individual projects.

CONSULTATION

Coordinating Committee

On May 16, 2018, the Committee reviewed the final master plan. Without objection, the Committee forwarded the proposed comments on the draft master plan to the Commission with the statement that the proposal has been coordinated with all participating agencies. Participating agencies included DDOT, the Department of Energy and Environment (DOEE, the Office of Planning, the Washington Metropolitan Area Transit Authority, the National Park Service, the General Services Administration and the State Historic Preservation Office. The SHPO indicated coordination was subject to satisfactory completion of the Section 106 Programmatic Agreement.
U.S. Commission of Fine Arts

The U.S. Commission of Fine Arts (CFA) reviewed the South Mall Campus Master Plan at an information presentation on January 22, 2015. Subsequently, the CFA reviewed the master plan at its January 18, 2018 meeting. On April 19, 2018, the CFA reviewed and approved the master plan. A copy of that action is attached.

ONLINE REFERENCE

The following supporting documents for this project are available online:

- Submission Package

ATTACHMENTS

1. Powerpoint
2. U.S. Commission of Fine Arts Letter
3. Record of Decision
4. Programmatic Agreement
5. Comment Letters
ATTACHMENT 1
NCPC File #7630
South Mall Campus Master Plan
National Mall
Washington, DC

Smithsonian Institution
Final Master Plan Review
Site Context

PROJECT NAME:
South Mall Campus Master Plan

LOCATION:
South Mall Campus

Smithsonian Institution Building
1000 Jefferson Dr SW
Washington, DC 20560

Arts and Industries Building
900 Jefferson Dr SW
Washington, DC 20560

Freer Gallery of Art
1050 Independence Ave SW
Washington, DC 20560

Hirshhorn Museum and Sculpture Garden
Independence Ave & 7th St SW
Washington, DC 20560

Quadrangle Building
1000 Independence Ave SW
Washington, DC 20560
INTRODUCTION
REGIONAL CONTEXT - MEMORIALS AND CULTURAL AND HISTORICAL LANDMARKS
A series of work sessions were held among the Smithsonian South Campus stakeholders. These sessions outlined the issues impacting the campus and potential directions for addressing the future.
INTRODUCTION

VIEW OF HISTORICAL BUILDINGS

Castle View Preservation:
As the oldest and most iconic building on the National Mall, the Castle should remain prominent and clearly visible to visitors arriving from all directions. Its presence on Independence Avenue will also become important as the SW Eco-district continues to develop in the future.

Campus Views:
Views to historical buildings on the campus will be maintained, restored, and improved to be clearly visible by visitors arriving from all directions.
PUBLIC REALM AND VIEWSHEDS
CASTLE AS HUB

NATIONAL MALL

CULTURAL /
MUSEUMS

88% OF PEOPLE WORLD-WIDE ASSOCIATE THE CASTLE WITH THE SMITHSONIAN, WHICH IN ADDITION TO ITS CENTRAL URBAN LOCATION, IS THE NATURAL LOCATION FOR THE VISITOR CENTER. THE CREATION OF THE VISITOR CENTER ENHANCES THE PHYSICAL CONNECTION TO THE QUAD MUSEUMS, PROGRAMMING AND AIB

WATER FRONT /
THE WHARF

GREEN OPEN SPACE /SW
ECODISTRICT
GOALS AND OBJECTIVES

- **Restore and Renovate**
  - Restore and renovate historic buildings

- **Accessibility**
  - Improve access for persons with disabilities

- **Connect**
  - Improve circulation and connectivity within campus and to adjacent context

- **Gardens**
  - Provide diverse gardens for visitor recreation and education

- **Visibility**
  - Improve visibility of below grade museums

- **Education**
  - Increase education spaces

- **Events**
  - Provide additional museum and event space

- **Visitor Services**
  - Create and expand visitor services

- **Activate**
  - Ensure that the campus can be active from morning to night.

- **Loading**
  - Improve and expand underground loading space

- **Security**
  - Update perimeter and building security

- **Sustainable Systems**
  - Establish a central utility plant to reduce GHG emissions and energy costs

- **Museums**
  - Improve facilities and accommodate growth
PROPOSED DEVELOPMENT / LAND USE PLAN

ALTERNATIVE D COMMENTS

CHARACTER OF GARDENS
The Haupt Garden appears too park-like.

HISTORICAL SETTING OF CASTLE
Sloped grade at visitor entry creates the impression of the Castle sitting on a glass plinth.

EXTENT OF EXCAVATION
Two levels of excavation beneath the Castle that extend towards Jefferson and the Quad.
PROPOSED DEVELOPMENT / LAND USE PLAN
ALTERNATIVE F STRATEGIES

CHARACTER OF GARDENS
Updated gardens take inspiration from the intimate characteristics of the existing gardens.

HISTORICAL SETTING OF CASTLE
Haupt Garden retains a level relationship to the Castle.

EXTENT OF EXCAVATION
Limited excavation beneath the Castle.
PROPOSED DEVELOPMENT / LAND USE PLAN
EXCAVATION COMPARISON - QUAD

EXISTING

ALTERNATIVE D

ALTERNATIVE F

BASEMENT LEVEL 1

BASEMENT LEVEL 2

BASEMENT LEVEL 3

20% LESS EXCAVATION THAN ALT D

☐ EXISTING EXCAVATED AREA

NEW EXCAVATION

BASEMENT RENOVATION
Alternative F maintains the character of the parterre and optimizes changes to grade. Gardens focus on creating both intimate and education spaces. Pavilions provide accessible entry to visitor center. Increased visibility and access entries from the Mall, new museum Pavilions, direct access from garden to amenities, cohesive Campus circulation, connections between the Castle and Quadrangle are all added. In addition to circulation enhancements, Campus infrastructure will be developed. At the Castle, seismic reinforcement will be installed in conjunction with a central utility plant. To better segregate exhibit, event, and trash delivery / transfer an enlarged below grade central loading dock will be built. Related to the construction of a central loading facility, the Ripley pavilion will be demolished. At the east end of the campus, a new lower level Sculpture Garden gallery will be installed, as well as an expansion of the existing tunnel.
MASTER PLAN DEVELOPMENT
ALTERNATIVE F - SCOPE BELOW GRADE

[Diagram showing scope below grade with labels for various areas: Demolition, Renovation/Restoration, Existing Excavation, Reconfiguration, New Construction]
PROPOSED DEVELOPMENT / LAND USE PLAN
RESTORE CASTLE

RESTORE CASTLE TO ITS PERIOD OF SIGNIFICANCE, 1845-1910
PROPOSED DEVELOPMENT / LAND USE PLAN
CONSOLIDATE LOADING RAMP.

REMOVAL OF QUAD LOADING ALLOWS FREER TO INTEGRATE WITH HAUP'T GARDEN

AIR AND QUAD LOADING AREAS TO BE RELOCATED AND CONSOLIDATED
Centralize and Modernize Loading

PROPOSED DEVELOPMENT / LAND USE PLAN
CAMPUS LOADING

LOADING CONNECTION TO AIB, CASTLE, QUAD AND FREER

CONSOLIDATED LOADING AT BASEMENT LEVEL 2
Improve Connectivity, Educational Space and Amenities
Centralize and Modernize Utilities
Existing Quadrangle
Improved Access

PROPOSED DEVELOPMENT / LAND USE PLAN
ACCESS TO MUSEUM VISITOR CENTER

ACCESS TO BELOW GRADE VISITOR AMENITIES
**Improved Access**

- **Proosed Development / Land Use Plan**
  - Relocate and reduce pavilions

- **Relocated Entrances**
  - Consolidate access, services, and screening

- **Smaller Pavilions**
  - Increase views of the castle, Alb and Freer

- **Pavilion Location**
  - Creates visibility from mall, provides mall facing entries and respects the McMillan line

- **Quad Museums**
  - Are the only museums on the campus without a door on the mall

---

(Credit: National Capital Planning Commission)
Improved Daylighting

PROPOSED DEVELOPMENT / LAND USE PLAN

EXPAND SKYLIGHTS

EXPANDED SKYLIGHTS BRING DAYLIGHT INTO THE CASTLE BASEMENT AND QUAD
PROPOSED DEVELOPMENT / LAND USE PLAN
CONSOLIDATE VISITOR CENTER & MUSEUM ACCESS

ELEVATOR ACCESS

CONSOLIDATION OF ENTRIES PROVIDES GENEROUS OFFSET FROM CASTLE FACADE
Enhance Cross-Campus Circulation
PROPOSED DEVELOPMENT / LAND USE PLAN

MAINTAIN A PARTERRE

PARTERRE AND RENWICK GATES PRESERVED AS A FORECOURT TO THE CASTLE
Incorporate Intimate Gardens
Incorporate Terrace Gardens
PROPOSED DEVELOPMENT / LAND USE PLAN
EAST WEST CIRCULATION

EAST WEST PATHS

EAST WEST PATHS
PROPOSED DEVELOPMENT / LAND USE PLAN
SW ECO DISTRICT CONNECTION

CONNECTS TO BANNEKER PARK AND THE WHARF
Connect to SW DC
ATTACHMENT 2
CFA 19/APR/18-1

LOCATION:
Independence Avenue, SW
Washington, DC

OWNER:
Smithsonian Institution

PROPERTY:
Smithsonian facilities, south side of the National Mall (South Campus)

DESCRIPTION:
Draft master plan

REVIEW TYPE:
Final

PREVIOUS REVIEW:
CFA 18/JAN/18-2

Letter

26 April 2018

Dear Mr. Horvath:

In its meeting of 19 April, the Commission of Fine Arts reviewed the proposed South Campus Master Plan for the properties of the Smithsonian Institution on the south side of the National Mall between 7th and 12th Streets, SW. The Commission approved the master plan as a basis for proceeding with the design of the plan’s components, and provided the following comments.

The Commission members thanked the project team for the concise summary and the clear presentation responding to their previous concerns, and they acknowledged both the complexity of the undertaking and the potential benefits of improving many aspects of the Smithsonian’s operations, including circulation, visibility, and visitor experience. They expressed overall support for the project, which now proposes new programming for the Arts & Industries Building and less excavation under the Castle; however, they noted the challenges to be faced in future design phases, such as accommodating the new truck access and loading facility, and the potential reconfiguration of access to the Arthur M. Sackler Gallery and the National Museum of African Art beneath the Quadrangle. Citing the sightline studies presented, they agreed that the plan to relocate the entrances to the underground museums to new portals farther north would open up views toward the historic museum buildings and create more street presence for the Enid A. Haupt Garden—transforming this area into a vital connection point between the National Mall and the adjacent Southwest Ecodistrict. They suggested that the designs for the new entrance pavilions could be informed by the collections and programs of the museums they would serve.

For the development of the design of the Haupt Garden, they expressed support for the general landscape plan, which would allow for the creation of a new garden imbued with important design characteristics derived from the existing one—such as intimacy and shade—as an alternative to a previously presented plan to construct a smaller, compromised parterre in place of the one to be demolished. They said that the revised plan presents an opportunity to create an innovative garden design expressive of the Smithsonian’s mission to educate the public, revealing the layers of a living landscape planted on the rooftop of the renovated underground museum complex. They also suggested informing the future landscape design with the philosophy and legacy of Enid A. Haupt, one of the country’s great horticultural patrons; this could include devising inventive and sustainable methods to adapt the landscape to climate change.

The Commission looks forward to reviewing submissions for each of the component projects of this master plan as designs for the architecture and landscape are developed.

Sincerely,

/s/Thomas E. Luebke, FAIA
Secretary

Albert Horvath
Under Secretary for Finance and Administration & Chief Financial Officer
Smithsonian Institution
P.O. Box 37012
Washington, DC 20013-7012

cc: Aran Coakley, Bjarke Ingels Group
Marcel Acosta, National Capital Planning Commission
ATTACHMENT 3 & 4
SOUTH MALL CAMPUS MASTER PLAN

Smithsonian Institution
National Mall
Washington, DC

June 7, 2018

Record of Decision

Statement of Decision

The National Capital Planning Commission (NCPC or the Commission) finds that the requirements of the National Environmental Policy Act (NEPA) of 1969 have been satisfied for the South Mall Campus Master Plan as proposed by the Smithsonian Institution (SI). NCPC, acting as lead federal agency, along with the SI as the project owner, and in cooperation with the National Park Service (NPS), have prepared an Environmental Impact Statement (EIS) pursuant to the Council on Environmental Quality’s (CEQ) Regulations of Implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1508); NCPC’s implementing regulations (1 CFR § 601); and the National Capital Planning Act (40 United States Code [USC] § 8722 (a) and (b)(1)) (master plans) and (40 USC 8722 (b)(1) and (d)) (individual projects) to evaluate the potential environmental impacts associated with implementing the South Mall Campus Master Plan. The master plan alternative was selected through a multi-year Alternatives Analysis / Draft Environmental Impact Statement, Final Environmental Impact Statement (FEIS), and National Historic Preservation Act (NHPA) Section 106 consultation process.

Project Background

South Mall Campus includes the Smithsonian Institution Building, the Arts and Industries Building, the Freer Gallery of Art, the Quadrangle Building, and the Hirshhorn Museum and Sculpture Garden, and associated Gardens and landscaped settings. In Spring 2012, prior to engaging an architectural team for the South Mall Campus Master Plan, the SI conducted a facilitated retreat with a Steering Committee drawn from senior SI leadership (including representation from the Secretary; Regents Facilities Committee; Undersecretary for Finance and Administration; Assistant Secretary for Education and Access; Undersecretaries for Science and History, Art, and Culture; Chief of Staff to the Secretary, Director of Advancement and Philanthropic Giving; General Counsel; museum directors; and other senior leaders) to develop a statement of project goals and priorities for the South Mall Campus.
The proposed Master Plan has four primary goals:

- To preserve and protect the historic buildings and features of the South Mall Campus;
- To improve and expand visitor services and education;
- To create clear accessible entrances and connections between the museums and gardens of the South Mall Campus, the National Mall, the neighborhood; and
- Replace aging building systems that have reached the end of their lifespan.

Using the statement of project goals, existing and future project needs were identified. These were synthesized into seven key priorities described below:

- Enter & Experience – Make points of entry clearer, more accessible, and easier to find through improved orientation, wayfinding, and location.
- Upgrade the Underground – Better utilize the existing below-grade space through clearer circulation, increased daylighting, and easier access to amenities.
- Activate the Afterhours – Provide the experiential, program, and technical capacity to support active nightlife within the South Mall Campus museums and gardens.
- Expand Education – Update and expand educational facilities to provide greater flexibility, incorporate new technology, and connect with other SI programs.
- Engage the Gardens – Capitalize on the beauty and popularity of the existing gardens by improving circulation, providing better maintenance facilities, integrating with museum programs, and expanding their ability to accommodate large groups.
- Connect the Campus – Improve circulation across the campus to encourage entry from the National Mall, facilitate east-west pedestrian flow both at- and below-grade, and remove impediments to a connected campus.
- Convene & Collaborate – Provide opportunities and venues for pan-institutional collaboration, meetings, and events. Pan-institution refers to activities that may occur across the Smithsonian.

The seven key priorities shaped the purpose and need for the proposed Master Plan.

**Purpose and Need of the Proposed Action**

The South Mall Campus Master Plan will guide future short-term and long-term renovation and development of the 17-acre campus. The proposed Master Plan will be implemented over a period of approximately twenty years and as funding allows beginning in 2018. The purpose of a proposed South Mall Campus Master Plan is to guide future short-term and long-term renovation and development of the 17-acre area known as the South Mall Campus, which includes the Smithsonian Institution Building (the Castle), the Quadrangle Building (the Dillon Ripley Center, the Arthur M. Sackler Gallery, the National Museum of African Art (NMAfA), and its rooftop Enid A. Haupt Garden), the Freer Gallery of Art, the Arts and Industries Building (AIB), the Hirshhorn Museum and Sculpture Garden, the Katherine Dulin Folger Rose Garden, and the Mary Livingston Ripley Garden.

The Master Plan is needed to meet SI’s long-term space requirements and to address physical and operational deficiencies across the campus that impact visitor use and experience as well as SI’s
ability to implement its programs effectively and safely. SI identified the following needs for the campus:

- Restore, repair, and rehabilitate historic properties;
- Replace roofs and building systems that are at the end of their useful lives;
- Improve accessibility and usability by individuals with disabilities;
- Improve circulation throughout the campus, including creation of a clear east-west at-grade pedestrian connection from the east side of the Freer Gallery to the Hirshhorn Museum Plaza;
- Improve access and visibility from the National Mall and the Castle for the NMAfA and Sackler Gallery entrances;
- Create expanded and linked centralized visitor services and education spaces;
- Provide additional museum and event space;
- Establish a new central utility plant and related infrastructure to reduce energy and operating costs and greenhouse gas (GHG) emissions;
- Provide expanded below grade loading and delivery facilities serving the Quadrangle Building, Castle, AIB and Freer buildings; and
- Update security measures to meet SI and federal requirements.

Rationale for Decision

This Record of Decision (ROD) documents the specific components of and reasons for NCPC’s decision. This decision is based on analyses contained in the Draft Environmental Impact Statement (EIS) issued November 2017; the Final EIS issued in April 2018; the comments of NCPC, other Federal, State, and local agencies, members of the public, and elected officials; and other information in the administrative record. The decision to choose the Selected Alternative as the basis for NCPC’s review of future projects involved balancing SI goals, resource concerns and public interests. NCPC reached its decision after careful consideration of the environmental analysis of effects of the Action Alternatives and the No-Action Alternative in concert with the needs of the Smithsonian Institution.

The Selected Alternative (Alternative F) best meets the purpose and need, while balancing potential impacts. The alternative addresses the Smithsonian Institution’s long-term space requirements and addresses physical and operational deficiencies across the South Mall Campus that impact visitor use and experience, as well as the Smithsonian Institution’s ability to implement its programs effectively and safely. Alternative F restores two National Historic Landmark buildings, maintains the character of the gardens, as well as the flat ground plane that forms the southern approach to the Castle. It also minimizes sub-basement excavation beneath the Castle and minimizes changes to the site walls of the Hirshhorn Museum Plaza. Alternative F seeks to accommodate campus improvements in balance with planning, historic preservation and urban design goals.

The master plan is a guide for project implementation over the next 20-30 years. Specific designs of each project will be further assessed, including their impacts, when they are developed in detail. Individual projects will also require review and approval by the Commission. Additional review,
as required by NEPA and the Programmatic Agreement (PA) developed pursuant to Section 106, will be required at that time.

**Selected Alternative Description**

Alternative F: *Maintain Flat Plane on Castle Axis* was selected as the preferred alternative to guide future implementation of South Mall projects. Alternative F provides increased visibility and access to entries from the National Mall, new museum pavilions, direct access from garden to amenities, cohesive Campus circulation, and connections between the Castle and Quadrangle.

Expanded visitor services will be constructed below-grade, extending from the Castle basement to the Quadrangle Building. They will be accessed via the existing north and south Castle entrances, via stairs or elevators from the Great Hall, and via new public stairways from the Haupt Garden. The basement level of the Castle will be lowered to create usable public interior spaces. Visitor amenities, including dining and a museum shop will be located at the new lower level to enable restoration of the historic above-grade public spaces of the Castle. This reconfiguration will improve and accommodate future growth in visitor services. The amount of space for Smithsonian Associates and other educational programs will increase and a new assembly space will be accommodated at the north end of the reconfigured Quadrangle Building. Importantly, the visitor services and education spaces will be adjacent and connected and will provide the Smithsonian with a location that includes a central large assembly space with adjacent smaller rooms for breakout sessions, a requirement for many conferences, and educational programming. This will significantly improve the Smithsonian’s ability to host scientific meetings and similar gatherings.

Alternative F reconfigures the Quadrangle Building to better meet the program needs of the Sackler Gallery and the NMAfA and the Smithsonian education programs currently housed there. A key priority for the museums is locating their above grade entrances closer to the Castle Visitor Center and the National Mall, providing better visitor access. Relocation will also allow the below-grade public spaces to be consolidated, improving access to the new assembly and education spaces in the Visitor Center. The two new entrance pavilions will be smaller than the current three pavilions, increasing the area available for the Haupt Garden. The museums currently are adjacent but separated so that there is little ability to share space and activities and to circulate between them. Alternative F will provide greater connectivity between the museums and Castle Visitor Center below-grade, supporting the increasingly pan-Institutional emphasis in Smithsonian programming and research. This alternative will provide the ability for each museum to expand both galleries and back of house spaces while maintaining required separations between public space and collections processing and storage space. The roof structure of the Quadrangle building will be replaced and will include a reconfigured and expanded Haupt Garden in its current location on grade. Alternative F will allow the Smithsonian to retain many of the characteristics and some of the specific features of the present Haupt Garden when the detailed design is developed.

At the Hirshhorn Museum and Sculpture Garden, Alternative F will provide substantial expansion of gallery space suited to large contemporary artworks through a redesign of the Sculpture Garden. The sculpture garden will remain below the level of the National Mall, and new gallery space will be provided below-grade. These new galleries will be connected back to the museum through an expansion of the existing tunnel beneath Jefferson Drive to reconfigured basement level public space. The Hirshhorn Museum has recently enjoyed a substantial increase in visitation, and this
expansion below grade will allow it to better serve its visitors and support its ambitious program of changing exhibitions and educational programs.

In addition to circulation enhancements, Campus infrastructure will be developed. At the Castle, seismic performance will be improved in the structural design of the restoration. A central utility plant will be installed at the unexcavated area between the east foundation wall of the Quadrangle and the west foundation of the AIB. To better separate exhibit, event, and trash materials handling, an enlarged below grade central loading dock will be built with the entrance located to the west of the Freer Gallery. Related to the construction of a central loading facility, the Ripley Pavilion will be demolished.

Regarding Alternative F, SI will:

**Castle**
- Excavate a limited sub-basement area beneath the west end of the building footprint to provide loading
- Excavate the existing basement level to create usable public space
- Construct new below-grade Visitor Center in previously unoccupied area between Castle basement and Quadrangle Building

**Quadrangle Building and Haupt Garden**
- Construct exterior entrance stairs to the Visitor Center at north edge of Quadrangle Building and Haupt Garden
- Expand the Haupt Garden, while remaining at grade
- Reconfigure gardens and pathways within the former footprints of the museum pavilions and loading dock
- Maintain intimate garden spaces and Gates in the Haupt Garden
- Remove Sackler Gallery and NMAfA museum pavilions and construct new entry pavilions closer to the National Mall
- Expand extent of skylights around the Quadrangle Building and Castle
- Reestablish historic view of the Washington Monument from south of the Castle.
- Improve historic view of Castle from Independence Avenue, SW

**Hirshhorn Museum and Sculpture Garden**
- Remove a small portion of west-facing Hirshhorn Plaza wall to create east-west circulation.
- Expand the tunnel from the Hirshhorn Plaza to the Sculpture Garden
- Reconfigure the Sculpture Garden to add new below-grade galleries. The Sculpture Garden will maintain a recessed relationship to the National Mall

**Utilities**
- Construct a new multi-story below-grade utility plant in the unexcavated area west of AIB
- Construct a new below-grade loading facility with entrance located to the west of the Freer Gallery
Freer Gallery

- Create an accessible entrance on the east elevation

Alternative F was chosen as the Selected Alternative, because it meets the project’s purpose and need, and best improves the visitor experience while balancing impacts to historic properties and other resources. The Selected Alternative restores two National Historic Landmark buildings, maintains the character of the gardens, as well as the flat ground plane that forms the southern approach to the Castle. The Selected Alternative also minimizes sub-basement excavation beneath the Castle and minimized changes to the site walls of the Hirshhorn Museum.

Alternatives Considered

Six master plan Alternatives (A through F) were developed (see Attachment (1)). Three Action Alternatives (B, D, and F) were advanced and evaluated in the DEIS and FEIS, in addition to the no action alternative. Alternatives C and E were dismissed from further review. The alternatives explored how to achieve the master plan needs, while balancing program, functionality, planning, urban design and historic preservation goals. SI held twelve public and consulting party meetings over the last three years, with feedback informing the alternative development. Throughout the process, public comments focused on how to minimize impacts on historic resources, as well as to protect the garden spaces. As a result, the alternatives consider a range of alterations to the campus, and primarily differ in their level of above- and below-ground change.

Alternative B: Limited Above-ground Change

In this alternative, above grade changes will be minimized while still accommodating improvements to the South Mall Campus’ infrastructure. For the Quadrangle Building, the current museum pavilions will remain. Consideration will be given to relocating the entrances to the existing full height pavilion windows facing north to provide greater visibility from the Castle and north side of the Haupt Garden. Alterations to the Haupt Garden will be limited to replacement of the Quadrangle Building’s roof membrane and improvements to circulation. Seismic protection will be added to the Castle. Related to the construction of a central loading facility, the Ripley Pavilion will be demolished. At the east of the Hirshhorn Museum, the Sculpture Garden wall and existing tunnel will be restored. To better separate collections deliveries from other materials handling, including food, trash and recycling; and to allow trucks to maneuver within the underground loading facility rather than on the street, and to facilitate east-west circulation across the campus; an enlarged below grade central loading dock will be built.

Below-grade changes will be limited to those needed to create a minimal public connection to the Castle and Visitor Center, and to connect the new loading and mechanical facilities to the existing circulation and air distribution systems of the Quadrangle. The remaining portions of the former Sackler loading dock will be repurposed for back-of-house support. The Smithsonian Associates offices and NMAfA and the Sackler Gallery museum uses will be expanded into space made available by the relocation of some or all the classroom and Discovery Theater education spaces to the new Castle Visitor Center. The internal connections between visitor amenities and educations spaces is not improved as the circulation cores are not relocated. Conflicts would remain as public spaces and circulation would pass through secured museum collections spaces.
As documented in the Final EIS, following the presentation of Alternative F to the Consulting Parties at its May 2017 meeting, SI considered alternative plans to incorporate the operational efficiencies of Alternative F in such a way that will not intensify or create new adverse effects within Alternative B. The resulting modified Alternative B incorporated a central utility plant within the unexcavated area between the existing Quadrangle and AIB.

This alternative was not selected as it did not greatly improve circulation or improve access and visibility from the National Mall and the Castle for the NMAfA and Sackler Gallery entrances. Alternative B also did not link centralized visitor services and education spaces as well as Alternative F, which included relocated pavilion and circulation cores within the Quadrangle Building. While Alternative B minimized impacts on cultural resources, it did not improve connectivity to surrounding land uses or improve visibility to the various museums that form the core of the South Mall campus.

**Alternative D: Plane Changes Above and Below Grade**

Alternative D includes the most significant above- and below-grade changes to the campus. New museum pavilions would be created. A new below grade visitor amenities and education center extending from the Castle basement to the Quadrangle Building will be accessed via a sloped Haupt Garden that provides for an at grade garden entrance and windows to the garden. Visitor amenities including dining and museum shop will be located at the new Visitor Center so as to enable a less encumbered restoration of the historic above grade public spaces of the Castle. The amount of space for Smithsonian Associates and other educational programs will also significantly increase and will be housed in the Visitor Center as well as at the north end of the reconfigured Quadrangle building. Importantly, the Visitor Center and education spaces will be adjacent and connected and will provide the Smithsonian with a location that includes a central large assembly space with adjacent smaller rooms for breakout sessions, a requirement for many conferences. This will significantly improve the Smithsonian’s ability to host scientific meetings and similar gatherings as there are no comparable venues currently.

Alternative D reconfigures the Quadrangle Building to better meet the program needs of the Sackler Gallery and NMAfA and the Smithsonian education programs currently housed there. A key priority for the museums is the location of their entrances closer to the Castle Visitor Center and the National Mall, providing better visitor access as well as benefitting from the ability to share direct access to amenities including the new assembly and education spaces in the Visitor Center. The museums currently are adjacent but separated so that there is little ability to share space and activities and to circulate between them. Alternative D will provide greater connectivity between the museums, supporting the increasingly pan-Institutional emphasis in Smithsonian programming and research. This alternative will provide the ability for each museum to expand both galleries and back of house spaces while maintaining required separations between public space and collections processing and storage space. The roof of the building will include a substantially reconfigured and expanded Haupt Garden with direct access to the Visitor Center amenities and education spaces and improved ability to host educational programs and events in the garden.

At the Hirshhorn Museum, Alternative D will provide substantial expansion of gallery space suited to large contemporary artworks through a redesign of the Sculpture Garden that will raise the level
of portions of the garden with the new galleries located below. These new galleries will be connected back to the museum through an expanded tunnel beneath Jefferson Drive to reconfigured basement level public space. The Hirshhorn Museum has recently enjoyed a substantial increase in visitation and this expansion below grade will allow it to better serve its visitors and support its ambitious program of changing exhibitions and educational programs.

In addition to circulation enhancements, Campus infrastructure will be developed. At the Castle, seismic protection will be installed in conjunction with a central utility plant. To better separate collections from other materials handling, including events, trash, recycling and food service; an enlarged below grade central loading dock will be built. Related to the construction of a central loading facility, the Ripley Pavilion will be demolished.

This alternative was not selected as it resulted in the most significant impacts to the historic properties, in particular the large-sloping lawn altered the setting of the Castle; removed large portions of the Hirshhorn site walls; and included a large sub-basement level of excavation beneath the Castle. Alternative F was developed in response to concerns raised regarding these components, and ultimately met the project’s purpose and need, while minimizing impacts as compared to Alternative D.

Alternatives Dismissed From Further Analysis in the EIS

Alternative A: Limited Below-ground Changes

Alternative A minimizes above and below grade changes while still accommodating improvements to the South Mall Campus’ infrastructure. Throughout the ongoing maintenance of buildings and systems, the facilities would be kept operable. Seismic protection would be added, and the Castle basement floor to ceiling height would be increased. Existing loading facilities will remain. The existing maintenance program for individual mechanical systems will continue. Mechanical systems will remain on General Services Administration (GSA) supplied steam and chilled water. The Quadrangle Building roof will be replaced under Alternative A.

Alternative A will have the least impact on the existing configuration of buildings; however, this alternative was dismissed because it did not meet the purpose and need of the South Mall Campus Master Plan.

Alternative C: Maintain Flat Plane with Changes Above and Below Grade

Alternative C will increase the visibility of access entries from the National Mall, construct new museum pavilions, create cohesive Campus circulation, and connect the Castle and Quadrangle Building. In addition to circulation enhancements, Campus infrastructure will also be developed. At the Castle, seismic protection will be installed. A central utility plant would be built beneath the Castle basement. To better separate exhibit, event, and trash delivery/transfer, an enlarged below grade central loading dock will be built. Related to the construction of a central loading facility, the Ripley Pavilion will be demolished. At the Hirshhorn, a new lower level Sculpture Garden gallery will be installed, as well as an expansion of the restored tunnel.
While Alternative C meets the purpose and need, it is similar to Alternative F. After reviewing with the Consulting Parties, it was agreed that Alternative C should be dismissed since its major components were shared with Alternatives D and F, and Alternative F more fully addresses the concerns raised through the NHPA Section 106 process.

**Alternative E: Maintain Character of Gardens and Minimize Plane Changes**

Alternative E was developed to address Consulting Parties comments about the preservation of the Haupt Garden’s existing features and configuration. The plan utilizes a sloped entry to the Visitor Center as found in Alternative D, with the Haupt Garden features integrated to provide access to the Visitor Center. After consideration, Alternative E was dismissed from further analysis because sloping the Haupt Garden into the entry for the Visitor Center did not preserve the character of the Haupt Garden and its features or the historic setting of the Castle.

**Environmentally Preferred Alternative**

The Council on Environmental Quality (CEQ) Regulations §1505.2 requires federal agencies including NCPC to "identify all alternatives considered by the agency in reaching its decision, specifying the alternative or alternatives which were considered to be environmentally preferable." The environmentally preferable alternative(s) have been outlined by resource area to reflect the balanced approach necessary when evaluating a long-term master plan. Table (1), below, identifies the resource and relevant alternative.

**Table 1. Environmentally Preferred Alternative Analysis**

<table>
<thead>
<tr>
<th>Resource Area</th>
<th>Reasoning for the Environmentally Preferable Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Soils</td>
<td>There would be no major excavation of soils under the No-Action Alternative and there would be no changes in the topography of the site. The No-Action Alternative will provide the least damage/change to the physical environment.</td>
</tr>
<tr>
<td>Seismic</td>
<td>Alternatives B, D, and F best provide the best seismic protection by providing seismic upgrades to the Castle and the AIB, which will lessen the seismic vulnerability of the South Mall Campus.</td>
</tr>
<tr>
<td>Stormwater Resources</td>
<td>Alternatives B, D and F will have beneficial impacts on stormwater management through the reduction of impervious surface, installation of a stormwater capture and reuse system, and provision of green infrastructure. One or more cisterns will be provided to capture, store and reuse stormwater drainage from the Castle and AIB roofs and other areas as feasible. Oil-water separators will be installed in the central loading facility and ramp to ensure that no contaminated water enters the cisterns or drains offsite. Alternatives D and F include smaller pavilions and therefore could allow for greater planting areas.</td>
</tr>
<tr>
<td>Air Quality</td>
<td>Long-term air quality improvements will occur under Alternatives B, D and F through the replacement of outdated mechanical systems at the Castle, Quadrangle Building and the Hirshhorn. A new central utility plant will be constructed with modern equipment that will result in a long-term reduction in</td>
</tr>
<tr>
<td><strong>Greenhouse Gas, Climate Change</strong></td>
<td>Alternatives B, D and F include a new central utility plant will allow SI to reduce energy consumption and costs as well as overall demand on utilities. Buildings will be renovated with the goal of achieving LEED® Gold Certification, which will be more resource efficient and use less water and energy resulting in less greenhouse gas emissions.</td>
</tr>
<tr>
<td><strong>Cultural Resources</strong></td>
<td>The National Historic Landmark Castle and AIB Buildings will be better protected under Alternatives B, D and F from seismic upgrades than for the No-Action Alternative. Alternative B best protects the integrity of all the resources in the South Mall Campus by minimizing the overall adverse effects to cultural resources.</td>
</tr>
<tr>
<td><strong>Visual Quality</strong></td>
<td>The visual character of the South Mall Campus will be improved by removing the Ripley Pavilion under Alternatives B and F. This will reestablish a view toward the Washington Monument. While Alternative F changes the view from Independence Avenue, SW towards the Castle, it allows for a better visual connection from outside the campus.</td>
</tr>
<tr>
<td><strong>Land Use</strong></td>
<td>Alternatives D and F will strengthen the connection of the South Mall Campus to the SW Ecodistrict and neighborhoods in Southwest Washington, DC. Relocated pavilions would increase views to the Castle from the Independence Avenue. These alternatives are consistent with the Comprehensive Plan for a pedestrian-oriented site and for improved connections to public space.</td>
</tr>
<tr>
<td><strong>Traffic</strong></td>
<td>Alternatives B, D and F will provide a new central loading facility that will have a net benefit to overall traffic operations and safety along Independence Avenue, SW. It will eliminate breaks in the current campus site plan, allowing for a cohesive connection across the entire campus. The underground loading area will provide adequate space to separate collections loading from food and garbage loading and will allow large trucks to maneuver below grade rather than in the street.</td>
</tr>
<tr>
<td><strong>Visitor Use &amp; Experience</strong></td>
<td>Alternative F provides a significantly better visitor experience than other alternatives. Better access to and visibility for the museums, AIB, and Castle are provided, along with a larger Haupt Garden that preserves characteristics of the current garden. Connections between visitor amenities, shared event space, education spaces and visitor services as well as expanded galleries for three museums, are also provided. The visitor experience is at the core of the Smithsonian’s founding mission to provide for “the increase and diffusion of knowledge.” Alternative F provides more total public space including enclosed space and garden space for visitor use than the other build alternatives.</td>
</tr>
<tr>
<td><strong>Human Health &amp; Safety</strong></td>
<td>Alternatives B, D and F will remove hazardous materials and provide seismic and blast protection that would improve overall human health and safety. Alternatives D and F provide security upgrades that will also improve the safety of visitors to the South Mall Campus. Alternatives D and F includes expanded skylights and access to daylight for underground offices and public spaces in the Quadrangle and Castle basement levels, improving the quality of underground spaces.</td>
</tr>
</tbody>
</table>
Utilities
Long-term improvements to utilities will occur under Alternatives B, D and F through the replacement of outdated mechanical systems at the Castle, Quadrangle Building and the Hirshhorn. A new central utility plant will be constructed with modern equipment that will result in an overall reduction in utility use.

Waste Management
An expanded composting, recycling, reuse, and return-to-vendor programs will reduce the amount of waste generated at the South Mall Campus with Alternatives B, D and F. Recyclable and compostable materials will be separated from the landfill-bound waste stream. A new central loading facility will consolidate waste streams of several Campus buildings, providing a centralized efficient system for trash, and recycling, collection deliveries, non-collections deliveries and services, and food service.

As noted above, the impacts to varying resource types were balanced against the project’s purpose and need, and the mission of the Smithsonian Institution. As noted previously, Alternative D was not selected as the preferred alternative as it resulted in the most significant impacts to the cultural resources. Alternative B was not selected because it did not greatly improve the visitor experience or enhance visibility and connectivity for the museums. Alternative F was developed to reduce the potential impacts to cultural resources, while improving the visitor experience and enhance connectivity.

Public Involvement
NCPC and SI began the preparation of an Environmental Assessment (EA) in 2014 for the proposed South Mall Campus Master Plan. In September 2014, SI Facilities staff met with representatives of District of Columbia and Federal external agencies and neighbors, including the U.S. Commission of Fine Arts (CFA), the NCPC, the District Office of Planning (DCOP), District Department of Transportation (DDOT), the US Department of Agriculture, the General Services Administration (GSA), and the National Park Service (NPS) among others, to introduce them to the project as a first step in the public phase of input to the plan.

As part of the EA process, the public was given an opportunity to participate in the scoping process through a public meeting held at the Castle on December 16, 2014. The scoping comment period for the proposed South Mall Campus Master Plan was open from December 16, 2014 through January 30, 2015. SI and NCPC initiated the public involvement processes through the distribution of scoping letters to Federal, State, local agencies, elected officials, and other interested parties. The scoping meeting provided a forum for the project team to present the proposed action to the public and explain the NEPA and Section 106 processes. The meeting included a presentation of potential Master Plan alternatives, and SI and consultant staff were on hand to address additional questions and receive public comments. Based on the information obtained and additional coordination with local and Federal agencies, NCPC and SI determined that preparation of an EIS was warranted rather than an EA. NCPC issued a Notice of Intent (NOI) to prepare an EIS on January 13, 2016 and reopened the scoping period until February 22, 2016.

Following development of the master plan alternatives and evaluation of potential impacts, a Notice of Availability for the Draft EIS was published in the Federal Register on November 17,
2017, opening a 60-day public review period ending January 16, 2018. The Draft EIS was made available at NCPC’s offices and the Smithsonian Institution’s offices at Capital Gallery.

During that time, 99 comments were received. SI and NCPC also held two public hearings on December 11 and December 18, 2017 at NCPC. Approximately 22 people attended the hearings. A presentation was shown, providing details regarding the impacts of the proposed action on natural, cultural, and socio-economic resources for all of the proposed alternatives. Comment forms were available for attendees to complete. Transcripts of the public hearings can be found in Appendix F of the Final EIS. A majority of the comments focused on the impacts to historic properties and the proposed changes to the Haupt Gardens. Refer to Attachment (2) for the Programmatic Agreement prepared pursuant to Section 106 of the National Historic Preservation Act (NHPA).

Comments received on the Draft EIS were taken into consideration in preparing the Final EIS. These comments and NCPC’s responses were summarized in Chapter 8 of the Final EIS. A Notice of Availability for the Final EIS was published in the Federal Register on April 20, 2018, opening a 30-day public review period ending May 21, 2018. The Final EIS was made available at NCPC’s offices and the Smithsonian Institution’s offices at Capital Gallery.

NCPC and SI received comments from U.S. Environmental Protection Agency (EPA), which stated that their comments had been adequately addressed in the Final EIS. These comments primarily focused on construction activities, stormwater and expected next steps. Sixteen additional comments were received on the Final EIS during the 30-day review period. Five commenters expressed support for aspects of Alternative F and seven were not in favor of changes to the Haupt Garden. The Department of Interior expressed their belief that Alternative B will have lesser impacts to historic resources than would implementing Alternative F, and DDOT reiterated their mitigation recommendations be incorporated.

Consultation with Federal, State, and local agencies has been conducted throughout the preparation of this EIS. NCPC and SI coordinated with the following agencies:

- National Park Service (NPS)
- U.S. Commission of Fine Arts (CFA)
- Advisory Council on Historic Preservation (ACHP)
- U.S. General Services Administration (GSA)
- U.S. Fish and Wildlife Service (USFWS)
- U.S. Department of Agriculture
- District of Columbia State Historic Preservation Office
- District Office of Planning
• District Department of Transportation,

• Advisory Neighborhood Commissions 2C and 6D

Section 106 of the National Historic Preservation Act

In compliance with the National Historic Preservation Act (NHPA), SI sought input from Consulting Parties on the impacts to the historic resources and ways to avoid and minimize potential adverse effects. As the Consulting Parties meetings have progressed, NCPC, SI, and the Master Planning team further refined the master plan alternatives. Following the presentation of Alternative F to the Consulting Parties at its May 2017 meeting, SI considered alternative designs to incorporate the operational efficiencies of the Alternative F design in such a way that will not intensify or create new adverse effects within Alternative B. The resulting modified Alternative B (analyzed in the EIS) incorporated a central utility plant within the unexcavated area between the existing Quadrangle and AIB. Attachment (2) provides a summary of Consulting Parties meetings held to date. Compliance with the NHPA culminated in a Programmatic Agreement (PA), provided in Attachment (2), which summarizes the outcome of the Section 106 consultation process, findings of the Master Plan Level Assessment of Effects on Historic Resources, and how the Section 106 process was coordinated with the NEPA process. The PA also provides the framework for how the SI will conduct Section 106 consultation for the projects that will be implemented as part of the South Mall Campus Master Plan. Separate processes are described for determinations of “adverse effect”, “no adverse effect”, or “no historic properties effected.”

The PA commits the SI to certain construction related activities, such as monitoring of historic properties during excavation or adjacent construction and maintaining campus circulation. The PA also outlines a process for how the SI will keep consulting parties and the public informed of future projects for the implementation of the Master Plan, and opportunities for public comment and review.

Specific mitigation measures include updating the National Register nomination for the Freer Gallery, submitting a National Register nomination for the Hirshhorn Museum, and updating the National Historic Landmark documentation for the Castle and the AIB. Recordation of the conditions of the Hirshhorn Museum and Sculpture Garden and the Quadrangle Building and Haupt Garden using Historic American Building Survey/Historic American Landscape Survey are also part of the mitigation.
<table>
<thead>
<tr>
<th>Consulting Parties Meeting Date</th>
<th>Meeting Summary</th>
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<tbody>
<tr>
<td>December 16, 2014</td>
<td>The first Consulting Parties meeting was conducted jointly with the NEPA Public Scoping Meeting. The purpose of this meeting was to provide an overview of the project and its major goals and objectives. To introduce the Section 106 process, NCPC and SI defined the undertaking; presented a draft Area of Potential Effects (APE); and identified historic properties within the APE, including the findings of the ongoing Cultural Landscape Report (CLR) for the South Mall Campus. For the purposes of NEPA, NCPC and SI presented the purpose and need for the project, the potential environmental issues to be addressed in the EIS, and the preliminary alternatives to be analyzed in the EIS. They also provided information on the coordination of the Section 106 and NEPA processes. The presentation was followed by an open house in which attendees could review the alternatives under consideration, provide written or verbal comments, or ask questions. Comments provided by Consulting Parties and meeting attendees were recorded in the South Mall Campus Master Plan Public Scoping Report (June 2015).</td>
</tr>
<tr>
<td>March 30, 2015</td>
<td>The second Consulting Parties meeting reiterated several pieces of information from the previous meeting, including the draft APE and preliminary identification of historic properties. NCPC and SI also outlined the roles and responsibility of the Consulting Parties and the anticipated Section 106 consultation schedule. SI presented the Master Plan objectives, including: visitor experience, education programs, museum programs, garden programs, collections, special events and retail, historic preservation, building systems, sustainability, loading and service, safety, security, and urban design. Comments provided by the Consulting Parties included preservation of the campus’s historic buildings, public outreach, the availability of technical reports, and seismic protection of the Castle. The presentation was followed by a tour of the South Mall Campus.</td>
</tr>
<tr>
<td>June 9, 2015</td>
<td>This meeting focused on a more detailed presentation of the range of alternatives being considered under the EIS and Section 106 processes. It also included a description of alternatives that had been considered but dismissed from further environmental review under the EIS. SI reiterated the historic properties within the campus area and also provided additional information on the goals and objectives that contributed to the development of the Master Plan alternatives. Consulting Parties asked a number of questions for additional information and clarification on the range of alternatives under consideration,</td>
</tr>
<tr>
<td>October 7, 2015</td>
<td>This meeting focused on the treatment of the Smithsonian Castle, including historic preservation, seismic protection, and programming needs. SI presented a comparative study of major museum complexes worldwide to benchmark the programmatic needs of the South Mall Campus. SI described the historic development of the Castle and how its varying degrees of integrity will correspond to treatment approaches in the building. SI’s consulting structural engineer provided a detailed presentation of the seismic vulnerabilities of the Castle and potential mitigation options, including a comparison of conventional structural reinforcement versus base isolation. The meeting concluded with a recap of the Master Plan alternatives under consideration, illustrating specifically how closely each alternative met its programmatic area needs. Consulting Party comments focused on base isolation and Castle seismic protection.</td>
</tr>
<tr>
<td>January 27, 2016</td>
<td>This meeting focused on the findings of the CLR being prepared for the South Mall Campus. The report was being developed to document the history of the campus and to inform both long-term and immediate treatment options.</td>
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<tr>
<td>Consulting Parties Meeting Date</td>
<td>Meeting Summary</td>
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<tr>
<td>April 13, 2016</td>
<td>Smithsonian Gardens also presented its ongoing mission and goals as well as its objectives for the South Mall Campus Master Plan. During the presentation, SI identified several major periods of development and illustrated those with historic photographs and period plan diagrams. During this meeting, SI also provided an update to the ongoing NEPA process, including loading traffic counts and the NOI to prepare an EIS. Consulting Parties commented on the scope and purpose of the CLR and the maintenance of Smithsonian Gardens. They also asked for additional clarification regarding the development of alternatives and the Master Plan and EIS processes.</td>
</tr>
<tr>
<td>October 26, 2016</td>
<td>This meeting provided detailed, revised alternatives based on Consulting Party comments and additional material gathered to inform the Master Plan. SI also presented an update to the inventory of historic properties within the APE and project area. Consulting Parties discussed details of the master plan alternatives and how comments will be addressed.</td>
</tr>
<tr>
<td>May 3, 2017</td>
<td>SI presented Alternatives E and F, developed to respond to Consulting Party comments. SI determined the design of Alternative E to be unsuccessful and dismissed it from evaluation in the EIS. Alternative F, however, was presented in greater detail and will be carried forward for analysis. SI also presented a general update to alternatives presented previously.</td>
</tr>
<tr>
<td>July 26, 2017</td>
<td>The purpose of this meeting was to present and discuss potential adverse effects on historic resources across the master plan alternatives. The Consulting Parties offered responses to these findings and discussed approaches to avoid or minimize potential adverse effects. SI also stated that it will dismiss Alternative A from further analysis in the EIS.</td>
</tr>
<tr>
<td>May 9, 2018</td>
<td>The purpose of this meeting was to discuss the content of a Programmatic Agreement and proposed language for future Section 106 consulting regarding individual projects implemented pursuant to the master plan.</td>
</tr>
</tbody>
</table>
Mitigations Measures

Potential mitigation measures were identified and recommended in the Final EIS to address the variety of short-term and long-term impacts resulting from the Selected Alternative. With respect to the Selected Alternative, Table 3 details mitigation commitments that SI will implement.

**Table 3. Mitigation Commitments for the Selected Alternative**

<table>
<thead>
<tr>
<th>Impacted Areas</th>
<th>Mitigation Commitments</th>
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</thead>
<tbody>
<tr>
<td>Soils</td>
<td>• An erosions and sediment control plan will be implemented in compliance with District Department of Energy and Environment regulations&lt;br&gt;• During construction BMPs will be implemented that will include, but are not limited to silt fence, erosion matting, curb inlet protection, hay bales, and revegetation of exposed sediment.&lt;br&gt;• Soils to be used as fill will be tested for hazardous materials and structural stability before use.&lt;br&gt;• Preconstruction surveys will be conducted prior to any underground excavation.&lt;br&gt;• Monitoring systems will be established in the interior and exterior of affected buildings to protect against vibration and settlement related damage during construction.&lt;br&gt;• SI will obtain any permits needed from NPS for use or disturbance of NPS land during construction and any long-term agreements required for any underground expansion of existing Smithsonian facilities below Jefferson Drive that link the Hirshhorn Museum and its Sculpture Garden.</td>
</tr>
<tr>
<td>Seismic Vulnerability</td>
<td>• Preconstruction surveys will be conducted for future projects of the Master Plan prior to any underground excavation to identify seismic deficiencies.&lt;br&gt;• Underpinning will be installed in accordance with all applicable codes and standards.&lt;br&gt;• Monitoring systems will be established in the interior and exterior of each building to protect against vibration and settlement related damage during construction.</td>
</tr>
<tr>
<td>Stormwater Management</td>
<td>• An erosion and sediment control plan and a stormwater management plan will be implemented in compliance with District Department of Energy and Environment regulations&lt;br&gt;• During construction, BMPs will be implemented that will include, but are not limited to silt fence, erosion matting, curb inlet protection, hay bales, and revegetation of exposed sediment.&lt;br&gt;• One or more cisterns will be provided either near the central utility plant or in the sub-basement of the Castle to capture and store stormwater drainage from the Castle and AIB roofs and other areas as feasible and as required to meet DOEE requirements and SI water reuse needs.&lt;br&gt;• Oil-water separators will be installed in the central loading facility and ramp to ensure that no contaminated water enters the cisterns or drains offsite.</td>
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</table>
## Impacted Areas Mitigation Commitments

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<thead>
<tr>
<th>Impacted Areas</th>
<th>Mitigation Commitments</th>
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</table>
| **Air Quality**          | • Short-term impacts will be mitigated through the use of proper control measures including minimizing vehicle idling times; maintaining emission controls on construction vehicles and equipment; and covering/wetting exposed soils to reduce fugitive dust  
  • Developers and construction contractors will be required to submit a construction management plan including plans to control impacts to air quality during construction.  
  • Outdated mechanical systems that are at the end of their useful lives will be replaced.  
  • Adjustments to signal timing and phasing at effected intersections will be recommended to DDOT for consideration to minimize idling times.                                                                                                          |
| **Cultural Resources**   | • A Section 106 Programmatic Agreement (Attachment 2) has been prepared that outlines the process for identifying, avoiding, minimizing and mitigating adverse effects on historic properties.                                                                                                                                                                     |
| **Visual Quality**       | • Sensitive, context-aware designs that reference, and are compatible, with existing features will be utilized  
  • Above-grade structures and landscape features proposed for the South Mall Campus will be limited in their size and placement in order to preserve and enhance existing views and historic viewsheds.  
  • The Smithsonian will endeavor to specify appropriately mature replacements where replanting of existing vegetation is undertaken.  
  • Where possible, infrastructure elements—such as the new loading dock ramp, perimeter security features, and central utility plant ventilation—will be integrated into landscape features to create a cohesive, aesthetically compatible design.                                          |
| **Land Use Planning & Policies** | • Individual projects for the South Mall Campus Master Plan will be subject to review and approval by NCPC.                                                                                                                                                                                      |
| **Transportation & Traffic** | **Transportation Demand Management Plan:**  
  • SI will work with DDOT and NCPC to develop a Transportation Demand Management (TDM) plan over time as each phase of the Master Plan progresses. This will allow SI to relate the expected changes to traffic generated for each project and the final programmed visitor and staff uses of each building, as well as the feasible TDM options available at the time of implementation.  
  **Vehicle Mitigations:**  
  • The existing unsignalized intersection of SW Jefferson Drive, SW and 12th Street, SW will be modified from a two-way stop-controlled intersection to an all-way stop controlled intersection.  
  • The southbound 14th Street, SW approach to Jefferson Drive, SW will be modified to include a protected-permitted left-turn phase.                                                                 |

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Pedestrians/Bicycle Mitigations:
- SI will monitor the utilization of onsite bicycle parking, as well as Capital Bikeshare stations within ¼ mile. If demand exceeds capacity, SI will install new bike racks and/or work with DDOT to evaluate the potential installation of a Capital Bikeshare Station. SI will work with DDOT and conduct visitor surveys to evaluate the applicability of bikeshare to mitigate visitor personal vehicle trips to the Mall.
- All curb ramps connecting to/from the South Mall Campus will be upgraded to meet current ADA standards. SI will work with DDOT to determine the appropriate stage for the ADA upgrades based upon project phasing as well as the phasing of other adjacent projects.
- A new crosswalk will be provided at the westbound approach of Independence Avenue, SW at the intersection with 12th Street, SW and the existing crosswalks at that intersection will be renovated.

Passenger Loading Mitigations:
- Passenger loading areas will be monitored to determine if they continue to meet SI needs without impacting traffic operations on Jefferson Drive, SW or Independence Avenue, SW.
- The lay-by lane on westbound Independence Avenue, SW will be closed and the curbline will be restored. The MTA bus stop will be relocated, if necessary.

Loading Mitigations:
- A loading management plan will be created for the South Mall Campus
- SI will coordinate with DDOT through the design and permitting of the new loading ramp curb cut. The driveway should be incorporated as part of the intersection and the pedestrian crossing and signal heads for the driveway should be offset with those for the 12th Street ramp to the extent possible.
- SI will ensure that trucks entering the loading ramp do not block the sidewalk or street while waiting for security clearance. During detailed design, the appropriate location of the guard booth will be determined based on multiple factors, including transportation design, Smithsonian security requirements, pedestrian safety, and impact to historic resources. SI will provide a physical barrier on the ramp in a location that will allow trucks to fully enter the ramp without blocking the sidewalk.
- All deliveries made with trucks WB-50 or larger will be scheduled in advance to avoid the AM (7:00 AM – 9:00 AM) and PM (4:00 PM – 6:00 PM) peak periods, unless necessary.
- Deliveries made in vehicles larger than a single unit truck will be required to enter from northbound 12th Street, SW or eastbound Independence Avenue, SW to avoid wide right-turns into the proposed ramped loading dock driveway.
- Right-turns on red will be restricted at the proposed ramped loading dock driveway and the westbound Independence Avenue, SW approach at the signalized intersection with 12th Street, SW.
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<tr>
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<tbody>
<tr>
<td>Traffic &amp; Transportation (cont.)</td>
<td>The existing curb cuts along Independence Avenue, SW will be closed to vehicular traffic and deliveries upon connection of the buildings they serve to the central loading facilities. SI may seek to maintain limited at-grade service access to the AIB site for emergency vehicles. Temporary permits may also be required during construction to allow the loading areas to be used for construction staging and constriction material delivery and removal.</td>
</tr>
</tbody>
</table>
| Visitor Use & Experience             | SI will provide appropriate signage and fencing to keep passersby out of construction areas.  
• The SI will use SI’s websites, signage, postings on social media webpages, email blasts, and press releases in accordance with its communications policies and protocols, to alert visitors to the potential for closed exhibits and/or constructions areas.  
• Construction activities will be coordinated in a manner that will minimize disruptions during planned events.  
• Pathways through the South Mall Campus will be rerouted during construction to maintain pedestrian flow. |
| Utilities                            | Campus-wide energy efficiency and sustainability measures, such as energy-efficient lighting, improved building envelopes, modernized HVAC systems, skylights and natural ventilation, low-flow plumbing fixtures, and renewable energy systems will be implemented.  
• Stormwater throughout the South Mall Campus will be collected and stored, to the maximum extent practicable, in the central utility plant and will be reused for irrigation, reducing stormwater runoff and demand for potable water. If any utilities that are to be impacted are on NPS-owned land, SI will obtain any permits needed from NPS for use of NPS land and will similarly do the same for any DC public space adjacent to the South Mall Campus. |
| Waste Management                     | An expanded composting, recycling, reuse, and return-to-vendor programs to reduce the amount of waste generated on the South Mall Campus will be implemented.  
• The proposed food and beverage systems on the South Mall Campus will use reusable, recyclable, or compostable dishes, cups, silverware, napkins, and other food service items to the extent practicable  
• Recyclable and compostable materials will be separated from the landfill-bound waste stream to the maximum extent practicable. |

Mitigation measures may vary depending on the project and sequencing. Therefore, as each project is implemented, SI will provide a mitigation plan to include the description of applicable mitigations measures, including those identified above, how and when they will be implemented, as well as a reporting mechanism to verify compliance.
Conclusion

Based on the analysis and evaluation contained in the Final EIS, and after careful consideration of all the identified social, economic, and environmental factors; input received from other agencies, organizations, and the public; and the mitigation measures outlined above, it is the decision of NCPC to select Alternative F as the basis of the South Mall Campus Master Plan. The key factors considered in this selection include:

- The Selected Alternative best meets the project’s purpose and need.
- The Selected Alternative would best improve the visitor experience, while balancing impacts to historic properties and other resources.
- The Selected Alternative restores two National Historic Landmark buildings, maintains the character of the gardens, as well as the flat ground plane that forms the southern approach to the Castle. The Selected Alternative also minimizes sub-basement excavation beneath the Castle and minimized changes to the site walls of the Hirshhorn Museum.
- Individual projects implemented pursuant to the Selected Alternative will be subject to further evaluation and consultation under the Programmatic Agreement adopted pursuant to Section 106 of the NHPA. Individual projects will seek to further avoid, minimize and mitigate adverse effects to historic properties.
- Given the long period of implementation, as individual projects are developed, NCPC in consultation with SI, will evaluate whether additional NEPA analysis may be necessary.

Based upon the above considerations, NCPC, along with SI as project owner, approves the Selected Alternative as the basis for the South Mall Campus Master Plan.

__________________________________________  _______________________
L. Preston Bryant, Jr.        Date
Chairman
National Capital Planning Commission

Attachment (1) – Graphic of Alternatives
Attachment (2) – Programmatic Agreement
ATTACHMENT (1) – Graphic of Alternatives

**MASTER PLAN DEVELOPMENT**

**ALTERNATIVES A-F**

**NO ACTION ALTERNATIVE:**
Existing campus

**ALTERNATIVE A (DISMISSED):**
Limited below ground change

**ALTERNATIVE B:**
Limited above ground change

**ALTERNATIVE C (DISMISSED):**
Maintain flat garden with changes above and below

**ALTERNATIVE D:**
Plane changes above and below grade

**ALTERNATIVE E (DISMISSED):**
Plane changes above and below grade
Maintain character of gardens

**ALTERNATIVE F:**
Minimize plane changes
Maintain character of gardens
PROGRAMMATIC AGREEMENT
AMONG
THE SMITHSONIAN INSTITUTION
THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICER
THE NATIONAL CAPITAL PLANNING COMMISSION
THE NATIONAL PARK SERVICE
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING
THE SOUTH MALL CAMPUS MASTER PLAN

This Programmatic Agreement (PA) is made as of this ____ day of __________, 2018, by and among the Smithsonian Institution (SI), the National Capital Planning Commission (NCPC), the District of Columbia State Historic Preservation Officer (DC SHPO), the National Park Service (NPS), and the Advisory Council on Historic Preservation (ACHP) (referred collectively herein as the “Signatories” or individually as a “Party” or “Signatory”), pursuant to Section 106 of the National Historic Preservation Act (NHPA), 54 U.S.C. §§ 306108, and its implementing regulations 36 CFR Part 800, and pursuant to 36 CFR § 800.14(b) authorizing the negotiation of a PA to govern the implementation of a particular program, and resolution of adverse effects from complex project situations or multiple undertakings, regarding the South Mall Campus Master Plan in Washington, DC (Undertaking); and

WHEREAS, for the purposes of this PA, the South Mall Campus is defined by Independence Avenue SW to the south; 12th Street SW to the west; Jefferson Drive SW to the north, and including the Joseph Henry statue and adjacent stair, and the Hirshhorn Museum’s Sculpture Garden both located north of Jefferson Drive; and 7th Street SW to the east; and

WHEREAS, the South Mall Campus includes five principal buildings: the Freer Gallery of Art (Freer), the Smithsonian Institution Building (Castle), the Arts and Industries Building (AIB), the Quadrangle Building (Quadrangle), and the Hirshhorn Museum and Sculpture Garden (HMSG); with the Quadrangle housing the Ripley Education Center, Arthur M. Sackler Gallery (Sackler Gallery) and the National Museum of African Art (NMAfA). The Campus includes four designed gardens: the Enid A. Haupt Garden, the Mary Livingston Ripley Garden, the Kathrine Dulin Folger Rose Garden, and the Hirshhorn Museum Sculpture Garden. The Campus also includes subsidiary structures, interstitial landscape, paved circulation paths, and infrastructure, hereinafter referred to as the “Campus” or “Site” (Exhibit A); and

WHEREAS, pursuant to Section 106 of the NHPA federal agencies must take into account the effects of their undertakings on any district, site, building, structure or object that is included in or eligible for inclusion in the National Register of Historic Places (NRHP) and afford the ACHP a reasonable opportunity to comment; and

WHEREAS, pursuant to Public Law 108-72, 117 Stat. 888 (August 15, 2003), for projects in the District of Columbia that are subject to review and approval by the NCPC, the SI is deemed to be a federal agency for purposes of compliance with the regulations pursuant to Section 106 of the NHPA; and

WHEREAS, the NCPC has certain review and approval authority over federal projects located within the District of Columbia pursuant to the National Capital Planning Act of 1952, 40 U.S.C. § 8722(b)(1) and (d); and
WHEREAS, the South Mall Campus Master Plan has been established as an Undertaking subject to the Section 106 process in accordance with 36 CFR § 800.3(a) and as defined in 36 CFR § 800.16(y); and the future design and implementation of each Master Plan project will be considered as an individual undertaking that requires SI to comply with the requirements of the Section 106 consultation process; and

WHEREAS, the SI and NCPC have agreed that SI will be the lead agency pursuant to 36 CFR § 800.2(a)(2) for the Undertaking to fulfill their collective Section 106 responsibilities; and

WHEREAS, all of the historic properties within the Campus are contributing to the National Mall Historic District listed in the NRHP on October 15, 1966 (documented May 19, 1981), and updated in December 2016, and also listed in the District of Columbia Inventory of Historic Sites on November 8, 1964. Additionally, the Castle was designated a National Historic Landmark on January 12, 1965, individually listed in the NRHP on October 15, 1966, and in the DC Inventory on November 8, 1964; the AIB was designated a National Historic Landmark and individually listed in the NRHP on November 11, 1971, and in the DC Inventory on November 8, 1964; and the Freer was individually listed in the NRHP on June 23, 1969, and in the DC Inventory on November 8, 1964. The Freer, Castle, AIB, and the Quadrangle and its gardens are also contributing properties to the Smithsonian Quadrangle Historic District listed in the DC Inventory on April 27, 2017; and

WHEREAS, the SI assembled a Steering Committee drawn from senior leadership, the Board of Regents, Museum Directors, and Smithsonian Gardens, to inform the Master Plan goals, objectives, and priorities; and

WHEREAS, the SI identified the following Institutional goals and objectives to be balanced and achieved by the Master Plan: to preserve and protect the historic buildings and features of the Campus to the greatest extent possible, with priority for the designated NHL buildings; to improve and expand visitor services and education spaces; to create clear accessible entrances and connections between the Museums and gardens of the Campus, the National Mall, and surrounding context; to create an expanded and consolidated central loading facility; and to replace aging building systems that have reached the end of their lifespans with new systems in a centralized mechanical plant that results in significant energy savings and carbon dioxide reduction; and

WHEREAS, the South Mall Campus Master Plan is intended to guide future short-term and long-term renovation and development of the Campus, with projects to be implemented, designed, and constructed over an estimated ten to twenty year period beginning in 2018, and subject to federal appropriations and prioritization of certain projects and phasing; and

WHEREAS, the SI has conducted numerous surveys and evaluations of the Campus and buildings to inform the development of the Master Plan, which have been shared publicly via the project website and in public meetings, including Existing Conditions Report Smithsonian Institution Building (April 2009), Historic Structure Report Smithsonian Institution Building (December 2009), Arts and Industries Building Historic Structure Report and Conditions Assessment (August 2009), South Mall Campus Cultural Landscape Report (February 2018), Determination of Eligibility for the Hirshhorn Museum and Sculpture Garden (May 2016), and Determination of Eligibility for the Quadrangle Building (May 2017); and

WHEREAS, the SI initiated Section 106 consultation with the DC SHPO regarding the Undertaking by letter dated October 9, 2014; and
WHEREAS, the SI and the DC SHPO determined through a Determination of Eligibility (DOE) Form dated May 12, 2016, that the Hirshhorn Museum and Sculpture Garden is eligible for individual listing in the NRHP; and

WHEREAS, on May 26, 2017 the SI requested from the Keeper of the NRHP a formal Determination of Eligibility for listing in the NRHP pursuant to 36 CFR 800.4(c)(2) and 36 CFR § 63 for the Quadrangle Building; and on July 13, 2017, the Keeper of the NRHP determined the Quadrangle Building ineligible for individual listing in the NRHP. On April 27, 2017, the DC Historic Preservation Review Board designated the Smithsonian Quadrangle Historic District a local historic district. The Quadrangle Building is a contributing element of the local historic district. The draft NRHP Nomination for the Quadrangle Historic District prepared by the DC SHPO has not yet been evaluated by the NRHP; and

WHEREAS, in addition to the Signatories, the SI has identified and consulted with other agencies, groups and individuals, and has invited them to participate as Consulting Parties pursuant to 36 CFR § 800.3(f); hereinafter referred to as the “Consulting Parties” (Exhibit B); and

WHEREAS, the SI has provided opportunities for Signatories, Consulting Parties, and public participation in the consultation process through public meetings and a public website (www.southmallcampus.si.edu), which provides a platform for document sharing of historic and technical reports, posting of comments received with SI responses, and webcast and archived presentation material from the public meetings (Exhibit C); and

WHEREAS, the SI and the DC SHPO, in consultation with the Consulting Parties, defined the Area of Potential Effects (APE) roughly bound by 1st Street to the east, 17th Street to the west, Constitution Avenue to the north, C Street and Independence Avenue to the south, and to the south centered along 10th Street. Direct and indirect effects to the identified historic properties within the APE have been considered. The APE, in addition to individual properties, includes the Washington Monument Grounds, U.S. Capitol and Grounds, a portion of the Federal Triangle Historic District, a portion of the Pennsylvania Avenue National Historic Site, and the National Mall Historic District (Exhibit D); and

WHEREAS, pursuant to 36 CFR § 800.5(a) the SI, in consultation with the DC SHPO and the ACHP, have applied the criteria of adverse effect to the various alternative concepts, and have determined that implementation of the South Mall Campus Master Plan will result in adverse effects on historic properties within the Campus and the Area of Potential Effects, as outlined in the Master Plan Level Assessment of Effects on Historic Properties (Exhibit E); and

WHEREAS, specific design details are not developed at the master planning level, therefore the Master Plan Level Assessment of Effects includes a determination of “potential adverse effect” from certain actions. This determination indicates a potential to create adverse effects from individual or cumulative actions. These effects will be further assessed as part of future Section 106 reviews of individual projects, as required under the terms of this PA; and

WHEREAS, the SI shall reevaluate, revise when appropriate, and finalize all determinations of effect as outlined in the Master Plan Level Assessment of Effects, including all “no adverse effect” determinations, through future consultation, with the DC SHPO (at minimum) that involves submittal of detailed drawings, specifications, and additional information as necessary, to document the proposed findings of effect pursuant to 36 CFR Part 800, in accordance with other applicable stipulations of this PA; and
WHEREAS, in accordance with 36 CFR § 800.6(a)(1), the SI has invited the ACHP to participate in consultation by letter dated September 26, 2017, as the Undertaking is likely to result in adverse effects on National Historic Landmarks, and in the preparation of this PA, and the ACHP has elected to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

WHEREAS, pursuant to 36 CFR § 800.10(c) the SI invited the Secretary of the Interior (the “Secretary”) to participate in consultation by letter dated September 26, 2017, since the Undertaking is likely to result in adverse effects on National Historic Landmarks, and the National Park Service has represented the Secretary concerning the NHLs within the Campus throughout consultation and will continue to participate in future consultations involving the National Historic Landmarks; and

WHEREAS, certain Master Plan components may require work of a temporary or permanent nature within areas under the jurisdiction of the NPS, which require NPS to issue a special use permit. The SI acknowledges that permits and coordination with the NPS will be required for the implementation of these undertakings. NPS may or may not choose to make use of the consultation process outlined in this PA to fulfill its Section 106 responsibilities associated with the issuance of the necessary permits; and

WHEREAS, this PA includes provisions which allow other federal agencies to use the terms of this PA to fulfill their Section 106 responsibilities for undertakings relating to the South Mall Campus Master Plan; and

WHEREAS, the NCPC, conducted public meetings to review the Master Plan at informational briefings on April 7, 2016, and September 7, 2017; and the Commission reviewed and commented favorably on the concept Master Plan on January 4, 2018, and on the draft Master Plan on April 5, 2018 (Exhibit F); and

WHEREAS, the Commission of Fine Arts in its meeting on April 19, 2018, reviewed the proposed South Mall Campus Master Plan Alternative F and approved the plan as a basis for proceeding with the design of the plan’s components (Exhibit G); and

WHEREAS, the SI has considered information provided by the public in the development of both the Section 106 and National Environmental Policy Act (NEPA) review processes; considered and responded to Signatories and Consulting Parties’ comments; posted meeting minutes, comments, and responses on the project website; incorporated some consulting parties’ comments in developing the Master Plan alternatives; and provided for public involvement in this PA at a Consulting Parties meeting on May 9, 2018; and

WHEREAS, on November 17, 2017, the SI and NCPC released the South Mall Campus Master Plan Draft Environmental Impact Statement (EIS) pursuant to the NEPA for a 60-day public comment period; and released the South Mall Campus Master Plan Final Environmental Impact Statement on April 20, 2018, for a 30-day public review period. The draft EIS and final EIS analyzed the potential impacts that the Undertaking may have on the natural and man-made environment; and

WHEREAS, through the NEPA process and Section 106 consultation, the SI has identified Alternative F as its preferred alternative because SI believes it balances accomplishing the Master Plan goals and objectives and the SI’s purpose and need, with adverse effects on historic properties; results in the least cumulative adverse impacts on the environment; places a top priority for the restoration of the
designated National Historic Landmark buildings; improves Campus-wide infrastructure, circulation, and utilities; and increases landscaped areas, and improves vistas and connections to the National Mall; and

WHEREAS, the SI obtained conceptual approval from the District of Columbia Public Space Regulation Administration on January 26, 2018, for the curb cut and driveway for the consolidated loading facility entrance located to the west of the Freer, and will apply specific mitigations and traffic signal safety coordination in consultation with the District Department of Transportation, as well as comply with the terms of this PA for the curb cut and associated loading ramp; and that the SI will return to the DC Public Space Regulation Administration for final approval; and

WHEREAS, the SI obtained conceptual approval from the District of Columbia Public Space Regulation Administration on January 26, 2018, for the curb cut and driveway for the consolidated loading facility entrance located to the west of the Freer, and will apply specific mitigations and traffic signal safety coordination in consultation with the District Department of Transportation, as well as comply with the terms of this PA for the curb cut and associated loading ramp; and that the SI will return to the DC Public Space Regulation Administration for final approval; and

WHEREAS, the SI intends to pursue the Undertaking in accordance with Master Plan Alternative F (Exhibit H) and this PA to accomplish the SI’s purpose and need; and

WHEREAS, NCPC reviewed the Draft Master Plan on April 5, 2018, and as the lead federal agency for the purposes of NEPA, supported the SI’s Alternative F as the basis of the campus master plan and the preferred alternative identified in the Final Environmental Impact Statement; and provided comments related to historic properties on the campus, including the National Historic Landmarks, noting that a Programmatic Agreement would be developed to describe the steps and process to further avoid, minimize and mitigate adverse effects, as individual project designs are developed (Exhibit F); and

WHEREAS, through Section 106 consultation, the DC SHPO, NPS, and some Consulting Parties expressed a preference for Alternative B, and concerns and opposition to aspects of the alternatives that would result in adverse effects on historic properties resulting from, and not necessarily limited to the following actions: excavation beneath the Castle; altering the flat grade and other character-defining features of the Haupt Garden; the demolition of the Ripley Pavilion; the demolition of the Sackler and NMAfA Pavilions; the construction of new museum pavilions closer to the Castle and the National Mall; and related actions that diminish the integrity of historic properties; and

WHEREAS, through the NEPA and Section 106 processes, public comments were sought on all of the alternatives, and public opposition was received on aspects of the Master Plan alternatives that would adversely affect historic properties including online petitions, letters, public statements, and testimony, particularly in reference to impacts on the Haupt Garden; and

WHEREAS, during Section 106 consultation, certain features of the alternatives under consideration were identified as significant adverse effects on historic properties, specifically: the sloped plane of the Haupt Garden to the below grade entrance to the Visitor Center amenities, substantial excavation beneath the Castle, and the removal of the majority of the Hirshhorn plaza walls. Alternative F incorporates measures to minimize some of the adverse effects by maintaining the grade of the Haupt Garden, limiting the depth and footprint of excavation beneath the Castle, and retaining the majority of the Hirshhorn plaza walls; and

WHEREAS, the DC SHPO, NPS, and some Consulting Parties intend to continue to advocate for a rehabilitation approach during future project design, and for the consideration of designs or other alternatives similar to Alternative B that could avoid and further minimize adverse effects on historic properties; and

WHEREAS, the SI will continue to provide opportunities for ongoing public involvement in the development of this Undertaking as each individual project is designed and implemented in accordance
with the Master Plan, in accordance with the terms of this PA which provides a framework for subsequent Section 106 consultation with the Signatories, Consulting Parties, and the public; and

WHEREAS, to the maximum extent feasible, project design and alterations to buildings within the Campus will be consistent with the Secretary’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings and Guidelines for the Treatment of Cultural Landscapes; to preserve historic building fabric and landscape character; to be compatible with historic structures using design and materials compatible with the settings and environment; new additions with limited above-grade impact to historic buildings and settings; and the least amount of damage or alteration to the historic fabric possible while providing functional occupancies meeting the programmatic requirements of the Master Plan; and

WHEREAS, like all the alternatives, Alternative F provides significant opportunities for restoration and stewardship of the buildings within the Campus, including addressing exterior envelopes and upgrading building systems, restoration work for the exterior and interior of the Castle, with opportunities to restore the Great Hall, Upper Great Hall, Children’s Room, and basement vaults; and

WHEREAS, the SI recognizes the need to further avoid, minimize, and mitigate adverse effects during future project design, particularly with regard to the Quadrangle Museum pavilions, the Visitors Center entrance, Castle basement excavation and seismic protection, replacement of the Quadrangle roof membrane and treatment of the Haupt Garden, and treatment of the Hirshhorn Museum Sculpture Garden, and will continue consultation with the Signatories, Consulting Parties, and the public in accordance with the terms of this PA; and that the cumulative adverse effects from the full implementation of the Master Plan will require reassessment as each project is addressed under Section 106 consultation; and

WHEREAS, pursuant to the consultation conducted under 36 CFR § 800.14(b), the Signatories have developed this PA to take into account the adverse effects of the Undertaking on historic properties, identify means to avoid, minimize and mitigate the adverse effects, and establish procedures to continue consultation to resolve any unknown, known, and future adverse effects that may result from the design and implementation of the South Mall Campus Master Plan; and

WHEREAS, the purpose of this PA is to ensure compliance with Section 106 and the principles of the NHPA, whereby SI will conduct consultation for the implementation and design of each phase of the Master Plan, and, prior to any effort that may directly or indirectly affect historic properties, shall, to the greatest extent possible, undertake planning and design actions as necessary to avoid or minimize adverse effects and shall afford the DC SHPO and the ACHP reasonable opportunity to comment; and

WHEREAS, the Signatories acknowledge that Section 106 consultation regarding the development of the South Mall Campus Master Plan itself has concluded with the execution of this PA;

NOW, THEREFORE, the Signatories agree that implementation of the South Mall Campus Master Plan shall be carried out in accordance with the following stipulations in order to take into account and avoid, minimize, and mitigate the adverse effects of the South Mall Campus Master Plan on historic properties.
STIPULATIONS

The SI shall ensure that the following measures are carried out:

ON-GOING AND FUTURE CONSULTATION

The general site plans, sections, and renderings included in Exhibit H illustrate Alternative F current as of the date of the last signature on this PA. Additional consultation will be required for each project developed for the implementation of the South Mall Campus Master Plan. As each project is designed, there is potential for unidentified adverse effects and for previously identified adverse effects as outlined in the Master Plan Level Assessment of Effects (Exhibit E) to be intensified. Therefore, the SI shall continue to consult with the Signatories, Consulting Parties, and the public, and take their comments into account in accordance with this PA and 36 CFR Part 800 as follows:

1. Preliminary Project Consultation

Early in the design development of each project, the SI will initiate preliminary consultation with the Signatories regarding the proposed designs for buildings or site changes, and will incorporate comments provided into the design to the greatest extent feasible, in light of the project’s goals and objectives and this PA. This early consultation will be centered around in-person group meetings, and will occur during the schematic phase of design development or pre-submission phase consistent with the NCPC Submission Guidelines, and before 15% design development drawings.

A. The SI will work with the Signatories to define the scope of the project(s), preliminarily assess adverse effects, develop and/or update the Consulting Parties list, and define the formal Section 106 consultation schedule and level of effort as they relate to the proposed project(s). Specifically, the SI will work with the Signatories to determine whether consulting party meetings will be required, and if so, outline a meeting schedule dependent upon the level of complexity of the project. If any Signatory believes a consulting party meeting(s) is/are necessary because a project is likely to result in an adverse effect, the SI shall agree to conduct such a meeting(s).

B. Re-evaluation of Historic Significance. Due to the extended timeframe of the Master Plan, the SI will consult early with the Signatories to re-evaluate the historic significance of properties or landscapes that may have changed over time. The SI shall conduct a Consulting Parties meeting as appropriate.

C. DC Historic Preservation Review Board (HPRB) Review: The DC SHPO may refer future South Mall Campus Master Plan projects to the HPRB for review and comment at any time during Preliminary Consultation or Section 106 Consultation. The SI shall cooperate with the DC SHPO to provide all necessary documentation and schedule any such HPRB hearings and shall consider any HPRB comments in the development of project review and plans.

D. Coordination and Consultation with NPS: The SI will consult early with the NPS regarding any project with the potential to affect the two NHL buildings, and/or any project that will impact historic properties on NPS park lands or under NPS jurisdiction. In addition, when a project will require work on NPS land, the SI will coordinate early with the NPS to determine if special use permits or short term construction permits must be issued, and whether NPS will use this PA to
fulfill its Section 106 responsibilities. If NPS chooses not to use this PA, the NPS will notify the Signatories and will conduct a separate Section 106 review. Should the undertaking be determined to be a streamlined activity as defined in the 2008 NPS Programmatic Agreement with the ACHP and the National Conference of State Historic Preservation Officers, the Signatories will not be notified and the typical streamlined NPS Section 106 review process will be followed.

2. **Section 106 Consultation Process and Procedures**

Implementation of the South Mall Campus Master Plan will be carried out over a period of an estimated ten (10) to twenty (20) years, with each project designed within the framework outlined in Alternative F and in this PA. The SI shall reevaluate, seek comments from the Signatories and Consulting Parties, revise when appropriate, and finalize all determinations of effect as outlined in the *Master Plan Level Assessment of Effects*, including all “no adverse effect” determinations, through future consultation. The design and implementation of each project will undergo a separate and substantive Section 106 review and consultation process pursuant to this PA:

A. **Initiating Consultation**: After the development of a schematic design and preliminary project consultation in accordance with Stipulation 1, the SI will formally initiate consultation with the DC SHPO and the Signatories via letter and notify the Consulting Parties through one of the following: provide information via email, and develop a project specific website or post the information to the SI’s Office of Architectural History and Historic Preservation website.

B. **Nature of Consultation**: Based upon the results of preliminary project consultation carried out in accordance with Stipulation 1, the SI shall provide sufficient time for a Consulting Parties’ Meeting or Meetings to occur, if necessary, before making a determination of effect in accordance with Stipulation 2.C.

C. **Assessment of Effect**: Based upon early consultation conducted in accordance with Stipulation 1 above, the SI shall apply the criteria of adverse effect in consultation with the DC SHPO and determine if the project(s) will result in “No Historic Properties Affected”, “No Adverse Effect”, or “Adverse Effect” on historic properties within the Area of Potential Effects (Exhibit D). Such determinations will be based upon the submission of up-to-date and detailed plans, drawings, specifications and additional information necessary to make final determinations of effect.

   i. **No Historic Properties Affected**: All of the buildings in the South Mall Campus are historic properties, but there may be specific projects that will have no effect on said historic properties. If the SI reaches a determination of “No Historic Properties Affected”, the SI will notify the Signatories in writing, provide sufficient project documentation to support its determination, and request concurrence. The SI shall simultaneously provide the project documentation and determination to the Consulting Parties through one of the following: provide information via email,
develop a project specific website, or post the information to the SI’s Office of Architectural History and Historic Preservation website.

a. The Signatories and Consulting Parties shall have thirty (30) days from receipt/posting of an adequately documented submission to review and comment on the determination. The DC SHPO shall have an additional fifteen (15) days to review and comment to take into account the comments of Consulting Parties and other Signatories.

b. If there are no objections to the determination within the specified timeframes, the SI may move forward with the project as proposed. Any objections shall be addressed in accordance with Stipulation 13 (Dispute Resolution).

ii. Determination of No Adverse Effect: If the SI determines a project will result in “No Adverse Effect,” it will notify the Signatories in writing, provide sufficient project documentation to support its determination, and request concurrence. The SI shall simultaneously provide the project documentation and determination to the Consulting Parties through one of the following: provide information via email, develop a project specific website, or post the information to the SI’s Office of Architectural History and Historic Preservation website.

a. The Signatories and Consulting Parties shall have thirty (30) days from receipt/posting of an adequately documented submission to review and comment on the determination. The DC SHPO shall have an additional fifteen (15) days to review and comment to take into account the comments of Consulting Parties and other Signatories. If there are no objections to the determination, the SI may move forward with the project as proposed.

b. If a Consulting Party responds that it does not concur with the determination of “No Adverse Effect,” the SI will notify the Signatories, consider the Consulting Party comments and consult with all parties to resolve the disagreement. Any disagreement with a Consulting Party that cannot be resolved shall be addressed in accordance with Stipulation 13.B of this PA. If any Signatory responds that it does not concur with the determination of “No Adverse Effect,” the SI will consult with the Signatories to attempt to resolve the disagreement.

c. If the disagreement cannot be resolved, the SI will refer its determination to the ACHP per 36 CFR 800.5(c)(3)(i) to determine whether the adverse effect criteria have been correctly applied. If the ACHP determines that the project will have “No Adverse Effect,” the SI may proceed with its project accordingly. If the ACHP
determines that the project may result in an “Adverse Effect,” the SI will consider whether further consultation is required under 2.C.iii.

iii. **Determination of Adverse Effect:** If the SI determines a project will result in an “Adverse Effect,” including any previously unidentified, intensified or cumulative “Adverse Effects,” it will notify the Signatories in writing, provide sufficient documentation to support its determination; share the determination via email, post each project submittal and determination to a specific project website, or post the information to the SI’s Office of Architectural History and Historic Preservation website for Consulting Party review, and consult further with the Signatories and Consulting Parties to seek ways to avoid the “Adverse Effect”, prior to considering mitigation measures.

a. The Signatories and Consulting Parties shall have thirty (30) days from receipt/posting of an adequately documented submission to review and comment on the determination. The DC SHPO shall have an additional fifteen (15) days to review and comment to take into account the comments of Consulting Parties and other Signatories. These review periods will occur prior to conducting a Consulting Parties meeting.

b. If all parties agree that avoidance is possible, SI will modify its plans accordingly, document the finding with the DC SHPO, and implement the project(s) in the manner that avoids the “Adverse Effect(s).”

c. If avoidance is not possible, SI shall consult further with the Signatories and Consulting Parties to identify ways to minimize or mitigate the “Adverse Effect(s).” Agreed upon minimization and mitigation measures shall be formalized in Memoranda of Agreement (MOA) executed pursuant to 36 CFR 800.6. Any disagreement regarding “Adverse Effect” determinations shall be referred to the ACHP per Stipulation 13 (Dispute Resolution).

3. **Notification for the Continuing Involvement of Consulting Parties and the Public**

Consulting Parties and the public will continue to have the opportunity to comment on each project for the implementation of the South Mall Campus Master Plan during Section 106 consultation pursuant to this PA.

A. At the initiation of each Section 106 consultation, the SI shall consult with the DC SHPO and the Signatories to update and expand the Consulting Parties list as suggested.

B. The SI shall provide project documentation and determinations of effect to the Consulting Parties and public through one of the following:

   i. Provide project documentation and determinations of effect via email.
ii. Develop a project specific website, and post all project information to the website, with notification to the Consulting Parties as information is posted.

iii. Post project information to the SI’s Office of Architectural History and Historic Preservation website, with notification to the Consulting Parties as information is posted.

C. The SI will establish a schedule for project specific Section 106 consultation with critical dates and identified opportunities for providing input in accordance with Stipulation 1. The SI will keep the Consulting Parties and the public informed of the established schedule via one of the formats outlined in Stipulation 3.B.

4. MODIFICATIONS TO THE MASTER PLAN

Due to the extended timeframe for design and implementation of the South Mall Campus Master Plan, modifications to the Master Plan may be necessary. NCPC will determine after preliminary consultation with the SI when a project or a change to a project requires an amendment or update to the Master Plan in accordance with the NCPC’s submission guidelines.

The SI will consult with the Signatories and Consulting Parties on any amendment/modification to the Master Plan in accordance with Stipulation 1 (Preliminary Project Consultation), 2 (Section 106 Consultation and Procedures), and 3 (Notification for the Continuing involvement of Consulting Parties and the Public). Notice will be provided to the Signatories and Consulting Parties of any submissions to NCPC for review and approval of the Master Plan amendment/modification.

5. MINIMIZATION MEASURES FOR ALTERNATIVE F

The following measures, which were concessions made and agreed upon during Section 106 consultation to minimize adverse effects on historic properties, shall be applied and incorporated into associated designs, as appropriate, and serve as a starting point for future Section 106 consultation in accordance with Stipulation 2:

A. Reduction of Campus Excavation: Excavation beneath the Castle will be limited to the consolidated loading facility located beneath the West Wing and Range, to increase the ceiling height of the Castle basement level, and excavation below the basement level to accommodate utility distribution, footings, and seismic measures. Excavation beneath the Castle will not exceed the extents outlined in Alternative F.

B. Hirshhorn Museum and Sculpture Garden:

i. The Hirshhorn plaza aggregate concrete walls will be maintained and restored. Alterations will be limited to minimal changes to the west wall, including the removal of the non-historic accessible ramp and opening, and removal of a select portion of the wall to connect with the main east-west Campus circulation route and to the central door on the AIB’s east elevation.
ii. The Sculpture Garden will maintain a depressed elevation, below the grade of the National Mall. The Sculpture Garden will maintain its current footprint, and the aggregate concrete perimeter walls will be restored.

C. Preservation, Repair, and Rehabilitation: All future preservation, repair, and rehabilitation efforts will be carried out in accordance with the NHPA, and the Secretary of the Interior’s Standards with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings and Guidelines for the Treatment of Cultural Landscapes.

6. SPECIFIC MITIGATION MEASURES

The SI shall ensure that mitigation measures commensurate with final adverse effect determinations made pursuant to this PA shall be identified in future consultation with the Signatories and Consulting Parties and implemented in accordance with individual project Memoranda of Agreement. It is understood that the following measures are a starting point for future consultation, and are not necessarily sufficient to adequately mitigate all adverse effects that may result from implementation of the South Mall Campus Master Plan, including any adverse effects which may have been previously unidentified and any which may be intensified and/or cumulative. At a minimum, these mitigation measures shall include nominating historic properties to the NRHP and updating existing NRHP nominations and NHL documentation, as appropriate. The following documentation and recordation mitigation measures shall be initiated within five (5) years of the last signature on this PA to allow time to allocate funding:

A. HABS/HALS Recordation of the Quadrangle and Haupt Garden: The SI shall use Historic American Building Survey/Historic American Engineering Record/Historic American Landscape Survey (HABS/HAER/HALS) Level 3 standards to document the Ripley Pavilion, Sackler Gallery Pavilion, African Art Pavilion, Haupt Garden, and associated Garden structures including the Moongate Garden, Fountain Garden, Downing Urn, and the Renwick Gates. The documentation will include exterior and interior photographs and measured drawings prior to any construction or implementation of the Master Plan. Documentation will be submitted for inclusion in the HABS/HAER/HALS collection.

B. HABS/HALS Recordation of the Hirshhorn Museum and Sculpture Garden: The SI shall use Historic American Building Survey/Historic American Engineering Record/Historic American Landscape Survey (HABS/HAER/HALS) Level 3 standards to document the Hirshhorn Museum and Sculpture Garden. The documentation will include exterior photographs prior to any construction or implementation of the Master Plan. Documentation will be submitted for inclusion in the HABS/HAER/HALS collection.

C. National Register Nomination for the Hirshhorn Museum and Sculpture Garden: The SI will complete an individual National Register of Historic Places Nomination for the Hirshhorn Museum and Sculpture Garden. The Nomination shall be completed by an individual or individuals meeting Stipulation 11, and carried out in consultation with the DC SHPO.

D. Update the National Register Nomination for the Freer Gallery of Art: The SI will update the existing individual National Register of Historic Places Nomination for the Freer Gallery of Art. The Nomination shall be completed by an individual or individuals meeting Stipulation 11, and carried out in consultation with the DC SHPO.
E. **Updates to National Historic Landmark Documentation**: The SI will update the existing National Historic Landmark documentation for the Smithsonian Institution Building (Castle) and the Arts and Industries Building. The documentation will be completed by an individual or individuals meeting Stipulation 11, and carried out in consultation with the National Historic Landmarks Program of the National Park Service.

7. **IMPLEMENTATION OF PROJECTS**

The Master Plan will be constructed in phases over an estimated ten (10) to twenty (20) year period. The SI will ensure that the following measures will be carried out in association with the implementation and construction of the Master Plan projects:

A. **Design and Construction Phasing.** The Master Plan projects will be designed and implemented as funding becomes available. Top priority will be given to the restoration of the Castle and the related seismic retrofit. An anticipated commencement and phased implementation approach to the Master Plan is outlined in Exhibit I. This anticipated schedule is subject to change; any schedule changes will be communicated to the Signatories.

B. **Required Federal Agency Reviews.** The Signatories will be informed of the outcomes of formal reviews by the NCPC, Commission of Fine Arts, and the DC SHPO, per annual reporting under Stipulation 10. Upon request, the SI will provide requesting Signatories a copy of the project materials submitted to the agency pursuant to the associated review.

C. **Monitoring of Adjacent Historic Properties.** To ensure that the construction and implementation of the South Mall Campus Master Plan does not harm the stability of the Castle, AIB, and Freer, the SI will complete extensive baseline information to document pre-construction conditions and will develop a Monitoring Plan that requires SI to install, prior to the testing phase, vibration and monitoring devices to be used during testing and all phases of construction. Testing and construction shall be temporarily halted should any vibration, noise, settlement or unanticipated circumstances exceed the safe limits outlined in the Monitoring Plan. Work shall resume only after remediation and consultation with the Signatories.

D. **Campus Circulation.** The SI will endeavor to maintain pedestrian access and circulation through the landscaped areas of the Campus as much as is practical during construction.

E. **Arts and Industries Building.** The Master Plan facilitates the mechanical and loading infrastructure to enable the interim use and/or permanent use of the AIB for general modifications, public exhibitions, educational programming, and special events. The AIB will continue to function as a flexible event and exhibition space, and will house a temporary Visitor’s Center during the Castle renovation, until a permanent use is identified and funding comes available. The SI shall notify the Signatories and seek comments on design modifications required to enable permanent use of the AIB in accordance with this PA.

F. **Interpretive Signage Related to Construction.** The SI shall prepare interpretive exhibits to be in place at the start of construction on each project. The exhibit will provide summary
information on the history of the associated building and the relationship of the project to the Master Plan. The nature of the exhibits will be flexible, based upon individual projects’ construction related closures, and is intended to educate the public about construction activities.

G. Maintenance of Website: The SI will maintain the South Mall Campus Master Plan website until the first Master Plan project is implemented. The SI will continue to post ongoing project implementation studies, such as seismic upgrades and structural protection plans for excavation work, during this interim period. After this period, the website will redirect users to the SI’s Office of Architectural History and Historic Preservation, where the materials from the South Mall Campus Master Plan website will be relocated, and where they will remain accessible to the public. The SI will publicize future Section 106 consultation on design projects for the implementation of the Master Plan in accordance with Stipulations 2 and 3.

8. EMERGENCY ACTIONS

Emergency actions are those actions deemed necessary by the SI as an immediate and direct response to an emergency situation. Provisions of this PA shall not restrict or otherwise impede the SI from taking immediate actions deemed necessary as an immediate and direct response to an emergency situation, to protect life and property, detect or otherwise respond to a credible terrorist threat or attack upon the Campus, or to address an emergency condition resulting from construction. Emergency actions under this PA are only those implemented within thirty (30) calendar days from the initiation of the emergency situation.

A. If the emergency action has the potential to affect historic properties, the SI shall notify the DC SHPO, Signatories, and other relevant parties as appropriate, prior to undertaking the action, when feasible. As part of the notification, SI shall provide a plan to address the emergency. The DC SHPO shall have seven (7) calendar days to review and comment on the plan to address the emergency. If the DC SHPO does not comment or does not object to the plan within the review period, SI shall implement the proposed plan.

B. If the SI is unable to consult prior to carrying out emergency actions, SI shall notify the DC SHPO, Signatories, and other parties as appropriate, within forty-eight (48) hours after the initiation of the emergency action. This notification shall include a description of the emergency action taken, the effects of the action(s) to historic properties, and, where appropriate, any further proposed measures to avoid, minimize, or mitigate potential adverse effects to historic properties. The DC SHPO shall have seven (7) calendar days to review and comment on the proposal where further action is required to address the emergency. If the DC SHPO does not comment or does not object to the plan within the review period, the SI shall implement the proposed plan.

C. Where possible, such emergency actions shall be undertaken in a manner that does not preclude future preservation or restoration of historic properties.

D. Immediate rescue and salvage operations conducted to preserve life or property are exempt from these and all other provisions of this PA.
9. POST-DESIGN REVIEW ARCHAEOLOGICAL DISCOVERIES

The Campus has been extensively disturbed by the construction of the existing buildings, therefore, there is minimal potential for archaeological resources that are listed in or eligible for listing in the National Register to be disturbed. The following stipulations, however, outlines the manner in which previously undiscovered archaeological resources will be reviewed if they are discovered:

A. Cultural Resources. Should cultural resources be unexpectedly identified during the implementation of the Master Plan or any actions taken pursuant to this PA, the SI shall ensure that reasonable efforts are made to avoid, minimize or mitigate adverse effects to such resources, and shall consult with the DC SHPO to resolve any unavoidable adverse effects pursuant to 36 CFR § 800.6. SI and DC SHPO shall resolve any disputes over the evaluation or treatment of previously unidentified resources using the processes outlined in Stipulation 2 of this PA.

B. Treatment of Human Remains. In the event that human remains, burials, or funerary objects are discovered during construction or any action taken pursuant to this PA, the SI shall immediately halt subsurface construction disturbance in the area of the discovery and in the surrounding area where additional remains can reasonably be expected to occur. The SI shall immediately notify the DC SHPO and the District of Columbia Chief Medical Examiner (CME) of the discovery under DC Code Section 5-1406 and other applicable laws and regulations.

   i. If CME determines that the human remains are not subject to a criminal investigation by federal or local authorities, SI shall comply with the applicable federal or local laws and regulations governing the discovery and disposition of human remains and consider the ACHP’s Policy Statement Regarding Treatment of Burial Sites, Human Remains, and Funerary Objects (2007).

   ii. For actions involving Native American human remains or burials, SI shall comply with applicable laws. in accordance with provisions of the Native American Graves Protection and Repatriation Act, as amended (Public Law 101-601, 25 USC 3001 et seq.), and regulations of the Secretary of the Interior at 43 CFR Part 10. Should human remains or such objects be found, the DC SHPO shall be notified pursuant to 43 CFR Section 10.4(d).

10. MONITORING AND REPORTING

Each year, until the PA expires or is terminated, the SI shall provide the Signatories with a summary report detailing work undertaken pursuant to its terms, or a statement of “no activity”. The report will be issued annually on or before July 31st. The report will summarize the efforts carried out during the prior year, updates on current Section 106 consultation processes, current construction activities, fiscal year budget allocations, status or completion of mitigation measures, and any projects planned for the coming year. The SI shall convene a meeting to discuss the information contained in the annual report as required, or when requested by a Signatory. Failure to provide such summary report may be considered noncompliance with the terms of the PA pursuant to the Amendments and Non-Compliance stipulation of this PA.
11. QUALIFICATIONS

SI shall ensure that all historic preservation and/or archaeological work performed on its behalf pursuant to this PA shall be accomplished by, or under the direct supervision of a person or persons who meet(s) or exceed(s) the pertinent qualifications in the Secretary’s Professional Standards (Archaeology and Historic Preservation: Secretary of the Interior’s Standards and Guidelines [As Amended and Annotated]), formerly located at 36 CFR Part 61 in those areas in which the qualifications are applicable for the specific work performed.

12. ANTI-DEFICIENCY ACT

The SI’s obligations under this PA are, in part, subject to the availability of appropriated funds, and the stipulations of this PA are subject to the provisions of the Anti-Deficiency Act. The SI shall make reasonable and good faith efforts to secure the necessary funds to implement its obligations under this PA. If lack of funds alters or impairs compliance with the Anti-Deficiency Act and the SI’s ability to implement its obligations under this PA, the SI shall consult in accordance with Stipulation 14 (Amendments to the PA and Non-Compliance), and if necessary, the Stipulation 16 (Termination).

13. DISPUTE RESOLUTION

A. Dispute Resolution for Signatories: Should any Signatory to this PA object at any time to any action proposed or the manner in which the terms of this PA are being implemented, the SI shall consult with such party and the other Signatories to resolve the objection. If a resolution cannot be reached after a good faith effort to resolve the dispute has been carried out, the SI shall forward all documentation relevant to the dispute to the ACHP including the SI’s proposed response to the objection. Within 45 days after receipt of all pertinent documentation, the ACHP shall exercise one of the following options:

i. Advise the SI that the ACHP concurs with the SI’s proposed response to the objection;

ii. Provide the SI with recommendations, which the SI shall take into account in reaching a final decision regarding its response to the objection; or

iii. Notify the SI that the objection will be referred for comment pursuant to 36 CFR 800.7(c), and proceed for comment. The resulting comment shall be taken into account by the SI in accordance with 36 CFR 800.7(c)(4) with reference to the dispute.

The SI shall take into account any ACHP recommendation or comment provided in accordance with this stipulation with reference only to the subject of this objection; the SI’s responsibility to carry out actions under this PA that are not subjects of the objection shall remain unchanged.

Should the ACHP not exercise one of the above options within 45 days after receipt of all documentation, the SI may assume the ACHP’s concurrence in its proposed response to the objection.

B. Public Dispute Resolution: A Consulting Party or member of the public may object in writing to the SI, with copies to the other Signatories and Consulting Parties, regarding any action
proposed to be carried out with respect to the implementation of the Master Plan and the PA. The SI shall take the objection into account and may consult with the objecting party, and other Consulting Parties, the public, and Signatories to resolve the dispute. The SI shall then respond to the objecting party in writing, with copies to the Signatories and other Consulting Parties. If the SI subsequently determines that the objection cannot be resolved through consultation, the SI shall notify the objecting party, the DC SHPO, and the ACHP which of the following options it will exercise:

i. Seek the assistance of the ACHP in resolving the objection in accordance with Stipulation 13.A.i-iii; or

ii. Provide a formal written response to the objection within thirty (30) days of notice to the objecting party and provide the Signatories and other Consulting Parties with copies of the written response.

14. AMENDMENTS TO THE PA AND NON-COMPLIANCE

If an amendment to the PA is required, the Signatories will consult on the proposed amendment. This PA may be amended when such an amendment is agreed to in writing by all Signatories. The amendment will be effective on the date a copy signed by all the Signatories is filed with the ACHP. The original amendment will be filed with the ACHP. If the Signatories cannot agree to appropriate terms to amend the PA, any Signatory may terminate the PA in accordance with Stipulation 15.

15. TERMINATION

If any Signatory to this PA determines that its terms cannot or are not being properly implemented, that Signatory shall immediately consult with the other Signatories to attempt to resolve the dispute or develop an amendment per Stipulations 13 and 14 above. If within sixty (60) days (or another time period agreed to by all Signatories) an amendment cannot be reached, any Signatory may terminate the PA upon written notification to the other Signatories.

Once the PA is terminated, and prior to work continuing on the Undertaking, SI must either (a) execute a new PA or MOA pursuant to 36 CFR § 800.14(b) or 800.6, or (b) reinitiate Section 106 consultation on the unfinished components of the Undertaking pursuant to 36 CFR Part 800. SI shall notify the Signatories as to the course of action it will pursue.

16. COORDINATION WITH OTHER FEDERAL REVIEWS

If the Smithsonian receives a written request from a federal agency or other organization to meet their Section 106 responsibilities for undertakings relating to implementation of the South Mall Campus Master Plan by adopting the terms of this PA, the SI shall notify the Signatories for consideration of the request(s). If all Signatories agree, the requesting agency or agencies may do so by an amendment carried out pursuant to Stipulation 14 of this PA.

17. DURATION

This PA shall be in effect for twenty-five (25) years from the date of the last signature on this PA. If necessary, the duration of this PA may be modified provided that all Signatories agree in writing.
Execution of this PA by the Signatories and implementation of its terms evidence that the SI has taken into account the effects of this Undertaking on historic properties and afforded the ACHP a reasonable opportunity to comment with regard to the Undertaking.

18. ELECTRONIC COPIES

Within one week of the last signature on this PA, the SI shall provide each Signatory with one legible, color, electronic copy of the fully executed PA and all of its attachments fully integrated into one, single document. Internet links shall not be used as a means to provide copies of attachments since web-based information can change. If the electronic copy is too large to send by e-mail, the SI shall provide each signatory with a copy of this PA on a compact disc.

SIGNATURES AND EXHIBITS FOLLOW ON SEPARATE PAGES

EXHIBITS
Exhibit A – South Mall Campus Site Plan
Exhibit B – Invitees to Scoping and Consulting Parties Meetings
Exhibit C – List of Consulting Parties Meetings
Exhibit D – Area of Potential Effects
Exhibit E – Master Plan Level Assessment of Effects on Historic Properties
Exhibit F – Comments from the National Capital Planning Commission
Exhibit G – Final Comments from the Commission of Fine Arts
Exhibit H – South Mall Campus Master Plan Alternative F
Exhibit I – Design and Construction Phasing
SIGNATURE PAGE

PROGRAMMATIC AGREEMENT
REGARDING
THE SOUTH MALL CAMPUS MASTER PLAN

FOR THE SMITHSONIAN INSTITUTION

By: ______________________________________________________________________
Albert G. Horvath
Under Secretary for Finance and Administration

Date
SIGNATURE PAGE

PROGRAMMATIC AGREEMENT REGARDING
THE SOUTH MALL CAMPUS MASTER PLAN

FOR THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICER

By: ______________________________________________________________________

David Maloney Date
State Historic Preservation Officer, District of Columbia
SIGNATURE PAGE

PROGRAMMATIC AGREEMENT
REGARDING
THE SOUTH MALL CAMPUS MASTER PLAN

FOR THE NATIONAL CAPITAL PLANNING COMMISSION

By: ____________________________________________________________

Marcel C. Acosta
Executive Director

Date
SIGNATURE PAGE

PROGRAMMATIC AGREEMENT
REGARDING
THE SOUTH MALL CAMPUS MASTER PLAN

FOR THE NATIONAL PARK SERVICE

By: ______________________________________________________________________
Robert Vogel
Regional Director, National Capital Region

Date
FOR THE ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: John M. Fowler
Executive Director
EXHIBITS

Exhibit A – South Mall Campus Site Plan

Existing South Mall Campus Plan. Bjarke Ingels Group.
Exhibit B – Invitees to Scoping and Consulting Parties Meetings

**Review Agencies**
- National Capital Planning Commission
- US Commission of Fine Arts

**State Historic Preservation Office**
- DC Historic Preservation Office

**Tribal Historic Preservation Office**
- Delaware Nation

**Public Agencies**
- Advisory Council on Historic Preservation
- Architect of the Capitol
- DC Department of Transportation
- DC Office of Planning
- National Archives and Records Administration
- National Gallery of Art
- National Park Service – National Mall and Memorial Parks
- National Park Service, National Capital Region – National Historic Landmarks Coordinator
- US Department of Agriculture
- US General Services Administration
- Washington Metropolitan Area Transit Authority
- DC Department of the Environment
- DC Department of Public Works
- DC Fire and Emergency Medical Services
- DC Chamber of Commerce
- US Department of Energy
- US Department of Health and Human Services
- Federal Aviation Administration
- Voice of America
- Internal Revenue Service
- US Department of Justice

**Interested Parties**
- American Institute of Architects, DC Chapter
- Committee of 100 on the Federal City
- Cultural Landscape Foundation
- Cultural Tourism DC
- DC Preservation League
- DC Water
- Docomomo US, DC Chapter
- Dwight D. Eisenhower Memorial Commission
- Guild of Professional Tour Guides of Washington, DC
- NPS Concessionaire
- National Association of Olmsted Parks
- National Coalition to Save Our Mall
- National Trust for Historic Preservation
- Potomac Electric Power Company
- Preservation Action
- Society of Architectural Historians
- Society of Architectural Historians, Latrobe Chapter
- Trust for the National Mall
- US Capitol Historical Society
- US Holocaust Memorial Museum
- Victorian Society in America
- Washington Gas
- Southwest Neighborhood Assembly
- National Civic Art Society
- Waterfront Gateway Neighborhood Association
- American Society of Landscape Architects
- Bethesda Community Garden Club
- National Conference of State Historic Preservation Officers

**Local Elected Representatives**
- Advisory Neighborhood Commission 2C
- Advisory Neighborhood Commission 6D
- DC Office of the Mayor
- DC City Council
- DC Delegate
<table>
<thead>
<tr>
<th>Consulting Parties Meeting Date</th>
<th>Meeting Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>December 16, 2014</td>
<td>Conducted jointly with the NEPA Public Scoping Meeting to provide an overview of the project and its major goals and objectives. To introduce the Section 106 process, NCPC and SI defined the undertaking; presented a draft Area of Potential Effects (APE); and identified historic properties within the APE, including the findings of the ongoing Cultural Landscape Report (CLR) for the South Mall Campus. For the purposes of NEPA, NCPC and SI presented the purpose and need for the project, the potential environmental issues to be addressed in the EIS, and the preliminary alternatives to be analyzed in the EIS. Information was provided on the coordination of the Section 106 and NEPA processes. The presentation was followed by an open house for attendees to review the alternatives under consideration, provide written or verbal comments, or ask questions. Comments provided by Consulting Parties and meeting attendees were recorded in the South Mall Campus Master Plan Public Scoping Report (June 2015).</td>
</tr>
<tr>
<td>March 30, 2015</td>
<td>Information from the previous meeting was reiterated, including the draft APE and preliminary identification of historic properties. NCPC and SI also outlined the roles and responsibility of the consulting parties and the anticipated Section 106 consultation schedule. SI presented the Master Plan objectives, including: visitor experience, education programs, museum programs, garden programs, collections, special events and retail, historic preservation, building systems, sustainability, loading and service, safety, security, and urban design. Comments provided by the Consulting Parties included preservation of the Campus’s historic buildings, public outreach, the availability of technical reports, and seismic protection of the Castle. The presentation was followed by a tour of the South Mall Campus.</td>
</tr>
<tr>
<td>June 9, 2015</td>
<td>Meeting focused on a more detailed presentation of the range of alternatives being considered under the EIS and Section 106 processes. It also included a description of alternatives that had been considered but dismissed from further environmental review under the EIS. SI reiterated the historic properties within the Campus area and also provided additional information on the goals and objectives that contributed to the development of the Master Plan alternatives. Consulting Parties asked questions for additional information and clarification on the range of alternatives under consideration.</td>
</tr>
<tr>
<td>October 7, 2015</td>
<td>Meeting focused on the treatment of the Castle, including historic preservation, seismic protection, and programming needs. SI presented a comparative study of major museum complexes worldwide to benchmark the programmatic needs of the South Mall Campus. SI described the historic development of the Castle and how its varying degrees of integrity would correspond to treatment approaches in the building. SI’s consulting structural engineer provided a detailed presentation of the seismic vulnerabilities of the Castle and potential mitigation options, including a comparison of conventional structural reinforcement versus base isolation. The meeting concluded with a recap of the Master Plan alternatives under consideration, illustrating specifically how closely each alternative met its programmatic area.</td>
</tr>
</tbody>
</table>
### Smithsonian Institution

#### South Mall Campus Master Plan

<table>
<thead>
<tr>
<th>Date</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>January 27, 2016</td>
<td>Meeting focused on the findings of the CLR being prepared for the South Mall Campus. The report was developed to document the history of the Campus and to inform both long-term and immediate treatment options. Smithsonian Gardens also presented its ongoing mission and goals as well as its objectives for the South Mall Campus Master Plan. During the presentation, SI identified several major periods of development and illustrated those with historic photographs and period plan diagrams. SI also provided an update on the ongoing NEPA process, including loading traffic counts and the Notice of Intent to prepare an EIS. Consulting Parties commented on the scope and purpose of the CLR and the maintenance of Smithsonian Gardens, and additional clarification regarding the development of alternatives and the Master Plan and EIS processes.</td>
</tr>
<tr>
<td>April 13, 2016</td>
<td>Meeting provided detailed, revised alternatives based on Consulting Party comments and additional material gathered to inform the Master Plan. SI also presented an update to the inventory of historic properties within the APE and project area. Consulting Parties discussed details of the master plan alternatives and how comments would be addressed.</td>
</tr>
<tr>
<td>October 26, 2016</td>
<td>To aid in the evaluation of the undertaking’s effects on historic properties, SI completed Determinations of Eligibility for listing the Hirshhorn Museum and Sculpture Garden and the Quadrangle Building in the NRHP. The former determined that the Hirshhorn Museum was eligible for National Register listing; the latter determined that the Quadrangle Building and landscape were not individually eligible for National Register listing at this time. SI presented the findings of these reports and the research and evaluation process that led to their conclusions. SI also presented a consolidated matrix of historic properties within the APE. Consulting Parties responded to the findings presented by SI and discussed implications for the Master Plan alternatives.</td>
</tr>
<tr>
<td>May 3, 2017</td>
<td>SI presented Alternatives E and F, developed to respond to Consulting Party comments. SI determined the design of Alternative E to be unsuccessful, and dismissed it from evaluation in the EIS. Alternative F was presented in greater detail and carried forward for analysis in the EIS. SI also presented a general update to alternatives presented previously.</td>
</tr>
<tr>
<td>July 26, 2017</td>
<td>Meeting was to present and discuss potential adverse effects on historic properties across the Master Plan alternatives. Consulting Parties offered responses to these findings and discussed approaches to avoid or minimize potential adverse effects. SI also stated that it would dismiss Alternative A from further analysis in the EIS.</td>
</tr>
<tr>
<td>December 11 and 18, 2017</td>
<td>Public meetings held to discuss the draft Environmental Impact Statement. The content of the meetings was identical, held at different times of day to accommodate schedules for public participation. Interested parties submitted oral comments at the meetings, and the record was open for submission of written comments until January 16, 2018.</td>
</tr>
<tr>
<td>May 9, 2018</td>
<td>Meeting to discuss the content of the Programmatic Agreement, and discussion of comments from Consulting Parties.</td>
</tr>
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</table>
The historic properties identified in the above maps and tables indicate properties that are individually listed in, or have been determined as eligible for individual listing in, the National Register of Historic Places.
Exhibit E – Master Plan Level Assessment of Effects on Historic Properties

The Master Plan Level Assessment of Effects on Historic Properties provides an assessment of the effects on National Register of Historic Places-eligible or National Register of Historic Places-listed properties from the alternatives that were considered for the South Mall Campus Master Plan.

The effects analysis is based upon the Section 106 criteria of adverse effect. The effects analysis has been organized by historic properties and actions under each alternative. Direct effects are addressed first, followed by indirect effects.

In most cases, design details at the master planning level are not sufficiently developed to fully and accurately assess the effect of a specific action. In such cases, the effects will be further addressed at the time of project design in accordance with the Programmatic Agreement. Where known or potential adverse effects have been identified, the Section 106 resolution document will outline treatment strategies to avoid, minimize, or mitigate adverse effects on the historic properties and outline guidelines for addressing unknown effects. Due to the nature of this project as a Master Plan, certain actions have the potential to create adverse effects due to their related or cumulative nature. These related and cumulative effects have been described at the end of this Exhibit.

The effects analysis has been organized by historic properties and actions under Alternative A, B, D, and F (Alternatives A, C, and E were dismissed from further consideration and were not assessed for effects on historic properties). Potential adverse effects resulting from the No Action Alternative are also described.
Master Plan Alternatives Considered.
<table>
<thead>
<tr>
<th>Resource</th>
<th>Feature/Action</th>
<th>NO ACTION</th>
<th>ALTERNATIVE A</th>
<th>ALTERNATIVE B</th>
<th>ALTERNATIVE C</th>
<th>ALTERNATIVE D</th>
<th>ALTERNATIVE E</th>
<th>Comments/Additional Information</th>
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<tbody>
<tr>
<td>Freer Gallery East</td>
<td>Accessible Entrance: An exiting window on the east side of the Freer Gallery will be lowered to create an accessible entrance from Hiall Garden.</td>
<td>No effect</td>
<td></td>
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<td>Underwriting is common to all action alternatives.</td>
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<td></td>
<td>New Loading Ramp: A new loading ramp will be constructed on the west lawn of the Freer Gallery to connect with centralized loading facilities.</td>
<td>No effect</td>
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<td>Undertaking is common to all action alternatives.</td>
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<tr>
<td>Castle Blast Protection</td>
<td>Castle retrofit will include blast resilience to be coordinated with perimeter security elements</td>
<td>Without treatment, Castle will be vulnerable to potential blast damage. Potential adverse effect.</td>
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<td>Undertaking is common to all action alternatives.</td>
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<tr>
<td>Smithsonian Institution</td>
<td>Building Castles: DC, MD, MA, NH, Contributing building to National Mall and Quadrangle</td>
<td>Without treatment, Castle will continue to deteriorate and be vulnerable to potential damage. Potential adverse effect.</td>
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<td>Undertaking is common to all action alternatives.</td>
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<tr>
<td>Castle Seismic Bracing</td>
<td>Structural bracing will be added to suppplement the Castles existing structure.</td>
<td>Structural bracing may require the removal or modification of historic fabric, with the potential to diminish the Castles integrity of design, materials, and craftsmanship. Potential adverse effect.</td>
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<td>Undertaking is common to all action alternatives.</td>
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<td>Resource</td>
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- **Castle Basement Floor Leveling**: In connection with seismic retrofit, the basement floor level will be lowered to create additional headroom for the visitor center and other program uses. Mechanical and other utility lines will be removed to expose the historic masonry vaults, piers, and walls. No effect.

- **Castle Interior Restoration**: The ground and upper floors of the Castle will be rehabilitated, with significant interior spaces restored to their period(s) of significance. Without coordinated treatment approach, Castle interior and systems will continue to deteriorate. Potential adverse effect.

- **Castle Sub-Basement Expansion**: A new sub-basement will be excavated beneath the existing basement level. Sub-basement will provide heating, utility, and building support. The footprint of the proposed expansion varies by alternative. No effect.

- **Visitor Center Entrance**: A new means of entrance and egress from the below-grade Visitor Center is proposed in several alternatives. No effect.

- **Potential adverse effect**

  - Undertaking is common to all action alternatives.
  - Undertaking will remove incompatible infill construction and allow for the restoration of these historic features.
  - Detailing of historic structural elements will be designed to meet the Secretary of the Interior Standards.
  - Approximately one-third of basement level was previously lowered at connection to Quadrangle and in mechanical and food service spaces.

  - **Potential adverse effect**

  - Undertaking is common to all action alternatives.
  - Undertaking will remove incompatible infill construction and will be designed to meet the Secretary of the Interior Standards.
  - Undertaking will restore primary public interior spaces and will retain historic configuration of cast iron window and range.

  - *Examination beneath the Castle is necessary for the functionality of the central delivery of goods, services, handling of trash and recycling, and museum content delivery.*

  - *Expanded sub-basement area will require additional egress through connecting buildings.*

  - *Examination will be monitored to ensure safety of building during implementation.*

  - *In Alternative F, the adverse effect of a visible grade change has been avoided or minimized by designating the size of the entrance, limiting its visibility from the south, and maintaining the existing flat grade of the visitors Center.*
<table>
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<tr>
<th>Resource</th>
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<tbody>
<tr>
<td>Reopen AIB for Public Circulation: The non-historic exit security door will be removed and AIB will be opened to allow interior east-west circulation.</td>
<td>No effect.</td>
<td>No alterations are proposed. No effect.</td>
<td>Return the east door to use will not adversely affect the character or integrity of AIB. No adverse effect.</td>
<td>Returning the east door to use will not adversely affect the character or integrity of AIB. No adverse effect.</td>
<td>Returning the east door to use will not adversely affect the character or integrity of AIB. No adverse effect.</td>
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</tr>
<tr>
<td>AIB Interior: Facilitate interim and/or permanent use of the AIB for public exhibitions, educational programming and special events. AIB may house a temporary Visitor's Center during the Center restoration.</td>
<td>No effect.</td>
<td>Modifications expected to be beneficial but plans have not yet been sufficiently developed to make a determination of effect. Effects to be determined.</td>
<td>Modifications expected to be beneficial but plans have not yet been sufficiently developed to make a determination of effect. Effects to be determined.</td>
<td>Modifications expected to be beneficial but plans have not yet been sufficiently developed to make a determination of effect. Effects to be determined.</td>
<td>Modifications expected to be beneficial but plans have not yet been sufficiently developed to make a determination of effect. Effects to be determined.</td>
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<tr>
<td>Remove Surface Parking Lot and Expand Ripley Gardens: The non-historic parking lot to the east of AIB will be removed, allowing for the expansion of the adjacent Ripley Garden.</td>
<td>No effect.</td>
<td>No alterations are proposed. No effect.</td>
<td>Removing the parking lot and expanding the existing garden will not adversely affect the character or integrity of AIB. No adverse effect.</td>
<td>Removing the parking lot and expanding the existing garden will not adversely affect the character or integrity of AIB. No adverse effect.</td>
<td>Removing the parking lot and expanding the existing garden will not adversely affect the character or integrity of AIB. No adverse effect.</td>
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</tr>
<tr>
<td>Central Utility Plant: Unsatisfactory areas adjacent to the CUP will be excavated to create a central utility plant for the campus. The location and extent of excavation varies by alternative.</td>
<td>No effect.</td>
<td>No excavations or utility/tenancy connection are proposed. No effect.</td>
<td>Excavation will require structural underpinning to be performed on west side of AIB foundations. Al-grade ventilation and access infrastructure associated with utility plant has potential to adversely affect character and setting of AIB. Potential adverse effect.</td>
<td>Excavation will require structural underpinning to be performed on west side of AIB foundations. Al-grade ventilation and access infrastructure associated with utility plant has potential to adversely affect character and setting of AIB. Potential adverse effect.</td>
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</table>

**NR** = National Register of Historic Places; **HD** = Historic District; **DC** = DC Inventory of Historic Sites; **NML** = National Memorial Landmark; **NHS** = National Historic Site
<table>
<thead>
<tr>
<th>Resource, Feature/Action</th>
<th>NO ACTION</th>
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<th>ALTERNATIVE F</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Hirshhorn Plaza Walls: Portions of the Plaza walls will be removed to allow a direct pedestrian connection to JAB and the Ripley Garden.</td>
<td>No effect.</td>
<td>No alterations are proposed. No effect.</td>
<td>Small opening will be inserted on the west Plaza wall. Adverse effect.</td>
<td>Portions of the north, west, and east Plaza walls will be removed. Adverse effect.</td>
<td>Small opening will be inserted on the west Plaza wall. Adverse effect.</td>
<td>Opening improves east-west circulation across the campus by providing a direct pedestrian link between the AIB, Ripley Garden, and Hirshhorn Plaza.</td>
</tr>
<tr>
<td>Hirshhorn Museum &amp; Sculpture Garden: The existing circulation between the Hirshhorn Plaza and Sculpture Garden beneath Jefferson Drive will be restored or replaced. Derive of intervention from elimination.</td>
<td>No effect.</td>
<td>No alterations are proposed. No effect.</td>
<td>Tunnel would be repositioned and restored to its original configuration. No adverse effect.</td>
<td>Tunnel would be repositioned and restored to its original configuration. No adverse effect.</td>
<td>Tunnel will be repositioned, expanded, and reconfigured, resulting in a loss of historic fabric. Adverse effect.</td>
<td>In Alternatives B, C, and E, the existing education facility will be relocated.</td>
</tr>
<tr>
<td>Hirshhorn Building Renovation: Renovation will not affect character or integrity of the building or site. No adverse effect.</td>
<td>No effect.</td>
<td>Walls will be repaired in-kind. No adverse effect.</td>
<td>Walls will be repaired in-kind. No adverse effect.</td>
<td>Walls will be repaired in-kind. No adverse effect.</td>
<td>Walls will be repaired in-kind. No adverse effect.</td>
<td>Undertaking is common to all action alternatives.</td>
</tr>
<tr>
<td>Hirshhorn Sculpture Garden Walls: Portion of the Sculpture Garden walls will be restored.</td>
<td>No effect.</td>
<td>Walls will be repaired in-kind. No adverse effect.</td>
<td>Walls will be repaired in-kind. No adverse effect.</td>
<td>Walls will be repaired in-kind. No adverse effect.</td>
<td>Walls will be repaired in-kind. No adverse effect.</td>
<td>Undertaking is common to all action alternatives.</td>
</tr>
<tr>
<td>New Galleries Beneath Sculpture Garden: In Alternatives A and B, the interior walls of the Sculpture Garden will be reconfigured to allow for high-ceilinged galleries below.</td>
<td>No effect.</td>
<td>Mild interim modifications without changes to grades may be considered. Potential adverse effect.</td>
<td>Existing Sculpture Garden elements will be removed and replaced with a new Sculpture Garden and galleries below. Adverse effect.</td>
<td>Existing Sculpture Garden elements will be removed and replaced with a new Sculpture Garden and galleries below. Adverse effect.</td>
<td>The new Sculpture Garden proposed in Alternatives A and B will remain below the prevailing grade of the Mall. The majority of the existing perimeter walls will be retained. Any interim changes to the Sculpture Garden will undergo separate review.</td>
<td></td>
</tr>
<tr>
<td>Castner Building: The existing loading ramp will be removed and the Hart Garden will be expanded into this area.</td>
<td>No effect.</td>
<td>Existing loading ramp will remain. No effect.</td>
<td>Loading ramp will be removed and garden will be expanded into this area. No adverse effect.</td>
<td>Loading ramp will be removed and garden will be expanded into this area. No adverse effect.</td>
<td>Loading ramp will be removed and garden will be expanded into this area. No adverse effect.</td>
<td>Removal of the loading dock in Alternatives B-F will not adversely affect the contributing Castner Building.</td>
</tr>
</tbody>
</table>

NR = National Register of Historic Places; HD = Historic District; DC = DC Inventory of Historic Sites; NHL = National Historic Landmark; NHLIS = National Historic Site.
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<th>ALTERNATIVE D</th>
<th>ALTERNATIVE F</th>
<th>Comments/Additional Information</th>
</tr>
</thead>
</table>
| Ripley Pavilion  | The Ripley Pavilion will be removed to allow construction of a consolidated loading facility. | No effect | Ripley Pavilion will remain. No effect.          | Removal of the Ripley Pavilion will adversely affect the contributing Quad building. Adverse Effect. | Removal of the Ripley Pavilion will adversely affect the contributing Quad building. Adverse Effect. | Removal of the Ripley Pavilion will adversely affect the contributing Quad building. Adverse Effect. | • Removal of the Ripley Pavilion in Alternatives B, F will restore views between the Quad and Mall and south of the Castle to the Washington Monument.  
• A new exit will be constructed to the south of the Castle to meet access requirements.                                                                 |
| Quadrangle Building | Replace Quadrangle Roof Membrane: Quadrangle roof membrane will be replaced. | Without treatment, Quad roof membrane will continue to deteriorate, posing danger to building and collections. Potential adverse effect. | Replacement of the roof membrane will not adversely affect the contributing Quad building. No adverse effect. | Replacement of the roof membrane will not adversely affect the contributing Quad building. No adverse effect. | Replacement of the roof membrane will not adversely affect the contributing Quad building. No adverse effect. | Replacement of the roof membrane will not adversely affect the contributing Quad building. No adverse effect. | • Undertaking is common to all action alternatives.  
• Replacement of roof membranes is necessary to protect Quadrangle and its collections.  
• The reconstruction of the Haupt Garden is addressed separately, and has a greater potential to adversely affect the resource.                                                                                           |
| National Mall     | Reconfigure Haupt Garden: In coordination with roof membrane replacement, the Haupt Garden will be reconfigured to accommodate new Quad museum and Visitor Center access. Degree of intervention varies by alternative. | No effect | Haupt Garden features will be replaced in kind following roof membrane replacement. No adverse effect. | Haupt Garden will be substantially reconfigured. Removal of Haupt Garden features will adversely affect character and integrity of the contributing Quad building. Adverse effect. | Haupt Garden will be reconfigured, although certain elements will be retained in kind. Removal of Haupt Garden features will adversely affect character and integrity of the contributing Quad building. Adverse effect. | Haupt Garden will be reconfigured, although certain elements will be retained in kind. Removal of Haupt Garden features will adversely affect character and integrity of the contributing Quad building. Adverse effect. | • Adverse effect has been minimized in Alternative F by retaining the existing grade and garden-like quality of the Haupt Garden and by retaining certain garden features. |
| Central Utility Plants | Unexcavated areas adjacent to the Quad will be excavated to create a central utility plant for the campus. The location and extent of excavation varies by alternative. | No effect | No excavation of central utility plant is proposed. No effect. | In Alternative B, the plant will be located in the unexcavated area between the Quad and AIB. Al-grade ventilation and access infrastructure associated with utility plant has potential to adversely affect character of Quadrangle and Haupt Garden. Potential adverse effect. | In Alternative D, the plant will be located in the unexcavated area between the Quad and AIB. Al-grade ventilation and access infrastructure associated with utility plant has potential to adversely affect character of Quadrangle and Haupt Garden. Potential adverse effect. | In Alternative F, the plant will be located in the unexcavated area between the Quad and AIB. Al-grade ventilation and access infrastructure associated with utility plant has potential to adversely affect character of Quadrangle and Haupt Garden. Potential adverse effect. | • Excavation will require structural underpinning.  
• Potential visual effect resulting from al-grade utility plant infrastructure will be mitigated by integrating these features into the landscape and building design.                                                                                                                                                                           |
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<tr>
<td>National Mall DC, NR</td>
<td>Quad Museum Pavilions: The pavilions will be reconfigured or replaced with new pavilions. Degree of intervention: varies by alternative.</td>
<td>No effect.</td>
<td>No effect.</td>
<td>Museum entrances will be reconfigured to existing glass-filled openings in the north walls of the museum pavilions. No historic fabric to be removed. No adverse effect.</td>
<td>Museum pavilions will be removed and replaced with new pavilions. Removal of pavilions will adversely affect the contributing building and setting of the Capitol and other historic buildings. Adverse effect.</td>
<td>Museum pavilions will be removed and replaced with new pavilions. Removal of pavilions will adversely affect the contributing building and setting of the Capitol and other historic buildings. Adverse effect.</td>
<td>In Alternative B, only the removal of glass curtains required to accommodate new entrances. In Alternatives D and F, relocation of the museum pavilions will allow for greater visibility from the Mall and significant improvement to the quality of the below-grade museum and circulation space. The existing above-grade entries and skylight structures will also be reconfigured in Alternatives D and F. Effects of the contemporary character of the new museum pavilions will be evaluated at time of design.</td>
</tr>
<tr>
<td>National Mall HD, DC, NR</td>
<td>Quad Skylights: Skylights will be removed and new skylights will be integrated into the Mall building to provide interior daylighting for the Capitol Visitors Center.</td>
<td>No effect.</td>
<td>No effect.</td>
<td>No effect.</td>
<td>No effect.</td>
<td>No effect.</td>
<td>In Alternatives D and F, adverse effects will be minimized by integrating these features into the landscape and building design.</td>
</tr>
<tr>
<td>National Mall HD, DC, NR</td>
<td>Perimeter Security: Perimeter security elements will be installed around the South Mall Campus</td>
<td>No effect.</td>
<td>No effect.</td>
<td>No effect.</td>
<td>No adverse effect.</td>
<td>No adverse effect.</td>
<td>Undertaking is consistent with all action alternatives. NPCP grants preliminary approval for a Mall-wide building perimeter security for the Mall in 2004. In the Master Plan, adverse effects were avoided by removing alterations to Jefferson Drive and Independence Avenue from all alternatives. Perimeter security elements will be integrated into hardened landscape features to the greatest degree possible.</td>
</tr>
<tr>
<td>Plan of the City of Washington (L'Enfant Plan) DC, NR</td>
<td>All Plan Components: The Master Plan proposes no major actions to contributing streets and avenues within the project area.</td>
<td>No effect.</td>
<td>No adverse effect.</td>
<td>No adverse effect.</td>
<td>No adverse effect.</td>
<td>No adverse effect.</td>
<td>Independence Avenue, Twelfth Street, Seventh Street, and Jefferson Drive are contributing elements to the Plan of the City of Washington. Adverse effects were avoided by removing alterations to Jefferson Drive and Independence Avenue from all Alternatives.</td>
</tr>
<tr>
<td>Potential Archaeological Resources</td>
<td>Plan Examines: Excavation is proposed for new loading, site assessment, and utility plant facilities. Degree of intervention: varies by alternative.</td>
<td>No effect.</td>
<td>No effect.</td>
<td>No effect.</td>
<td>Areas of excavation have the potential to impact previously undiscovered archaeological resources. Effect to be determined.</td>
<td>Areas of excavation have the potential to impact previously undiscovered archaeological resources. Effect to be determined.</td>
<td>The site has been extensively disturbed and has minimal potential for archaeological resources. Programmatic Agreement will include stipulations for previously undiscovered archaeological resources.</td>
</tr>
</tbody>
</table>

MR = National Register of Historic Places; HD = Historic District; DC = DC Inventory of Historic Sites; NHL = National Historic Landmark; NHS = National Historic Site

Potential adverse effect

Adverse effect
<table>
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<tr>
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<tr>
<td>Plan of the City of Washington (L Enfant Plan) DC, NR</td>
<td>Grade Changes Across Project Areas: Existing grades in the Hirshhorn Sculpture Garden and Haud Garden will be modified to varying degrees across the alternatives.</td>
<td>No effect.</td>
<td>No major above-grade changes are proposed. No adverse effect.</td>
<td>No major above-grade changes are proposed. No adverse effect.</td>
<td>New Quad museum pavilions, sunken Water Center entrance, and modified Sculpture Garden will not affect contributing views. No adverse effect.</td>
<td>New Quad museum pavilions and modified Sculpture Garden will not affect contributing views. No adverse effect.</td>
<td>• The new Sculpture Garden proposed in Alternatives E and F will remain below grade of Mall.</td>
</tr>
<tr>
<td>National Mall HD DC, NR</td>
<td>Hirshhorn Sculpture Garden Alterations: In Alternatives D,F, portions of the Hirshhorn Sculpture Garden will be raised to create high-collared galleries below.</td>
<td>No effect.</td>
<td>No substantial alterations to the Sculpture Garden are proposed. No adverse effect.</td>
<td>No substantial alterations to the Sculpture Garden are proposed. No adverse effect.</td>
<td>Modifying the Sculpture Garden has the potential to affect the east-west viewshed. Potential adverse effect.</td>
<td>Modifying the Sculpture Garden has the potential to affect the east-west viewshed. Potential adverse effect.</td>
<td>• Contributing views were identified in the amended National Mall National Register Nomination. • The new Sculpture Garden proposed in Alternatives D and F will remain below grade of Mall to minimize the potential adverse effect. • Effects will be further evaluated at time of project design. To assess the visibility of the proposed changes.</td>
</tr>
<tr>
<td>National Mall HD DC, NR</td>
<td>Remove Loading Ramp/Expand Gardens: The existing loading ramp will be removed and a new ramp installed adjacent to the Front Gallery.</td>
<td>No effect.</td>
<td>Existing Quad loading dock would be retained. No effect.</td>
<td>The new loading dock ramp will be only minimally visible from the Mall. No adverse effect.</td>
<td>The new loading dock ramp will be only minimally visible from the Mall. No adverse effect.</td>
<td>The new loading dock ramp will be only minimally visible from the Mall. No adverse effect.</td>
<td>• Beyond the potential direct effects to the surrounding area, there will be no adverse effects on the Mall HD. • The new loading ramp has no potential to alter the principal east-west viewshed.</td>
</tr>
<tr>
<td>National Mall HD DC, NR</td>
<td>Quad Museum Pavilions: The pavilions will be reconfigured or replaced with new pavilions. Degree of intervention varies by alternative.</td>
<td>No effect.</td>
<td>No reconfiguration of the museum pavilions is proposed. No adverse effect.</td>
<td>Only a minor reconfiguration of the museum pavilions is proposed. No adverse effect.</td>
<td>Replacement of these pavilions will not negatively affect contributing historic views within the Mall. No adverse effect.</td>
<td>Replacement of these pavilions will not negatively affect contributing historic views within the Mall. No adverse effect.</td>
<td>• Contributing views were identified in the amended National Mall National Register Nomination.</td>
</tr>
<tr>
<td>Washington Monument and Grounds HD DC, NR</td>
<td>Grade Changes Across Project Areas: Existing grades in the Hirshhorn Sculpture Garden and Haud Garden will be modified to varying degrees across the alternatives.</td>
<td>No effect.</td>
<td>No major above-grade changes are proposed. No adverse effect.</td>
<td>Alternative B proposes limited above-ground changes. No adverse effect.</td>
<td>Alternative D proposes grade changes in the Haud Garden and a higher elevation for the Sculpture Garden. Changes will be minimally visible from the Monument Grounds. No adverse effect.</td>
<td>Alternative F proposes a higher elevation for the Sculpture Garden. Changes will be minimally visible from the Monument Grounds. No adverse effect.</td>
<td>• In all action alternatives, the removal of the Ripley Pavilion will reduce the visual impact between the Monument and South Yard. • In all action alternatives, the loading ramp adjacent to the Freer Gallery will be minimally visible from the Monument Grounds.</td>
</tr>
<tr>
<td>Federal Triangle DC, DSE</td>
<td>All Plan Components</td>
<td>No effect.</td>
<td>No major above-grade changes are proposed. No adverse effect.</td>
<td>Projects proposed under all alternatives will be minimally visible and have no potential to adversely affect surrounding historic resources. No adverse effect.</td>
<td>Projects proposed under all alternatives will be minimally visible and have no potential to adversely affect surrounding historic resources. No adverse effect.</td>
<td>Projects proposed under all alternatives will be minimally visible and have no potential to adversely affect surrounding historic resources. No adverse effect.</td>
<td>• A small portion of the APE overlaps with these historic districts, drawn to incorporate the 15th Street Widening.</td>
</tr>
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<tbody>
<tr>
<td>Individually Designated Historic Properties See APE for complete list</td>
<td>All Plan Components</td>
<td><strong>No effect.</strong></td>
<td>Visibility of the proposed alterations under will be determined at the time of the project. Potential adverse effect.</td>
<td>Visibility of the proposed alterations under will be determined at the time of the project. Potential adverse effect.</td>
<td>Visibility of the proposed alterations under will be determined at the time of the project. Potential adverse effect.</td>
<td>• Effects will be further evaluated at time of project design, to assess the visibility of the proposed changes from these locations. There is a limited potential for adverse effects to result.</td>
<td></td>
</tr>
</tbody>
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*NR = National Register of Historic Places; HD = Historic District; DG = DC Inventory of Historic Sites; NHL = National Historic Landmark; NHS = National Historic Site*
Cumulative and Related Effects

NHPA Section 106 implementing regulations require agencies to consider the cumulative effects on their undertakings on historic properties. When assessed individually, some of the above-described actions may have a limited potential to adversely affect historic properties. However, when assessed as connected or interrelated projects, these cumulative effects have the potential to rise to the level of adverse under Section 106. Furthermore, many of these actions, such as restoring the public interior spaces of the Castle, are intended to counter past and reasonably foreseeable future actions and/or events. This narrative includes a discussion of those past and future actions.

In most cases, these cumulative effects are common to all action alternatives. Therefore, they have been organized by historic property, rather than by alternative. This assessment has identified no cumulative effects to properties outside the project area; therefore, they have been excluded from this narrative.

Freer Gallery of Art

No cumulative adverse effects have been identified on the Freer Gallery.

Smithsonian Institution Building “Castle”

Under all action alternatives, the degree of change proposed for the Castle has the potential to generate cumulative adverse effects on this property.

Throughout the twentieth century, alterations to the Castle have resulted in a diminished degree of integrity to its significant interior spaces. Circa 1940, several bays on the east and west sides of the Lower Main Hall (Great Hall) were infilled with partition walls, reducing the original length of that space by approximately one-third. The enclosed areas behind these partitions were subsequently modified in 1987 to accommodate restrooms, offices, and a café.

In the Upper Main Hall, the installation of the Woodrow Wilson Center circa 1968 subdivided this room both horizontally and vertically, creating an additional floor and a warren of offices and corridors in the formerly open space. On the basement floor, infill construction—including extensive mechanical equipment, ducts, and pipes—completed throughout the late nineteenth to late twentieth centuries has obscured the historic masonry piers and vaults. Cumulatively, these alterations have diminished the Castle’s integrity of design, feeling, workmanship, and materials, and feeling, resulting in an adverse effect.

In 2011, an earthquake originating in Mineral, Virginia resulted in damage to buildings throughout Washington, including on the Castle’s chimneys and towers, demonstrating the building’s susceptibility to potential future damage. Furthermore, the lack of adequate perimeter security and blast protection for the Castle creates a risk for future potential damage.

The South Mall Campus Master Plan seeks to address the deficiencies in the Castle’s historic character and structural integrity through a coordinated expansion, rehabilitation, and structural and blast upgrade. All action alternatives propose extensive excavation to create a below-grade Visitor Center beneath and adjacent to the Castle basement and to allow for the installation of a base isolation system. The sub-basement expansion will accommodate visitor amenities in addition to mechanical equipment and centralized loading. The relocation of these systems and program elements will allow mechanical equipment and infill construction.
to be removed from the historic spaces above, allowing for the restoration of the Lower and Upper Main Halls. The basement floor will be lowered throughout, partitions and equipment removed, and the masonry vaults and piers restored.

In all action alternatives, the degree of change proposed for the Castle—including interior restoration and rehabilitation, blast protection, base isolation, seismic bracing, basement expansion, and sub-basement excavation—has the potential to generate cumulative adverse effects on this property, and by association on the National Mall Historic District (to which the Castle is a contributing property). The addition of a Visitor Center ingress or egress and new museum pavilions to the south of the Castle also have the potential to diminish the Castle’s integrity of setting. However, these cumulative adverse effects could be viewed as balanced by the beneficial effects of the Castle interior restoration and structural upgrade, which ensures long-term preservation of the building. The proposed changes also avoid more impactful alterations to the Castle, including a potential above-grade exterior addition.

To minimize or avoid cumulative adverse effects at the time of project implementation, the Castle treatment must be carefully designed and implemented to meet or exceed historic preservation standards for the treatment of historic properties. Implementation of the Castle restoration under the Master Plan will allow SI to better utilize this National Historic Landmark and reallocate interior spaces to public use.

**Arts and Industries Building**

No cumulative adverse effects have been identified on AIB.

**Hirshhorn Museum and Sculpture Garden**

Under Alternatives D and F, the greater degree of change proposed for the Hirshhorn Museum and Sculpture Garden has the potential to generate cumulative adverse effects on this property. Two major landscape projects in the twentieth century altered the character of the Hirshhorn Plaza and Sculpture Garden. In the Sculpture Garden, a landscape rehabilitation project completed between 1977 and 1981 improved the accessibility and environmental hospitableness of the landscape. Between 1989 and 1993, Smithsonian rehabilitated the Plaza to replace the paving, cover over the original Tunnel entrance, and introduce mostly new plant material. Because both of these projects fell outside the period of significance for this property, the Determination of Eligibility for the Hirshhorn Museum and Sculpture Garden found them to be non-contributing, yet compatible, additions to the property. Therefore, any alterations to these specific elements do not represent an adverse effect unless they also alter the significant contributing features of the Sculpture Garden.

The additional changes proposed to contributing features of the site—including the removal or alteration of portions of the Plaza walls, alteration of the elevation of the Sculpture Garden to create gallery space below, and reopening and alteration of the Tunnel—have the potential to create cumulative adverse effects on this property, and by association on the National Mall Historic District (to which the Hirshhorn is a contributing property). The adverse effects could be viewed as balanced by the cumulative beneficial effects of restoring the Sculpture Garden perimeter walls and rehabilitating the Hirshhorn Museum building. These effects can be further avoided or minimized by designing and implementing these projects to meet historic preservation standards for the treatment of historic properties.
Quadrangle

The Quadrangle is a contributing building to the National Mall Historic District. Under Alternatives D and F, the greater degree of change proposed for above-grade Quadrangle Building features and the Haupt Garden has the potential to generate cumulative adverse effects on this property. These related actions include the replacement of the Quadrangle roof membrane, relocation of the existing loading dock, removal of the Ripley Pavilion, removal and replacement of the museum pavilions, replacement of the skylights and egress stair enclosures, potential construction of a new Visitor Center entrance near the Castle, and reconfiguration of the Haupt Garden and its associated features—will create a cumulative adverse effect on this property, and by association on the National Mall Historic District.

Alternative F, which maintains the flat grade of the existing Haupt Garden, represents a lesser cumulative effect than Alternative D, which alters the grade by introducing the Visitor Center “dip” entrance to the garden. In both alternatives, the effects of interior illumination from the museum pavilions and skylights has the potential to contribute to the cumulative adverse effect by altering the character and setting of the Mall and contributing buildings in this location.

National Mall Historic District

Under all action alternatives, the greater degree of change proposed for the Haupt Garden, Quadrangle, and Castle has the potential to generate cumulative adverse effects on the historic district, namely the character and setting of the National Mall in this location.

Specifically, this applies to the greater degree of change proposed to contributing buildings within the National Mall and South Mall Campus under Alternatives D and F. These effects will be further assessed at the time of project design. Cumulative effects to individual properties that contribute to the historic district have been described above.

Plan of the City of Washington

No cumulative adverse effects have been identified on the Plan of the City of Washington.
**Commission Action**  
January 4, 2018

<table>
<thead>
<tr>
<th>PROJECT</th>
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<tr>
<td>South Mall Campus Master Plan</td>
<td>7630</td>
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| NATIONAL MALL BETWEEN 7TH STREET, JEFFERSON DRIVE, 12TH STREET, AND INDEPENDENCE AVENUE, SW WASHINGTON, DC |

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<tr>
<td>Advisory</td>
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The Commission:

**Supports** the goals of the South Mall Campus Master Plan, which address the Smithsonian’s need to meet its long-term space requirements and address physical and operational deficiencies across the campus that impact visitor use and experience as well as the Smithsonian’s ability to effectively and safely implement its programs.

**Notes** that pursuant to the National Environmental Policy Act, a Draft Environmental Impact Statement was prepared, and public comments are sought on the alternatives and impacts through January 16, 2018. These comments will inform the Commission’s selection of a preferred alternative at the draft master plan review in the spring.

**Notes** the Master Plan will be implemented over the next 20-30 years; and further, that individual projects contained within the Master Plan will be subject to Commission review and approval at the time when detailed designs are developed.

**Requests** the Smithsonian Institution prepare a phasing plan to be included in the next draft master plan submission.

**Notes** a Programmatic Agreement will be prepared pursuant to the National Historic Preservation Act that will describe the process and steps necessary for developing the detailed designs for individual projects at the time of their implementation.

**Finds** the Master Plan must consider the context of a changing city, particular the SW Ecodistrict and Southwest Waterfront, which will change the character of Independence Avenue and the southern approach to the campus.
Notes that six action alternatives have been developed (A through F). Three alternatives (B, D, and F) have been advanced to the Draft Environmental Impact Statement, in addition to the no action alternative. The Smithsonian Institution, as project owner, has indicated that currently Alternative F best meets their needs.

Finds the action Alternatives (B, D, and F) generally contain a number of common projects, including:

- Renovation and restoration of the Castle;
- Protection of the Castle to address seismic vulnerabilities;
- Removal of the Ripley Pavilion to facilitate views and circulation from the Mall to the center of the campus;
- Consolidation of the Quadrangle and Arts and Industries Building loading areas and parking into a single underground, centralized loading facility to serve the campus;
- Creation of a new underground central utility plant to increase efficiency, sustainability and cost-effectiveness, and help maintain the critical Smithsonian collections;
- Creation of a below-grade visitor center between the Castle and the Quadrangle, and reconfiguration of the Castle basement level as new visitor and interpretive space;
- Addition of a new accessible entrance off the east façade of the Freer Gallery to provide a direct pedestrian connection to the Haupt Garden;
- Retention of the Arts and Industries Building as a flexible space for temporary exhibits and events until such time as a permanent use is identified; and
- Upgrades to underground utilities and perimeter security.

Supports these projects as they help improve visitor service, increase access across the campus, and modernize facilities, while recognizing that program and functionality must be balanced with historic preservation, planning and urban design goals.

Requests the master plan indicate that potential conversion of the Arts and Industries Building into a museum is reasonably foreseeable as a long-term project, regardless of the final occupant; and further, the master plan should describe any implications for such a use.

Regarding the Quadrangle Building and Pavilions:

Notes the Quadrangle Building and pavilions are not eligible for individual listing on the National Register of Historic Places, but are contributing elements to the National Mall Historic District. The Quadrangle Historic District has been identified at the local level.

Finds the current location of the pavilions affects the configuration and functionality of the below-grade Quadrangle interior spaces, as well as views of the Castle from Independence Avenue and 10th Street, SW to the south.

Finds that Alternative B retains the pavilions in their current location, allowing only limited improvement to the functionality of the Quadrangle interior spaces.
**Finds** that Alternative D and F replace the existing pavilions with smaller pavilions closer to the Castle, allowing for improvements to the functionality of the Quadrangle interior spaces.

**Finds** that the new pavilion locations would create greater visibility for the Sackler Gallery and National African Art Museum as seen from the National Mall.

**Finds** that smaller, relocated pavilions could improve views of the Castle and the National Mall from the south, and over time guide visitors from the Southwest Quadrant of the City, including the SW Ecodistrict, the Wharf and Waterfront, which are connected along 10th Street, SW, and are undergoing tremendous growth.

Regarding the Haupt Garden:

**Notes** the garden forms the roof of the Quadrangle Building and the roof will need to be removed and replaced for maintenance purposes.

**Finds** the garden provides a view to and setting for the Castle as seen from the south; and further, the intimate character and scale of the existing garden is a beloved component of the South Mall campus, and are an important counterpoint to the scale and openness of the National Mall.

**Notes** Alternative B would replace the garden in its current configuration and character; Alternative D proposes a large grade change in front of the Castle with a new open configuration and different, park-like character; and Alternative F retains the existing grade and characteristics but reconfigures the garden layout to include two new entrance ramps and skylights.

**Does not support** the large sloped entry in Alternative D as it would greatly change the character of the garden and the setting of the Castle.

**Finds** that, while the Master Plan will not include a specific design for the garden, changes in circulation, vertical access and daylighting of the Quadrangle Building will influence the future garden design.

**Recommends** the design of the future garden balance the desire to maintain a space of intimate character and scale with the need to improve the Quadrangle Building, and desire for greater access and visibility across the campus.

**Notes** the Smithsonian Institution has publicly committed to maintaining the intimate character and high-quality landscape of the garden as the design is developed.

Regarding the Hirshhorn Museum and Sculpture Garden:

**Finds** that a modest opening in the western site wall would facilitate pedestrian connections to AIB, while larger alterations of the wall will change the character of the Hirshhorn Museum site.
Supports the reestablishment of the existing below-grade connection between the Museum and Sculpture Garden.

Requests the applicant provide additional details, including sections that describe the proposed expansion of the tunnel and the addition of gallery space below the Sculpture Garden, as shown in Alternatives D and F, so the Commission may better understand the relationship of the proposal to the setting of the National Mall.

Regarding the extent of Castle sub-basement excavation:

Notes that Alternative D includes the greatest amount of excavation beneath the Castle.

Finds the Alternative B and F minimize the amount of sub-basement excavation by accommodating the program elsewhere in the campus.

//Original Signed//  1/5/2018
Julia A. Koster  Date
Secretary to the National Capital Planning Commission
The Commission:

**Supports** the goals of the South Mall Campus Master Plan, which address the Smithsonian’s need to meet its long-term space requirements and address physical and operational deficiencies across the campus that impact visitor use and experience as well as the Smithsonian’s ability to effectively and safely implement its programs.

**Notes** the Master Plan identifies elements and general locations of projects to be implemented over the next 20-30 years; and further, that individual projects contained within the Master Plan, including new pavilions and gardens, will be subject to additional Commission review and approval at the time when detailed designs are developed.

**Notes** a Programmatic Agreement (PA) will be prepared pursuant to the National Historic Preservation Act that will describe the process and steps necessary for developing the detailed designs for individual projects at the time of their implementation. The process will take into account and avoid, minimize and mitigate adverse effects.

**Finds** the Master Plan must consider the context of a changing city, particularly the SW Ecodistrict and Southwest Waterfront, which will change the character of Independence Avenue and the southern approach to the campus.

**Supports** the projects identified in the master plan as they help improve visitor service, increase access across the campus, and modernize facilities, while recognizing that program and functionality must be balanced with historic preservation, planning and urban design goals.

**Finds** the South Mall campus provides an important physical and cultural link between the Smithsonian Institution, the National Mall and Southwest Washington, DC; and further, this connection will be strengthened with the implementation of the master plan and continued coordination and collaboration among all stakeholders.
Notes that pursuant to the National Environmental Policy Act, a Draft Environmental Impact Statement was prepared and public comments were received regarding the proposed alternatives and their impacts.

Notes the Smithsonian Institution developed a number of alternatives in response to comments and feedback received throughout the planning process:

- Alternative D was the first alternative created and included the most dramatic changes to the campus, and would change the character of the garden, the setting of the Castle and maximize excavation under the Castle.
- Alternative B included more minimal changes to the campus, but it did not best achieve the goals of the Smithsonian.
- Alternative F was then developed to balance changes to the campus with the need to meet the master plan goals. Alternative F retains the character of the gardens, reduces excavation under the Castle and maintains its setting.

Supports the Smithsonian Institution’s preferred Alternative F as the basis of the campus master plan and the preferred alternative to be identified in the Final Environmental Impact Statement.

Supports the use of design guidelines to help inform the design of individual projects at the time of their development, in conjunction with the Section 106 consultation process and further input from the Commission, staff and other agencies.

Regarding the Smithsonian Castle:

Supports the restoration of the Castle to its period of significance.

Finds the Castle is the physical and symbolic center of the Smithsonian Institution as well as the South Mall Campus, and therefore is the more appropriate location for a centralized visitor center.

Finds the relocation of a number of support facilities for the visitor center to an adjacent below-grade space will allow for the restoration of the Castle, including the Great Hall, to its period of significance while improving the visitor experience.

Notes the Castle and visitor center spaces will have a direct connection to the Sackler Gallery and National African Art Museum.

Regarding the Arts and Industries Building

Notes the Arts and Industries Building is a National Historic Landmark that is recognized for its architectural style and role in initiating one the greatest museum complexes in the world.

Supports the restoration of the Arts and Industries Building to its period of significance, including removing non-historic walls and other contemporary interventions, to allow the building to return to its original grandeur and use as an exhibition hall with voluminous spaces and a clear expression of structure when a full revitalization is undertaken.
Finds the Smithsonian Institution has a need for large-scale event and exhibition space that does not exist elsewhere on the campus, and further the Arts and Industries Building can provide that space in a way that is consistent with its historic use and character.

Finds adding a visitor center and related uses into the building would require adding new walls, rooms and other elements that would be inconsistent with the goals of the building restoration.

Notes the Smithsonian Institution has completed a building shell revitalization, and is actively fundraising for additional interior renovations to enable the building’s reopening as an exhibition hall in the near future.

Notes the Smithsonian has hired a full-time director with a goal of creating year-round programming available to the public.

Regarding the Quadrangle Building:

Supports improvements to the Quadrangle Building, including increased public access, expanded amenities and programming, and improved daylighting, that will enhance the visitor experience and help the Smithsonian Institution meet its needs.

Finds the relocation of the pavilions will help improve the functionality of the below-grade Quadrangle Building spaces, and notes the new facilities and improved spaces will help provide additional programming, events and educational opportunities for residents and visitors.

Notes that the exact location, size and design of new pavilions will be determined at the individual project stage, in consultation with the relevant agencies and consulting parties through the Section 106 process.

Finds the relocation of the pavilions opens up the Haupt Gardens, the Smithsonian Castle, and the National Mall to Independence Avenue and the rapidly evolving southwest neighborhood.

Finds that the relocated pavilions and addition of large-scale ramps to a lower level could alter the setting of the Castle and the Arts and Industries Building and may have undesirable effects on these two National Historic Landmarks.

Recommends that at the time of individual project design, the Smithsonian evaluate the size and scale of any proposed ramps or stairs to help minimize their impact on the setting of the Castle while balancing circulation and access needs. SI will further engage the relevant review agencies and consulting parties through the Section 106 process.

Regarding the Haupt Garden:

Notes the garden is the roof to the Quadrangle Building and the 30-year old roof membrane under the garden is at the end of its useful life and must be replaced.
Finds the garden provides a view to and setting for the Castle as seen from the south; and further, the intimate character and scale of the existing garden is a beloved component of the South Mall campus, and are an important counterpoint to the scale and openness of the National Mall.

Notes the garden design has evolved over time and will continue to be altered to respond to changes in aesthetics, functionality, and climate.

Notes the Smithsonian has committed to retaining the parterre, although the exact design and layout of the remainder of the garden will be determined at the individual project stage, and further, the Smithsonian has committed to maintain the high quality landscape of the garden, along with its intimate character.

Requests the Smithsonian Institution consider opportunities to reuse existing garden elements, where appropriate, to provide a link between the history of the garden and its future iterations.

Requests the Smithsonian Institution evaluate opportunities to save, store and replant trees and other plantings after construction has been completed.

Requests the gardens continue to accommodate a variety of native plants as well as those that will help support pollinator health.

Requests that at the time of garden design, tree replacement should prevent net loss of tree canopy in accordance with the policies set forth in the Comprehensive Plan for the National Capital.

Regarding the Hirshhorn Museum and Sculpture Garden:

Supports restoration of the museum and only a limited open in the perimeter wall surrounding the site to provide a direct pedestrian connection to the Arts and Industries Building.

Supports restoration the below-grade tunnel connection between the museum and sculpture garden.

Notes that the Smithsonian Institution may seek to alter the sculpture garden response to contemporary needs related to the function and display of art.

Requests that future project submissions for the sculpture garden should describe the proposed program needs, the existing and proposed functionality of the space, and how the project might affect the garden’s original design intent.

//Original Signed//
Julia A. Koster
Secretary to the National Capital Planning Commission

04/05/2018
Date
U.S. COMMISSION OF FINE ARTS

Established by Congress 17 May 1910


26 April 2018

Dear Mr. Horvath:

In its meeting of 19 April, the Commission of Fine Arts reviewed the proposed South Campus Master Plan for the properties of the Smithsonian Institution on the south side of the National Mall between 7th and 12th Streets, SW. The Commission approved the master plan as a basis for proceeding with the design of the plan’s components, and provided the following comments.

The Commission members thanked the project team for the concise summary and the clear presentation responding to their previous concerns, and they acknowledged both the complexity of the undertaking and the potential benefits of improving many aspects of the Smithsonian’s operations, including circulation, visibility, and visitor experience. They expressed overall support for the project, which now proposes new programming for the Arts & Industries Building and less excavation under the Castle; however, they noted the challenges to be faced in future design phases, such as accommodating the new truck access and loading facility, and the potential reconfiguration of access to the Arthur M. Sackler Gallery and the National Museum of African Art beneath the Quadrangle. Citing the sightline studies presented, they agreed that the plan to relocate the entrances to the underground museums to new portals farther north would open up views toward the historic museum buildings and create more street presence for the Enid A. Haupt Garden—transforming this area into a vital connection point between the National Mall and the adjacent Southwest Ecodistrict. They suggested that the designs for the new entrance pavilions could be informed by the collections and programs of the museums they would serve.

For the development of the design of the Haupt Garden, they expressed support for the general landscape plan, which would allow for the creation of a new garden imbued with important design characteristics derived from the existing one—such as intimacy and shade—as an alternative to a previously presented plan to construct a smaller, compromised parterre in place of the one to be demolished. They said that the revised plan presents an opportunity to create an innovative garden design expressive of the Smithsonian’s mission to educate the public, revealing the layers of a living landscape planted on the rooftop of the renovated underground museum complex. They also suggested informing the future landscape design with the philosophy and legacy of Enid A. Haupt, one of the country’s great horticultural patrons; this could include devising inventive and sustainable methods to adapt the landscape to climate change.

The Commission looks forward to reviewing submissions for each of the component projects of this master plan as designs for the architecture and landscape are developed.

Sincerely,

[Signature]

Thomas E. Luebke, FAIA
Secretary

Albert Horvath
Under Secretary for Finance and Administration & Chief Financial Officer
Smithsonian Institution
P.O. Box 37012
Washington, DC 20013-7012

cc: Aran Coakley, Bjarke Ingels Group
    Marcel Acosta, National Capital Planning Commission
Exhibit H – South Mall Campus Master Plan Alternative F
All images created by the Bjarke Ingels Group and SurfaceDesign.

Existing Site Plan.

Existing Site, Axonometric View.
Proposed Site Plan.

Proposed Site Plan, Axonometric View.
Above-grade Scope of Work.

Below-grade Scope of Work.
Distances between the new Quadrangle Pavilions and adjacent historic buildings.
Existing view looking northeast on Independence Avenue.

Rendered view looking northeast on Independence Avenue.
Existing Castle Basement Level.

Proposed Castle Basement Level.
In the proposed condition, the blue shading and dots indicate seismic protection upgrades.

Proposed accessible entrance on the east elevation of the Freer Gallery.

Proposed Hirshhorn Museum and Sculpture Garden section.
Existing Hirshhorn Museum and Sculpture Garden, Axonometric View.

Proposed Hirshhorn Plaza wall opening, Tunnel expansion, and below-grade Sculpture Garden expansion.
Proposed north-south section, illustrating the Castle Visitor Center, connection to the Quadrangle Building, and reconfiguration of the Quadrangle programming.
The phasing of the South Mall Master Plan will prioritize the Castle Revitalization, urgently needed repairs at the Hirshhorn, and campus infrastructure projects. The infrastructure projects include the central utility plant and the consolidated loading facility, which provide the support for subsequent campus construction projects. The Arts and Industries Building may play a role in accommodating temporarily displaced programs. The Quadrangle and Hirshhorn renovations and the AIB revitalization will take place after new services are in place and as funding becomes available.
ATTACHMENT 5
May 10, 2018

Mr. Matthew Fils  
Senior Urban Designer  
National Capital Planning Commission  
Urban Design and Plan Review  
401 9th Street, NW  
Washington, DC 20004

Re: Final Environmental Impact Statement for the Smithsonian Institution’s South Mall Campus Master Plan, Washington, D.C. April 2018 (CEQ #20180064)

Dear Mr. Fils:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act, and Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency (EPA) has reviewed the Smithsonian Institution’s (SI) Final Environmental Impact Statement (FEIS) for the South Mall Campus Master Plan in Washington, DC prepared by the National Capital Planning Commission (NCPC). The Master Plan is needed to meet SI’s long-term space requirements and to address physical and operational deficiencies across the campus which impact visitor use and SI’s ability to implement its program effectively and safely.

EPA reviewed the November 2017 Draft EIS and submitted a letter dated January 16, 2018 in which EPA stated we had no objections to the master plan proposal and offered minor recommendations regarding stormwater, potential noise impacts, and EIS documentation. EPA appreciates the consideration given to our comments. Based on our review of the document and response to the suggestions included in our January letter, we continue to have no objections to the project.

Thank you for providing EPA with the opportunity to review this project. EPA requests that NCPC please send a copy of the Record of Decision when it is released. We look forward to working with you on future projects. If you have questions regarding these comments, the staff contact for this project is Ms. Nora Theodore; she can be reached at 215-814-2728 or theodore.nora@epa.gov.

Sincerely,

Barbara Rudnick  
NEPA Review Coordinator
Mr. Matthew Flis  
Senior Urban Designer  
National Capitol Planning Commission  
401 9th Street, NW Suite 500  
Washington, DC 20004  

Ms. Michelle Spofford  
Architect/Senior Planning Manager  
Smithsonian Institution  
P.O. Box 37012, MRC 511  
Washington, DC 20013  

Re: South Mall Campus Master Plan - Final Environmental Impact Statement  

Dear Mr. Flis and Ms. Spofford:  

The Department of the Interior (Department) has reviewed the Final Environmental Impact Statement (EIS) conducted by the Smithsonian Institution (SI) and the National Capital Planning Commission (NCPC) for the proposed South Mall Campus Master Plan (Master Plan) in Washington, DC. We have the following comments regarding the preferred alternative identified in the Final EIS.  

The National Park Service (NPS) has participated in the development of the EIS as a cooperating agency due to its mission to preserve unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations including its jurisdiction in managing the open space and monuments on the National Mall, which are located adjacent to the SI’s South Mall Campus. In addition to the NPS responsibilities related to the resources of the National Mall, National Historic Landmarks (NHLs) are designated by the Secretary of the Interior, and administered by the NPS, as authorized under the 1935 Historic Sites Act (16 U.S.C. sec. 461-467), and implemented in accordance with 36 CFR Part 65. Under these regulations and those that implement the National Historic Preservation Act (36 CFR 800.10), the NPS has the responsibility to monitor the integrity of established NHLs, to provide technical assistance and advice to NHL owners, and to participate in Section 106 consultations to resolve adverse effects to NHLs.  

As expressed in the Department’s comment letter for the Draft EIS, the Department continues to have concerns about the potential for adverse effects to the historic character of the South Mall Campus and its historic buildings, structures, and landscapes that would occur through the
implementation of the identified preferred alternative, Alternative F - *Maintain Flat Plan on Castle Axis*. As stated by the SI, one of the goals of the Master Plan is to preserve and protect the historic buildings and features of the South Mall Campus. To meet this goal, the Department recommends that the Master Plan develop strategies that avoid and minimize the most detrimental of these adverse effects, particularly those that involve the NHL buildings, in order to balance the needed improvements with the historic character of the site. In particular, the Department is concerned with the new elements close to the NHL Smithsonian Castle that will fundamentally alter the setting and perception of the building, proposed in the preferred alternative. While minimization may be possible through design, it is unlikely that this scheme will be able to avoid adverse effects to the NHL. To that end, we continue in our belief that Alternative B, *Limited Above Ground Change*, best accomplishes this balance. Alternative B appears to meet the overall purpose and need of the project, while having lesser impacts to historic resources than would result from the implementation of Alternative F. We would also like to reiterate that Alternative B could be enhanced to meet the purpose and need more effectively, without demolishing the quadrangle pavilions.

The Department notes that the NPS has worked closely with the SI and has provided input on elements of the Final EIS with regards to potential impacts to the resources of the National Mall and lands under the jurisdiction of the NPS, as well as any potential future NPS decision-making responsibilities. The Department does note that since the Master Plan is programmatic in nature there is no action required by the NPS at this time that would require the NPS’ adoption of this EIS and preparation of a NPS Record of Decision. As you are aware, implementation of projects included in the Master Plan will require further NEPA and NHPA Section 106 compliance. As such, the Department, as well as the NPS, has a continuing interest in working closely with the SI and NCPC to ensure that the impacts to resources of concern are adequately addressed for all parties. For continued consultation and coordination with the NPS, please contact Peter May, Associate Regional Director for Lands and Planning, National Park Service, National Capital Region. Mr. May can be reached by telephone at 202-619-7025.

The Department appreciates the opportunity to provide these comments.

Sincerely,

[Signature]

Michaela E. Noble
Director, Office of Environmental Policy and Compliance

Submitted electronically to: commentsonsouthcampus@si.edu

cc: Lindy Nelson, Department of the Interior, REO, Philadelphia: lindy_nelson@ios.doio.gov
Peter May, NPS: peter_may@nps.gov
Joel Gorder, NPS: joel_gorder@nps.gov

TRANSMITTED ELECTRONICALLY – NO HARD COPY TO FOLLOW
May 11, 2018

Mr. Matthew Flis
Senior Urban Designer
National Capitol Planning Commission
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Washington, DC 20004

Ms. Michelle Spofford
Architect/Senior Planning Manager
Smithsonian Institution
Facilities Master Planning
P.O. Box 37012, MRC 511
Washington, DC 20013

Re: Comments on Draft Programmatic Agreement | South Mall Campus Master Plan

Dear Mr. Flis and Ms. Spofford:

The National Trust for Historic Preservation writes to submit comments on the Draft Programmatic Agreement for the Smithsonian South Mall Campus Master Plan. We concur in the overall framework and conditions set forth in the Draft Programmatic Agreement and adoption of Alternative F as the preferred alternative, subject to the comments we previously submitted on January 18, 2018, with respect to the Draft EIS. The area labeled by the Smithsonian as the “South Mall Campus” is one of the most historically and cultural significant places in the United States. For this reason, we urge continued caution should the Smithsonian moves forward with implementation of the Master Plan.

Following up on the Advisory Council on Historic Preservation’s suggestion during the May 9, 2018, consultation meeting, we would also suggest that the Programmatic Agreement specifically note that members of the public are contemplated as intended beneficiaries. In addition, we would add language to the first sentence of Section 13 (“Dispute Resolution”) that allows consulting parties to object in the event a dispute arises. Considering the public’s significant interest in the Smithsonian Institution, the scope of changes proposed by the Master Plan, and our participation in the Section 106 process from the beginning, we believe these are reasonable additions.

The National Trust appreciates the opportunity to submit these comments on the Draft Programmatic Agreement and applauds the Smithsonian Historic Preservation Office’s ongoing stewardship and commitment to the future preservation of the museum’s unique
and irreplaceable historic resources. We look forward to participating as a consulting party in future Section 106 consultations involving the implementation of proposed changes to individual historic properties identified in the Master Plan.

Respectfully submitted,

[Signature]

William J. Cook
Associate General Counsel

cc: Lee Webb, Federal Preservation Officer, NCPC
    Charlene Vaughn, Chris Wilson, Tom McCulloch, and Reid Nelson, Advisory Council on Historic Preservation
    Sharon Park, Federal Preservation Officer, Smithsonian Institution
    David Maloney, DC State Historic Preservation Officer
    Rebecca Miller, DC Preservation League
    Robert Nieweg and Elizabeth Merritt, National Trust for Historic Preservation
May 7, 2018

Matthew Flis
Senior Urban Designer
National Capital Planning Commission
401 9th Street, NW, Suite 500
Washington, DC, 20004

Michelle Spofford
Architect / Senior Planning Manager
Smithsonian Institution
Facilities Master Planning
P.O. Box 37012, MRC 511
Washington, DC, 20013

Via email: commentsoncampusplan@si.edu, spoffordm@si.edu, matthew.flis@ncpc.gov

Re: Smithsonian South Mall Campus Master Plan Final EIS

Dear Mr. Flis and Ms. Spofford:

The National Mall Coalition appreciates the opportunity to provide further comments on the Smithsonian’s South Mall Campus Master Plan. These are in addition to our previous written comments on January 2015, May 2016, and January 16, 2018, and our testimony to the Commission of Fine Arts on January 18, 2018, which is attached.

The Coalition is supportive of the Smithsonian’s plans to upgrade, restore, and improve circulation throughout the South Mall Campus area. Our primary concern, stated in our previous comments and testimony, is that the South Mall Campus Plan treats this part of the Mall as a separate “campus.” In truth, the Smithsonian museums, gardens, and public spaces are an integral part of the Mall as a whole, both historically vis-à-vis the L’Enfant and McMillan Plans as well as in the visitor’s experience. While Alternative F appears to meet the Smithsonian’s objectives while minimizing adverse effects on the existing buildings and site, it does not address the larger Mall context. This Alternative can, and should, be improved by including solutions to the broader needs of the Mall and Mall visitors. We offer some suggestions below.

Our comments today focus on our request made in our earlier comments that the Smithsonian, in evaluating environmental effects, take into consideration the National Mall Underground project now being studied by the U.S. Army Corps of Engineers. The Corps’s study will be completed in June 2018. The Underground, a multi-use flood reservoir and bus and car parking facility to be located under the Mall grass panels north of the Castle, will provide significant benefits to the Smithsonian. These include parking for visitors arriving by bus and car, irrigation, groundwater capture, visitors center, and geothermal energy.

- While the reservoir and parking facility will be located north of the South Campus area, it will require an entrance ramp off Independence Avenue through a portion of the surface parking area east of the Arts & Industries Building. From the plans and
drawings, it appears the current plans call for a new garden space but that there is no underground or other structural impediment to locating an access ramp here.

- The Underground will include a large visitors center, cisterns for collecting ground water pumped from nearby buildings, rainwater cisterns for irrigation, and geothermal capacity. These elements could help satisfy or supplement the Smithsonian’s stated operational and visitors services needs.
- In addition, the Underground design could be enhanced to include 5 loading berths and a loading dock feeding directly to the Arts & Industries building from the north, thus obviating the need for the proposed ramp west of the Freer Gallery and tunnel to the A&I Building, which the EIS indicates could have adverse effects.

The National Mall Coalition has worked together with federal and District of Columbia stakeholders to develop the National Mall Underground. The design continues to evolve in response to those consultations and to recommendations by the Army Corps of Engineers. We welcome the opportunity to work with the Smithsonian to refine the concept further so that it best meets the needs of the Smithsonian and all Mall visitors.

In conclusion, the South Mall Campus Plan is an opportunity for the Smithsonian to demonstrate how its objectives can contribute to the Mall’s long-range future as the unified, vibrant public open space and center of American culture it was intended to be. For example, enhanced objectives could include:

- Create an entrance experience for visitors to the National Mall on both the National Mall and Independence Avenue side of the campus.
- Address sorely needed parking demands for both the Smithsonian and the National Mall right at the Smithsonian’s entrance/visitors’ center.
- Address flood control for the Smithsonian buildings and the National Mall.
- Develop resilient solutions applicable across the Mall since the forces of change are upon us and will continue to grow.
- Become a model for sustainable design by renovating and re-using the Smithsonian’s existing buildings. For instance, the Arts and Industries Building would be a far better visitor’s center than constructing a new underground building. Sensitively designed, A&I could serve multiple public purposes.

We thank you for the opportunity to comment on the final EIS.

Sincerely,

Judy Scott Feldman, PhD, Chair
National Mall Coalition

Attachment

May 6, 2018

Mr. Preston Bryant, Chairman  
pbryant@mwcllc.com  
Mr. Marcel C. Acosta, Executive Director  
marcel.acosta@ncpc.gov

Commissioners, National Capital Planning Commission  
marcella.brown@ncpc.gov  julia.koster@ncpc.gov

National Capital Planning Commission  
401 9th Street, NW, Suite 500N  
Washington, DC  20004

Re: Smithsonian South Mall Campus Master Plan - Comments on Draft Programmatic Agreement, ref. Section 106, National Historic Preservation Act (NHPA) and Final Environmental Impact Statement (EIS), ref. National Environmental Protection Act (NEPA) - [NCPC File No. 7630]

Dear Messrs. Bryant and Acosta:

The Committee of 100 on the Federal City (Committee) submits the following comments on the proposed Smithsonian South Mall Campus Master Plan (Master Plan). This responds to both your recent request for comments on the draft Programmatic Agreement (PA) as well as the Final EIS. The Committee’s position on the Master Plan is, by now, well known to the Commission and to Smithsonian Institution leadership. I will not reiterate the details here; they are part of the public record. The Committee remains opposed to fundamental approaches and design decisions of the Master Plan and recommends against approval of the Programmatic Agreement (PA). Our reasons are several:

The Historic Quadrangle and the Bjarke Ingles Group – Wrong Design Approach: The heart of the Master Plan is the historic Quadrangle. The 4.2 acre site is nothing short of what famed American architectural historian Vincent Scully would call a “sacred precinct”. The ensemble of historic buildings and gardens embodies nearly 170 years of Smithsonian Institution history. From James Renwick’s pre-Civil War Castle to the mid-20th century Haupt Garden and below-
grade galleries, all are historically significant to the Smithsonian’s history and to the nation. Yet the Master Plan proposes destruction of much of the story’s most recent chapter. That approach is contrary to every public policy, philosophical and professional maxim in professional historic preservation practice today – both nationally and internationally.

While the Bjarke Ingels Group (BIG) has rightly achieved international acclaim and prestige for its creative, innovative, and attention-grabbing designs, they are, simply put, the wrong firm for this job. Known for bold, dramatic, assertive designs, a more subtle hand with deep experience in balancing new design within historic context is (was) required. The firm’s representatives have, in aural presentations, consistently emphasized their proposal as “improving” the historic Quadrangle. Their proposed design solutions treat the existing historic buildings and landscapes as mere set pieces or “background” for their own concepts. The Quadrangle, the Smithsonian, the National Mall, and the nation deserve better. The overall approach is simply not appropriate for the historic precinct.

Public Comments Largely Ignored in Draft PA: WHEREAS 26 and 27 in the PA draft test the limits of credibility by implying that all public comments received were both supportive of Alternative F and resulted in changes to the Master Plan. Nothing is further from the truth. Nowhere in the draft PA is the depth of public, professional, and organizational objection to the Master Plan reported; it is, simply put, untrue “happy talk.” Thousands of members of the general public nationally and internationally signed an online petition objecting to much of what is proposed for the Quadrangle. Leading architectural and landscape scholars from major universities raised concerns. Aural testimony and letters from noted, professional organizations such as the Garden Club of America responded similarly. Descendants of former Smithsonian Secretary S. Dillon Ripley and Enid A. Haupt added their opposing voices as well. All of this has largely been ignored by the Smithsonian during the consultation process and is similarly absent from the Programmatic Agreement draft. One is left to wonder the point of public consultation over the last four years if this holds. This must be remedied in the PA draft if, for no other reason, the sake of historic accuracy and to give the “illusion” that the public factored into the decision-making processes.

To that end, we recommend strongly revising WHEREAS 26 and 27 to correct credibly the public record and adding a new WHEREAS. Specifically,

WHEREAS 26: Eliminate the word “favorably” in line 2. In sheer numbers, the majority of comments were not, in fact, favorable.

[Add New] - WHEREAS, the NCPC, sought and received significant public opposition to many aspects of the Master Plan through online petitions, letters, public statements, and aural testimony; and,

WHEREAS 27: Eliminate the word “incorporated: in line 4. In fact, most suggestions were not taken and were not incorporated.

The Problem with Alternative F: The draft PA itself (as a document) is, on its face, self-congratulatory and benign – largely standard “boilerplate” in the Section 106/NEPA arena. [Note:
HABS/ HAER/ HALS documentation of significant historic properties slated for demolition makes one wonder - why bother? What is really mitigated?) It is, however, the draft PA’s endorsement of Alternative F that is highly problematic and objectionable. First, the Smithsonian consistently frames Alternative F as a new, improved consensus design that, “responds to the many concerns voiced in the public consultation process” (see above). Not true. Alternative F is the product of the Smithsonian choosing a few public suggestions with which they agree - ignoring those they do not. All of which is, of course, their statutory and regulatory right in the 106/ NEPA process. The PA should, however, better reflect this reality.

Second, and more importantly, Alternative F is framed to always redound to the Smithsonian’s benefit as this 10 – 20 year process progresses – and likely not to the integrity of the affected historic properties. What specifically is being “approved” if the PA is signed? It clears the way for demolition of the Haupt Garden and the three historic Jean-Paul Carlhian pavilions (both actions the Committee of 100 opposes) as well as taking a slice out of the Hirshhorn perimeter wall and cutting a new door in the east elevation of the Freer Gallery (in which the Committee concurs). Nothing else specific. [NB: It is unclear whether or not the James Renwick-designed gates and fencing along Independence Avenue survive intact as renderings vary.] More importantly, the Smithsonian has consistently framed every new design reveal as “only suggestions” and “nothing is cast in concrete” – leaving a largely wide-open playing field. You do not execute a legal document with such vagaries. Will the new entrance pavilions in the garden be the glass-and-steel “swoops” in many renderings or will they be small “Miesian glass boxes” as described aurally? Do the Renwick gates/ fence survive or not?

It is difficult to discern what is actually being approved as the Smithsonian recently removed the full evolutionary history of BIG design evolutions from their website. The vulnerability in approving Alternative F is that in “out years”, poor ideas may be forced claiming, “That was already approved in Alternative F”. Conversely, concepts heretofore not discussed may be introduced with the bromide, “Well, remember the Master Plan was only conceptual.” You cannot “have it both ways.” If the end goal in the near 4-year consultation covered in this PA is getting a green light to demolish the garden, pavilions, and the Hirshhorn wall cut and new Freer door, say so and limit the PA’s scope to that. But there is simply too much variability and vulnerability in everything else and the historic resources too nationally significant to responsibly approve the PA as currently drafted and at this time.

“Restoring” the Haupt Garden: Opposition to destruction of the Haupt Garden has been a consistent and loud leitmotif in public comments since the beginning of the consultation process – most notably from the Garden Club of America and the thousands signing an online petition. The putative justification for its demolition is repairing the leaking subterranean roofs under the historic Quadrangle landscapes. But what prevents restoring the historically-significant Lester Collins et al landscape design when work is completed – even with all the additional skylights, ramps, and moved pavilions envisioned by BIG? Consulting parties have never been given a viable answer. As of late, Smithsonian representatives have taken to responding, “The Haupt Garden will be restored.” It is, however, clear that the Garden will not be restored and approval of this PA will greenlight a completely new design (yet unknown) to which only End A. Haupt’s name will be affixed. There is clearly no intention of “restoring” the landscape she funded and approved. This is disingenuous on the part of the Smithsonian,
poorly understood by consulting parties, the media, and the public, and should be addressed in the draft PA with a stipulation that the original Collins et al design will be restored to every extent practicable – even given BIG’s proposed “improvements” to the area.

Thank you for the opportunity to raise, once again, these important issues. The Quadrangle precinct is a nationally-significant chapter in the Smithsonian Institution’s storied history and should be better respected in the aster Plan. Too and as currently, too many variables and unknowns exist in the draft programmatic agreement. The historic context is simply too important. The Committee of 100 has serious reservations on major issues in the South Mall Master Plan and neither supports signing the draft Programmatic Agreement nor the Record of Decision (ROD).

Thank you for considering these points. If I may answer any questions about this letter, please do not hesitate to contact me. I look forward to hearing back from you.

Sincerely,

Stephen A. Hansen, Chair
Committee of 100 on the Federal City

cc’s: Peggy McGlone, Washington Post  peggy.mcgglone@washpost.com
David Maloney, DC SHPO, OP  david.maloney@dc.gov
Peter May, NPS  Peter_May@nps.gov  Robert Vogel, NPS  Bob_Vogel@nps.gov
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Rebecca Miller, Peter Sefton, DCPL  Rebecca@dcpresevation.org  psefton@comcast.net
John Fowler, ACHP  jfowler@achp.gov  Charlene Dwin-Vaughn, ACHP  evaughn@achp.gov
Carly Bond, Smithsonian  BondC@si.edu
David Maxfield  dmaxfield10@gmail.com
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Alexandra Graubert/ Dede Petri  petridade@gmail.com
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Barbara Freeman  bfreemanwdc@gmail.com
William Brown, AOI  aoiofdc@gmail.com
Peter Sefton  psefton@comcast.net
James Goode  james-goode@comcast.net
May 21, 2018

Matthew Flis  
Senior Urban Designer  
National Capital Planning Commission  
401 9th Street, NW, Suite 500  
Washington, DC, 20004

Michelle Spofford  
Architect / Senior Planning Manager  
Smithsonian Institution  
Facilities Master Planning  
P.O. Box 37012, MRC 511  
Washington, DC, 20013

RE: Final Environmental Impact Statement (FEIS) for the Smithsonian South Mall Campus Master Plan

Dear Mr. Flis and Ms. Spofford:

The District Department of Transportation (DDOT) appreciates the opportunity to submit a letter detailing DDOT’s review of the Smithsonian South Mall Campus Master Plan FEIS. DDOT previously reviewed the Draft EIS and provided comments in a letter dated January 16, 2018 that evaluated the project’s anticipated impacts and the adequacy of the proposed mitigations. DDOT identified several aspects of the DEIS that required refinement in order to mitigate the project, which were expected to be resolved satisfactorily prior to the release of the FEIS. Many of DDOT’s comments have not been addressed.
The table below reviews the FEIS responses to DDOT's comments on the Draft EIS.

<table>
<thead>
<tr>
<th>Proposed Mitigation</th>
<th>DDOT Evaluation (1/16/18 Letter)</th>
<th>SI Response in FEIS</th>
<th>DDOT Response</th>
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<tbody>
<tr>
<td>At multiple unspecified intersections, signal timing, phasing, and offset modifications, including an increase in cycle lengths.</td>
<td>Reflect the specific intersections where changes to signal operations are proposed. SI initiated signal retimings for this intersection are inappropriate mitigations. Instead, the Applicant should focus on TDM and mitigations that reduce auto travel, including a commitment to provide funding and first year’s operating expenses for a minimum of 19-dock Capital Bikeshare station.</td>
<td>The FEIS recommends monitoring utilization of onsite bicycle parking, as well as Capital Bikeshare stations within ¼ mile. If demand exceeds capacity install new bike racks and/or a Capital Bikeshare Station. If a new Capital Bikeshare Station is required, consider locating it near the intersection of 7th Street, SW and Jefferson Drive, SW to fill an existing gap in the system.</td>
<td>Revise the FEIS to address DDOT’s 1/16/18 comment to provide funding and first year’s operating expenses for a minimum of 19-dock Capital Bikeshare station.</td>
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<tr>
<td>Independence Avenue &amp; 14th Street SW Modify the southbound 14th Street, SW approach to Jefferson Drive, SW to include a protected-permitted left-turn phase.</td>
<td>DDOT agrees subject to approval at permitting. SI will be required to upgrade any signal hardware required to implement the mitigation.</td>
<td>No response required. DDOT agrees with proposed mitigation.</td>
<td>No response required. DDOT agrees with proposed mitigation.</td>
</tr>
<tr>
<td>12th Street SW &amp; Jefferson Drive SW Modify the existing unsignalized intersection of Jefferson Drive, SW and 12th Street, SW from a two-way stop controlled intersection to an all-way stop controlled intersection.</td>
<td>This intersection is on NPS property and is therefore subject to NPS approval. SI is expected to coordinate with DDOT through the permitting process to ensure that any proposed changes at this intersection do not negatively impact operations at adjacent intersections on the District’s road network.</td>
<td>No response required. DDOT agrees with proposed mitigation.</td>
<td>No response required. DDOT agrees with proposed mitigation.</td>
</tr>
<tr>
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| Curb cut            | The details of the overall mitigation package for the loading curb cut would be determined as part of the public space permitting process. Any mitigations identified as part of that process would need to be included as part of the EIS. | SI received conceptual approval for the curb cut for the consolidated loading facility from the Public Space Committee at its January 25, 2018 hearing subject to the following mitigations:  
- Commit to the proposed Loading Management Plan, including a restriction on large (WB-50 and bigger) trucks during the peak periods.  
- Commit to the construction of the new north-south crosswalk across at the east leg of the intersection including any new ADA ramps, crosswalks, and the relocation of any features in public space that conflict with the implementation of a DDOT standard crossing.  
- Treat the curb cut as an intersection design rather than a driveway design and offset the crosswalks and pedestrian signals of the driveway and | Update the FEIS to fully satisfy the conditions of conceptual curb cut approval and acknowledge the future need to secure permits for the final design of the curb cut. |

The DEIS identifies multiple proposed mitigations to address impacts from the consolidated loading facility curb cut:  
- Install new bike racks or a Capital Bikeshare location;  
- Upgrade all curb ramps to/from the South Campus;  
- Provide a new crosswalk across the westbound approach of Independence Avenue, SW at the intersection with 12th Street, SW;  
- Monitor passenger loading areas;  
- Create a Loading Management Plan; and  
- Restrict right turns on red for the westbound approach of Independence Avenue at 12th Street SW.  

The FEIS recommends creation of a loading management plan that includes a restriction of all deliveries made with trucks WB-50 or larger in advance to avoid the AM (7:00 AM – 9:00 AM) and PM (4:00 PM – 6:00 PM) peak periods, unless necessary (emphasis added).
<table>
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<tr>
<td></td>
<td></td>
<td>the 12th Street ramp.</td>
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<td>The FEIS does not commit to this mitigation.</td>
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<td></td>
<td>• Commit to locating any guard booth at least 40’ inside the sidewalk to ensure that trucks do not block the sidewalk or travel lanes while waiting for security clearance.</td>
<td></td>
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<td></td>
<td></td>
<td>The FEIS does not commit to this mitigation.</td>
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<tr>
<td></td>
<td></td>
<td>• Commit to measurable triggers for the closure of the other curb cuts on the block. Other curb cuts are expected to be closed as soon as possible, defined as when the buildings served by the existing curb cuts have access to the consolidated loading facility.</td>
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<td>The FEIS does not commit to this mitigation.</td>
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<td>• Commit to closing the lay-by and restoring the curbline to the east of the proposed curb cut. This change may be necessitated as a result of the signal plan design and associated striping plan. As part of this, SI would be responsible for relocation of the MTA commuter bus stop, if necessary.</td>
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<td>The FEIS does not commit to this mitigation but calls for SI to monitor passenger loading areas to determine if</td>
<td></td>
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<tr>
<td>Transportation Demand Management (TDM) Plan</td>
<td>The DEIS did not include a TDM plan. Failure to provide a robust TDM plan and infrastructure improvements could result in higher auto usage and impacts to the network not anticipated in the DEIS. Accordingly, the DEIS should be revised to include a robust TDM plan as a means to reduce impacts that are proposed by SI to be mitigated with signal timing changes not supported by DDOT.</td>
<td>they continue to meet SI needs without impacting traffic operations on Jefferson Drive, SW or Independence Avenue, SW.</td>
<td>A sufficiently robust TDM plan to support assumed mode splits and mitigate impacted intersections is needed and must be approved by DDOT. This can be done by developing a comprehensive TDM plan as part of the FEIS. Alternatively, commit to develop a TDM plan with DDOT concurrence as each phase of the Master Plan progresses</td>
</tr>
</tbody>
</table>

**Conclusion**

While DDOT appreciates the coordination with SI on this project, significant DDOT comments remain unaddressed or unresolved in the FEIS that DDOT expects to be remedied. Please revise the FEIS to address the outstanding project impacts and required mitigations noted above. Please contact Jonathan D. Rogers, the Case Manager for the project at jonathan.rogers2@dc.gov or 202-671-3022, with any questions.

Sincerely,

Jim Sebastian
Associate Director

cc: Anna Chamberlin, DDOT
Megan Kanagy, DDOT
Jonathan Rogers, DDOT
May 8, 2018

Mr. Preston Bryant, Chairman
Mr. Marcel Acosta, Executive Director
National Capital Planning Commission
401 9th Street, NW, Suite 500N
Washington, DC 20004

RE: Smithsonian South Mall Campus Master Plan —
Comments on Draft Programmatic Agreement and
Final Environmental Impact Statement

Dear Messrs. Bryant and Acosta:

The following comments are submitted on behalf of The Garden Club of America, its 200 clubs and
nearly 18,000 club members around the country.

Founded in 1913, The Garden Club of America has long been a friend and supporter of the
Smithsonian. We donated the core images and slides of the Archives of American Gardens in 1992.
Along with the Smithsonian’s Women’s Committee, we helped fund and expand The Pollinator Garden,
adjourning the National Museum of Natural History. The current Smithsonian exhibit, Cultivating
America’s Gardens, outlines the long and important history of gardens and relies upon The Garden Club
of America’s documentation. And, annually, we fund GCA Scholarships in Garden History and Design
at the Archives of American Gardens.

For over 100 years, we have dedicated ourselves to promoting the knowledge and love of gardening and
restoring, improving and protecting the environment. We also believe in institutional adherence to
donor intent.

For the reasons outlined in the attached comments, we renew our opposition to major components of
the South Campus Master Plan and urge the Commission not to approve the proposed Programmatic
Agreement.

Sincerely,

Anne Neal Petri
President

Enclosure
Cc:
pbryant@mwellc.com
marcel.acosta@ncpc.gov
Marcella.brown@ncpc.gov
Julia.koster@ncpc.gov
Peter May, NPS, Peter_May@nps.gov
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Thomas Luebke, Secretary, CFA, tluebke@cfa.gov
Matthew Flis, Diane Sullivan, Lee Webb, NCPC,
matthew.flis@ncpc.gov, lee.webb@ncpc.gov, diane.sullivan@ncpc.gov
May 8, 2018

Comments of The Garden Club of America

RE: Smithsonian South Mall Campus Master Plan –
Draft Programmatic Agreement and
Final Environmental Impact Statement

The Smithsonian is a venerable institution whose stated vision is to shape “the future by preserving our heritage.” It is therefore ironic that the Smithsonian’s proposed South Mall Campus Master Plan and Programmatic Agreement aggressively ignore the Quadrangle’s historical and cultural significance, while simultaneously dismissing the clear intent of donor Enid A. Haupt.

Given our long-term support of the Smithsonian and the integrity of its operations, we – The Garden Club of America – renew our opposition to major components of the South Campus Master Plan and urge the Commission not to approve the proposed Programmatic Agreement. We do not endorse Alternative F. Our reasons follow:

Donor Intent Must Govern. Contemporaneous documents released by the Smithsonian show that Mrs. Haupt agreed to a specific garden design including the pavilions, after a long courtship by then-Secretary Dillon Ripley. Her generous $3 million endowment was given in reliance on that design. Vague claims that it will maintain the “character” of the space should not absolve the Smithsonian of its obligation to abide by donor intent. The proposed Master Plan and Alternative F violate that intent and should not be approved.

Alternative B Responds to Public Concerns and Better Addresses Adverse Impacts. Despite suggestions to the contrary, Alternative B – not F – responds to concerns raised by The Garden Club of America and others since it does not “reconfigure” (Page 40, line 9) the garden, adheres to Mrs. Haupt’s intent, and properly retains the pavilions and existing buildings as part of the historic design.

For substantially less environmental damage, the Smithsonian can repair the roof under the Enid Haupt Garden and return the Historic District to its current configuration. If the Smithsonian honestly intends to minimize environmental impact, retaining and creatively adapting the existing pavilions – rather than destroying them as outlined in Alternative F – is the logical response.

The Smithsonian should not have it both ways. Language in the Programmatic Agreement regularly assures the reader that no specifics have been determined and that it will be years before any determination is made regarding the South Mall Campus. On the one hand, this gives us hope. On the other hand, Secretary Skorton has indicated that the garden roof will not likely be replaced for at least a decade. Locking the Master Plan into Alternative F would thus be premature and prejudicial to the kind of open discussions the Smithsonian purports to invite.

Use of the Arts and Industries Building must be addressed. Given the very long-term nature of this Master Plan, the Commission should refuse to finalize any programmatic agreement until use of the landmark Arts and Industries Building is defined. This building has, effectively, had no purpose for 15 years and, under the proposed Programmatic Agreement, has none for the future. Constructive and thoughtful use of this existing space might very well obviate the need for the massive excavation and adverse impacts outlined above and ensure adherence to Mrs. Haupt’s intent.
May 14, 2018

Dear Chairman Bryant, Secretary Koster, Mr. Flis, Ms. Stofford, and Members of the Commission;

I am writing on behalf of the members of the Garden Club of Chevy Chase [MD] to express our strong opposition to major aspects of the Smithsonian’s South Campus Master Plan that would designate the destruction or alteration of the Enid A. Haupt Garden. As a member club of the Garden Club of America (GCA), we take historic landscape design very seriously, as our GCA President Anne Neal Petri has made clear in her testimony and letters about this treasured landmark garden and its threatened future.

The Garden Club of American has had a long and valued association with the Smithsonian Institution through our volunteers on the Women’s Committee and our assistance in various horticultural projects. A gift in 1992 from the GCA helped make the Smithsonian’s Archives of American Gardens possible, establishing a major collection of historic images and slides that document garden design across the country since the early 20th century – a fine effort in preserving garden history. However, a decision to reconfigure or destroy an existing historic garden as beloved as the Victorian Haupt Garden by the Smithsonian, who so admirably champions the collection and preservation of important cultural artifacts, seems in obvious opposition to the Institution’s own goals.

We can understand the need for the repair of the roof of the basement area under the garden. But surely wise architects and engineers can solve this problem without irrevocably causing destruction to an important design element of the Smithsonian grounds. At our April 2018 Garden Club of America Annual Meeting in San Francisco we heard a remarkable talk by Thomas Woltz of the firm Nelson Byrd Woltz Landscape Architects speak about their work in Houston’s Memorial Park and other major projects that feature cultural and historic considerations that must be addressed.

In summary, we urge you not to approve any design that will deny those of us in the Washington area, as well as visitors from around the nation and world, the pleasure of enjoying this distinctive garden setting. Mrs. Haupt’s original gift to the Smithsonian of the garden and the sustaining funds for its maintenance, was a magnanimous and creative gesture befitting the Victorian origins of the Smithsonian, and as such, it should be honored.

Sincerely,

Marilyn Montgomery, President
Garden Club of Chevy Chase
Representing thousands of concerned citizens, The Coalition to Save the Haupt Garden Campus endorses the comments, attached below, by the Garden Club of America on the Draft Programmatic Agreement and Final Environmental Impact Statement regarding the Smithsonian South Campus Master Plan.
May 11, 2018

Dear Chairman Bryant, Secretary Koster, Mr. Flis, Ms. Spofford and Members of the Commission,

Thank you for giving Kenilworth Garden Club another opportunity to comment about the plans for the Smithsonian, the Mall and, most importantly, the Enid A. Haupt Garden.

Kenilworth Garden Club restates and incorporates herein by reference its previously filed January 16, 2018 comments, attached hereto.

Kenilworth Garden Club also endorses, restates and incorporates herein by reference the May 8, 2018 Garden Club of America letter regarding the Draft Programmatic Agreement and Final Environmental Impact Statement regarding the Smithsonian South Campus Master Plan including its attached May 8, 2018 Comments of the Garden Club of America, attached hereto.

Thank you for your consideration.

Sincerely yours,
Lenore Macdonald
President
Kenilworth Garden Club
May 7, 2018

Chairman Preston Bryant, National Capital Planning Commission
Marcel C. Acosta, Executive Director, NCPC
Mr. John Fowler, Executive Director, Advisory Council on Historic Preservation

RE: Draft Programmatic Agreement for the Smithsonian South Mall Campus Master Plan

Dear Chairman Bryant, Mr. Acosta, Mr. Fowler,

The Smithsonian Institution’s (SI) draft Programmatic Agreement (PA) regarding the South Mall Campus Master Plan guarantees destruction of much of the identity of the historic Castle Quadrangle including Enid A. Haupt’s own Garden design, the pavilion entrances to the Sackler Gallery and Museum of African Art, and the Quadrangle’s Downing Urn, Moon Gates, Alhambra fountain, and other ornamentation. Instead of an acknowledgement in a “Whereas” clause that proposed Alternative F is the SI’s preferred approach, the draft PA incorporates Alternative F as a required “Stipulation.” The enormity of the difference is the reason the PA should not be signed as drafted.

Since the first public meeting four years ago on the South Mall Campus Master Plan, experts and the public have questioned the need for, or wisdom of, accepting today a so-called “Master Plan” that provides only concepts and few details, and that will govern two and one half future decades of additional design development. The SI has rigidly responded to concerns and questions by, on the one hand, claiming that commitments at this point are premature, and, on the other hand, that Alternative F responds to concerns. If either is true, then it is irrational to insist on sign-offs now by the governmental entities who serve as the public’s watch dogs to protect historic and cultural resources.

The PA’s fatal flaw is explicit in Stipulation, Section 2, first paragraph:

“Implementation of the South Mall Campus Master Plan will be carried out over a period of an estimated ten (10) to twenty (20) years, with each project designed within the framework outlined in Alternative F and in this PA.”

Compounding the PA’s fatal flaw is Stipulation, Section 2, Part A:


The Quadrangle was designed as an integrated whole, with the pavilion designs and garden areas thematically indicative of the art treasures below. Alternative F obliterates that historically
significant integrated whole and dooms it to oblivion, with its official “recording” as its gravestone. Official recording, regardless of whose, in no way constitutes “Mitigation.” Even the Renwick Gates, which the SI had said it would save after all, apparently are not safe.

Despite the draft PA’s statements to the contrary, opposition to the SI’s proposed SMCMF and elimination of the Haupt Garden as we know it, has poured into the SI over the past four years of SI meetings, drawings, documents, and statements. Nationally and locally recognized experts in historic preservation, architectural and landscape design, garden design, and planning, and members of the public residing in or visiting the DC area have expressed opposition ignored by the SI and rejected by Alternative F. The draft PA attempts to address concerns by describing a 25-plus-year process entailing countless more meetings to review project components. The draft PA thus gives the impression of transparency and the SI’s being open minded to evolving designs; in fact it locks everyone into “Preferred Alternative F.”

The Hirshhorn’s marvelous recent “Infinity Mirrors” exhibition, with works by Kusama, perfectly symbolizes the infinite circularity of the draft PA. Page after page outlines all the ways that design and effect determinations might be questioned, and that the public may provide input over 25 years, but the SI always will get its way...which the PA prescribes right up front is Alternative F. Moreover, the PA even allows “other federal agencies to use the terms of this PA to fulfill their Section responsibilities for undertakings relating to the South Mall Campus Master Plan.”

The longevity of the draft PA is especially suspect in view of: a) the SI’s own admission that it hasn’t any money identified to cover the $2 and ½ Billion cost estimate (dated 4 years ago); b) its failure to provide updated cost estimates, or comparative cost estimates of the other identified Alternatives, or even cost estimates projected over the next 25 years; and c) its admission that it will ask Federal taxpayers to pay for this proposal.

The draft PA should not be signed. Moreover, the Advisory Council on Historic Preservation’s full Council Membership should hold a public meeting to consider the SI proposal for the following reasons: the historic resources affected including local landmarks, resources listed on the National Register of Historic Places, and National Historic Landmarks; the significant public concern; inconsistencies and lack of answers in the SI’s own presentations; and the extensive public and governmental resources already devoted—and anticipated to be devoted—to development of the SMCMF.

Thank You,

Kate Montague Perry
cc:

Thomas Luebke, Secretary, CFA  thuebke@cfa.gov
Peter May, NPS  Peter_May@nps.gov
Mina Wright, GSA  mina.wright@gsa.gov
Matthew Flis  matthew.flis@pepc.gov
Charlene Dwin-Vaughn  evaughn@nclhp.gov
David Maloney, DC HPO  david.maloney@dc.gov
Carly Bond, Smithsonian  BondC@s.si.edu
Rebecca Miller, DCPL  rebecca@depreservation.org
Stephen Hansen, C100  stephen.hansen@gmail.com
Rob Nieweg, NTHP  rnieweg@savingplaces.org
Betsy Merritt, NTHP  emerritt@savingplaces.org
Will Cook, NTHP  wcook@savingplaces.org
David Maxfield  dmaxfield10@gmail.com
Dede Petri & Alexandra Graubert  petridede@gmail.com
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Peter Sefton  psefton@comcast.net
Richard Longstreth  rvl@iu.edu
Peggy McGlone, Washington Post  peggy.meglone@washpost.com
Thank you very much for supporting Alternative F, recommending restoration of the Castle and preservation of the character of the Haupt Garden. Excellent choice from aesthetic, preservation, and public appeal standpoints!

Sincerely,

Thomas D. Edmondson
Alexandria, Va.
All of the Smithsonian Gardens are beautiful and so important to the enjoyment of the DC Mall. The Enid A Haupt Garden is one of my personal favorites. I sit in the shade of a tree and enjoy plant and people watching. It is so important that you commit to keeping a healthy and extensive tree canopy. Thank you for your commitment to preventing long-term tree canopy loss as you work to replace the garden. Please make the garden as lovely as it has been in the past 45 years that I have frequented it.

Leanna Fenske
Hello,

I am providing comments on the Smithsonian south Mall Campus Master Plan. I oppose removal of the Haupt Garden. The garden is my mom's favorite place on the mall. It is a lovely place to sit and relax from the busyness of the mall and the museums and to enjoy the cool shade in the summer.

I support the renovation of the Arts and Industries Building. It is a beautiful building and it needs to be restored and open all year long, not just for special events.

I do not believe an adequate job was done in publicizing this plan. I went to the website; it was very difficult to navigate. I could not find any understandable summary of what the current plan is and how it has changed.

Elizabeth Jose
I have reviewed the video on the new plan for the South Campus and am relieved to find new respect paid to the Haupt Garden, a period gem like the castle, which provides a uniquely restorative space in the heat and noise of the city.

I am concerned that I do not find the lovely moon gate or Japanese garden anywhere in the plan. I strongly believe that they are an important introduction to the aesthetic of the Sackler and Freer collections. The vista through the moon gate is one of the places where visitors most often stop to be photographed. Many may be seeing a moon gate for the first time, and it clearly makes a powerful impression on both children and adults. I have seen people walk back and forth multiple times to view the vista framed by the gate from both directions until they settle on a place that they want to be remembered in a photograph. I have seen a couple there in wedding clothes posing for a photo. I have taken photos there and drawn sketches of the gate while participating in Smithsonian art classes at the Dillon Ripley Center. The gate should be included in the new garden plans.

I appreciate your willingness to take public responses seriously.

Sincerely,
Kathryn Miller Krogh, Ph.D.
Arlington County Resident for 30 years

Sent from my iPad
To Whom it may concern;

I am very concerned and disheartened regarding the Smithsonian's south campus plan. Thank you for the extended comment period given to the public and all concerned.

The Smithsonian Institution and the National Mall serve many many audiences. Millions of visitors to the Mall each year use its **diverse spaces**. Runners, players, picnickers, photographers, lovers, strolling tourists, very young, very old. The design of this space needs to serve all of these people. Thousands of SI and other government workers are on the Mall as well, inside museums, outside on a break enjoying an outdoor space - we all need green space - for lunch, or for a needed break to think over and plan an assignment that needs deep thought. There is running space and space for contemplation. Quiet. Away from machines and loud noises that take over the city. Away from the crowds and into an intimate space. More people are living downtown that will be using these spaces into the evening. Our gardens not only give needed space to pollinators and migrating birds but educate our tourists worldwide about nature in such an unlikely spot. When Mrs. Ripley's Garden was designed - for scent, touch, I believe to serve an under-served audience. Its beauty throughout the year is astounding. I watch photographers, tourists, and staff go from one Smithsonian Garden to another. People study outside, rest, contemplate and play. Millions of visitors see the Smithsonian Museums on the Mall each year. Museums are very crowded - visitors need open space to unwind and relax and then re-enter and take in another museum.

I am not sure that the firm hired to create this plan has looked into all of the uses of this outdoor space or understands the needs of the American public and international visitors. It does not seem to have seen all of the visitors I see on my regular trips to the Mall. I saw the BIG 3D plans at the Building Museum, and understand it has been changed a bit since that time. I also understand the need to fix roof leaks for underground structures. However, what appears to be created is a sterile, open space that just gives more non-permeable ground to people running around. I first visited the Smithsonian in 1960 as a young Girl Scout from NY. I was impressed by the gardens that suited the Castle so well - and the gorgeous Arts and Industries Building - inside and out. Gardens are so very important. The Mall has certainly changed a lot since that time. With the revival of the waterfront, there should be more visitors - both local and out of town entering the space from the south. Going through the beautiful gates to the Haupt Garden is such an impressive way to be introduced to the Smithsonian Institution. A 19th century building needs and deserves 19th century gardens that surround it. Closing off the Haupt garden with gates creates a special enclosed place away from the air and noise pollution and heavy traffic on Independence Ave. Please honor in good faith the commitments to Enid Haupt, Secretary Ripley, and his wife who lovingly gave to the public such wonderful
spaces. Trees planted along Independence Avenue would soften the appearance of the South Mall and provided much needed shade.

The entryways for the African Art Museum and Sackler Gallery in the garden are so beautiful. Please do not close these spaces that so well set up the experience of the Museums below. The entrances do not need to be moved to the Mall side. People seeking these museums are lead through beautiful gardens that set up the experience in the museums below. Beautiful signage can help guide the way.

Two billion dollars would be wasted money on the redesign of spaces that already work so well. The interior of many of the SI museums are leaking and falling apart - something the SI seems to have overlooked in its desire to expand. Collections need care and preservation. Let's save the Smithsonian we have and not "fix" what is not broke.

Thank you for taking my thoughts into consideration.

Sincerely,
Helene Lisy
I am writing to thank you for making a commitment to prevent long-term tree canopy loss in the master plan for the South Mall Campus.

Our urban environment is such a harsh place for trees, and I believe we must do all we can to protect and preserve our trees. Thank you for recognizing this in the master plan.

Jerry Malmo
1331 Park RD NW
Washington DC 20010

Sent from my iPhone
Dear Friends,

Having attended a public meeting to review this project at NCPC a few months ago, and now having looked over the latest renderings of the Smithsonian's Preferred Alternative 'F', I am quite pleased to say that what's currently intended to replace the Enid A. Haupt Garden, when it's mature, should prove to be a satisfactory substitution for the existing landscape amenities, and due to the proposed reconfiguration of entrance pavilions for the African and Asian art galleries, should prove to be a significant improvement of the beloved Haupt Garden (especially as experienced by visitors arriving from the south).

I am also pleased to note that in this process the designers at Bjarke Ingels Group (BIG) seem to have learned certain important lessons, not only about the values, needs and wants of Washingtonians in this specific case, but also (hopefully) more generally about landscape architecture, such as the fact that a place like the Haupt Garden is not simply a space for people to look across or move through from one museum to another, but is instead a destination in its own right (which is why the original BIG design for the South Mall Campus was so completely inappropriate).

sincerely,

Stephen E. McLaughlin, RLA/ASLA

StephenEMcL@AOL.com

1800 N Oak St #913
Arlington, VA 22209