



August 25, 2026

Ms. Tammy Stidham
Associate Regional Director - Lands and Planning
National Park Service
1100 Ohio Drive SW Washington, DC 20242

RE: Lafayette Park - Consulting Party Meeting #1

Dear Ms. Stidham,

Thank you for this opportunity for The Cultural Landscape Foundation (TCLF) to provide comments about the [Lafayette Park Security Modifications – Consulting Party Meeting #1](#) on August 12, 2026, concerning plans to erect a permanent ten-foot-tall metal fence around Lafayette Park, part of the Lafayette Square Historic District, across the street from the White House. A permanent fence would fundamentally alter the nation's most significant site for First Amendment protected rights.

At that meeting **TCLF pointed a fundamental flaw in the proposal presented** by U.S. Secret Service (USSS) representative Andrew Stohs and consultant AECOM representative Claire Sale, specifically that the National Historic Landmark (NHL) [designation of 1970 for the Lafayette Square Historic Designation](#), which formed the basis to the design decisions and form giving, has not been updated to include the [Additional Documentation and Boundary Increase & Boundary Decrease of 2022](#). It has been 56 years since the NHL designation and considerable documented cultural history has occurred, but its relevance to the design decision-making is currently excluded from consideration. Consequently, **the design proposals presented at the Section 106 review are based on incomplete data, which nullifies their value and appropriateness.**

Nevertheless, the meeting continued with specific design proposals that would have an adverse effect on the park and landmark district.

The amendment of 2022 was prepared by the National Park Service (NPS) and unanimously approved by the D.C. Historic Preservation Review Board on [September 29, 2022](#), and approved by David Maloney at the D.C. State Historic Preservation Act on [October 5, 2022](#). However, according to remarks by Mr. Maloney at the August 12, 2026, Section 106 consulting party meeting, the **National Park Service never forwarded this vital information that provides essential context—about the park's area of significance and expanded period of significance—to the National Register of Historic Places.**

At the Section 106 meeting the USSS and AECOM representatives were unprepared to address the amendment of 2022, and the NPS representative offered no insights. Below is a recollection of the Q&A between TCLF and NPS, USSS, and AECOM, [based on the video recording of the event](#) (starting at 35:58):

TCLF: “Before we get into the designing and the specificity of the fence, I was just hoping that someone can speak to the [amendment of 2022] ... that revisited the 1970 [NHL] nomination which identified a broadened area of significance ... Are there alternatives that are being triggered by looking at a broader period of significance? ...”

USSS: Mr. Stohs said: “I don’t know as much of the status of some of that so I think maybe my team and the park service team will have to rally together to answer that because **I don’t think we’re prepared to give a holistic answer to that.**” [emphasis added].

TCLF: “But how can we possibly do a fence design and looking at adverse effects if we don’t know what the periods of significance and what the areas of significance are? Is this the cart before the horse?” To which there was no response.

TCLF: “Is there someone on the team who has done the research who can speak to that question?”

AECOM: Ms. Sale said she had “two comments on that”; in the first she effectively punted: “One is if the park service ... [has] ... a clarification on the status ... of the documentation Charles referenced.”

NPS: “Not of the top of my head. **I do not have a status report on those documents** but we can definitely look at them Charles and circle back on that question.” [emphasis added].

Ms. Sale did not follow up with a second comment.

TCLF again highlighted the fundamental problem: “I don’t understand how we can actually get into design if we don’t know what the areas of significance are or am I being naïve about this after my fifteen years with NPS?”

NPS: “No, you are not being naïve. We are at the very beginning of the Section 106 process so you’re talking about alignment.” The meeting then, inexplicably, pivoted back to the discussion of fence design options.

Following that meeting, [on August 17, 2026, TCLF sent a letter to NPS](#) specifically asking when the amendment of 2022 would be sent to the National Register of Historic Places. TCLF has yet to receive a reply. Moreover, NPS recently sent a presentation deck to the National Capital Planning Commission for that body’s September 3, 2026, meeting that appears identical to the one shared during the Section 106 meeting—again, the deck sent to NCPC and its proposals are based on incomplete data that is foundational and critical to carrying out Section 106 review.

A permanent fence would forever alter visual and spatial relationships, the first and most important characteristics identified in the *Secretary of the Interior’s Guidelines for the*

Treatment of Cultural Landscapes. Lafayette Park's unique location makes it one of the nation's most important embodiments of First Amendment-protected rights. It is therefore shocking that the design options presented for such a powerful symbol of our democracy display a stunning lack of imagination and originality—a bland generic response to a unique and nationally important landmark district.

If the goal of a Section 106 review is to identify potential adverse effects and then ways to avoid, minimize, or mitigate those adverse effects, there is no attempt at avoidance. When confronted with a similar security challenge at the Washington Monument, an elegant and understated site-specific solution was developed that met the security requirements with dignity. **What site-specific design responses did NPS consider at Lafayette Park?** Was there a more holistic approach that also considered Pennsylvania Avenue, south of the park, and/or the roadways immediately north?

Until the National Park Service forwards the amendment of 2022 to the National Register of Historic Places and the areas and period of significance are understood and updated, the Section 106 process will be fundamentally flawed and will hinder a full accounting of potential adverse effects and how to “avoid, minimize, or mitigate” them. So, this gets back to the question TCLF raised in its letter of August 17, 2026, what is the schedule for this revision/updating? In addition, why would NPS, USSS, and AECOM knowingly send a nearly identical and fundamentally flawed presentation to NCPC, in preparation for that body's September 3, 2026, meeting, *after* the problem was identified and acknowledged but not addressed?

Feel free to contact me with any questions.

Sincerely,

A handwritten signature in dark ink, consisting of a large, stylized 'C' followed by a smaller 'B' and a long, horizontal flourish extending to the right.

Charles A. Birnbaum, FASLA, FAAR
Founding President & CEO

cc:

David Maloney, D.C. State Historic Preservation Office