Dear Ms. Bond,

As an official consulting party to the National Historic Preservation Act Section 106 review now underway for the Hirshhorn Sculpture Garden in Washington, D.C., The Cultural Landscape Foundation (TCLF) is pleased to add the following remarks to the public record. As the Section 106 review is now in the initial phase of defining the federal undertaking that could adversely affect an historic landscape, we ask that the sculpture garden’s Period of Significance (POS), identified in the Determination of Eligibility (DOE), be expanded to include the period from 1977 to 1981, when important modifications to Gordon Bunshaft’s original design were made by the notable landscape architect Lester Collins, whose contributions to the garden were significant. This letter will elaborate on the legacy of Lester Collins as a landscape architect, placing his work at the Hirshhorn Sculpture Garden in context. It will then discuss TCLF’s unaddressed concerns regarding the various iterations of the South Mall Campus' Cultural Landscape Report (CLR).

I. The Landscape Legacy of Lester Collins

The 1977 redesign of the Hirshhorn Sculpture Garden represents a rare, extant, civic commission by Lester Collins (1914-1993), a preeminent postwar landscape architect and educator. Collins was trained in landscape architecture at Harvard University’s Graduate School of Design from 1940 to 1942, at a time when Walter Gropius chaired the Department of Architecture, promulgating ideas of European Modernism. Collins’ design sensibilities were heavily influenced by his early travels to East and South Asia, as well as his contact with Christopher Tunnard, who was also then at Harvard. These influences are clearly evident in Collins’ original selection of plantings for the redesigned sculpture garden. Weeping willows, weeping beeches, Japanese black pines, and dawn redwood trees, which are heavily sculptural in form, display the design principle of ‘occult balance,’ an asymmetrical mode of composition found in Japanese painting. These Japanese-inspired elements, combined with distinct architectural gestures, such as the ramps, low-maintenance landscape, and concrete stairs, firmly anchor the 1981 redesign to the distinct legacy of Modernism in landscape architecture, as also seen in the work of Dan Kiley, James Rose, Garrett Eckbo, and others.

TCLF has worked extensively to document Lester Collins’ contributions to landscape architecture; he features prominently in our 2018 publication, Shaping the Postwar Landscape (University of Virginia Press), in which his Hirschhorn Sculpture Garden redesign is noted and illustrated as a significant work in his career canon. TCLF has also served as a consultant to the Innisfree Foundation, which is dedicated to the stewardship of Collins’ Innisfree Garden and communicating the designer’s legacy. In various publications, TCLF has traced Collins’ journey as a prolific practitioner and educator who worked alongside several prominent landscape architects throughout his career. He joined the faculty at Harvard’s Graduate School of Design and chaired the Department of Landscape Architecture from 1950
to 1953. From 1955 to 1970, he was the Washington, D.C., partner of Simonds and Simonds Landscape Architects and Planners. In 1970 the firm became Environmental Planning and Design (EPD), for which Collins served as consultant. Collins was named a Fellow of the American Society of Landscape Architects in 1964.

In addition to the Hirshhorn Sculpture Garden, Collins’ other notable projects in Washington, D.C., include the design of the Smithsonian Institution’s Enid A. Haupt Garden (1987); the landscape design at The Podium of the John F. Kennedy Center for the Performing Arts; the 1972 master plan for the Smithsonian National Zoological Park, in collaboration with Faulkner, Fryer & Vanderpool; and the gardens for the Embassy of Ghana in the 1970s. He also advised many local schools and universities on their campus designs, including Georgetown University, American University, and George Washington University. Unfortunately, many of these designed landscapes are no longer extant or suffer from significantly diminished design integrity. Collins’ masterpiece, the Innisfree Garden, was part of TCLF’s Landslide 2012: Landscape and Patronage initiative, when the garden was faced with an inadequate funding base as it transitioned from a private estate to a public garden, which led to our engagement with the landscape.

Collins oversaw the development of the much celebrated Innisfree Garden, a 200-acre reserve in Millbrook, New York, for 40 years. The landscape has recently been included in the New York State Register of Historic Places, and a nomination to the National Register of Historic Places is underway. At Innisfree, Collins used natural elements such as rocks, streams, and plants to compose and frame nature, creating a series of self-contained landscapes traversed by paths of grass, gravel, or brick.
This same approach to design is evident in his work at the Hirshhorn Sculpture Garden. Collins transformed Bunshaft’s severe landscape into a shaded, choreographed space. This is especially noticeable in smaller architectural gestures, such as the angled entrance-stair and internal ramps, meant to gradually reveal specific vistas, along with the deliberate division of a larger arena into smaller parcels, and the screening of the garden from the Mall by a ‘wall’ of plantings. Collins’ work at the Hirshhorn was praised by the Washington Post’s noted architecture critic Benjamin Forgey, who wrote on September 12, 1981:

The parched severity of [the original sculpture garden] was not without merit, but the appeal was more to the mind than to the senses, more theoretical than practical.... The new design reinforces the identity of the garden as a welcoming urban park.... [This] park for art...serves the sculpture. The divisions of the space prove essential accents; artworks pop in and out of view as the spectator moves about the space....
Furthermore, Collin’s 1977 plan is an extraordinary and pioneering example of an integrated and sympathetic solution to the challenges of accessibility, a design that predates the 1991 American Disabilities Act (ADA) Standards for Accessible Design by more than a decade. The network of interior ramps allows visitors, regardless of limitations in mobility, an opportunity to traverse the garden’s internal aisles and circumambulate each sculpture. The symmetrical ramps on the Mall side give visitors immediate access to the reflective pool and underground passage. These ramps, used instead of a hidden, side entrance, face the Hirshhorn museum and stairs on the opposite side, thereby allowing all visitors entering the garden to catch an initial glimpse of the reflective pool before pivoting to descend into the space. Taken together, these features form part of a successful, accessible design that affords every user a dignified arrival and a comparable spatial experience.

II. The Inadequacy of the South Mall Campus’ Cultural Landscape Report (2015) and the Present DOE

In 2015 TCLF was contracted to review the South Mall Campus’ Cultural Landscape Report (50% submission; OFEO Project Number 731299616 Task 15). We submitted initial comments on March 12 of that year. At that time, we expressed surprise that Collins’ work at the Hirshhorn Sculpture Garden was not included in the garden’s period of historical significance. In reviewing a subsequent draft of the South Mall Campus’ Cultural Landscape Report (95% Draft, June 2015; CLR 95% Draft), we reiterated those same concerns, which had not been addressed. As written, the CLR 95% Draft does not recognize what we believe to be Collins’ National Register-eligible work at the garden. Rather, it seems to attribute all aspects of the sculpture garden’s Modernist design to Gordon Bunshaft and the earlier, altered, 1971 plan by Skidmore, Owings & Merrill. Doing so completely ignores Collins’ executed Modernist redesign of the garden as it appeared in 1981, which established the circulation patterns, planting plan, display areas, and accessibility that remain in place today. These serious omissions were carried forward into the DOE, which likewise selectively applies the criteria for eligibility to the garden’s 1974 design, thus ignoring Collins’ work.

There is agreement that the sculpture garden qualifies for designation under Criteria A, C, and G. Notably, expanding the Period of Significance to include Collin’s work would only bolster designation under those same criteria, while further ensuring that the design integrity of his work would not suffer potential adverse effects:

Criterion A (associated or linked to events that have made significant contributions to the broad patterns of our history): The DOE states that the Hirshhorn Museum and Sculpture Garden is eligible under Criterion A for its “reflection of the evolution of both the Smithsonian Institution and the National Mall during the middle half of the twentieth century” and marks the “discernible shift toward Modernism in the character of the National Mall.” It also explicitly mentions that “[T]he development of the museum is also reflective of a concentrated period of growth experienced by the Smithsonian during the 1960s to 1980s.” Collins’ 1977-1981 redesign thus fits within the identified timeframe and is characteristic of the “shift toward Modernism.”

Criterion C (associated with properties that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction): The DOE states that the garden meets this criterion “as an outstanding example of Modernist architecture by a recognized master in the field, with a design that was closely tailored to its urban planning context as
well as associated collection of Modern and Contemporary art.” Although the above statement refers to all modernist design elements within the sculpture garden, the DOE confines its references to the 1974 design while naming both SOM and Gordon Bunshaft as pioneers in Modernist design, failing to mention the 1981 redesign or Lester Collins, who was most certainly a “recognized master in the field.” Notably, this omission also leaves to the side Collins’ pioneering efforts to make the site accessible to those with physical challenges.

Criterion G (a property achieving significance within the past 50 years if it is of exceptional importance): Although the DOE only acknowledges the “exceptional importance” of the garden in connection to Bunshaft and SOM’s architectural legacy, recognizing Collins’ legacy would not preclude eligibility under Criterion G, because his work meets the same required standard of exceptional importance that the document associates with the work of Bunshaft.

The Integrity of the 1981 Collins Redesign

In reference to the 1974 Bunshaft plan, the DOE finds the following:

> Although the plaza and sculpture garden have been modified from their original appearances, the strong formal elements that generate the character of these spaces has been retained, allowing them to retain their integrity of design. (In the case of the plaza, it is the perimeter walls and relationship to the museum drum; in the case of the sculpture garden, it is the sunken nature and intimacy of scale in relation to the National Mall). Although the changes removed or altered some of the original materials and circulation patterns, the spaces continue to act as backgrounds for the display of sculpture and as quiet, Zen-like, and contemplative retreats from the surrounding urban environment. Therefore, they continue to convey their integrity of feeling and association.

Yet previously in the document, the DOE seems to cast doubt on the integrity of the 1981 Collins plan, stating the following:

> Since the completion of the sculpture garden rehabilitation in 1981, the plant material within the garden has continued to evolve. New plantings, including trees, perennial grasses, groundcover, and woody vines, have greatly increased both the quantity and diversity of trees within the sculpture garden, with the result that its current appearance is quite distinct from its appearance in 1981.

But the schematic plans presented at the recent Section 106 consulting parties meeting (see below) indicate, rather, that there are more extant features, possessing a high degree of design integrity, from Collins’ 1981 redesign than from the original Bunshaft plan. Moreover, the DOE seems to characterize the 1981 redesign as merely introducing planting materials into the sculpture garden. That characterization, however, negates Collins’ role in introducing new formal elements, such as the pool basin, reconfiguring the circulation pattern, redesigning the display areas for sculpture, and sensitively creating an ADA-compliant landscape well ahead of its time.
Plan of the existing Hirshhorn Sculpture Garden. Elements of the 1974 design are shown in blue; elements of the 1981 redesign are shown in orange.

III. Conclusion

In closing, we reiterate that the current Period of Significance in the Section 106 review should be expanded to include the historically significant work done between 1977 and 1981 by Lester Collins, given his legacy as a celebrated landscape architect and his consequential redesign of the sculpture garden. The current Period of Significance has been determined by a CLR that takes a very narrow view of the history of Modernist interventions at the Mall and offers little reasoning to support its conclusions. Moreover, expanding the Period of Significance to include Collins’ work would only bolster designation under the criteria for eligibility that have already been identified. We therefore strongly suggest that the DOE be corrected to extend the Period of Significance to encompass 1977–1981, thereby recognizing the 1981 redesign as a contributing feature under Criterion A, C, and G. For the imminent redesign of the Hirshhorn Sculpture Garden to be successful, the Section 106 review must take account of potential adverse effects on all of the landscape’s historic features.

Sincerely,

Charles A. Birnbaum, FASLA, FAAR
Founder, President, and CEO, The Cultural Landscape Foundation
May 15, 2019

Charles A. Birnbaum, FASLA, FAAR  
The Cultural Landscape Foundation  
1711 Connecticut Avenue NW, Suite 200  
Washington, DC 20009

Dear Mr. Birnbaum,

The Smithsonian Institution (SI) is very pleased to have The Cultural Landscape Foundation’s participation as a Consulting Party for Section 106 review of the Hirshhorn Museum and Sculpture Garden (HMSG) Revitalization project. This letter is in response to comments received from TCLF dated May 1, 2019, based on the SI’s April 10th public meeting.

The SI appreciates TCLF’s careful review of the South Mall Campus Cultural Landscape Report (2018) and the Determination of Eligibility (DOE) for the Hirshhorn Museum and Sculpture Garden (2016). We considered TCLF’s comments during the preparation of the South Mall Campus Cultural Landscape Report which was finalized in February 2018. The HMSG DOE was the subject of a public consultation meeting in October 2016, and no public comments were received on the proposed period of significance of 1974.

The 1974 date was determined as the period of significance in the DOE in consultation with the District of Columbia State Historic Preservation Office. The DOE and draft National Register of Historic Places nomination are for the entire Hirshhorn museum building, site, and Sculpture Garden, based on several National Register Criteria. Because the DOE and draft nomination are for the entire complex, Gordon Bunshaft’s design and his recognition as a master in his field, form the basis for the 1974 period of significance date under Criterion C. The SI recognizes that this date excludes Collins’s modifications to the Sculpture Garden, and James Urban’s 1993 museum plaza modifications from the period of significance, but notes their compatibility with Bunshaft’s design. Both efforts vastly improved the accessibility, visitor comfort, and usability of these spaces for the display of sculpture.

The garden evolution plan shown at the April 10th meeting and referenced in TCLF’s comments, illustrated the extant Bunshaft and Collins work, which results in the hybrid design influences present in the Sculpture Garden today. Collins’s design choices retained certain Bunshaft elements, and added important features, that all work together in creating the Garden’s character defining features as outlined in the draft National Register nomination: sunken plan, concrete perimeter walls and sense of enclosure, center axis entrance and exits, reflecting pool, and setting for the display of sculpture. The SI recognizes that the concept plan for the Sculpture Garden Revitalization will result in adverse effects, and consultation with the Consulting Parties and the public on minimization and mitigation measures will be pivotal as we move through Section 106 consultation.

The SI would like to arrange to meet with TCLF in the near future to continue this dialogue. The SI has submitted the concept plan to the federal design review agencies, and there are public meetings on May 16th at the Commission of Fine Arts, and on June 6th at the National Capital Planning Commission. The SI

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would like to propose meeting after the June 6th review, as TCLF’s input on design modifications in response to completing the first round of public comments will be invaluable.

We look forward to working closely with The Cultural Landscape Foundation during this important process.

Sincerely,

Carly Bond  
Historic Preservation Specialist

cc:  Melissa Chiu, Director, HMSG  
     Jay Kaveeshwar, Deputy Director, HMSG  
     Al Masino, Director of Exhibits, Design, and Special Projects, HMSG  
     Laura Harvey, Exhibition Coordinator, HMSG  
     Nancy Bechtol, Director, Smithsonian Facilities  
     Sharon Park, Associate Director of Architectural History and Historic Preservation, OPDC  
     Lauren McCunney, Design Manager, OPDC  
     Andrew Scott, Deputy Chief of Engineering and Design, OPDC  
     Catherine Moore, Program Manager, OPDC  
     Ann Trowbridge, Associate Director for Planning, OPDC  
     Michelle Spofford, Senior Architect/Facilities Planning Manager, OPDC  
     Barbara Faust, Director, Smithsonian Gardens  
     Bill Donnelly, Landscape Architect, Smithsonian Gardens  
     Marisa Scalera, Landscape Architect, Smithsonian Gardens
May 3, 2019

Ms. Carly Bond
Historic Preservation Specialist
Smithsonian Institution
Smithsonian Facilities
Office of Planning, Design & Construction
Architectural History and Historic Preservation
600 Maryland Avenue SW, Suite 5001
Washington, D.C. 20013

Dear Ms. Bond:

Thank you for this opportunity to make comments as part of the Section 106 process for the repair and redesign of the Hirshhorn Museum and Sculpture Garden. I am a resident of Washington DC since 1971 and a landscape architect specializing in the areas of landscape history and the value of cultural landscapes. As author of the Lester Albertson Collins biography which appears in The Cultural Landscape Foundation’s book series, New Profiles from the Pioneers of American Landscape Design Project: Shaping the American Landscape (2009) and Shaping the Postwar Landscape (2018), both published by the University of Virginia Press, my comments will be confined to the redesign of the sculpture garden.

Lester Collins was a prominent Washington DC landscape architect with a National practice from Florida to New York. Among his many projects he developed the masterplan for the new town of Miami Lakes (1962) in Dade County, Florida and partnered with Pittsburgh landscape architect John O. Simonds, (Collins, Simonds and Simonds) in the 1960s and 1970s developing the Florida planned communities of Saga Bay, Indian Trace and Pelican Bay. His work in Millbrook, New York at the 200-acre Innisfree Garden for over forty years is a New York State Historic Landscape and a well-recognized masterpiece eligible for nomination to the National Register of Historic Places. In Washington DC his practice included: commissions for the masterplan for the Smithsonian’s National Zoo (1972) ; the design of the Enid A. Haupt Garden (1987); landscape design for many Washington private schools and universities including American, Georgetown and George Washington University; 29 small parks along Pennsylvania Avenue, SE, for the National Park Service; as well as the campus for the Comsat Laboratory in Clarksburg, Maryland (1969). But it his design for the Hirshhorn Sculpture Garden (1977-1981), which the public has enjoyed for thirty-eight years, that remains his most important Washington DC legacy. It is a testimony to his design sensibility to marry a Modernist landscape design to Gordon Bunshaft’s Modernist architecture.
My initial comment concerns the limited period of significance of 1974 for the National Register of Historic Places documentation process as seen in power point slide #30. Although 1974 was the opening year of the Hirshhorn Museum and Sculpture Garden designed by Gordon Bunshaft of Skidmore, Owings & Merrill, his Modernist sculpture garden was found to be an unworkable design as an outdoor public space and Lester Collins was commissioned to redesign the garden in 1977. Collins’ plans to modify the garden were approved in 1978 and the redesigned garden opened to the public in September 1981.

This Modernist garden designed by Lester Collins, that completes the Bunshaft museum complex is the one that the public has experienced since 1981 and the one it considers the to be the “Hirshhorn Sculpture Garden”. A popular Smithsonian publication sold in your gift shop at the Hirshhorn Museum, A Garden For Art, Outdoor Sculpture at the Hirshhorn Museum, by Valerie Fletcher, 1998, states that “The renovated garden proved to be more hospitable to visitors and sculptures alike. The success of the garden’s renovation prompted the museum’s new director, James Demetrion, to reevaluate the plaza in the late 1980s.” (p.28) The plaza was redesigned in 1991 by James Urban. Therefore I feel that the period of significance should be expanded to include the Lester Collins’ design (1977-1981) as it the work of a master; it is a Modernist sculpture garden that is a complement to the museum’s architectural design; it is the sculpture garden that the public has associated with the museum; and it influenced the redesign of the plaza space surrounding the museum.

My concern with sculpture garden redesign presented on April 10, 2019 is that the new design does not unify the garden and the museum building but rather speaks a different language. I applaud the reconnection of the museum and the garden through the underground passage and a better connection to the Mall seems like a good endeavor. But the tripart division of the garden into different spaces based on their use, the use of stone walls and planting design scheme are out of character with the design of Bunshaft’s Modernist museum building.

I look forward to following the progress of this design process.

With best regards,

Nancy S. Slade, ASLA
3500 Quesada St. NW
Washington D.C. 20015
May 14, 2019

Nancy S. Slade, ASLA
3500 Quesada Street NW
Washington, DC 20015

Dear Ms. Slade,

The Smithsonian Institution (SI) is pleased to have your participation as a Consulting Party for Section 106 review of the Hirshhorn Museum and Sculpture Garden Revitalization project. We especially welcome the opportunity to connect with you as a scholar of Lester Collins’s work. This letter is in response to your comments dated May 3, 2019, based on the SI’s April 10th public meeting.

The 1974 date was determined as the period of significance for the Hirshhorn Museum and Sculpture Garden in consultation with the District of Columbia State Historic Preservation Office. The Determination of Eligibility and draft National Register of Historic Places nomination are for the entire Hirshhorn museum building, site, and Sculpture Garden, based on several National Register Criteria. Because the DOE and draft nomination are for the entire complex, Gordon Bunshaft’s design and his recognition as a master in his field, form the basis for the 1974 period of significance date under Criterion C (architecturally significant properties). The SI recognizes that this date excludes Collins’s modifications to the Sculpture Garden, and James Urban’s 1993 museum plaza modifications from the period of significance, but notes their compatibility with Bunshaft’s design. Both efforts vastly improved the accessibility, visitor comfort, and usability of these spaces for the display of sculpture.

Collins’s design choices retained certain Bunshaft elements, and added important features, that all work together in creating the Garden’s character defining features as outlined in the draft National Register nomination: sunken plan, concrete perimeter walls and sense of enclosure, center axis entrance and exits, reflecting pool, and setting for the display of sculpture. The SI recognizes that the concept plan for the Sculpture Garden Revitalization will result in adverse effects, and consultation with the Consulting Parties and the public on minimization and mitigation measures will be pivotal as we move through Section 106 consultation.

As part of our next steps in refining the design, two stone wall mock-ups will be constructed in July 2019 and available for public review. The mock-ups will be instrumental in evaluating the proposed stone for a portion of the Sculpture Garden walls, and how the material serves the museum’s goal to improve its outdoor galleries, especially for the display of its significant modern bronze collection, as well as how these new walls relate to the restored aggregate concrete walls and to the museum plaza.

The SI hopes that you will continue to follow the design process at two upcoming public meetings as the Sculpture Garden concept plan moves through the federal design review process. The concept plan will be reviewed by the Commission of Fine Arts on May 16th, and the National Capital Planning Commission on June 6th.

We look forward to continuing consultation with you during this important process.

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Sincerely,

Carly Bond
Historic Preservation Specialist

cc: Melissa Chiu, Director, HMSG
Jay Kaveseshwar, Deputy Director, HMSG
Al Masino, Director of Exhibits, Design, and Special Projects, HMSG
Laura Harvey, Exhibition Coordinator, HMSG
Nancy Bechtol, Director, Smithsonian Facilities
Sharon Park, Associate Director of Architectural History and Historic Preservation, OPDC
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Ms. Bond,

Docomomo, an international organization with thousands of members in 70 countries that advocates for the documentation and conservation of buildings of the Modern Movement, is writing to respond to the Hirshhorn Museum and Sculpture Garden proposed changes. Docomomo commends the Smithsonian for its thoughtful stewardship of Gordon Bunshaft’s masterwork and appreciates having the opportunity to participate in the Hirshhorn Museum and Sculpture Garden Section 106 process. Representatives from Docomomo US and Docomomo DC attended the April 10 consulting party meeting and based on the information presented we would like to share with you our observations and concerns regarding replacement of the museum concrete aggregate facade panels and the use of stacked stone walls in the garden.

The proposal to replace all the original precast concrete facade panels would result in the permanent loss of two character defining features of the building: the precast Swenson pink granite concrete aggregate panels and the relationship of the elevated drum to the concrete piers below, upsetting the building’s overall proportions. We find the proposed alteration is not in keeping with *The Secretary of the Interior Standards for Rehabilitation* that state, “The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided” and “Distinctive materials that characterize a property will be preserved”.

It is understood the proposed panel replacement and enlargement of the building is being undertaken due to attachment clip deterioration and to increase energy efficiency. As the panels themselves are structurally sound and only the attachment clips require replacement, such a drastic alteration should not be undertaken without a thorough review of energy saving approaches to all areas of the building and exploring all other options. For example, what is the energy savings of only insulating the roof and has the design team been able to quantify how much heat loss and gain occurs through the glass versus the concrete portions of the facade? If there are future plans to replace the glazing for security purposes, should that energy savings be weighed now as part of the overall strategy to increase energy performance of the building? We also recommend the Smithsonian reconsider the option of adding 1.5” thick mineral wool insulation to the existing cavity. It was dismissed in the proposal because it does not meet prescriptive energy requirements. Historic buildings are exempt from complying with the perspective energy code where doing so would affect the character defining features of the building. This exemption exists specifically for projects such as this and is preferable considering alternate energy saving measures have not been exhausted.

Beyond the loss of the original fabric is the visual effect that enlarging the original radius of the building by 3” will have on the façade. We are concerned this dimensionally small change will have a major effect on such a simple, unornamented building. We recommend a detailed study of the effect of this
Docomomo applauds the Smithsonian for undertaking efforts to make the sculpture garden more accessible and improving the connection to the museum by reopening the original tunnel. We understand the original concrete walls are damaged beyond repair and require replacement. However, we question the introduction of stacked stone walls to the Modern composition. This choice of material is foreign to Bunshaft’s and Collins’ designs and has no precedent at the museum or on the Mall. We respectfully question the Smithsonian’s suggestion that the stacked stone walls are needed to provide “a pre-modern material to highlight the modernity of the Modern art” on display in the garden. The Hirshhorn has successfully exhibited modern art and sculpture in the garden for 45 years without employing false historical backdrops. We believe the clarity of Bunshaft’s design as a diagram would be significantly diminished with these new seemingly randomly placed stacked stone walls. Docomomo encourages the Smithsonian to further explore the materiality and placement of all the proposed new garden walls.

Thank you for considering our observations and concerns. We look forward to learning more about the project as the Section 106 process continues.

Sincerely,

Docomomo DC
May 14, 2019

Jennie Gwin
Docomomo US/DC
P.O. Box 230977
New York, NY 10023

Dear Ms. Gwin,

The Smithsonian Institution (SI) is very pleased to have Docomomo US/DC’s participation as a Consulting Party for Section 106 review of two projects at the Hirshhorn Museum and Sculpture Garden, the Envelope Repair and Garden Revitalization projects. This letter is in response to comments received from Docomomo US/DC received May 3, 2019, based on the SI’s April 10th public meeting.

The Envelope Repair project resulted from extensive study of the existing conditions of the building envelope, structural slabs and post tension tendons, plaza structure and walls, and Sculpture Garden walls completed in early 2019. As part of this effort, monitors were installed on the exterior drum panels.

The study concluded that the problematic original installation of the anchor attachments, shimming of the panels, and other field modifications, has resulted in cracking, spalling, and deterioration of the concrete and rusting of the anchors. Reusing the panels is possible, but with significant risk in the extensive conservation treatments for crack repair, and risk in damaging the very large (up to 14’-3” by 7’6”) panels upon removal and reattachment to a more robust structural system to meet blast requirements.

The Hirshhorn’s existing enclosure system completely lacks a vapor, air or water resistive barrier, and insulation. This condition results in ongoing water infiltration and condensation during the cold months of the year along the interior side of the solid concrete structural back-up wall. The SI acknowledges Docomomo’s comments that historic buildings are not required to meet prescriptive energy requirements. However, we are committed to construct and renovate our buildings to meet federal goals for overall energy use reduction. As shared at the April 10th meeting, the Hirshhorn is the SI’s worst offending facility for energy consumption (based on BTU/SF). The SI is obligated to consider the best use of capital and operating funds, and the opportunity that this project provides to improve the Hirshhorn’s ability to function efficiently, and best protect its collection. Because our buildings must maintain tightly controlled temperature and humidity levels in collections storage and gallery spaces at all times, as well as accommodating crowds of visitors, their energy use is high as are the cost benefits and greenhouse gas (GHG) reductions of each incremental improvement.

We acknowledge and agree with Docomomo’s comments that the proposed 3” offset may result in an adverse effect to the building where the panels meet the poured in place concrete base and pilotis. We are continuing to study the changes in the shadow line at the base of the building, and effects to the third floor balcony window opening size, and look forward to consulting further with Docomomo. The SI can make the 2019 study available for Docomomo’s review at our office.
Smithsonian Institution

The SI is confident that the aggregate concrete panels can be replaced in-kind. Currently we are engaged in preparations for mock-ups with aggregates and concrete finish treatments, and we look forward to consulting further with Docomomo and other stakeholders when these are available.

As part of our next steps in refining the design of the Sculpture Garden Revitalization project, two stone wall mock-ups will be constructed in July 2019 and available for public review. The mock-ups will be instrumental in evaluating the proposed stone for a portion of the Sculpture Garden walls, and how the material serves the museum’s goal to improve its outdoor galleries, especially for the display of its significant modern bronze collection, as well as how these new walls relate to the restored aggregate concrete walls and to the museum plaza. We will also continue to study the placement and hierarchical organization of the stacked stone walls, and impacts to historic resources, and will continue consultation with all stakeholders.

The SI is available to meet with the Docomomo US Board in the near future to continue these dialogues. The SI has submitted the concept plan for the Sculpture Garden Revitalization to the federal design review agencies, and there are upcoming public meetings on May 16th at the Commission of Fine Arts, and on June 6th at the National Capital Planning Commission. We expect to submit the concept plan for the Building Envelope Repair project to the federal design review agencies later this summer.

We look forward to working closely with Docomomo US/DC during this important process for both projects and receiving input on design modifications after we complete the first round of comments from the federal design review agencies.

Sincerely,

Carly Bond
Historic Preservation Specialist

cc: Liz Waytkus, Docomomo US
Melissa Chiu, Director, HMSG
Jay Kaveeswar, Deputy Director, HMSG
Al Masino, Director of Exhibits, Design, and Special Projects, HMSG
Laura Harvey, Exhibition Coordinator, HMSG
Nancy Bechtol, Director, Smithsonian Facilities
Sharon Park, Associate Director of Architectural History and Historic Preservation, OPDC
Lauren McCunney, Design Manager, OPDC
Andrew Scott, Deputy Chief of Engineering and Design, OPDC
Catherine Moore, Program Manager, OPDC
Ann Trowbridge, Associate Director for Planning, OPDC
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Barbara Faust, Director, Smithsonian Gardens
Bill Donnelly, Landscape Architect, Smithsonian Gardens
Marisa Scalera, Landscape Architect, Smithsonian Gardens

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Hello Sharon and Carly:

Thank you for initiating Section 106 consultation and providing the presentation materials from the recent consulting parties’ meeting on the Hirshhorn Sculpture Garden and Building Envelope Repair Projects. We are preparing more detailed comments and will provide them in the near future but, in response to your request for comments by COB today, we are writing to notify you of our determination that the Sculpture Garden Project will have an “adverse effect” on historic properties if it is implemented as currently proposed. Of primary concern is the proposal to alter the most highly visible remnants of Bunschaff’s original design – particularly the central reflecting pool and central partition wall. Further consultation to identify ways to avoid, or at least minimize, the adverse effects will be required. As you are already aware, these comments are consistent with the ones we have provided on numerous occasions in the past.

The Building Envelope Repair project appears to have less potential to result in an adverse effect given that it will effectively consist of an in-kind replacement of the original precast panels and result in a relatively small difference in building dimensions (i.e. +3). However, we also wish to consult further on this topic to ensure we understand the full range of potential implications and to be certain that there are no ways to achieve the energy code requirements without altering the dimensions of the exterior walls.

Additional comments will follow soon.

Best regards,
May 24, 2019

Ms. Sharon C. Park
Associate Director of Architectural History and Historic Preservation
Smithsonian Institution
600 Maryland Avenue, SW, Suite 5001
PO Box 37012 MRC 511
Washington, DC  20013-7012

RE: Initiation of Section 106 Consultation for the Hirshhorn Sculpture Garden Revitalization and Hirshhorn Museum Building Envelope Repair Projects

Dear Ms. Park:

Thank you for initiating consultation with the District of Columbia State Historic Preservation Officer (SHPO) regarding the above-referenced undertakings. We have reviewed the project submission, the materials from the April 10, 2019 consulting parties’ meeting, and the subsequent letters from the consulting parties and are writing to provide additional comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

As you will recall, we provided initial comments on the proposed projects via email dated May 3, 2019. To briefly summarize, these comments documented our determination that the currently proposed Sculpture Garden Project would cause an adverse effect on historic properties; noted that the Building Envelope Project appeared to have less potential for adverse effects; and expressed our desire to consult further regarding both projects.

The Sculpture Garden Project is of primary concern because it proposes significant alterations to a component of Gordon Bunshaft’s concept that was very important from the onset of the design process. Although the scale of the completed sculpture garden was substantially reduced from the earliest proposals, it still reflects Bunshaft’s Modernist ideals and functions as fully one half of the overall Hirshhorn complex. Through materials and design, the sculpture garden serves as a setting and visual context for the museum building, and vice versa.

For these reasons, it is critically important to preserve the remaining elements of Bunshaft’s design. Failure to do so would undermine the design intent of one of the world’s most respected Modernist architects. As proposed, the undertaking would destroy the visual connections that establish the garden and building as one composition, result in two disassociated features and cause adverse effect on a property which is both listed in National Register of Historic Places as a contributing element of the National Mall Historic District, and determined individually eligible for listing in the National Register as well.
We are pleased that some original features identified as contributing in May 12, 2016 Determination of Eligibility (DOE) Form (see table below) are going to be preserved, partially restored or at least replaced in-kind. These include the sunken path, several of the concrete walls, the south stair, the north stair, and the setting for the display of rotating sculpture. However, we remain quite concerned about the proposal to effectively replace two of the most important design features, specifically the reflecting pool and the concrete garden walls.

<table>
<thead>
<tr>
<th>Feature</th>
<th>Contributing/Non-Contributing</th>
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<tbody>
<tr>
<td>Sunken plan</td>
<td>Contributing</td>
</tr>
<tr>
<td>Concrete walls (perimeter and inner partition)</td>
<td>Contributing</td>
</tr>
<tr>
<td>South stairs</td>
<td>Contributing</td>
</tr>
<tr>
<td>North stairs</td>
<td>Contributing</td>
</tr>
<tr>
<td>Reflecting pool</td>
<td>Contributing</td>
</tr>
<tr>
<td>Setting for the display of rotating sculpture</td>
<td>Contributing</td>
</tr>
<tr>
<td>Interior ramps and stairs</td>
<td>Non-Contributing</td>
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<tr>
<td>Raised planting beds</td>
<td>Non-Contributing</td>
</tr>
<tr>
<td>Vegetation</td>
<td>Non-Contributing</td>
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<tr>
<td>Paving</td>
<td>Non-Contributing</td>
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<tr>
<td>Enclosed arts education space (at former stair opening)</td>
<td>Non-Contributing</td>
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<tr>
<td>Guard booth</td>
<td>Non-Contributing</td>
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<tr>
<td>Moveable site furniture, trash receptacles, etc.</td>
<td>Non-Contributing</td>
</tr>
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Bunshaft undoubtedly placed a great deal of importance on the museum’s reflecting pool since he originally proposed that it span almost the entire width of the Mall’s central greensward. Even when compelled to significantly reduce its size, he elected to design the pool using the same shape and proportions he selected for the one window that breaks the otherwise uninterrupted façade of the museum. This visual connection, which is illustrated in the image below, has remained intact since 1974. In our opinion, the pool must retain its original shape in order to avoid an adverse effect. Although we suspect it would be difficult to successfully achieve from a design standpoint, it may be possible to augment the pool with an additional feature or features.
Similarly, Bunshaft’s use of granite aggregate concrete for the walls of both the sculpture garden and the museum reinforce the strong relationship between the two halves of the design. While the inner partition wall expresses this connection most prominently because of its central location and high visibility, the overall design of the garden must reflect its original materials in order to avoid an adverse effect. These comments are consistent with those which we provided in several early concept meetings over the last year or so.

Some consulting parties have suggested that the work of Lester Collins is also significant. The DOE identifies Collins’ work as compatible, yet non-contributing, primarily due to the Period of Significance (POS) being limited to 1974, the year that work on Bunshaft’s designs was completed. The consulting party letters are quite thorough and provide valid arguments for reconsideration of Collins’s contributions so we will not summarize their positions in this letter. However, we agree that this matter warrants further analysis and note that our determinations of effects may also require revision based upon the results of that further study.

Other aspects of the proposed project also have potential to adversely affect historic properties. For example, we have no objection to the installation of the metallic tube as part of the “underground passage concept” in so far as it is reversible and does not damage historic fabric. However, the current design proposes to remove portions of original walls and/or doors. We recognize and understand the importance of the “infinity” aspect of the design, but recommend that the tube, or the manner/location in which it is installed, be revised so that it avoids removing historic fabric.

On a related note, we also recommend against altering the Bunshaft knee wall in the museum plaza which surrounds the stair leading down into the passageway beyond. If additional natural light is desired in the stair/passageway, this could potentially be achieved more sensitively by incorporating “walkable skylights” such as those shown in the image to the right. This approach would provide additional light while allowing the Bunshaft walls to remain unaltered.

As indicated earlier, the Building Envelope Repair Project may have less potential to result in an adverse effect given that it will effectively consist of an in-kind replacement of the original precast panels and result in a relatively small difference in building dimensions. However, we echo the concerns expressed by other consulting parties who stressed the importance of investigating all potential alternatives that might meet the program needs without replacing the original panels. Thus, we wish to consult further to ensure we understand the full range of the potential implications that may result from at +/- 3” differential between current and proposed conditions, and to make sure that alternative approaches which could avoid the unnecessary replacement of original materials have been fully evaluated before work begins.
If you should have any questions or comments regarding any of these matters, please contact me at andrew.lewis@dc.gov or 202-442-8841. Otherwise, thank you for providing this initial opportunity to comment. We look forward to consulting further with the Smithsonian Institution and all consulting parties to continue the Section 106 review of this project.

Sincerely,

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

19-0361 (Sculpture Garden) and 19-0362 (Building Envelope)
May 30, 2019

C. Andrew Lewis  
Senior Historic Preservation Specialist  
DC State Historic Preservation Office  
DC Office of Planning  
11400 4th Street SW, Suite E650  
Washington, DC 20024

Dear Mr. Lewis,

Thank you for the thorough comments dated May 24, 2019, regarding two Section 106 consultations running concurrently for projects at the Hirshhorn Museum and Sculpture Garden. This letter responds to your comments, separated by project. The Smithsonian Institution (SI) would like to reconvene the Signatories to the South Mall Campus Master Plan Programmatic Agreement (PA) after the upcoming June 6th National Capital Planning Commission meeting for concept review of the Sculpture Garden Revitalization, to discuss consultation schedules and PA compliance.

Envelope Repair Project

The Envelope Repair project resulted from extensive study of the existing conditions of the building envelope, structural slabs and post tension tendons, plaza structure and walls, and Sculpture Garden walls completed in early 2019. As part of this effort, monitors were installed on the exterior drum panels.

The study concluded that the problematic original installation of the anchor attachments, shimming of the panels, and other field modifications, has resulted in cracking, spalling, and deterioration of the concrete and rusting of the anchors. Reusing the panels is possible, but with significant risk in the extensive conservation treatments for crack repair, and risk in damaging the very large (up to 14'-3" by 7'6") panels upon removal and reattachment to a more robust structural system to meet blast requirements.

The Hirshhorn’s existing enclosure system completely lacks a vapor, air or water resistive barrier, and insulation. This condition results in ongoing water infiltration and condensation during the cold months of the year along the interior side of the solid concrete structural back-up wall. The SI is committed to construct and renovate our buildings to meet federal goals for overall energy use reduction. As shared at the April 10th meeting, the Hirshhorn is the SI’s worst offending museum facility for energy consumption (based on BTU/SF). The SI is obligated to consider the best use of capital and operating funds, and this project provides to improve the Hirshhorn’s ability to function efficiently, and best protect its collection. Because our buildings must maintain tightly controlled temperature and humidity levels in collections storage and gallery spaces at all times, as well as accommodating crowds of visitors, their energy use is high as are the cost benefits and greenhouse gas (GHG) reductions of each incremental improvement.

We acknowledge that the proposed 3” offset has potential to result in an adverse effect to the building where the panels meet the poured in place concrete base and pilotis. We are continuing to study the
changes in the shadow line at the base of the building, and effects to the third floor balcony window opening size, and look forward to consulting further. The SI can make the 2019 study available for the DC SHPO's review at our office.

The SI is confident that the aggregate concrete panels can be replaced with in-kind materials. Currently we are engaged in preparations for mock-ups with aggregates and concrete finish treatments, and we look forward to consulting further with the DC SHPO and other stakeholders when these are available.

**Sculpture Garden Revitalization**

The SI recognizes that the concept plan for the Sculpture Garden Revitalization will result in adverse effects, and consultation with the Consulting Parties and the public on minimization and mitigation measures will be essential as we move through Section 106 consultation.

The SI is prepared to begin drafting an Assessment of Effects on Historic Resources, and to consider all alternatives shown at the April 10th Consulting Parties meeting for the reflecting pool and underground passage connection at the museum plaza. The underground passage connection at the museum plaza was closed over in the 1993 James Urban modifications, and the Bunshaft balustrade (knee wall) was removed. This project proposes reestablishing this access point to the underground passage, and one of the alternatives under consideration does propose a skylight, to recall the original opening size. In all of the alternatives, the Bunshaft balustrade would be restored with minor modifications for code compliance, which will be under further study during the upcoming design phase. The replacement in-kind of the perimeter concrete walls and reestablishment of the underground passage connection, maintains and builds on the visual connections between the Sculpture Garden and museum building and Plaza perimeter walls.

With regard to the Period of Significance in the current Determination of Eligibility (DOE), the SI has been in discussion with the National Register, and would like to consult further with the DC SHPO very soon. The Sculpture Garden is a hybrid of design influences; Collins’s design choices retained certain Bunshaft elements, and added important features, that all work together in creating the Garden’s character defining features as outlined in the draft National Register nomination and DOE: sunken plan, concrete perimeter walls and sense of enclosure, center axis entrance and exits, reflecting pool, and setting for the display of sculpture. As such, the SI will be considering effects to Collins's work in our draft Assessment of Effects on Historic Resources.

We will continue to consider the additional comments on the other aspects of the design as we consult further on the draft Assessment of Effects. We look forward to consulting further with the DC SHPO on both of these important projects, and meeting with you soon.

Sincerely,

Carly Bond
Historic Preservation Specialist

600 Maryland Avenue SW Suite 5001
PO BOX 37012 MRC 511
Washington, DC 20013-7012
202.633.6535
BondC@si.edu
Dear Ms. Bond,

Thank you for your speedy reply to our initial comments concerning the Section 106 meeting held on April 10, 2019, in regard to the Hirshhorn Museum and Sculpture Garden Revitalization Project. We appreciate the time you have spent in reviewing and responding to the concerns of official consulting parties.

You state in your letter dated May 15, 2019, that the Smithsonian “considered TCLF’s comments during the preparation of the South Mall Campus Cultural Landscape Report [CLR] which was finalized in February 2018.” But the crux of the matter is, of course, that such consideration did not result in any recognition of the significant redesign of the Hirshhorn Museum Sculpture Garden by landscape architect Lester Collins (1914–1993).

As you know, TCLF was contracted to review the South Mall Campus’ Cultural Landscape Report (50% submission; OFEO Project Number 731299616 Task 15) on February 25, 2015. As part of our review, we submitted extensive written comments on March 12, 2015, noting that Collins’ work at the Hirshhorn Museum Sculpture Garden should be included in the landscape’s Period of Significance, writing, under the heading “Specific Observations,” that we were “perplexed why the Lester Collins contributions are non-contributing.” After reviewing a subsequent draft of the South Mall Campus’ Cultural Landscape Report (95% Draft, June 2015; CLR 95% Draft), we reiterated those same concerns, which had not been addressed. On March 22, 2016, TCLF re-submitted via e-mail a systematic written response to the Smithsonian, quite literally highlighting our initial enquiry about Collins. The text of the e-mail itself stated the following: “to evaluate the period(s) of significance additional contextual information is lacking...Deeper research for landscapes of the last 50 years is required — this includes interviews with folks like Ian Tyndall and Stu Dawson; evaluating Lester Collins 1977 work at the Sculpture Garden in a more significant way, as Collins considered this important in his career...(emphasis added).”

Although your recent letter to TCLF states that the Period of Significance was determined “in consultation with the District of Columbia State Historic Preservation Office,” (DC SHPO) it has become clear via correspondence with that office that TCLF’s comments were not shared with its staff when the critical work to approve a Determination of Eligibility for the sculpture garden was underway. Given that the Smithsonian engaged TCLF as a consultant on this project because of our unique expertise in historic, designed landscapes, and, in particular, Modernist landscape architecture in Washington, D.C., we believed—quite naturally—that the results of our review would meaningfully inform the Determination of Eligibility for the Hirshhorn’s Modernist sculpture garden, if not in a determinative way, then at least in a constructive one. Unfortunately, that did not prove to be the case.

As a consequence, it is only with the knowledge of our submission as a consulting party to the current Section 106 review that these concerns were brought before the DC SHPO, which, in a letter dated May 24, 2019, to the Smithsonian’s Sharon Park, has stated that “the consulting party letters are quite thorough and provide valid arguments for reconsideration of Collins’s contributions...we agree that this matter warrants further analysis and note that our determinations of effects may also require revision based upon the results of that further study.” To those remarks we should add that, in recent discussions with TCLF, staff at the National Park Service’s National Register of Historic Places Program have also expressed, without equivocation, that Collins’ redesign of the
Hirshhorn Sculpture Garden is undeniably historic, that his significant contributions to the project were that of a master practitioner, and that the Period of Significance should be expanded to recognize his work.

To reiterate points from our submitted remarks, we concur with your assessment that Collins retained Gordon Bunshaft’s sunken plan, concrete perimeter walls, and reflecting pool, making the Hirshhorn Museum Sculpture Garden a palimpsest of two Modernist masters. Yet other important, character-defining features of the garden are Collins’ alone, as is outlined in the draft National Register nomination. For example, Collins significantly modified the garden’s entrance from the Mall by introducing ramps that afforded every visitor, including those with physical challenges, a dignified arrival and a comparable spatial experience. He also created a tree canopy and “wall of plantings” on the Mall side, thus providing a very different sense of enclosure from that of the previous design. What is more, the garden’s current design in terms of the display of sculpture is wholly attributable to Collins, as is clear when comparing the Collins and Bunshaft plans.

Thus while some of the garden’s significant, character-defining features are attributable to Bunshaft, the preponderance of the designed landscape that visitors have enjoyed—and critics have praised—for almost 40 years is attributable to Lester Collins, a fact that is entirely at odds with the current Period of Significance established for the garden. Moreover, Collins’ status as a master of his craft has been recently affirmed by the District of Columbia’s Historic Preservation Review Board (HPRB) and the National Register of Historic Places. In its 2017 historic designation of the Smithsonian Quadrangle (case no. 17-04), the HPRB determined that the nominated property “meets D.C. Designation Criteria F for Creative Masters,” among them “Landscape Architect Lester Collins.” And on May 18, 2017, the Lyndon Baines Johnson Department of Education Building (Federal Office Building No. 6) in Washington, D.C., was added to the National Register, having satisfied Criterion C as a property that “embodies the distinctive characteristics of a type, period, or method of construction, or that represent[s] the work of a master...”—in this case “Master Landscape Architect: Lester Collins” (nomination form prepared by EHT Traceries, Inc.). Apropos of Collins’ work being listed in the National Register, it is our understanding that the nomination of the Hirshhorn Museum and Sculpture Garden to the Register has been deferred in accord with a request by the Smithsonian on October 18, 2018. That now being the case, there is ample opportunity to amend the nomination to reflect Collins’ contribution, as the foregoing discussion clearly suggests should be done.

As these and other facts accrue, we hope you will agree that it is most prudent to address the Period of Significance for the sculpture garden immediately. Indeed, comments from members of the U.S. Commission of Fine Arts during their May 16 meeting only reinforce that this issue should be resolved while the review process is still in its early stages. Doing so would help ensure that much time and effort are not lost in revisiting and revising plans throughout the already lengthy review process. We therefore ask that you remove the project from the agenda of the upcoming meeting of the National Capital Planning Commission on June 6, 2019, which would allow a good-faith attempt to reconcile the proposed plans with the new information that has recently come to light.

Finally, we appreciate the Smithsonian Institution’s invitation to further this dialogue and are certainly happy to do so. As nearly every party in the review process now seems to agree, the work of landscape architect Lester Collins is of significant cultural and historical value, and removing it entirely from the National Mall would be an uncharacteristically shortsighted act by such an enduring institution as the Smithsonian.

Sincerely,

Charles A. Birnbaum, FASLA, FAAR
Founder, President, and CEO, The Cultural Landscape Foundation

cc: Melissa Chiu, Director, HMSG
Jay Kaveeshwar, Deputy Director, HMSG
Al Masino, Director of Exhibits, Design, and Special Projects, HMSG
Laura Harvey, Exhibition Coordinator, HMSG
Nancy Bechtol, Director, Smithsonian Facilities
Sharon Park, Associate Director of Architectural History and Historic Preservation, OPDC
Lauren McCunney, Design Manager, OPDC
Andrew Scott, Deputy Chief of Engineering and Design, OPDC
Catherine Moore, Program Manager, OPDC
Ann Trowbridge, Associate Director for Planning, OPDC
Michelle Spofford, Senior Architect/Facilities Planning Manager, OPDC
Barbara Faust, Director, Smithsonian Gardens
Bill Donnelly, Landscape Architect, Smithsonian Gardens
Marisa Scalera, Landscape Architect, Smithsonian Gardens
Linda St. Thomas, Chief Spokesperson, Smithsonian Institution
David Maloney, State Historic Preservation Officer, DC Historic Preservation Office
Steve Callcott, Deputy State Historic Preservation Officer, DC Historic Preservation Office
Andrew Lewis, Senior Historic Preservation Specialist, DC Historic Preservation Office
Thomas Luebke, Secretary, U.S. Commission of Fine Arts
Marcel Acosta, Executive Director, National Capital Planning Commission
Elizabeth Miller, Director, Physical Planning Division, National Capital Planning Commission
March 25, 2020

Carly Bond
Historic Preservation Specialist
Hirshhorn Museum and Sculpture Garden
Independence Avenue and 7th Street
Washington, DC 20560

RE: Hirshhorn Sculpture Garden Revitalization Project

Dear Ms. Carly Bond,

Thank you for the opportunity to provide comments on the Hirshhorn Museum and Sculpture Garden's Hirshhorn Sculpture Garden Revitalization Project. The District Department of Transportation (DDOT) is pleased that the Hirshhorn Museum and Sculpture Garden is embarking on a project to shape the future development of the museum.

The designs as shown do not show any work occurring in the public right-of-way. As was noted in DDOT’s e-mail correspondence, if any portion of the project has elements in the public space requiring approval, the Hirshhorn Museum and Sculpture Garden must obtain a public space permits through DDOT’s permitting process.

DDOT looks forward to future coordination.

Sincerely,

Jim Sebastian
Associate Director
Planning and Sustainability Division
CC: Kelsey Bridges, DDOT
    Austina Casey, DDOT
March 24, 2020

Carly Bond
Historic Preservation Specialist
Smithsonian Facilities
Office of Planning, Design & Construction
Architectural History and Historic Preservation
600 Maryland Avenue, SW, Suite 5001
Washington, DC 20013

Dear Ms. Bond,

Thank you for this opportunity to comment on the Smithsonian’s February 24th presentation of the draft Hirshhorn Museum Sculpture Garden Significance and Integrity Report. As the author of the Lester Collins biography in the Cultural Landscape Foundation’s Pioneers of American Landscape series, Shaping the American Landscape and Shaping the Postwar Landscape, published by University of Virginia Press, I am delighted that the Lester Collins design of the Hirshhorn Sculpture Garden has been included in the period of significance for the Hirshhorn Museum complex. I thank Robinson Associates and Laura L. Knott, Historical Landscape Architect, authors of the draft Hirshhorn Museum Sculpture Garden Significance and Integrity Report, for their investigation and scholarship and their determination that the sculpture garden retains a high degree of integrity in all seven categories established by the National Register of Historic Places.

My comments below are regarding the New Concept Design presented in the Sculpture Garden Revitalization report which was also part of the February 24th presentation. The Smithsonian’s new proposed garden design makes me ask, “Where is the Collins’ design?”

The experience of Collins’ Modernist garden is something that is not found elsewhere on the Mall or often in Washington DC. I recognize that sculpture today is often different from what it was when Joseph H. Hirshhorn was making his Collection; but to include the Collin’s sculpture garden in the period of significance and then remove the essence of his garden is problematic. The Collins garden is a compliment to Bunshaft’s circular insertion on the Mall and together they form a unique Modernist museum campus complex.

The New Concept Garden design proposes the division of the garden into three programmable spaces and uses stacked-stone walls to create garden rooms for the display of sculpture. These alterations are not in keeping with the essence of the Collins Modernist design which is about movement and “hide and reveal” experiences throughout the garden. The Robinson Associates report states, “Collins’s overlay onto the original garden therefore represents a unique adaptation in the sculpture garden context in its fusion of Modernist and Asian garden principles based on a landscape in which views unfold as the visitor moves through the space. This study therefore concludes that the Collins redesign contributes to the National Register significance of Hirshhorn Museum and Sculpture Garden under
Criterion C as an alteration of the original garden that possesses “high artistic value.” (p.89) Although stacked-stone walls are found elsewhere on the Mall they are elements in totally different landscapes from the Hirshhorn Museum and Sculpture Garden. The present relationship of the Collins garden and the Bunshaft museum are harmonious in materials and spirit and create a unified experience.

I hope that the Smithsonian will use their talented team to devise a plan which addresses the Hirshhorn’s goals and which honors the design and materials of two Modernist elements, the Lester Collins landscape and Gordon Bunshaft’s museum.

Sincerely,

Nancy Slade, ASLA
3500 Quesada St. NW
Washington DC, 20015
April 9, 2020

Nancy Slade, ASLA
3500 Quesada Street NW
Washington, DC 20015

Dear Ms. Slade,

Thank you for your participation in Section 106 consultation for the Hirshhorn Sculpture Garden Revitalization project. This letter is a response to your comments dated March 24, 2020.

As the author of Lester Collins’s biography, the Smithsonian is pleased that you concur with the scholarship, integrity analysis, and period of significance as presented in the Hirshhorn Museum Sculpture Garden Significance and Integrity Report. This report will be finalized and available to the public and other researchers on Collins.

Researching the report showed the Smithsonian interesting parallels in the project goals for Collins’s redesign of the Sculpture Garden and Hiroshi Sugimoto’s concept design. Learning of Collins’s unrealized design for the Sculpture Garden without the north stairs and a north overlook aligns with the proposed design and is an interesting connection. We are planning our next public meeting for May 27th, which will focus on a draft Assessment of Effects on Historic Resources and design progress updates. This assessment will consider the effect of each action of the project on character defining features of the Sculpture Garden from 1974, 1981, and consider how the design restores or recalls certain features.

We look forward to your continued participation in Section 106 consultation as the Sculpture Garden Revitalization project further develops.

Sincerely,

Sharon C. Park

Sharon C. Park, FAIA
Associate Director for Architectural History and Historic Preservation

cc: Melissa Chiu, Director, HMSG
Jay Kaveeshwar, Deputy Director, HMSG
Kate Gibbs, Director of Communication, HMSG
Al Masino, Director of Special Projects and Exhibits, HMSG
Carly Bond, Historic Preservation Specialist, OPDC
Lauren McCunney, Design Manager, OPDC
Ann Trowbridge, Associate Director for Planning, OPDC
Michelle Spofford, Architect and Senior Planner, OPDC
Bill Donnelly, Landscape Architect, Smithsonian Gardens
March 18, 2020

Carly Bond
Historic Preservation Specialist
Smithsonian Facilities Office of Planning, Design and Construction
600 Maryland Avenue SW, Suite 5001
Washington, DC 20013-7012

Dear Ms. Bond,

As an official consulting party to the National Historic Preservation Act Section 106 review now underway for the Hirshhorn Sculpture Garden in Washington, D.C., The Cultural Landscape Foundation (TCLF) is pleased to add the following remarks to the public record. As is appropriate at this stage of the review, we will comment on the recently released draft Hirshhorn Museum Sculpture Garden Significance and Integrity Report. While there will be future opportunities to do so, we will also comment on the preliminary “Concept Design” for the sculpture garden that appears in the presentation dated February 24, 2020, which accompanied the aforementioned report.

The Period of Significance:

We concur with the newly established Period of Significance identified in the draft Hirshhorn Museum Sculpture Garden Significance and Integrity Report: 1974, 1981. The addition of the year 1981 in this new Period of Significance duly recognizes the sculpture garden’s redesign by landscape architect Lester Collins, which, according to the report, contributes to the National Register significance of the property under Criterion C as both a work of “high artistic value” and as “the work of a master.”

Integrity Analysis:

We concur with the draft Hirshhorn Museum Sculpture Garden Significance and Integrity Report in its conclusion that the sculpture garden retains integrity in all seven categories established by the National Register of Historic Places, namely a high degree of integrity in its location, setting, association, and feeling, and a moderate degree of integrity in its materials, design, and workmanship.

The New Concept Design:

As the Smithsonian’s research on the design and development of the Hirshhorn Museum and Sculpture Garden makes clear, the museum building and the open-air garden, which Gordon Bunshaft originally created as two parts of a single, unified design, are connected by important
visual and spatial relationships. Each part defies its ground plane in equal but opposite measure; the cylindrical mass of the building hovers fourteen feet above its paved plaza, while the lowest level of the garden sinks fourteen feet below the adjacent National Mall. The strong link between the museum and the garden is overtly expressed in their shared materials. The building is clad in a Swenson Pink granite aggregate surface, the same surface that covers the boundary and freestanding walls of the sculpture garden, helping to communicate clearly the unified design in a spare, Modernist idiom.

Another strong connection between the building architecture and the landscape architecture is evident in the visual interplay between the garden’s rectangular reflecting pool and the rectangular balcony window on the north side of the museum. Overlooking the sculpture garden and the National Mall, the balcony window is the only fenestration in the museum’s austere façade. In addition to their similar shapes, the pool and the window are aligned on the north-south axis that bisects the museum building and continues through the garden. One notes, in fact, that the expansion joints on the garden’s walls are centered on that same axis. The rhythm of the thickset concrete balusters that support the balcony’s railing is repeated in the identically styled balusters that support the railing defining the garden’s southern boundary on the north side of Jefferson Drive. Although plans generated by the Smithsonian to redesign the sculpture garden in the 1970s would have removed the pool—a character-defining feature of the garden today—those plans were averted when the commission for the project was given to Lester Collins, whose redesign, as the Significance and Integrity Report attests, “did not affect Bunshaft’s reflecting pool” (p. 82).

As it apparently was to Collins, maintaining a clear visual relationship between the pool and the balcony window is also a matter of paramount importance to the National Capital Planning Commission (NCPC), which, in its “Executive Director’s Recommendation” (NCPC meeting, June 6, 2019, p.5), called the pool “a fundamental feature of the original Bunshaft design, which relates to the north window and balcony of the Hirshhorn Museum.” The NCPC report further recommended that the applicant “explore a pool alternative that retains the historic character-defining dimensions of Bunshaft’s pool design.”

Despite these facts and the findings of reviewing agencies, we think that the treatment of the reflecting pool in the recently released Concept Design does little to preserve the important relationship between the pool and the balcony window. The renderings in the Concept Design (Feb. 24, 2020, presentation, pp. 65, 66) show that the dimensions of the pool (12ft. x 60ft.) would only be fully expressed in one of several configurations, when all other reservoir platforms in the theater-like arrangement are fully drained of water. But what is more, when that singular configuration is achieved, the pool would nonetheless be fronted by the T-shaped stage and apron that form its southern boundary, an imposing visual element whose strong geometry overwhelms that of the sunken pool. In no case, therefore, would the simple but strong gesture that Bunshaft placed in the garden continue to communicate fully with the
equally simple and stark gesture he placed in the building. One also wonders whether the new stage/platform in the sculpture garden would ultimately require a ledge or handrail because it is elevated some 22 inches above the lowest seating level. If so, then the visual dissonance between the new arrangement and the original pool would only be increased.

Needless to say, the addition of stacked-stone walls, as both a prominent backdrop to the pool and a replacement for the current aggregate walls elsewhere in the landscape, would only further diminish the ability of the sculpture garden to communicate its historical significance, simultaneously weakening its connection to the museum building. One also notes that by replacing lawn with hardscape, the Concept Design returns in large measure to the type of inhospitable surface that Collins was tasked with removing long ago—a proposal that bears particular scrutiny given estimates of rising temperatures in the future. Taken together, the details of the various plans now proposed would seem to work at cross purposes with one of the primary objectives of the revitalization identified in a letter by the Hirshhorn’s director, Melissa Chiu, namely “to reestablish the cohesion of the Hirshhorn’s Sculpture Garden, the Plaza and Museum.”

We therefore hope that the Smithsonian will revisit the Concept Design in an effort to better honor and maintain one of the exemplary works of art in its collection, which its own research now declares to be a work of “high artistic value.” As a landscape that still faithfully communicates the skill of two recognized masters of their crafts, Gordon Bunshaft and Lester Collins, the sculpture garden should be regarded as a valuable resource with a unique connection to the museum, just as it was in 1982, when Nancy Kirkpatrick, the museum’s executive officer, issued the following stern warning to the Smithsonian's Office of Horticulture about the garden’s maintenance:

_The Sculpture Garden, integral to the Museum’s mission, is the only garden specifically referred to in any public law pertaining to the Smithsonian Institution (P.L 89-788 “to provide for the establishment of the Joseph H. Hirshhorn Museum Sculpture Garden, and for other purposes.”) It is not a by-product or an afterthought; and the very name of our museum indicates its importance._

Sincerely,

Charles A. Birnbaum, FASLA, FAAR
President + CEO
The Cultural Landscape Foundation

cc: Melissa Chiu, Director, HMSG
Jay Kaveeshwar, Deputy Director, HMSG
Sharon Park, Associate Director of Architectural History and Historic Preservation, OPDC
April 9, 2020

Charles A. Birnbaum, FASLA, FAAR  
President + CEO  
The Cultural Landscape Foundation  
1711 Connecticut Avenue NW, Suite 200  
Washington, DC 20009

Dear Mr. Birnbaum,

On behalf of the Smithsonian Institution (SI), thank you for The Cultural Landscape Foundation’s participation as a consulting party pursuant to Section 106 consultation for the Hirshhorn Sculpture Garden Revitalization project. This letter is a response to your comments dated March 18, 2020.

Thank you for concurring with the proposed Period of Significance of 1974, 1981, and integrity analysis of the Sculpture Garden, as presented in the report prepared by Robinson & Associates. The Hirshhorn Museum Sculpture Garden Significance and Integrity Report will be finalized and available to the public.

The organization of the Sculpture Garden, Museum, and Plaza around the 8th Street axis unifies the connection between the two main parts of the Hirshhorn complex. The SI learned over the course of research on the Sculpture Garden this past year, that while the north balcony window and reflecting pool have a visual relationship, the east-west dimension of the reflecting pool matched the east-west dimension of the north stair. We lost our institutional knowledge of this link when Lester Collins altered the north stair.

In connection with Section 106 consultation, this project is moving into early design development under artist and architect Hiroshi Sugimoto and his team. At our next public meeting tentatively planned for May 27, 2020, the SI will provide a draft Assessment of Effects on Historic Resources, with design progress updates. We will continue to study the design details for the reflecting pool to strengthen the connection to the historic pool dimensions. Highlighting the historic pool dimensions in concert with placards that provide images and history of the evolving Sculpture Garden will help visitors connect with evolution of the Garden. Design development will carefully study the pool depth to avoid the requirement of a handrail. Gracing the central portion of the Garden with a larger reflecting pool, evaporative cooling, and shaded seating will temper the environment to improve visitor comfort and provide programming opportunities to support the museum’s mission.

The enclosing aggregate concrete perimeter walls for the Sculpture Garden and the Plaza are the primary unifying connection between these two sections of the complex. During design development we will carefully study wall hierarchy, materials, and detailing of the interaction of the stacked stone walls and concrete walls. This project will not change the character defining connection of aggregate concrete walls between the Museum, Plaza, and Sculpture Garden.

The Sculpture Garden’s purpose and mission has always been to display sculpture. Smithsonian facilities are not accessioned objects in our collection. The Sculpture Garden is a physical facility that requires rehabilitation to fulfill its mission for visitor engagement with the Museum’s collection and evolving
programming with contemporary art. We look forward to consulting further with The Cultural Landscape Foundation as the Sculpture Garden Revitalization project further develops.

Sincerely,

Sharon C. Park

Sharon C. Park, FAIA  
Associate Director for Architectural History and Historic Preservation

cc: Melissa Chiu, Director, HMSG  
Jay Kaveeshwar, Deputy Director, HMSG  
Kate Gibbs, Director of Communication, HMSG  
Al Masino, Director of Special Projects and Exhibits, HMSG  
Carly Bond, Historic Preservation Specialist, OPDC  
Lauren McCunney, Design Manager, OPDC  
Ann Trowbridge, Associate Director for Planning, OPDC  
Michelle Spofford, Architect and Senior Planner, OPDC  
Bill Donnelly, Landscape Architect, Smithsonian Gardens
Dear Hirshhorn Museum and Sculpture Garden,

As both a proud Washingtonian and visual artist, it is my pleasure to write this letter of support for the upcoming revitalization of the Museum’s Sculpture Garden. This is wonderful news as an update towards a more modern and interactive experience has been needed for some years. That the great Hiroshi Sugimoto has been designated as the visionary lead for the project is just icing on the cake. As such, I am certain that the new Sculpture Garden will become not just a destination for locals, but a “must see” for national and international visitors, art lovers, and those discovering and experiencing art for the first time. What makes it make great is that it belongs to us as a symbol of our collective identity!

This I know from a personal point-of-view as the Sculpture Garden has always been a mainstay in my creative life. Since high school, having the opportunity to sit outdoors among masterpieces was wildly influential and one of the most wonderful things that makes growing up in our nation’s capital special. In planning the necessary repairs to its infrastructure and in better engaging a 21st century audience, I believe the Hirshhorn furthers its mission as the national museum of modern and contemporary art and bridges an important divide towards inclusiveness and representation in new media and new voices.

I look forward to hearing news of the project’s development and am so grateful that it is moving forward. Many thanks for your consideration.

Sincerely,

Mark Kelner
March 25, 2020

Ms. Sharon C. Park, Associate Director of Architectural History and Historic Preservation  
Smithsonian Institution  
600 Maryland Avenue, SW, Suite 5001  
PO Box 37012 MRC 511  
Washington, DC  20013-7012

RE:  Ongoing Section 106 Consultation for the Hirshhorn Sculpture Garden Revitalization Project

Dear Ms. Park:

Thank you for continuing to consult with the District of Columbia State Historic Preservation Officer (SHPO) regarding the above-referenced undertaking and for hosting another consulting parties’ meeting on February 24, 2020. Based upon our participation in the meeting and review of relevant materials, we are writing to provide additional comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act.

We appreciate that the Smithsonian prepared the Period of Significance and Integrity Analysis Report for the sculpture garden and produced alternative design approaches for the same. These developments represent significant steps forward in our understanding of the history of this important space and will hopefully help to ensure that essential Bunshaft and Collins elements will be preserved.

The report was well researched, informative, and well written. It clearly establishes Lester Collins as a master landscape architect whose achievements contributed greatly to modern landscape design, and to the evolution of the Hirshhorn Sculpture Garden. We concur that the period of significance should be revised to “1974/1981.” Although it is atypical to identify two discrete periods of significance, it is warranted in this circumstance because the sculpture garden is the product of two distinct designs and the specified dates represent the culmination of each effort.

Even though some aspects of the most recent design may contribute to the overall adverse effect, we acknowledge that some alterations will be necessary to meet the museum’s stated goals. For example, we are not opposed to augmenting secondary areas of the garden with new “rooms” defined by stacked stone walls. Bunshaft’s use of hedges to create similar spaces, as can be seen in the image below, and Collins’ emphasis on progression through outdoor rooms establish historical precedents for such intimate areas. While new materials and construction techniques may help to differentiate contemporary interventions from original fabric, stacked stone is out of character with historic conditions and it should not undermine the role of aggregate concrete as a unifying feature of the building and garden. If stacked stone is ultimately used, we support the Smithsonian’s selection of “Version A” stacked stone over “Version B.”
We also acknowledge that relocating ADA ramps to the west side of the garden is a logical modification since it corrects current deficiencies by providing access from the north and south rather than from the north alone. Similarly, we support the use of the stainless steel “infinity” structure that will reestablish the critically important direct link that Bunshaft designed to physically connect the garden with the museum, and we endorse reconstruction of the missing guard rail element that protected the stair leading down from the plaza. To protect the integrity of the historic complex, however, we continue to recommend that the stainless steel structure be modified to minimize damage to historic fabric and the guard rail be an accurate reconstruction rather than a modified design. Notwithstanding the comments above, we have two primary concerns about the proposed design.

The Reflecting Pool

The revised concept has been improved by incorporating a vestige of Bunshaft’s original pool design, but it appears that this key element, which the aforementioned study describes as “the centerpiece of the lower level,” will be visually and physically overwhelmed by the new pool and rendered unrecognizable as a historic feature. This would be especially true if the historic pool were reconstructed rather than preserved and restored. We suspect that the former treatment is proposed over the latter but request clarification on which approach the Smithsonian proposes.

As shown in the illustrations below, Bunshaft’s design intent would be fully exhibited only when water was drained from the rest of the new reflecting pool (upper right image), but its historic character would still be significantly diminished by the surrounding new “frame.” The ability to perceive the original pool based solely upon a greater depth when all other areas were filled with water seems questionable (upper left image), and the remaining options relegate the historic pool to the same status as the rest.
We continue to oppose alterations that cause avoidable adverse effects on the critically important historic reflecting pool. Eliminating the outermost level/edge of the new pool would greatly minimize, or possibly avoid the adverse effect on this particular feature by allowing Bunshaft’s pool to retain the visual prominence it deserves and by preserving the shape and proportions of the central grass panel that Collins incorporated later. The goals of the current project would still be met since the lower level would still provide the same amount of space for seating, or possibly more, and the size and location of the central stage would be unaffected.

To illustrate, we request the Smithsonian to develop and evaluate an alternative that eliminates the yellow-highlighted areas shown in the figure below, and either eliminates or retains the green-highlighted area based upon the proportions of Lester Collins’s central grass panel.

The Inner Partition Wall

Our second concern relates to changes proposed for another critically important historic feature – namely the proposal to encapsulate the inner partition wall with stacked stone. This prominent wall is the first feature one encounters upon entering the garden. It is important not only because it is original, centrally located, and a primary delineator of space, but also because it, along with the south stair, establishes a clear and direct visual tie to the museum beyond. The image to the right illustrates how the use of a single material – aggregate concrete – for all three elements defines this connection. Replacing aggregate concrete with stacked stone in this location would significantly alter Bunshaft’s design and denigrate the crucial visual relationship between the museum and its sculpture garden.
We understand that the inner partition wall must be replaced due to its poor condition, but *in-kind* replacement would avoid the adverse effect that stacked stone would cause. This adverse effect would be exacerbated if stack stoned also necessitated an increase in the height and thickness of the inner partition wall and a requirement to batter its ends. For these reasons, we urge the Smithsonian to respect the original and significant design and replace the entire inner partition wall *in-kind*.

We look forward to consulting further with the Smithsonian and the consulting parties regarding these and any other refinements that may be identified as important to preserving the Bunshaft and Collins legacies within the Hirshhorn Sculpture Garden, and to meeting the current program goals.

If you should have any questions or comments regarding any of these matters, please contact me at andrew.lewis@dc.gov or 202-442-8841. Otherwise, thank you for providing this additional opportunity to comment.

Sincerely,

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

19-0361 (Sculpture Garden) and 19-0362 (Building Envelope)
April 9, 2020

C. Andrew Lewis
Senior Historic Preservation Officer
DC State Historic Preservation Office
DC Office of Planning
1100 4th Street SW, Suite E650
Washington, DC 20024

Dear Mr. Lewis,

On behalf of the Smithsonian Institution (SI), thank you for your ongoing participation in Section 106 consultation for the Hirshhorn Sculpture Garden Revitalization project. This letter is a response to your comments dated March 25, 2020. Thank you for concurring with the proposed Period of Significance of 1974, 1981, as presented in the report prepared by Robinson & Associates. The Hirshhorn Museum Sculpture Garden Significance and Integrity Report will be finalized and available to the public.

In connection with Section 106 consultation, this project is moving into early design development under artist and architect Hiroshi Sugimoto and his team. At our next public meeting tentatively planned for May 27, 2020, the SI will provide a draft Assessment of Effects on Historic Resources, with design progress updates. The historic guardrail design at the plaza access to the tunnel and the guardrail extant in the Sculpture Garden do not meet code requirements. Careful consideration of preserving the proportions of the concrete guardrail and minimal additions to close non-code compliant gaps will be studied, with alternatives for consideration.

We will continue to study the design details for the reflecting pool to strengthen the connection to the historic pool dimensions. Highlighting the historic pool dimensions in concert with placards that provide images and history of the evolving Sculpture Garden will help visitors connect with evolution of the Garden. Design development will reevaluate the pool depth to determine an elegant solution that does not require a handrail. Gracing the central portion of the Garden with a larger reflecting pool, evaporative cooling, and shaded seating will temper the environment to improve visitor comfort and provide programming opportunities to support the museum’s mission. Reconstructing the historic pool within a larger footprint offers multiple options for programming while preserving the original design intent.

The enclosing aggregate concrete perimeter walls for the Sculpture Garden and the Plaza are the primary unifying connection between these two sections of the complex. During design development we will carefully study wall hierarchy, materials, and detailing of the interaction of the stacked stone walls and concrete walls. Art historical research in support of this project has revealed that artists and their personal estates often displayed modern sculptures against a stacked stone backdrop, including at Joseph Hirshhorn’s estate (Fig. 1).
Using stacked stone as gallery walls reinforces the connection to both the mission of the Sculpture Garden to exhibit sculpture and to Hirshhorn. In the concept design, the inner partition wall is proposed to be reconstructed in the same location, and 18” lower than the current height. In Sugimoto’s design, this feature wall links the east and west galleries across the Sculpture Garden and serves as the gallery wall backdrop for performance art and sculpture within the central gallery. Lowering this wall in combination with the north overlook and its concrete walls ensures that aggregate concrete is the perimeter defining visible feature of the Sculpture Garden, maintaining Gordon Bunshaft’s material relationship with the Museum building (Fig. 2). Emphasis will remain on the aggregate concrete walls with the stacked stone as secondary gallery partition walls.
Sugimoto’s design is a new layer for the evolving Sculpture Garden, transformed in a similar way and with the same goals that Collins used to transform Bunshaft’s original design. Sugimoto’s design creates a hierarchy which places Bunshaft’s walls at the apex and builds on past design influences in the Garden. We look forward to consulting further with the DC State Historic Preservation Office as this project develops.

Sincerely,

Sharon C. Park

Sharon C. Park, FAIA
Associate Director for Architectural History and Historic Preservation

cc:  David Maloney, DC State Historic Preservation Office
    Andrew Trueblood, DC Office of Planning
    Melissa Chiu, Director, HMSG
    Jay Kaveeshwar, Deputy Director, HMSG
    Kate Gibbs, Director of Communication, HMSG
    Al Masino, Director of Special Projects and Exhibits, HMSG
    Carly Bond, Historic Preservation Specialist, OPDC
    Lauren McCunney, Design Manager, OPDC
    Ann Trowbridge, Associate Director for Planning, OPDC
    Michelle Spofford, Architect and Senior Planner, OPDC
    Bill Donnelly, Landscape Architect, Smithsonian Gardens
June 26, 2020

Carly Bond  
Historic Preservation Specialist  
Smithsonian Institution  
600 Maryland Avenue, SW, Suite 5001  
PO Box 37012 MRC 511  
Washington, DC  20013-7012

RE: Additional Comments Regarding Section 106 Consultation for the Hirshhorn Sculpture Garden Revitalization Project

Dear Ms. Bond:

Thank you for hosting a “virtual” consulting parties meeting on May 27, 2020 to discuss the above-referenced undertaking. We are writing to provide additional comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

As you are aware, the DC State Historic Preservation Office (SHPO) has consistently maintained that Gordon Bunshaft’s reflecting pool and concrete aggregate walls – particularly the central partition wall – are the most critical elements to preserve because their materials and design visually tie the museum and sculpture garden together and identify them as a single, unified work of a master. These elements are also important because they align on the central, north-south axis that provides important views to and from the museum and the garden. Consulting parties such as the Committee of 100 on the Federal City and the Cultural Landscape Foundation share our opinion and have raised similar concerns.

We understand that the SI is studying alternative designs for the reflecting pool and we look forward to consulting further on these, hopefully including the alternative requested in our March 25, 2020 letter which would retain the historic pool in its original form and location and augment it with a new, differentiated pool reflecting the position and dimensions of the grass panel that Lester Collins sensitively introduced in 1981. We also look forward to consulting further regarding the central partition wall and the proposed use of stacked stone.

As previously indicated, we concur that this undertaking will have an adverse effect on historic properties but since additional avoidance may yet be possible, we will defer detailed comments on the Assessment of Effects Report until we have had an opportunity to evaluate the forthcoming alternatives.

If you should have any questions or comments regarding any of these matters, please contact me at andrew.lewis@dc.gov or 202-442-8841. Otherwise, thank you for providing this additional opportunity to comment.

Sincerely,

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

19-0361 (Sculpture Garden) and 19-0362 (Building Envelope)
July 9, 2020

C. Andrew Lewis
Senior Historic Preservation Officer
DC State Historic Preservation Office
DC Office of Planning
1100 4th Street SW, Suite E650
Washington, DC 20024

Dear Mr. Lewis,

The Smithsonian Institution is in receipt of your comments dated June 26, 2020, which we will include in our administrative Section 106 record for the Hirshhorn Sculpture Garden Revitalization project. There is consensus of adverse effects on historic properties from this undertaking, and we notified the Advisory Council on Historic Preservation on July 2, 2020 and requested their participation in the resolution of adverse effects.

We are preparing drawings for further discussion on pool alternatives, including review of the pool alternatives proposed originally in April 2019, and views of programmatic use of the central garden and the central partition wall. We look forward to consulting further with DC State Historic Preservation Office on the resolution of adverse effects in support of the Hirshhorn Sculpture Garden Revitalization project and the museum’s mission.

Sincerely,

Carly Bond
Senior Historic Preservation Specialist

cc: Melissa Chiu, Director, Hirshhorn Museum and Sculpture Garden
Jay Kaveeshwar, Hirshhorn Museum and Sculpture Garden
Kate Gibbs, Hirshhorn Museum and Sculpture Garden
Lauren McCunney, Smithsonian Facilities, OPDC
Michael Zisk, Smithsonian Facilities, OPDC
Sharon Park, Smithsonian Facilities, OPDC
Ann Trowbridge, Smithsonian Facilities, OPDC
Michelle Spofford, Smithsonian Facilities, OPDC
June 12, 2020

Carly Bond
Historic Preservation Specialist
Smithsonian Facilities Office of Planning, Design and Construction
600 Maryland Avenue SW, Suite 5001
Washington, DC 20013-7012

Dear Ms. Bond,

As an official consulting party to the National Historic Preservation Act Section 106 review now underway for the Hirshhorn Sculpture Garden in Washington, D.C., The Cultural Landscape Foundation (TCLF) is pleased to add the following remarks to the public record regarding the Draft Assessment of Effects on Historic Resources (AOE). We do so in response to the most recent meeting of consulting parties, held virtually on May 27, 2020, during which the draft AOE was presented and discussed.

I. Valorizing the Central Core of the Hirshhorn Sculpture Garden

The draft AOE presently records potential adverse effects in several areas of the sculpture garden, including the northern perimeter (removal of stairs and lateral ramps), southern perimeter (addition of underground passage art installation), west side (addition of ramps), east side (modification of ramps), and central core (replacement of paving, alteration of reflecting pool and inner partition wall). To date, consulting parties and reviewing agencies have expressed most concern about adverse effects to the sculpture garden’s central core, loosely defined as the rectangular area containing the garden’s reflecting pool and bounded by the inner partition wall and south stairs, and framed by embankments to the east and west. That concern derives from the fact that the central core contains elements that are essential to maintaining the dialogue between the sculpture garden and the museum building, a sunken, open-air space and an elevated, cylindrical mass that, despite their contrasting forms, clearly register as two halves of a single, unified design. Moreover, while the view of the sculpture garden from the National Mall is of special interest because the Mall itself comprises an historic resource of great significance, views of the sunken garden’s central core from the entire periphery of the landscape are important in communicating the visual and spatial relationships that unify the garden/museum ensemble, not the least of which is a shared materials palette. For these reasons, we believe that adverse effects to elements within the central core should be avoided, while those beyond its boundaries can be minimized or mitigated.

I.A. The Reflecting Pool

The primary feature of the central core—and of the sculpture garden itself—is the rectangular reflecting pool. As TCLF and reviewing agencies have noted, the visual interplay between the reflecting pool and the rectangular balcony window on the north side of the museum constitutes a particularly strong connection between the building architecture and the landscape architecture. In addition to their similar...
shapes, the pool and the window are aligned on the north-south axis that bisects the museum building and continues through the garden. The “Executive Director’s Recommendation” to the National Capital Planning Commission (NCPC) noted that the pool was “a fundamental feature of the original Bunshaft design, which relates to the north window and balcony of the Hirshhorn Museum” (NCPC meeting, June 6, 2019, p.5). As we have noted in prior communications, that same document asked the Smithsonian to “explore a pool alternative that retains the historic character-defining dimensions of Bunshaft’s pool design.”

The treatment of the reflecting pool in the current Concept Design, however, would not preserve the important relationship between the pool and the balcony window. The renderings in the Concept Design show that the dimensions of the pool would only be fully expressed in one of several configurations resulting from the variable level of water in the new theater-like pool arrangement; even in that particular case, the pool’s prominence would be diminished by the T-shaped stage and apron that would form its southern boundary. In no case, therefore, would the simple rectangular, horizontal gesture that Bunshaft placed in the garden (and which Lester Collins wisely left unaltered) continue to communicate fully with the equally simple and stark gesture he placed in the building (for more on the importance of these very sculptural gestures, see below). The alteration to the dimensional area of the water also introduces questions about the extent to which the museum building may be reflected on the water’s surface, contrary to the effect that Bunshaft envisioned.

1.B. The Inner Partition Wall

Replacing the current aggregate wall, which is a prominent backdrop to the pool, with a stacked-stone wall would significantly distance the proposed redesign from that of the sunken garden during its Period of Significance, and, importantly, from the museum building as well. Although the draft AOE presently notes adverse effects from potential changes to the wall’s height and materiality, it does not indicate the adverse effect stemming from a change to the wall’s shape. In the current Concept Design, what was a shear aggregate wall representative of the Brutalist idiom in its simple, spare form would become an angular, stacked-stone wall—a pylon whose base is wider than its top—characteristic of ancient building traditions.

Consulting parties and reviewing agencies alike have maintained their skepticism about such alterations to the inner partition wall. A representative from the District of Columbia Historic Preservation Office, for example, most recently “urge[d] the Smithsonian to replace that wall in-kind.” While the current Concept Design would significantly alter the partition wall in order to maintain connectivity between the east and west sides of the sculpture garden, where similar stacked-stone walls would be erected, doing so would significantly diminish the connectivity between the sculpture garden and the museum building, altering the visual and tactile qualities of yet another key, axial feature in the garden’s central core. It is worth repeating that those qualities should remain legible to viewers approaching the sculpture garden from either the north or the south. Significantly, this would be in keeping with Bunshaft’s design intent as noted in former Smithsonian Secretary S. Dillon Ripley’s September 12, 1977 memo concerning the Collins redesign of the sculpture garden. In it Dillion says he “spoke to Gordon Bunshaft today about the
new design.” Dillon stated: “[Bunshaft] said that he hoped that the materials used ... would consist of 
the same kind of aggregate concrete work which occurs in the main building.”

II. The Hirshhorn Sculpture Garden Is a Work of Art, and the Reflecting Pool Is Its Signature Feature

As architectural historians have noted, several of Gordon Bunshaft’s projects, particularly those realized 
after the beginning of the 1960s, evince the architect’s interest in the interplay between architecture 
and sculpture. In fact, regarding the Hirshhorn building, Bunshaft let it be known that he wanted the 
experience of visitors to be “comparable to an encounter with a work of art” (see, e.g., Adams, N., 
Bunshaft presented his design for the Hirshhorn to the U.S. Commission of Fine Arts (of which he was 
then a current member), fellow architect John Carl Warnecke probed that very point, asking Bunshaft 
whether the museum was “a sculpture or a building.” Bunshaft’s reply is worth quoting at length:

    We studied trying to break up the surface, expressing some ribbed effect or something, 
    and it is just wrong because everything here [in the vicinity of the National Mall] has this 
    pattern, and some place there ought to be something simple. This is really a piece of 
    sculpture (emphasis added).

If Bunshaft was unambiguous about the artistic nature of his design, he was equally clear that the 
sculpture garden was integral to it, telling the NCPC that “A sculpture garden is as essential to this 
museum as a surgical section is to a hospital” (see “Department of the Interior and Related Agencies 
Appropriations for 1972: 1st Session, Part 4,” pp. 942-43). In this way, the Hirshhorn Sculpture Garden 
stands in relation to the museum building as earlier sunken gardens stood in relation to other Bunshaft 
buildings, namely the sunken garden at the Chase Manhattan Bank Plaza (1961) and the sunken garden 
at the Beinecke Rare Book and Manuscript Library (1963) on the campus of Yale University—two 
landscapes designed by sculptor Isamu Noguchi to be perceived from above. In the former, water 
flowed over rocks brought from the Uji River in Japan, thus contributing to both the visual and aural 
qualities of the space (Adams, p. 76). Although the design of the Hirshhorn Sculpture Garden fell to 
Bunshaft rather than Noguchi, and was later reinterpreted by master landscape architect Lester Collins, 
the garden is nonetheless a work of art. Bunshaft’s primary sculptural gesture within the garden is the 
reflecting pool, a rectangular void carved from the flat plain of the central core, mirroring the singular 
void he placed in the surface of the cylindrical museum building.

While the sculpture garden, like all landscapes, can be expected to evolve over time, the unified design 
of the Hirshhorn Museum and Sculpture Garden must remain legible throughout that evolution—a 
precept that Lester Collins understood and abided by in his work on the landscape. According to a 
recent media report, museum officials have already begun a rebranding campaign that seeks to sever 
the sculpture garden from the museum; rather than the “Hirshhorn Museum and Sculpture Garden” the 
institution would be known as “Hirshhorn National Museum of Modern Art.” In our letter of March 18, 
2020, concerning this Section 106 process, we cited the remarks made in 1982 by Nancy Kirkpatrick, the 
museum’s executive officer. They are worth repeating:

We studied trying to break up the surface, expressing some ribbed effect or something, 
and it is just wrong because everything here [in the vicinity of the National Mall] has this 
pattern, and some place there ought to be something simple. This is really a piece of 
sculpture (emphasis added).
The Sculpture Garden, integral to the Museum's mission, is the only garden specifically referred to in any public law pertaining to the Smithsonian Institution (P.L 89-788 “to provide for the establishment of the Joseph H. Hirshhorn Museum Sculpture Garden, and for other purposes.”) It is not a by-product or an afterthought; and the very name of our museum indicates its importance.

Any revitalization effort that sacrifices the clarity of the unified and holistic design must be deemed a failure, no matter its artistic ambition or programmatic utility. The sculpture garden and the museum building remain intimately bound together, just as Bunshaft conceived them to be.

Sincerely,

Charles A. Birnbaum, FASLA, FAAR
President + CEO
The Cultural Landscape Foundation

Cc: Melissa Chiu, Hirshhorn Museum and Sculpture Garden; Jaya Kaveeshwar, Hirshhorn Museum and Sculpture Garden; Sharon Park, Smithsonian Institution; David Maloney, D.C. Historic Preservation Office; Andrew Lewis, D.C. Historic Preservation Office; Thomas Luebke, U.S. Commission of Fine Arts; Marcel Acosta; National Capital Planning Commission; Lee Webb, National Capital Planning Commission; John Fowler, Advisory Council on Historic Preservation; D.C. Historic Preservation Review Board; Theo Prudon, DoCoMoMo; Kirby Vining, Committee of 100 on the Federal City; Rebecca Miller, D.C. Preservation League; Betsy Merritt, National Trust for Historic Preservation; Bill Brown, Association of Oldest Inhabitants.
July 9, 2020

Charles A. Birnbaum, FASLA, FAAR
President + CEO
The Cultural Landscape Foundation
1711 Connecticut Avenue NW, Suite 200
Washington, DC 20009

Dear Mr. Birnbaum,

The Smithsonian Institution (SI) is in receipt of your comments dated June 12, 2020. Your comments on the Draft Assessment of Effects on Historic Resources presented at the May 27, 2020, virtual public consulting parties meeting will be entered into the SI’s administrative Section 106 record for the Hirshhorn Sculpture Garden Revitalization project. The SI will consider comments received as the Assessment of Effects is finalized.

To clarify a point raised in your comments, there is not a rebranding campaign associated with the Hirshhorn. The museum complex will continue to be known as the Hirshhorn Museum and Sculpture Garden.

We look forward to consulting further with The Cultural Landscape Foundation on the resolution of adverse effects in support of the Hirshhorn Sculpture Garden Revitalization project and the museum’s mission.

Sincerely,

Carly Bond
Senior Historic Preservation Specialist

cc: Melissa Chiu, Director, Hirshhorn Museum and Sculpture Garden
    Jay Kaveeshwar, Hirshhorn Museum and Sculpture Garden
    Kate Gibbs, Hirshhorn Museum and Sculpture Garden
    Lauren McCunney, Smithsonian Facilities, OPDC
    Michael Zisk, Smithsonian Facilities, OPDC
    Sharon Park, Smithsonian Facilities, OPDC
    Ann Trowbridge, Smithsonian Facilities, OPDC
    Michelle Spofford, Smithsonian Facilities, OPDC
June 19, 2020

Carly Bond, Historic Preservation Specialist
Smithsonian Facilities
600 Maryland Ave. SW, Suite 5001, MRC 511
Washington DC 20560

Dear Ms. Bond,

On behalf of the Board of Directors of the Washington Chapter of the American Institute of Architects, I write in support of the proposed revitalization of the Hirshhorn Sculpture Garden. The Museum has always been at the vanguard of contemporary artistic display and expression and it continues that role with the proposed redesign.

We commend the project for using needed infrastructure improvements to propel rethinking the garden for the modern era. The two garden spaces give visitors the opportunity for different interactions with art: an up-close-and-personal view of the museum’s permanent collection on the east side, and place of new works, including performance. on the west.

We are also supportive of reestablishing the underground connection between the garden and museum, which was part of the original design, and the addition new ramps to make the garden fully accessible.

In conclusion, we support this thoughtful design that balances the historic character of the original garden plan with the opportunity for enhanced methods of interpretation for today’s visitors.

Sincerely,

Mary Fitch, AICP, Hon. AIA
Executive Director
June 26, 2020

Carly Bond, Historic Preservation Specialist
Smithsonian Facilities
600 Maryland Ave. SW, Suite 5001, MRC 511
Washington DC 20560

Re: **Hirshhorn Museum and Sculpture Garden Revitalization**
**Public Review Process**

Dear Ms. Bond,

On behalf of Skidmore, Owings & Merrill (“SOM”), I am writing you in support of the Smithsonian Institution’s proposed garden revitalization for the Hirshhorn Museum and Sculpture Garden. SOM is appreciative of the opportunity to offer our voice in the public review process for this important investment.

We applaud Museum leadership and its talented consulting advisors for the concept design of garden improvements presented in the May 27th Section 106 Consulting Parties meeting. We support the design approach taken to rethink the form and function of the garden room. We also endorse the Museum’s preferred strategy to restore the original underground connection between the garden and plaza under Jefferson Drive, and the addition of ramps to make the garden fully ADA accessible.

As the museum and garden complex’s original architect, SOM values the Smithsonian’s mission to respect the integrity of architect Gordon Bunshaft’s design intent while also innovating to enhance hospitality, visitor comfort and the user experience—all at the service of contemporary art and the vanguard ethos of this special museum.

Very truly yours,

SKIDMORE, OWINGS & MERRILL

Kristopher Jon Takács
Director

cc:
Chris Cooper, FAIA (SOM)
chium@si.edu
kaveeshwarj@si.edu
parks@si.edu
andrew.lewis@dc.gov
david.maloney@dc.gov
tluebke@cfa.gov
marcel.acosta@ncpc.gov
lee.webb@ncpc.gov
jfowler@achp.gov
historic.preservation@dc.gov
Thank you for the Committee of 100 on the Federal City’s participation in Section 106 consultation on projects at the Hirshhorn Museum and Sculpture Garden. We appreciate the Committee’s concurrence on the project goals for the Sculpture Garden Revitalization and many aspects of the design. Enhancing universal access and adapting the Sculpture Garden with sensitive changes to allow the Hirshhorn to increase our display of modern and contemporary sculpture by almost 50% are paramount.

We would like to respond to the Committee’s concerns regarding the reflecting pool and stacked stone walls addressed in your letter dated June 10, 2020.

The Sculpture Garden, as you indicate, is a palimpsest with many design influences present today. As we have learned and discussed at our public meetings, the reflecting pool emerged from several unrealized concepts, all much larger in configuration. The reflecting pool dimensions were created by Gordon Bunshaft in congruity with the north stairs to the Sculpture Garden. Lester Collins later erased this visual relationship with his alteration of the north stairs. The concept design proposes re-establishing this relationship.

Our proposal for the reflecting pool incorporates the dimension of Bunshaft’s 1974 design and illustrates his thought process. The 1974 dimensions are the guiding principle for the proportions of the levels within the enlarged pool, which reflects Bunshaft’s unrealized designs and will dramatically enhance visitor comfort, in an area that many find hot and inhospitable for much of the year. Our sketch renderings of the central garden illustrate performances on a central stage, but programming of this space will take many forms enhanced by the flexibility afforded by the water levels, and a variety of seating opportunities. This space will support the Hirshhorn’s mission by providing adaptable space for performance art, site-specific work, sculpture, and other 21st century art forms such as sound and time-based media.

In addition to heating only the historic dimensions of the pool for a year-round water presence, we currently are investigating design refinements to emphasize the dimensions of the 1974 reflecting pool. We look forward to sharing these ideas with the public soon. An enlarged reflecting pool will serve as a focal point for the Garden, emphasize the relationship of the Garden to the reopened underground passage, and provide evaporative cooling for the central space of the Sculpture Garden.

We concur that the Hirshhorn’s aggregate concrete is a critical character-defining feature. This material visually unifies our two separate campuses. In order to preserve this material for the future, this project will replace the historic aggregate concrete perimeter walls in-kind, which suffers from incurable concrete disease. It is our responsibility to steward the national collection by eliminating the regular flood events that only increase with the severity of weather events, and to stop the inevitable disintegration of the aggregate concrete.
Stacked stone walls contained within the concrete perimeter are all new walls, carefully designed to be secondary features that are hierarchically deferential and in a complementary material to the aggregate concrete. The addition of these walls supports the museum’s mission and curatorial vision for increased impact and flexibility for displaying the most compelling modern and contemporary art. Gallery “rooms”, a concept first introduced by Collins, provide more space for the increased display of sculpture, as well as the choreography of new narratives which explore Joseph Hirshhorn’s collection and broader cultural history. There is also a long and established relationship between the display of outdoor sculpture and dry-stacked stone, including at Mr. Hirshhorn’s personal home in Greenwich CT, Round Hill. In particular, the artist Henry Moore—with whom Mr. Hirshhorn had a special relationship and whose works the new Garden will highlight—lived and worked in England’s countryside, where stone walls form a ubiquitous backdrop to both life and landscape. Today the Henry Moore Foundation points to particularly successful installations of the artist’s work in front of stacked stone walls, such as at the Fondation Leclerc in 2018. The juxtaposition of sculpture against the stone walls, which has been tested extensively and shared with the public, intentionally highlights the striking modernity of sculpture masterworks against this carefully rendered natural substrate. Ultimately, the careful integration of concrete aggregate walls with the stacked stone walls will allow for more and dynamic opportunities to show a wider range of sculpture to greatest effect, marrying unique surface tones, textures, and scale to distinct backdrops of equal integrity.

One historic aggregate concrete wall, the inner partition wall, will be reconstructed in stacked stone, and we acknowledge that this action has an “adverse effect” on the Sculpture Garden. This wall will be the only stacked stone wall to incorporate the granite used historically in the aggregate concrete to highlight its significance and linkage to the two campuses.

The Sculpture Garden Revitalization concept design preserves character defining features from 1974 and 1981 while building on the present layers of change to enable the Hirshhorn Museum to fulfill its mission to share the transformative power of modern and contemporary art by creating meaningful, personal experiences in which art, artists, audiences and ideas converge. We look forward to completing the public review process next year and supporting a revitalized Sculpture Garden that is a comfortable, welcoming, and flexible space for all to enjoy in the future.

Sincerely,

Melissa Chiu
Director
Hirshhorn Museum and Sculpture Garden
August 29, 2020

Melissa Chiu, Director
chium@si.edu
Hirshhorn Museum and Sculpture Garden
Independence Avenue & 7th Street, SW
Washington, DC 20560

RE: Hirshhorn Museum and Sculpture Garden Restoration and Rehabilitation Proposal

Director Chiu:

Thank you for the August 21, 2020, request to review the most recent iteration of concept plans for the restoration and rehabilitation of the historic Hirshhorn Museum exterior and Sculpture Garden. The Committee of 100 on the Federal City provides these comments as a Consulting Party under Section 106 of the National Historic Preservation Act (54 USC §300101 et seq).

As we allowed in our June 10, 2020, letter reviewing the then most recent phase of this project, we applaud many aspects of the proposal. Most particularly: the sensitive restoration/thermal insulation retrofit of the museum exterior “drum”, the plan to restore the now-closed access tunnel under Jefferson Drive, the thoughtful disability access improvements to the Sculpture Garden, restoration and “opening” of the north Garden stair to the Mall, and the overall goal of improving visitor use and enjoyment of the Garden itself.

However, as you may also recall in the June 10 letter, we opposed what we believed to be adverse proposals affecting the Bunshaft 1974 Reflecting Pool and the inadvisable introduction of “Stacked Stone” Partition Walls within the Garden itself.

Based on our review of the August 21 revised concept plans, we provide additional comments:

**Bunshaft 1974 Reflecting Pool.** The Committee was heartened to see progress in affording the Bunshaft 1974 Reflecting Pool protection and prominence given its significance—particularly as illustrated in Alternative 2 of 2, pages 12 & 13 of the August 21 document. Having said that, the 1974 Bunshaft Pool must not be subsumed into whatever larger design is finally selected for the proposed new Reflecting Pool. The 1974 Bunshaft Pool is a unique and historically significant survivor of the original garden design. As such, it must be preserved and not perceived or understood as a sub-element of the larger and new Reflecting Pool—particularly given the 1974 Pool’s referential link with the great longitudinal window on the museum’s north face. That relationship is regrettable lost in the most recent design concept proposals. The two pools (the 1974 Bunshaft and the proposed Reflecting Pools) must be physically distinct, separable to the degree practicable, and constructed of different materials and finishes.

**New Performance Space/Pool/Sculpture Platform (aka, Reflecting Pool).** As many have observed over time, the Hirshhorn Sculpture Garden is a palimpsest of many nationally-significant hands and designs. Were the Hirshhorn Sculpture Garden
of a single surviving design, we would likely argue against the introduction of so large a new feature as the proposed Reflecting Pool/Performance Space. However, as the current Garden is an aggregation over time and as there is some historic precedence for a larger water feature in earlier Bunshaft proposals for the Hirshhorn Garden, the Reflecting Pool design is arguably supportable.

**Stacked-Stone Partition Walls.** Our earlier opposition to the introduction of Stacked-Stone Partition Walls in the Garden remains, regretfully, unchanged. Use of this material is simply not consistent with the historic character of the nationally-significant Garden and the Museum itself. To our mind, Stacked Stone, as proposed, conflicts adversely with both. We reviewed carefully all material provided by your offices to date on this matter and can find little rationale for introducing this material beyond current taste and fashion. A brief comment in your August 21st material posits that the stone provides improved setting for the sculpture. We disagree. The argument is counterintuitive to most every professional tenant in museum exhibition design which argues for neutrality in backdrop to the art object - emphasizing it and not the background. We appreciate the effort to reduce in height the walls to mitigate better the proposed stone’s impact. And we applaud your restoring the historic aggregate/cast concrete Perimeter Garden Walls throughout. But, simply put, the Stacked-Stone Partition Walls are historically inappropriate and diminish not only the Garden but the sculpture as well. Please reconsider this aspect of the proposal and return to using the historic aggregate/cast concrete for the Partition Walls throughout the Garden as preferred by both Gordon Bunshaft and Lester Collins.

Thank you again for the opportunity to provide the Committee of 100’s comments on this important project of national interest. If we may provide clarification or answer any questions, please contact us. We appreciate your consideration of our views.

Sincerely,

Kirby Vining, Chair
Committee of 100 on the Federal City
September 15, 2020

Kirby Vining, Chair
Committee of 100 on the Federal City
945 G Street, NW
Washington, DC 20001

Dear Mr. Vining,

The Smithsonian Institution (SI) is in receipt of comments from the Committee of 100 on the Federal City dated August 29, 2020. We appreciate your participation as a consulting party to the review process, as described in Section 106 of the National Historic Preservation Act. The Committee of 100’s comments on the Sculpture Garden Revitalization Update materials and the Final Assessment of Effects on Historic Resources will be entered into the SI’s administrative Section 106 record for the Hirshhorn Sculpture Garden Revitalization project.

On behalf of the SI, we appreciate the Committee of 100’s careful review of the recent project materials. We appreciate your recognition of restoring the connection to the Mall, Sculpture Garden and Museum through the “now-closed access tunnel”, “thoughtful disability access improvements”, “restoration and ‘opening’ of the north Garden stair to the Mall”, and our “overall goal of improving visitor use and enjoyment of the Garden itself.”

The Hirshhorn Museum receives approximately one million visitors a year. Yet only 15% of its visitors experience the 1.5-acre outdoor Sculpture Garden, even though it faces the National Mall – a space visited by 35 million people a year. We are committed to creating a welcoming environment for the broadest possible audience with expanded seating, shade and accessibility, as well as introducing new galleries for the display of sculpture and new forms of art.

As your letter suggests, the SI will continue to carefully study materials and finishes to highlight the importance of the 1974 reflecting pool dimensions. On Oct. 7, 2020, we will host our next Section 106 public consultation meeting. Later this fall, I hope you will join us to review our stacked stone wall mock-up using the proposed granite and evaluating its complementary effect on the aggregate concrete walls. This will demonstrate the timeless and contemplative character of the stacked stone walls selected by Hiroshi Sugimoto and the Museum’s curatorial team to highlight the singularity of our modern sculpture masterworks.

We look forward to consulting further with the Committee of 100 on the Federal City on the resolution of adverse effects in support of the Hirshhorn Sculpture Garden Revitalization project and the museum’s mission.

Sincerely,

Carly Bond
Senior Historic Preservation Specialist
600 Maryland Avenue SW, Suite 5001
PO BOX 37012 MRC 511
Washington, DC 20013-7012
202.633.6535
BondC@si.edu
cc: Melissa Chiu, Director, Hirshhorn Museum and Sculpture Garden
Jay Kaveeshwar, Hirshhorn Museum and Sculpture Garden
Kate Gibbs, Hirshhorn Museum and Sculpture Garden
Lauren McCunney, Smithsonian Facilities, OPDC
Michael Zisk, Smithsonian Facilities, OPDC
Sharon Park, Smithsonian Facilities, OPDC
Ann Trowbridge, Smithsonian Facilities, OPDC
Michelle Spofford, Smithsonian Facilities, OPDC
David Maloney, DC SHPO
Andrew Lewis, DC SHPO
Charles Birnbaum, TCLF
Thomas Luebke, CFA
Marcel Acosta, NCPC
Lee Webb, NCPC
Betsy Merritt, National Trust for Historic Preservation
Rebecca Miller, DC Preservation League
Peggy McGlone, Washington Post
Philip Kennicott, Washington Post
John Fowler, ACHP
Name: Judy Scott Feldman, PhD, Chair, National Mall Coalition
Email: jfeldman@nationalmallcoalition.org
Organization: National Mall Coalition
Message: RE. Hirshhorn Sculpture Garden Revitalization, Comments Sept. 4, 2020 from the National Mall Coalition:

The National Mall Coalition, a DC-based nonprofit dedicated to the protection and improvement of the Mall as America’s Stage for Democracy, offers the following brief comments on the Smithsonian’s proposed Hirshhorn Sculpture Garden Revitalization plan. The Coalition participated in the “virtual” Section 106 Historic Preservation review meeting for this project on May 27th, 2020.

The National Mall Coalition supports the goals of the plan to create flexible gallery spaces, to improve the visitor experience, to enhance the sculpture collection, and to replace and repair the failing infrastructure. On some of the various components of the plan, we have the following comments:

• We support the proposal to reopen the tunnel, to reconnect the museum building to the below-grade sculpture garden. The final choice of ramp should minimize the existing sharp slope for a more gradual pedestrian descent experience and it should maximize light so as to draw visitors into this space instead of creating a dark void people will not wish to enter.
• We support a landscape program that increases to the extent possible the amount of shade in this low-level space devoid of cooling breezes in Washington’s hot summers. Our experience is that currently the open space discourages summer visitors to descend into the under-utilized sculpture garden. We have read in the paper some objections that the new planting program will reduce shade. If true, we urge the team to increase plantings to increase well beyond current conditions the amount of shade on visitor pathways.
• The stormwater cistern is, in our opinion, a sustainable way to correct the common problem of flooding of the sculpture garden during heavy rain storms. We would encourage the Smithsonian to consider, as a possible alternative or an addition to the program, connecting the sculpture garden to the proposed National Mall Underground that would hold stormwater not only from the Hirshhorn but also from other nearby Smithsonian museums and gardens.
• We understand that there is some opposition by preservation groups to proposed changes to the size and configuration of the central pool and to the materials and locations of interior walls. Our view is that these changes, while creating an “adverse effect” by changing the original design, will also likely improve the visitor experience. Most importantly, they are reversible and do not constitute a permanent alteration of the historic resource.
• We think making the pool function as a performance space is a creative way to accommodate modern performance needs that were probably not anticipated when the Hirshhorn was completed in 1974, while also returning to Bunshaft’s original 1967 plan for a larger pool. This larger pool element may also draw visitors in ways the smaller pool did not by giving a sense of an oasis from summer’s heat. One concern is that a too large pool encountered as visitors exit the tunnel into the garden space may create a kind of barrier to movement to the surrounding outdoor “rooms”. It’s hard to tell from just examining plans. For example, the Capitol Reflecting Pool is an attractive landscape foreground to the Capitol Building. But as a pedestrian approaches it, it becomes a considerable physical barrier to
movement from the grassy Mall panels to the Capitol grounds itself. Would it be possible to 
create another pedestrian bridge through the pool, running east-west in addition to the one 
running north-south, to allow continuous forward movement into the sculpture garden, and not 
just movement to the sides of it?

- The proposal to use stacked stone walls is, in our view, a reasonable one. While concrete is 
the historic material, the truth is that concrete deteriorates and stains badly, creating an 
unattractive and industrial setting for the modern sculpture. As was mentioned during the May 
2020 consultation meeting, the original intent in the 70s was to clad the concrete of the 
museum with stone (Travertine), which would have created a very different look and feel from 
the Brutalist exposed concrete. The stacked stone would create a more natural, and less man-
made, setting for what is otherwise a stark open walled sculpture garden. Moreover, the 
stacked stone walls are reversible and so not a permanent adverse effect.

- We do not disagree with SI’s conclusion that cumulative adverse effects are limited to 
effects on the Hirshhorn Museum and the Sculpture Garden, not cumulative effects to the 
National Mall Historic District. Nonetheless, we would remind SI that any unanticipated 
adverse cumulative effects that occur to historic features, settings, and circulation as a result of 
project implementation may require further consultation to protect and preserve the integrity 
the National Mall Historic District.

We appreciate this opportunity to comment on the plans and look forward to reviewing any 
future proposals as the project moves forward.

Sincerely,

Judy Scott Feldman, PhD
Chair, National Mall Coalition
9507 Overlea Drive
Rockville, MD 20850
301-335-8490
jfeldman@nationalmallcoalition.org

From: https://hirshhorn.si.edu/sculpture-garden-revitalization/
User agent: Mozilla/5.0 (Macintosh; Intel Mac OS X 10_14_6) AppleWebKit/605.1.15 
(KHTML, like Gecko) Version/13.1.2 Safari/605.1.15
September 15, 2020

Judy Scott Feldman, PhD, Chair
National Mall Coalition
9507 Overlea Drive
Rockville, MD 20850

Dear Dr. Feldman,

The Smithsonian Institution (SI) is in receipt of comments from the National Mall Coalition dated September 4, 2020. We appreciate your participation as a consulting party to the review process, as described in Section 106 of the National Historic Preservation Act. The National Mall Coalition’s comments on the Sculpture Garden Revitalization Update materials and the Final Assessment of Effects on Historic Resources will be entered into the SI’s administrative Section 106 record for the Hirshhorn Sculpture Garden Revitalization project.

On behalf of the SI, we appreciate the National Mall Coalition’s careful review of the recent project materials and its support of the goals to “create flexible gallery spaces, to improve the visitor experience, to enhance the sculpture collection, and to replace and repair the failing infrastructure.”

The Hirshhorn Museum receives approximately one million visitors a year. Yet only 15% of its visitors experience the 1.5-acre outdoor Sculpture Garden, even though it faces the National Mall — a space visited by 35 million people a year. We are committed to creating a welcoming environment with expanded seating, shade and accessibility, as well as introducing new galleries for the display of sculpture and new forms of art.

To clarify a point in the comments regarding shade, in the proposed plan there is slight reduction in the overall amount of green space, but the amount of shade will not be reduced. The planting plan maintains specific specimen trees from the Gordon Bunshaft era of 1974 and the Lester Collins era of 1981. Shade is carefully considered to provide comfortable seating and sculpture viewing areas throughout the Sculpture Garden.

We look forward to consulting further with the National Mall Coalition on the resolution of adverse effects in support of the Hirshhorn Sculpture Garden Revitalization project and the museum’s mission.

Sincerely,

[Signature]

Carly Bond
Senior Historic Preservation Specialist

cc: Melissa Chiu, Director, Hirshhorn Museum and Sculpture Garden
Jay Kaveeswar, Hirshhorn Museum and Sculpture Garden
Kate Gibbs, Hirshhorn Museum and Sculpture Garden

600 Maryland Avenue SW, Suite 5001
PO BOX 37012 MRC 511
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202.633.6535
BondC@si.edu
September 4, 2020

Carly Bond  
Historic Preservation Specialist  
Smithsonian Institution  
600 Maryland Avenue, SW, Suite 5001  
PO Box 37102 MRC 511  
Washington, DC  20013-7012

RE: Additional Comments Regarding the Hirshhorn Sculpture Garden Revitalization Project

Dear Ms. Bond:

Thank you for continuing to consult with the DC State Historic Preservation Office (SHPO) regarding the above-referenced undertaking. This letter provides additional comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

We appreciate that the Smithsonian Institution (SI) has produced two new alternatives for the reflecting pool, especially “Alternative 2” (below right) which reflects the design we requested the SI to develop and evaluate in our letter of March 25, 2020. This approach would allow Bunshaft’s pool to remain distinct and recognizable from the augmented pool to the south, preserve the important visual connection between the historic pool and the museum’s singular window, and significantly minimize, or possibly avoid the adverse effect on this critically important feature of the Sculpture Garden. Many of the SI’s program goals would still be met by implementing Alternative 2.

We also appreciate the SI’s proposal to minimize the adverse effect on the historic central partition wall by introducing Swenson Pink granite into the mix of stacked stone, but we continue to believe this additional, critically important feature warrants in-kind replacement.
If you should have any questions or comments regarding any of these matters, please contact me at andrew.lewis@dc.gov or 202-442-8841. Otherwise, thank you for providing this additional opportunity to comment.

Sincerely,

[Signature]

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

19-0361 (Sculpture Garden) and 19-0362 (Building Envelope)
September 15, 2020

C. Andrew Lewis  
Senior Historic Preservation Officer  
DC State Historic Preservation Office  
DC Office of Planning  
1100 4th Street SW, Suite E650  
Washington, DC 20024

Dear Mr. Lewis,

The Smithsonian Institution (SI) is in receipt of comments from the DC Historic Preservation Office dated September 4, 2020. We appreciate your participation as a consulting party to the review process, as described in Section 106 of the National Historic Preservation Act. The comments on the Sculpture Garden Revitalization Update materials and the Final Assessment of Effects on Historic Resources will be entered into the SI’s administrative Section 106 record for the Hirshhorn Sculpture Garden Revitalization project.

On behalf of the SI, we appreciate your careful review of the recent project materials and ongoing consultation over the past several years. The SI acknowledges that the DC Historic Preservation Office has provided comments regarding the adverse effects from the preferred pool alternative and the reconstruction of the inner partition wall in stacked stone reflected in the administrative record.

The SI plans to proceed with developing the designs for the preferred pool alternative and reconstruction of the inner partition wall. Part of the purpose and need for this project is to respond and adapt to changes in contemporary art by designing flexible, contemplative spaces. The preferred pool alternative achieves this with the additional benefit of evaporative cooling and maintaining the 1974 dimensions of the historic pool. The current pool alternative design has improved due to Section 106 consultation. We acknowledge that the changes to these character defining features are adverse effects but are central to the project’s purpose and need.

The SI will carefully study materials and finishes to highlight the importance of the 1974 reflecting pool dimensions and refining the use of Swenson Pink granite on the inner partition wall to minimize the adverse effect. We look forward to consulting with the public later this fall on a final stacked stone wall mock-up using the proposed granite and evaluating its complementary effect on the aggregate concrete walls.

We look forward to consulting further with the DC Historic Preservation Office on the resolution of adverse effects in support of the Hirshhorn Sculpture Garden Revitalization project and the museum’s mission.

Regards,

[Signature]

Carly Bond  
Senior Historic Preservation Specialist
cc: David Maloney, DC State Historic Preservation Office
Melissa Chiu, Director, Hirshhorn Museum and Sculpture Garden
Jay Kaveeshwar, Hirshhorn Museum and Sculpture Garden
Kate Gibbs, Hirshhorn Museum and Sculpture Garden
Lauren McCunney, Smithsonian Facilities, OPDC
Michael Zisk, Smithsonian Facilities, OPDC
Sharon Park, Smithsonian Facilities, OPDC
Ann Trowbridge, Smithsonian Facilities, OPDC
Michelle Spofford, Smithsonian Facilities, OPDC
September 2, 2020

Ms. Carly Bond
Historic Preservation Specialist
Smithsonian Institution
Smithsonian Facilities
Office of Planning, Design & Construction
Architectural History and Historic Preservation
600 Maryland Avenue SW, Suite 5001
Washington, D.C.  20013

Dear Ms. Bond:

Thank you for the opportunity to make comments as part of the Section 106 process, on the Final Assessment of Effects on Historic Resources for the Hirshhorn Sculpture Garden. As Lester Albertson Collins’ biographer for The Cultural Landscape Foundation’s books, Pioneers of American Landscape Design New Profiles from the Pioneers of American Landscape Design Project: Shaping the American Landscape (2009) and Shaping the Postwar Landscape (2018), I write to express my continued concern about the redesign of the Hirshhorn Sculpture Garden.

No one can look at the Bunshaft/Collins sculpture garden and not feel sad at its diminished state and know that rehabilitation is appropriate. Right from the opening presentation on April 10, 2019 of the Hirshhorn/Sugimoto redesign of the Sculpture Garden, the Lester Collins’ design, which is the only sculpture garden the public has known, was presented as non-contributing and the work of a minor landscape architect. Finally, when scholarship by Robinson & Associates and Laura Knott led to a reassessment of Lester Collins’ design and his career, his design for the Sculpture Garden was included in the period of significance (February 24, 2020 presentation). Yet, even after acknowledging Collins’ contribution, few modifications were made to accommodate it in the Hiroshi Sugimoto plan. The garden plan remains materially the same as presented on April 2019. Reducing the Collins landscape to a row of cherry trees and a few ramps does not make this the historic Lester Collins garden.

The linkage of the Museum and Garden by shared elements was central to Bunshaft’s design. The Sugimoto design severs that link by adding incompatible materials to the garden (stacked stone walls) and by absorbing the Bunshaft’s/Collins horizontal pool as part of a larger programable multi-elevational water feature that also doubles as a greatly expanded paved surface/area. Who would know that the Garden and the Museum were contributing artistic expressions on the same campus were it not for the perimeter concrete walls? On page 3 in the Assessment of Effects on Historic Resources, in the section Concrete Walls- Inner Partition is the note that by lowering of the inner wall partition by 18” (the stacked stone wall behind the pool) the “Adverse effect on the National Mall Historic District (is) minimized with limited visibility from the Sculpture Garden’s north overlook, and from the Mall paths.
Aggregate concrete walls will be the first material visible from the exterior of the garden.” This implies that the stacked stone walls which are used throughout the Sugimoto design are incompatible and disrupt the harmonious visual and modernist connection between the Museum and the Garden.

The Hirshhorn Museum and Garden are one of the jewels on the Mall. The erasure of any work of art or landscape is a loss that cannot be reclaimed. Including signage about the past designs and designers is not enough. I hope that these comments will be considered.

With best regards,

Nancy Slade, ASLA

cc: Melissa Chiu, Hirshhorn Museum and Sculpture Garden; Jaya Kaveeshwar, Hirshhorn Museum and Sculpture Garden; Sharon Park, Smithsonian Institution; David Maloney, DC Historic Preservation Office; Andrew Lewis, DC Historic Preservation Office; Tom Luebke, U.S. Commission of Fine Arts; Marcel Acosta, National Capital Planning Commission; Steve Callcott, Historic Preservation Review Board; Kirby Vining, Committee of 100 on the Federal City; Rebecca Miller, D.C. Preservation League
September 15, 2020

Nancy S. Slade
3500 Quesada Street NW
Washington, DC 20015

Dear Ms. Slade,

The Smithsonian Institution (SI) is in receipt of your comments dated September 2, 2020. We appreciate your participation as a consulting party to the review process, as described in Section 106 of the National Historic Preservation Act. The comments on the Sculpture Garden Revitalization Update materials and the Final Assessment of Effects on Historic Resources will be entered into the SI’s administrative Section 106 record for the Hirshhorn Sculpture Garden Revitalization project.

On behalf of the SI, we appreciate for your careful review of the recent project materials and participation in ongoing consultation. To clarify one point in your comments, an Assessment of Effects on Historic Resources must consider all effects the project has on historic resources within a defined Area of Potential Effects. It is important for the SI to analyze effects of the Sculpture Garden project on the National Mall Historic District and maintaining aggregate concrete as the first visible material preserves the Hirshhorn’s relationship to the Mall context. The SI proposes that the stacked stone walls, aside from the inner partition wall, are not an adverse effect, carefully detailed to place these walls secondary to the aggregate concrete in the wall hierarchy within the Garden.

The Robinson & Associates report commissioned by the Smithsonian is the most important contribution of new scholarship on Lester Collins. The report revealed many similarities between the proposed design and the 1974 and 1981 eras, most striking were the identical project goals that Lester Collins was tasked with solving. The SI is considering ideas to create and expand more information on Collins on multiple platforms, and we look forward to sharing these ideas with the public at our next consulting parties meeting.

We look forward to consulting further with you on the resolution of adverse effects in support of the Hirshhorn Sculpture Garden Revitalization project and the museum’s mission.

Sincerely,

Carly Bond
Senior Historic Preservation Specialist

cc: Melissa Chiu, Director, Hirshhorn Museum and Sculpture Garden
Jay Kaveeshwar, Hirshhorn Museum and Sculpture Garden
Kate Gibbs, Hirshhorn Museum and Sculpture Garden
Lauren McCunney, Smithsonian Facilities, OPDC
Michael Zisk, Smithsonian Facilities, OPDC
Name: J. Green  
Email: jaredlgreen@gmail.com  
Organizations: Independent  
Message: Applaud the design team for a new approach that adds depth and richness to a stark space. Using the stone stacked walls only in the interior is a good compromise. This will add interesting layers. Preferred alternative for the pool makes sense.
September 2, 2020

Carly Bond
Historic Preservation Specialist
Smithsonian Institution
Office of Planning, Design & Construction
Architectural History and Historic Preservation
600 Maryland Avenue, SW, Suite 5001
Capital Gallery MRC 511
Washington, DC 20013

Dear Ms. Bond,

Docomomo US appreciates the opportunity to continue to comment and clarify the Smithsonian Institution’s goals at the Hirshhorn Museum and Sculpture Garden. With the pandemic and shifting demands within our own organization, we appreciate your patience as it has taken us a bit longer to review the Hirshhorn Sculpture Garden revitalization materials.

Over the course of the last three months, our national advocacy committee has completed a review of the Sculpture Garden revitalization documents and updates. We have also become aware of a third phase: an interior rehabilitation and expansion of the Hirshhorn Museum. While we applaud the Smithsonian for being so detailed in your description of alterations, we would like to see an overall impact analysis on all three phases to the Hirshhorn Museum and Sculpture Garden in addition to the National Mall Historic District. The piecemeal review of the project does not allow for a comprehensive understanding of the combined potential effects of the project. If these phases continue to stand alone, how will the consulting parties appropriately comment on alterations or repairs to original fabric that impact one another? As an example, how does the expanded balcony dimensions due to the growth of the panels and expansion joints relate to the proposed expansion of the pool?

Additionally, we would like the analysis of impacts on individual character defining features and new elements separated out in order to fully understand what alterations will occur to historic fabric, versus what new elements will be introduced. We would also like to see further analysis of the combined alteration of character-defining features of the garden and further discussion on the effects of the Sculpture Garden as a holistic historic property, instead of as a collection of individual features as currently described.
Reflecting Pool
In our review of the enlarged reflecting pool options, we are concerned with the proposal’s focus on what was designed and not what was built. While the Smithsonian provided a sketch that at one time presented the idea of a larger pool, it is without context. We do know this was never built and establishes the current pool size as the foundation of design intention for the site. We believe that enlarging the pool will create a false historical appearance not in keeping with the original built design. The built pool dimensions are directly related to the museum’s balcony overlooking the garden. It is not clear from the documentation why the current size of the pool does not meet "rigorous programming needs of a modern and contemporary art museum.” Why does the pool need to be expanded in order for it to be engaging?

Wall Hierarchy, Rock Walls and Vistas
The wall hierarchy and introduction of unprecedented stacked rock walls will radically change the character defining features of the garden. Precedent should be drawn from the Hirshhorn landscape elements (introduced by Collins) and not the larger materials palette of the National Mall Historic District. By placing stacked rock walls at each and every vista as one travels through the garden, it confuses the original design intent and negatively impacts the garden’s integrity of design, feeling, materials, and workmanship, as well as association with the designers. Collins careful understanding of room hierarchy delicately placed plantings as a means of defining space while not taking away from the purpose and aesthetics of the exposed aggregate concrete walls that are featured in other significant museum sculpture gardens constructed between 1950 and 1990. There is no historical precedent relating to the Hirshhorn or other modern sculpture gardens and this historicized element is not in keeping with the Secretary of the Interior Standards for Rehabilitation.

Creation of More Rooms
The garden historically designed by Gordon Bunshaft and later by Lester Collins, functioned as an open setting with a few rooms meant as places of quiet contemplation. One of our main take-a-ways from the thoroughly researched Hirshhorn Museum Sculpture Garden Significance and Integrity Report (Feb. 2020) is Collins’ masterful ability to balance the overlapping sculpture views with vertical plantings rather than with new wall introductions. Walls to create more rooms for sculpture was considered for the 1981 alteration and ultimately deemed unnecessary. We find the introduction of the unprecedented stacked rock walls will overwhelm the garden and is a significant adverse effect on the integrity of the garden. These new rooms should be secondary to the original design and not compete with the layout, design form, and relationship of the historic garden.

Setting for the Display of Sculpture
The Assessment of Effects on Historic Resources places “Setting for the Display of Sculpture” as a significant feature of the project. While we understand the garden will continue to be used as a setting for sculpture, we would like to see an analysis of the programmatic goals for the garden. Designing flexible space for the “presentation of time-based artwork, large-format sculpture and site-specific installations” is quite different from the historic use as a setting for sculpture. We believe more information is needed on the usage goals and programming before we can agree to no adverse effect.
Interior Renovation and Expansion Project
As we review documents made available by the Smithsonian to the public and the Section 106 consulting parties, we are at the Smithsonian’s will in terms of the information that is shared with us regarding the project. It has only been through other means of information gathering and not the formal Section 106 process, that we have been made aware of a third phase of the overall project. While we understand the interior renovation was forthcoming, it is concerning that no notice to consulting parties has been made. As the request for proposals and response to questions have already been announced and completed, we can only assume the solicitation process has concluded and a project team has been selected. We would like to see more detailed information on this third phase including the idea behind the expansion of the first-floor lobby, expansion of the basement level, and an analysis on the overall effect of these proposals on the Hirshhorn Museum and Sculpture Garden in addition to the National Mall Historic District.

Conclusion
In conclusion, Docomomo US asks for more clarity of the process and insists the public and Section 106 consulting parties review the project as a whole, instead of in piecemeal phases. We ask for an Assessment of Effects of the garden as a holistic resource, instead of focusing on individual projects elements and character-defining features. We suggest an analysis of historic and proposed programmatic goals for the garden. As many of the design interventions seem focused on the “presentation of time-based artwork, large-format sculpture and site-specific installations” as opposed to the historic intent of the sculpture garden as a place for the quiet contemplation of art.

Sincerely,

Todd Grover  Liz Waytkus
Vice President Advocacy  Executive Director
Docomomo US  Docomomo US
September 15, 2020

Liz Waytkus, Executive Director
Docomomo US
P.O. Box 230977
New York, NY 10023

Dear Ms. Waytkus,

The Smithsonian Institution (SI) is in receipt of comments from Docomomo US dated September 2, 2020. We appreciate your participation as a consulting party to the review process, as described in Section 106 of the National Historic Preservation Act. The comments on the Sculpture Garden Revitalization Update materials and the Final Assessment of Effects on Historic Resources will be entered into the SI’s administrative Section 106 record for the Hirshhorn Sculpture Garden Revitalization project.

On behalf of the SI, we appreciate Docomomo’s careful review of the recent project materials and participation in consultation on this project and the Envelope Repair project. An architect has not been selected for the future building revitalization project referred to in your letter, and this project is many years away from even initiating Section 106 consultation. We are addressing projects in a way to allow the Hirshhorn to remain open to visitors, by first addressing the panel replacement project to keep the Hirshhorn safe for visitors. Once this project is complete, the construction on the Sculpture Garden will begin, followed by a master plan that will integrate all parts of the Museum campus, and the building revitalization project many years later.

To address another point in the comments, the proposed curatorial organizational site plan for the Sculpture Garden has been publicly shared many times and is available in past presentation material on the project webpage.

Contemporary art is constantly evolving, but the Sculpture Garden will always remain an outdoor gallery space for the display of sculpture and art. Neither Smithsonian Facilities nor the public can tell the Hirshhorn what is appropriate or not appropriate to exhibit inside the Sculpture Garden.

Creating rooms for the display of sculpture was introduced by Lester Collins, and we are building on this legacy and maintaining the layout the Sculpture Garden. The Robinson & Associates report commissioned by the Smithsonian revealed many similarities between the proposed design and the 1974 and 1981 eras, most striking were the identical project goals that Collins was tasked with solving. Approaches to universal accessibility have evolved and providing a comfortable environment for visitors in a changing climate and increasing the ability for the Hirshhorn to display art are required. Later this fall, we will invite the public to review a final stacked stone wall mock-up using the proposed granite and its complementary effect on the aggregate concrete walls.

We look forward to consulting further with Docomomo US on the resolution of adverse effects in support of the Hirshhorn Sculpture Garden Revitalization project and the museum’s mission.

Sincerely,

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PO BOX 37012 MRC 511
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202.633.6535
BondC@si.edu
Carly Bond
Senior Historic Preservation Specialist

cc: Melissa Chiu, Director, Hirshhorn Museum and Sculpture Garden
Jay Kaveeshwar, Hirshhorn Museum and Sculpture Garden
Kate Gibbs, Hirshhorn Museum and Sculpture Garden
Lauren McCunney, Smithsonian Facilities, OPDC
Michael Zisk, Smithsonian Facilities, OPDC
Sharon Park, Smithsonian Facilities, OPDC
Ann Trowbridge, Smithsonian Facilities, OPDC
Michelle Spofford, Smithsonian Facilities, OPDC
Name: Saisha Grayson
Email: saigray@gmail.com
Organization: Smithsonian American Art Museum
Message: I think the exploration of alternates by HMSG shows good faith effort to see this project from all sides and consider all the options; but at the end of the day, this redesign, like all Smithsonian efforts is ultimately for serving the public, and the preferred alternate they've put forward is clearly in the best interest of the widest public – those who love high-quality art and functional, flexible design; those who are looking for an inviting public space or a place to cool off from the Mall; those who might be enticed by a live program and those with access needs when engaging such events; etc. The Sculpture Garden is ultimately most important as a support for artworks and people coming together, and all the designs of the past were working towards that in their own way, in their own times. HMSG and the Smithsonian now need to be able to do the same for the people and art of our time.
September 2, 2020

Carly Bond
Historic Preservation Specialist
Smithsonian Facilities Office of Planning, Design and Construction
600 Maryland Avenue SW, Suite 5001
Washington, DC 20013-7012

Dear Ms. Bond,

As an official consulting party to the National Historic Preservation Act Section 106 review now underway for the Hirshhorn Sculpture Garden in Washington, D.C., The Cultural Landscape Foundation (TCLF) is pleased to add the following remarks to the public record regarding the revitalization update on alterations to the inner partition wall and reflecting pool (“revitalization update”) provided to consulting parties on Friday, August 21, 2020.

The Hirshhorn and the Smithsonian are to be commended for having made the “revitalization” of the sculpture garden a priority. It is much needed and long overdue, especially given the sculpture garden’s prominence on the National Mall. There are several favorable aspects such as re-establishing the underground connection to better unify the campus. Moreover, the Hirshhorn appears to be guided in part by architect Gordon Bundshaft’s “intent.” The artist’s intent is a curatorial north star in any museum’s stewardship of its material collections and should be at the Hirshhorn’s sculpture garden.

To date, consulting parties and reviewing agencies have expressed the most concern about adverse effects to the sculpture garden’s central core, loosely defined as the rectangular area containing the sunken garden’s reflecting pool and bounded by the inner partition wall and south stairs and framed by embankments to the east and west. This derives from the fact that the central core contains minimalist elements that are essential to maintaining the harmonious dialogue between the landscape architecture and building architecture, the sunken, open-air sculpture garden that reads in plan as a canvas and the elevated, cylindrical mass. These contrasting forms clearly register as two halves of a single, unified design expression. Moreover, while the view of the sculpture garden from the National Mall is of special interest because the Mall itself comprises an historic resource of great significance, views of the sunken garden’s central core from the entire periphery of the landscape are important in communicating the visual and spatial relationships that unify the garden/museum ensemble, not the least of which is a shared materials palette. For these reasons, we believe that significant, documented adverse effects to elements within the central core should be avoided, while those beyond its boundaries can be minimized or mitigated.

Remarkably, what the Final Assessment of Effects (AOE) fails to adequately present are measures to avoid the documented adverse effects on the central core. Indeed, there is no discussion of avoidance at all. Consequently, what the Smithsonian and Hirshhorn are presenting is an incomplete set of choices. In addition, there are two sections of the revitalization update that we wish to address:

On page three, the section labeled “Inner Partition Wall – Context” fails to note the most important contextual aspect, the shared minimalist materiality of the walls of the sculpture garden and the museum building. Instead, the revitalization update obfuscates by only delineating the borders of the
walls surrounding the museum building and the sculpture garden as giving a “strong sense of enclosure and cohesion across the Hirshhorn complex.” In fact, it is the use of aggregate concrete on the surfaces of the walls of the sculpture garden and the museum building that provides the “cohesion across the Hirshhorn complex.” The 1981 Lester Collins redesign maintained this key unifying element, which reflected Bunshaft’s design intent as memorialized by Smithsonian Secretary S. Dillon Ripley in memorandum of September 12, 1977 to Hirshhorn director Abram Lerner: “I spoke with Gordon Bunshaft about the new design for the Hirshhorn Sculpture Garden ... [Bunshaft] said he hoped that the materials used in the ramp and the facing thereto would consist of the same kind of aggregate concrete work which occurs in the main building” (emphasis added).

The introduction of stacked stone walls, notably in the central core, violates the artist’s intent.

On page eight, the section labeled “Reflecting Pool – Context” claims that proposed new pool configuration “re-envisions” the “original design intent, which was to give the ‘visual suggestion of a ‘floating’ museum.’ The 1967 design, which called for the sculpture garden and reflecting pool to bisect the National Mall, was never realized. The 1967 design also called for a museum building that was wider, taller, and clad in travertine. The 1974 design that was built – smaller in diameter, shorter in height and clad in Swenson pink granite aggregate – also included a radically different relationship between the museum building and reflecting pool. The proposed 506 x 60-foot rectangular reflecting pool oriented north-to-south that would have stretched across the National Mall was replaced with a 12 x 60-foot rectangular reflecting pool oriented east-to-west, which directly corresponds with the similarly oriented rectangular window on the museum building that faces the sculpture garden. Bunshaft recalibrated the campus’ key visual and spatial relations for the 1974 design.

The addition of an “enhanced, flexible water feature” not only distorts this key carefully articulated relationship, it introduces new materials, creates a new set of geometries, elevational changes, expanses of pavement, and voids in the ground plane that compete with the extant, character-defining visual and spatial relationships that were created by Bunshaft and respected by Collins.

The “enhanced, flexible water feature,” like the stacked stones, violates the artist’s intent.

The Hirshhorn notes of the museum’s architect on its website: ‘Bunshaft conceived the Hirshhorn as “a large piece of functional sculpture.”’ Indeed, the Hirshhorn Museum and Sculpture Garden is arguably the largest work of art in the Smithsonian Institution’s material collections. Consequently, the proposed alterations to the central core of a work of landscape architecture that is eligible for listing in the National Register of Historic Places and a contributing feature in the National Mall Historic District, should avoided, and the artist’s intent, a central guiding principal in any museum’s stewardship of its material collections, should be respected.

We call upon the Hirshhorn and the Smithsonian to revise the Final AOE and present options that avoid adverse effects on the central core of the sculpture garden.

Sincerely,

Charles A. Birnbaum, FASLA, FAAR
cc: Melissa Chiu, Hirshhorn Museum and Sculpture Garden; Jaya Kaveeshwar, Hirshhorn Museum and Sculpture Garden; Sharon Park, Smithsonian Institution; Greg Bettwy, Smithsonian Institution; Richard Kurin, Smithsonian Institution; Kevin Gover, Smithsonian Institution; Jaime Loichinger, Advisory Council on Historic Preservation; David Maloney, D.C. Historic Preservation Office; Andrew Lewis, D.C. Historic Preservation Office; Thomas Luebke, U.S. Commission of Fine Arts; Marcel Acosta; National Capital Planning Commission; Lee Webb, National Capital Planning Commission; Steve Callcott, D.C. Historic Preservation Review Board; Theo Prudon, President, DoCoMoMo U.S.; Kirby Vining, Committee of 100 on the Federal City; Rebecca Miller, D.C. Preservation League; Betsy Merritt, National Trust for Historic Preservation; Bill Brown, Association of Oldest Inhabitants.
September 15, 2020

Charles A. Birnbaum, FASLA, FAAR
The Cultural Landscape Foundation
1711 Connecticut Avenue NW, Suite 200
Washington, DC 20009

Dear Mr. Birnbaum,

The Smithsonian Institution (SI) is in receipt of comments from The Cultural Landscape Foundation dated September 2, 2020. We appreciate your participation as a consulting party to the review process, as described in Section 106 of the National Historic Preservation Act. The Foundation’s comments on the Sculpture Garden Revitalization Update materials and the Final Assessment of Effects on Historic Resources will be entered into the SI’s administrative Section 106 record for the Hirshhorn Sculpture Garden Revitalization project.

On behalf of the SI, we appreciate The Cultural Landscape Foundation’s careful review of the recent project materials. The SI acknowledges that the Foundation has provided comments regarding the adverse effects from the preferred pool alternative and the reconstruction of the inner partition wall in stacked stone reflected in the administrative record. We look forward to consulting with the public later this fall on a final stacked stone wall mock-up using the proposed granite and evaluating its complementary effect on the aggregate concrete walls.

We look forward to consulting further with The Cultural Landscape Foundation on the resolution of adverse effects in support of the Hirshhorn Sculpture Garden Revitalization project and the museum’s mission.

Sincerely,

Carly Bond
Senior Historic Preservation Specialist

cc: Melissa Chiu, Director, Hirshhorn Museum and Sculpture Garden
Jay Kaveeshwar, Hirshhorn Museum and Sculpture Garden
Kate Gibbs, Hirshhorn Museum and Sculpture Garden
Lauren McCunney, Smithsonian Facilities, OPDC
Michael Zisk, Smithsonian Facilities, OPDC
Sharon Park, Smithsonian Facilities, OPDC
Ann Trowbridge, Smithsonian Facilities, OPDC
Michelle Spofford, Smithsonian Facilities, OPDC
September 15, 2020

James Brayton Hall, President and CEO
The Garden Conservancy
20 Nazareth Way
P.O. Box 608
Garrison, NY 10524

Dear Mr. Hall,

The Smithsonian Institution (SI) is in receipt of The Garden Conservancy’s comments dated September 10, 2020, addressed to the National Capital Planning Commission. The SI will include The Garden Conservancy’s comments in our administrative Section 106 record for the Hirshhorn Sculpture Garden Revitalization project.

The Hirshhorn Museum receives approximately one million visitors a year. Yet only 15% of its visitors experience the 1.5-acre outdoor Sculpture Garden, even though it faces the National Mall – a space visited by 35 million people a year. We are committed to creating a welcoming environment with expanded seating, shade and accessibility, as well as introducing new galleries for the display of sculpture and new forms of art.

Creating rooms for the display of sculpture was introduced by Lester Collins, and we are building on this legacy and maintaining the layout the Sculpture Garden. The Robinson & Associates report commissioned by the Smithsonian revealed many similarities between the proposed design and the 1974 and 1981 eras, most striking were the identical project goals that Collins was tasked with solving. Approaches to universal accessibility have evolved and providing a comfortable environment for visitors in a changing climate and increasing the ability for the Hirshhorn to display art are required.

The SI is developing ideas to create and expand more information on the history of the Sculpture Garden, Gordon Bunshaft, and Collins on multiple platforms, and we look forward to sharing these ideas with the public at our next consulting parties meeting. We look forward to consulting further with The Garden Conservancy on the resolution of adverse effects in support of the Hirshhorn Sculpture Garden Revitalization project and the museum’s mission.

Sincerely,

Sharon C. Park, FAIA
Associate Director for Architectural History and Historic Preservation

cc: Marcel Acosta, NCPC
Lee Webb, NCPC
Melissa Chiu, Director, Hirshhorn Museum and Sculpture Garden
Jay Kaveeshwar, Hirshhorn Museum and Sculpture Garden

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As an official consulting party to the National Historic Preservation Act Section 106 review now underway for the Hirshhorn Museum and Sculpture Garden (HMSG) in Washington, D.C., The Cultural Landscape Foundation (TCLF) is pleased to add the following remarks to the public record regarding the [October 7, 2020 Consulting Parties Meeting #5](#) concerning the sunken sculpture garden.

As we have [previously noted](#), the HMSG and the Smithsonian are to be commended for having made the “revitalization” of the sculpture garden a priority. There are several favorable aspects such as addressing core infrastructure failures and re-establishing the underground connection to better unify the campus. However, we and other consulting parties and reviewing agencies continue to raise concerns about the introduction of a new design element, stacked stone walls, and alterations to the scale and geometry of the pool area. And, while the stacked stone walls have been reclassified as an “adverse effect” in the Final Assessment of Effects on Historic Resources (page 13 of the presentation), there is still no effort being made to avoid this significant adverse effect.

In fact, on page 68 of the presentation, the Smithsonian notes that “comments are welcome on” “proposed minimization measures” and “proposed mitigation measures.” The absence of language in this context about “proposed avoidance measures” would indicate that, with regards to the stacked stone walls and alterations to the scale and geometry of the pool area specifically, the Hirshhorn and the Smithsonian have decided they will not take any actions to avoid the documented adverse effects.

However, far more troubling than the lack of language about “proposed avoidance measures” is the inability of Hirshhorn director Melissa Chiu and sculpture curator Anne Reeve to directly answer a question central to the stewardship and decision-making about the sculpture garden’s redesign – is the sculpture garden a work of art/sculpture? For any museum, let alone a leading art museum, such a determination is an obvious and elemental first step in the evaluation of a central aspect of their material collection. The failure thus far to provide a clear answer calls into question the legitimacy of the undertaking as well as the Hirshhorn’s claims of transparency in the review process.

Ms. Chiu, when asked if she considered the sculpture garden to be a work of art, demurred: “So, I ... I mean, actually I don’t think it’s about my own opinion on this.” Ms. Reeve was asked if she considered the sculpture garden to be a work of sculpture and deflected: “I think we could go back and forth on nomenclature, you know, for, for, forever.”

Contrast those answers with the statement by Andrew Lewis, senior historic preservation specialist at the D.C. Historic Preservation Office (DC HPO), who declared quite emphatically that the sculpture
garden is “an important work of art.” In fact, this is not a novel concept. No less than Robert A.M. Stern, dean of the Yale School of Architecture, in a November 9, 2014 New York Times article about a planned expansion by the Frick Collection in New York City that would have destroyed their viewing garden on East 70th Street designed by the influential postwar British landscape architect Russell Page, stated unequivocally: “Gardens are works of art.” It’s worth noting that the Frick shifted gears and hired a new architect, Selldorf Architects, which developed an expansion plan that meets the museum’s programmatic needs without having an adverse effect on the Page-designed garden.

The opinions of senior Hirshhorn officials about whether the sculpture garden is a work of art are central to their stewardship and decision-making about the sculpture garden's proposed redesign. Moreover, the current evasions by Ms. Chiu, who is spearheading the redesign effort, and Ms. Reeve, who has curatorial responsibility for the sculpture garden, give cover for the Smithsonian’s repeated assertions about the redesign’s necessity to address “purpose and need” and the priority given to “purpose and need” when considering avoidance, minimization and mitigation. This is important because in the meeting Ms. Chiu directly stated a shared responsibility for the redesign effort when she said: “I think we’ve worked as a team with our Smithsonian’s facilities group to really look carefully at Bunshaft, Collins and Sugimoto as an evolving design.” In other words, the Smithsonian is willingly complicit in implementing a fundamentally flawed design and decision-making process.

The Association of Art Museum Directors’ professional practices guidelines state: "Member museums must have clear, written collections management policies ... as well as policies that address preservation, conservation, and collection care." The Association of Art Museum Curators' professional practices guidelines state: "The curator has a fundamental role in ensuring that works of art are properly conserved, stored, and exhibited." If HMSG officials do not consider their sculpture garden a work of art, they should explain why. If they do consider it art, then how does that square with the documented adverse effects of the design decisions they advocate? If they don’t know whether it’s art, do they not have a professional and ethical obligation to make that determination before executing a plan that would have long-term ramifications?

The HMSG complex has been described as the largest work of art in the Smithsonian’s collection; on November 4, 1989, Washington Post architecture critic Ben Forgey dubbed it, “the biggest piece of abstract art in town.” In addition, the Hirshhorn’s website says: ‘Bunshaft conceived the Hirshhorn as “a large piece of functional sculpture”’; Bunshaft, when asked to describe the Hirshhorn, said it was “sculpture”; and Ms. Reeve, in the February 24, 2020 public presentation about the redesign, included a quote by Isamu Noguchi that described sculpture gardens as being works of sculpture.

If credence is to be given to claims that the Hirshhorn is acting in a transparent manner, if deference is to be given to the priority of “purpose and need” over the avoidance of documented adverse effects, and if legitimacy is to be conferred on the review process itself, then it’s the responsibility of the Hirshhorn’s leadership to answer whether the sculpture garden is a work of art, and explain both the basis of their decision and how it dovetails with the proposed redesign. This is their professional and ethical obligation, and essential to the Section 106 review process.

Sincerely,

Charles A. Birnbaum, FASLA, FAAR
President & CEO
cc: Melissa Chiu, Hirshhorn Museum and Sculpture Garden; Jaya Kaveeshwar, Hirshhorn Museum and Sculpture Garden; Sharon Park, Smithsonian Institution; Greg Bettwy, Smithsonian Institution; Richard Kurin, Smithsonian Institution; Kevin Gover, Smithsonian Institution; Jaime Loichinger, Advisory Council on Historic Preservation; David Maloney, D.C. Historic Preservation Office; Andrew Lewis, D.C. Historic Preservation Office; Thomas Luebke, U.S. Commission of Fine Arts; Marcel Acosta; National Capital Planning Commission; Lee Webb, National Capital Planning Commission; Steve Callcott, D.C. Historic Preservation Review Board; Christine Anagnos, Executive Director, Association of Art Museum Directors; Judith Pineiro, Executive Director, Association of Art Museum Curators; Theo Prudon, President, Docomomo U.S.; Elizabeth Waytkus, Executive Director, Docomomo U.S.; Kirby Vining, Committee of 100 on the Federal City; Rebecca Miller, D.C. Preservation League; Betsy Merritt, National Trust for Historic Preservation; Bill Brown, Association of Oldest Inhabitants; Alexandra MacKay, Esq., Stites & Harbison PLLC.
Ms. Bond:

Please add the following statement to the Hirshhorn Sculpture Garden Revitalization record.

Congratulations to the Hirshhorn Museum! Thank you for adapting the sculpture garden to provide a warm welcome to visitors as it removes the mystery of that 50 year old question, "Where do I go once I walk down there?" Although it was not the intention of Mr. Bunshaft, it is the outcome.

The addition of more—sculpture, trees, and guest seating—based upon the knowledge of a half century of experience makes for a more interesting space that will draw visitors for the next 50 years, especially if they can discern the walkthrough to the museum campus. People don't want to be trapped and retrace their steps. It is a potential source of personal embarrassment as only the most daring go where their destination is unknown. Shopping malls learned from their early 1970s iterations to avoid dead ends. Hotels spend effort and energy on their guests' welcome but that is muted by the sense of arrival that theatre marquees are designed to offer. The designers of the Hirshhorn revitalization seemed to have addressed these issues and I am delighted with the outcome of their proposal. Function and sustainability are addressed with a strong connection to the past and without restraining the enjoyment of future generations. Given the wisdom from 50 years of experience, I think Mr. Bunshaft would respond well to the adaptation of his less than perfect design.

I do hope that the revitalization and enhancements are complete by 2026, the Semiquincentennial of the nation when I expect enormous crowds to visit the National Mall.

Thank you for your consideration of these observations.

Respectfully submitted,

Steve Shulman
November 6, 2020

Carly Bond  
Historic Preservation Specialist  
Smithsonian Institution  
Office of Planning, Design & Construction  
Architectural History and Historic Preservation  
600 Maryland Avenue, SW, Suite 5001  
Capital Gallery MRC 511  
Washington, DC 20013

Dear Ms. Bond,

As we stated during the Section 106 Consulting Parties review on October 7, 2020 of the Hirshhorn Sculpture Garden Revitalization, Docomomo US is disappointed with the final design interventions. The final design and the proposed minimization measures regarding significant features of the sculpture garden including the reflecting pool and inner partition wall fail to address our concerns and the concerns of peer consulting parties such as the DC State Historic Preservation Office, the National Trust for Historic Preservation, The Cultural Landscape Foundation and the DC Preservation League.

These four organizations along with Docomomo US, to the best of our knowledge are the core of the preservation focused consulting parties for this Section 106 Process. Collectively our organizations have continued to say the changes proposed raise substantial concerns with the destruction of significant materials, spaces, and setting and the mitigation efforts do not resolve these losses.

Based on our nearly two years of participation in this 106 Process, we find no programmatic reason for the replacement of the inner partition wall with stacked stones. The inner partition wall in concrete provides the same purpose as a stacked rock wall. We find no reason for its replacement.

It is equally as concerning if not more so that while alternative designs were developed to mitigate the negative impact on the reflecting pool that those alternatives were abandoned. The reflecting pool is literally central to the garden’s design and is a piece of art within a greater work of art. We find no reason for its alteration.
We have yet to see a review of the cumulative effects of the changes proposed, in progress, and still in the planning stages on the total resource. Docomomo US believes the omission of a cumulative impact review to be detrimental and might result in the resource no longer being eligible for the National Register of Historic Places. From page ix of *The Secretary of the Interior’s Standards for Rehabilitation* it states (bold added for emphasis):

**Identify, Retain, and Preserve**

The guidance that is basic to the treatment of all historic buildings—identifying, retaining, and preserving the form and detailing of those architectural materials and features that are important in defining the historic character—is always listed first in the "Recommended" column. The parallel "Not Recommended" column lists the types of actions that are most apt to cause the diminution or even loss of the building's historic character. **It should be remembered, however, that such loss of character is just as often caused by the cumulative effect of a series of actions that would seem to be minor interventions.** Thus, the guidance in all of the "Not Recommended" columns must be viewed in that larger context, e.g., for the total impact on a historic building.

Lastly, it was asked of us as a consulting party to provide mitigation recommendations for the loss or diminishment of the historic resource. The Smithsonian Institution’s proposed mitigation efforts focus almost exclusively on the overall garden and its plantings and not on the elements proposed to be removed or significantly altered such as the reflecting pool and the inner partition wall. While we still emphasize that the project remains an inappropriate modification to a significant, historic landscape, if this project does move forward, the proposed mitigation falls extremely short of the demolition that required these measures. A more robust level of mitigation effort should be developed, which could include:

- Working with the consulting parties to develop a new series of lectures at the Smithsonian’s expense discussing the fragility of landscapes and their preservation; and modernist landscape preservation
- Development of a publication that addresses these same concerns
- New research and publications discussing Bunshaft’s and Collin’s landscape work
- Dedicated funding to provide support to nonprofit organizations if/when another modern property in Washington D.C. requires documentation or the development of a National Register listing
- Interpretive signage on the site that discusses and provides visual understanding of the changes that were made, and also identifies that there was resistance to these changes and the reasons for that resistance
- Full HALS documentation of the existing site and all existing and historic drawings included in this documentation
- A permanent exhibition at the Hirshhorn telling the story and changes of this site that would include a rotating exhibit of landscape design

Sincerely,

Todd Grover  
Vice President Advocacy  
Docomomo US

Liz Waytkus  
Executive Director  
Docomomo US
cc: Melissa Chiu, Hirshhorn Museum and Sculpture Garden; Jaya Kaveeshwar, Hirshhorn Museum and Sculpture Garden; Sharon Park, Smithsonian Institution; Greg Bettwy, Smithsonian Institution; Richard Kurin, Smithsonian Institution; Kevin Gover, Smithsonian Institution; Jaime Loichinger, Advisory Council on Historic Preservation; David Maloney, D.C. Historic Preservation Office; Andrew Lewis, D.C. Historic Preservation Office; Thomas Luebke, U.S. Commission of Fine Arts; Marcel Acosta; National Capital Planning Commission; Lee Webb, National Capital Planning Commission; Steve Callcott, D.C. Historic Preservation Review Board; Christine Anagnos, Executive Director, Association of Art Museum Directors; Judith Pineiro, Executive Director, Association of Art Museum Curators; Nord Wennerstrom, Director of Communications, The Cultural Landscape Foundation; Charles Birnbaum, President, The Cultural Landscape Foundation; Theo Prudon, President, Docomomo U.S.; Todd Grover, Advocacy Chair, Docomomo U.S., Kirby Vining, Committee of 100 on the Federal City; Rebecca Miller, D.C. Preservation League; Betsy Merritt, National Trust for Historic Preservation; Bill Brown, Association of Oldest Inhabitants; Alexandra MacKay, Esq., Stites & Harbison PLLC.
October 30, 2020

Ms. Carly Bond  
Historic Preservation Specialist  
Smithsonian Institution  
Smithsonian Facilities  
Office of Planning, Design & Construction  
Architectural History and Historic Preservation  
600 Maryland Avenue SW, Suite 5001  
Washington, D.C. 20013

Dear Ms. Bond,

Thank you for the opportunity to comment on the Hirshhorn Museum and Sculpture Garden Revitalization Meeting #5 presentation on October 7, 2022.

I will say again as Lester Collins’ biographer in the University of Virginia Press’ *Pioneers of American Landscape Design* book series published in 2009 and 2018, that I see no meaningful progress toward changes which address the loss of this National Register eligible Modernist sculpture garden from the National Mall Historic District.

Art is a complex relationship between the whole and its parts. The duality of the restoration of the Bunshaft museum building and the erasure of the Collins modernist sculpture garden is a sad comment on what is valued today by the Hirshhorn stewards. Many of the proposed changes to the sculpture garden, the new connections to the museum both above and below ground and the more welcoming new entrance to the Mall are positive and welcome alterations. But many of the proposed Sugimoto design elements disrupt the harmonious and minimalist connection between the Modernist museum’s building architecture and the sculpture garden’s landscape architecture.

By introducing a new element of stacked stone walled rooms, which the Hirshhorn has recognized as an adverse effect, and changing the configuration of the historic Bunshaft/Collins pool, the Sugimoto design makes a landscape where the design elements overwhelms the sculpture and produces a discordant relationship with the Museum. How do stacked stones walls relate to a 1970s Modernist building? The beauty of the Hirshhorn complex is the harmonious relationship between the Bunshaft Museum and the Bunshaft/Collins garden.
In the section of the Hirshhorn’s presentation related to mitigation of the adverse effects of the proposed changes on the Collins sculpture garden include the following:

**Recordation and Documentation:**
- Revising the Period of Significance to include the Lester Collins Sculpture Garden in the period of significance.

**Lester Collins Scholarship:**
- A Donation to the Archives of American Gardens: Compilation of Collins Records on the Hirshhorn Sculpture Garden.
- Web based exhibit of Publications: Commission Additional Collins Scholarship Articles on Smithsonian Gardens and SI Architectural History webpage.
- Permanent posting of the HSG Significance and Integrity Report by Robinson & Associates.
- Smithsonian Garden Plant Explorer Webpage for information about Collins plant choices.
- Educational Outreach 57- Public Symposium on Sculpture Gardens – Sculpture Garden Site Tours- Sculpture Garden Revitalization Webpage.

Rather than do all this mitigation why not rehabilitate the Collins garden to make it work with the new programming needs? The National Mall is an ensemble of different types of architecture and landscape. The Hirshhorn has a unique position. It is the only Modernist Museum and Sculpture Garden on the Mall. Let us celebrate that connection not sever it.

With best regards,
Nancy Slade

cc: Melissa Chiu, Hirshhorn Museum and Sculpture Garden; Jaya Kaveeshwar, Hirshhorn Museum and Sculpture Garden; Sharon Park, Smithsonian Institution; Greg Bettwy, Smithsonian Institution; Jaime Loichinger, Advisory Council on Historic Preservation; David Maloney, D.C. Historic Preservation Office; Andrew Lewis, D.C. Historic Preservation Office; Thomas Luebke, U.S. Commission of Fine Arts; Marcel Acosta; National Capital Planning Commission; Lee Webb, National Capital Planning Commission; Steve Callcott, D.C. Historic Preservation Review Board; Christine Anagnos, Executive Director, Association of Art Museum Directors; Judith Pineiro, Executive Director, Association of Art Museum Curators; Theo Prudon, President, Docomomo U.S.; Elizabeth Waytkus, Executive Director, Docomomo U.S., Kirby Vining, Committee of 100 on the Federal City; Rebecca Miller, D.C. Preservation League; Betsy Merritt, National Trust for Historic Preservation; Bill Brown, Association of Oldest Inhabitants.
October 22, 2020

Melissa Chiu, Director  
Hirshhorn Museum and Sculpture Garden  
Independence Avenue & 7th Street, SW  
Washington, DC  20560  
chium@si.edu

RE: Hirshhorn Museum and Sculpture Garden Restoration and Rehabilitation Proposal

Director Chiu:

Thank you for the opportunity to comment once again on the Smithsonian Institution’s concept plans for the restoration and rehabilitation of the historic Hirshhorn Museum exterior and Sculpture Garden. The Committee of 100 on the Federal City provides these as a Consulting Party under Section 106 of the National Historic Preservation Act, as amended (54 USC §300101 et seq). Your October 7 “virtual” consultation session proved disappointing given the lack of responsiveness to our and other parties’ concerns expressed over many months. The same design proposal is presented again and again – without significant change or collegial dialogue.

As we allowed in our June 10 and August 29, 2020, letters, we applaud many aspects of the overall concept. But as you also recall, we (and others) oppose what we believe to be adverse proposals affecting the historically-significant Gordon Bunshaft 1974 Reflecting Pool and the inadvisable introduction into the Garden of new and historically inappropriate “Stacked Stone” Partition Walls. We will not reiterate here the arguments opposing both. We believe them well reasoned and expressed clearly in our past correspondence.

We concur in the argument expressed by you personally on October 7 that the historic Sculpture Garden must grow, evolve, and change in response to “new” Smithsonian and visitor needs and purposes. We agree. We do not advocate “freezing” the Garden in some mid-20th century stasis. We support the introduction of the proposed new performance venue. We applaud improving access from the National Mall and disability access throughout the Garden. And we concur in the proposed restoration/reconfiguration of the Underground Tunnel from the Plaza under Jefferson Drive into the Garden. None, we believe, will affect adversely the overall historic significance of this national-class, historic Garden. However, such is not the case of the two issues cited previously. If any cultural institution in the United States understands the issues, it is most assuredly the Smithsonian Institution. Please consider again our concerns concerning the Bunshaft Pool and the inappropriate introduction of the stacked stone partition walls.

Thank you again for the opportunity to provide the Committee of 100’s comments on this important project of national interest. If we may provide clarification or answer any questions, please contact us.

Sincerely,
Kirby Vining, Chair  
The Committee of 100 on the Federal City

cc:  • Jaya Kaveeshwar, Deputy Director, Hirshhorn Museum and Sculpture Garden, kaveeshwarj@si.edu  
• Carly Bond, Historic Preservation Specialist, Smithsonian Facilities Office of Planning, Design, & Construction bondc@si.edu  
• Sharon C. Park, Smithsonian Associate Director of Architectural History and Historic Preservation parks@si.edu  
• Charles A. Birnbaum, Founder + President, The Cultural Landscape Foundation charles@tclf.org  
• C. Andrew Lewis, Senior Historic Preservation Officer, DC State Historic Preservation Office Andrew.Lewis@dc.gov  
• David Maloney, DC State Historic Preservation Officer David_Maloney@dc.gov  
• Thomas Luebke, Secretary, Commission of Fine Arts tluebke@cfa.gov  
• Marcel Acosta, Executive Director, National Capital Planning Commission marcel.acosta@ncpc.gov  
• Lee Webb, National Capital Planning Commission, Lee.webb@ncpc.gov  
• Elizabeth Merritt, National Trust for Historic Preservation emerritt@savingplaces.org  
• Rebecca Miller, DC Preservation League Rebecca@dcpreservation.org  
• Peggy McGlone, Washington Post peggy.mcglonge@washpost.com  
• Philip Kennicott, Washington Post philip.kennicott@washpost.com  
• William Brown, AOI aoiofdc@gmail.com  
• John Fowler, ACHP jfowler@achp.gov  
• Marnique Heath, Chair, DC Historic Preservation Review Board historic.preservation@dc.gov
November 18, 2020

Liz Waytkus, Executive Director
Docomomo US
P.O. Box 230977
New York, NY 10023

Dear Ms. Waytkus,

The Smithsonian Institution is in receipt of written comments dated November 6, 2020, from Docomomo US following a Section 106 consultation meeting for the Hirshhorn Sculpture Garden Revitalization project held on October 7, 2020.

Docomomo’s comments will be added to this project’s Section 106 administrative record and note that they state the adverse effects to the Inner Partition Wall and Reflecting Pool have not been justified. The Hirshhorn Museum has programmatic and aesthetic reasons for altering these two features, and both have specific design actions developed through Section 106 consultation to minimize adverse effects. The Hirshhorn’s mission requires us to steward and grow the nation’s collection of modern art. Revitalized outdoor gallery spaces allow us to fulfill this challenge.

The Sculpture Garden Revitalization was identified as one of several projects to address the Hirshhorn’s programmatic and infrastructure needs as part of the South Mall Campus Master Plan. Cumulative effects were considered as part of the Assessment of Effects on historic resources and considered under the initial proposed mitigation and minimization measures. Thank you for providing specific comments on additional mitigation measures, and the Smithsonian agrees with many of them. We look forward to consulting further on the resolution of adverse effects in support of the Hirshhorn Sculpture Garden Revitalization project and the Museum’s mission.

Sincerely,

Carly Bond
Senior Historic Preservation Specialist
Smithsonian Facilities

Kate Gibbs
Director of Communications and Marketing
Hirshhorn Museum and Sculpture Garden

cc: Melissa Chiu, Director, Hirshhorn Museum and Sculpture Garden
Jay Kaveeshwar, Hirshhorn Museum and Sculpture Garden
Anne Reeve, Hirshhorn Museum and Sculpture Garden
Lauren McCunney, Smithsonian Facilities, OPDC
Michael Zisk, Smithsonian Facilities, OPDC
Sharon Park, Smithsonian Facilities, OPDC
Ann Trowbridge, Smithsonian Facilities, OPDC
Michelle Spofford, Smithsonian Facilities, OPDC
November 18, 2020

Charles A. Birnbaum, FASLA, FAAR
The Cultural Landscape Foundation
1711 Connecticut Avenue NW, Suite 200
Washington, DC 20009

Dear Mr. Birnbaum,

The Smithsonian Institution is in receipt of written comments dated October 28, 2020, from The Cultural Landscape Foundation following a Section 106 consultation meeting for the Hirshhorn Sculpture Garden Revitalization project held on October 7, 2020.

Thank you for the comments. None of the Smithsonian’s historic facilities or physical spaces are accessioned as artworks. The Hirshhorn and the Smithsonian Institution is concerned with considering how the Sculpture Garden can best meet the program and needs of the Hirshhorn and still respect its layered evolution from the work of Gordon Bunshaft and Lester Collins.

The Hirshhorn’s Sculpture Garden is an evolving outdoor gallery space for the display of art in all its many forms. It is in serious need of revitalization to fulfill the Museum’s mission to provide the most engaging art experience, replace the deteriorating walls and infrastructure, improve accessibility, and to update plant materials to respond to climate change. The Hirshhorn’s mission requires us to steward and grow the nation’s collection of modern art, and revitalized spaces allow us to fulfill this challenge. The proposed revitalization will enrich the lives of the region’s residents, visitors and workers, and is consistent with the palimpsest design of the Sculpture Garden.

The Cultural Landscape Foundation’s comments will be added to this project’s Section 106 administrative record. We have conducted a thorough public process including five public Section 106 meetings to date to address adverse effects, which have been avoided and minimized. The purpose and need of the project cannot be discounted and are central to the mission of the Museum and Institution. We look forward to consulting further on the resolution of adverse effects in support of the Hirshhorn Sculpture Garden Revitalization project and the Museum’s mission.

Sincerely,

Carly Bond  Kate Gibbs
Senior Historic Preservation Specialist  Director of Communications and Marketing
Smithsonian Facilities  Hirshhorn Museum and Sculpture Garden

cc: Melissa Chiu, Director, Hirshhorn Museum and Sculpture Garden
Jay Kaveeshwar, Hirshhorn Museum and Sculpture Garden
Anne Reeve, Hirshhorn Museum and Sculpture Garden
Lauren McCunney, Smithsonian Facilities, OPDC