



October 25, 2021

Ms. 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 (“NHPA”) 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.

On at least four separate occasions since the beginning of the Section 106 review process, including in our [letter of October 6, 2021](#), we have pointed out that **the principal work of this Section 106 review has not been done, namely assessing the impacts on [visual and spatial relationships](#), which are the primary organizational principles of the Secretary of the Interior’s Standards [Guidelines for the Treatment of Cultural Landscapes](#), which underpins this review.** Indeed, we and other consulting parties have repeatedly stressed the importance of the garden’s character-defining visual and spatial relationships and have requested that a deeper and a more meaningful analysis be undertaken so that any proposed changes – the relationship between the pool and the museum elevation; where and how views were revealed and concealed as part of the garden’s intentional choreography; the harmony of the minimalist material palette – could be understood and the impacts of the proposed work carefully assessed.

As the author of the *Guidelines for the Treatment of Cultural Landscapes*, I can state with great certainty that such a critical understanding of the landscape’s visual and spatial relationships has not been produced to date (the reference to views and vistas on pages 57-59 of the Smithsonian’s [February 24, 2020, presentation](#) is not an analysis of visual and spatial relationships). It is unclear whether this has been purposeful or out of ignorance on the part of the Smithsonian staff, and/or whether the project landscape architects, Rhodeside & Harwell, or any other qualified consultants, have been directed to undertake such an analysis as was done with other aspects of the undertaking, such the [acoustics](#) (though the Smithsonian only released a summary of the acoustics findings and ignored calls for release of the full analysis for public review).

Over the past two-and-one-half years, walls have been proposed to be removed and new ones introduced, the restrained unified materials palette between building and garden has been diluted, and the garden’s central feature, the rectangular reflecting pool, conceived by Bunshaft (in conversation with the museum’s façade) and retained by Collins, has had grafted onto it a new U-shaped water feature with a 17-foot-square stage at its center. Now, in this expanding collection of adverse effects, the Smithsonian has put forth three “choices” concerning the central partition wall. Two would alter its height (with one also adding new materials) – the net result is that when added to the alterations already proposed the garden no longer possess integrity.

The current, [October 20, 2021, memorandum to consulting parties](#) again illustrates the ongoing problem – indeed, the fatal flaw – in this entire process. The Smithsonian asserts “Bunshaft and Collins (sic) critical visual and spatial relationships are maintained” in the central gallery, noting:

- “The new water feature and performance platform approximates the dimensions of the Collins center turf panel, maintaining the overall composition, visual and spatial relationships in the Central Gallery.”
- The “Alternative 3 Lowered Concrete Wall” design maintains a higher degree of historic integrity for the inner partition wall [through] [t]he use of aggregate concrete maintains visual material relationships to the concrete perimeter walls and the Museum building.”

In the case of the first point, **the Smithsonian asserts the addition of the new pool will maintain the “overall composition” and the “visual and spatial relationships” without any providing any documentation or analysis that would support this claim.** The central wall is being lowered. Regardless of the materiality, the visual and spatial relationships in the central gallery are being fundamentally altered. Where is the assessment of effects concerning this major change to the heart of the Sculpture Garden? We are only told that “[t]he use of aggregate concrete maintains visual material relationships to the concrete perimeter walls and the Museum building.” This conflates visible similar materials with visual relationships, which is either done to deceive or out of ignorance.

Page six of the [Assessment of Effects](#) notes of the “Garden Rooms”: “Presence of garden rooms maintained in the east garden and builds on the 1981 modifications. No adverse effect.” How does the insertion of new stacked walls into the East Gallery, which subdivides the space, not create an adverse effect on the visual and spatial relationships of that space? There is no documentation or analysis provided that would support the Smithsonian’s claim of “no adverse effect.”

We have seen this before. Early in the review process, Smithsonian officials asserted with absolute certainty that the Lester Collins work of 1981 was not eligible for listing in the National Register of Historic Places. When presented with evidence by consulting parties using information from the Smithsonian’s archives that the Smithsonian’s research was incomplete, the Smithsonian engaged a qualified consultant in landscape history and landscape architecture who did the research, which resulted in a determination of eligibility for the Collins work. Therefore, it does not matter that “Consultation occurred on this project over an extended period with seven consulting parties meetings and reviews of several supplemental informational packets.” If the Smithsonian and/or the consultants at its direction have not done the work required – in this case the analysis of visual and spatial relationships – then the Smithsonian has not done its job to “carry out the Institution’s commitment to protect and preserve those Smithsonian buildings, structures, and sites in its care that contribute to our national cultural heritage.”

Consequently, the fact that this Section 106 has gone on for several years is no justification for concluding the process and finalizing a Memorandum of Agreement. The Smithsonian *must* do the work that it’s required to do. Their primary responsibility in this undertaking is the analysis of the impacts on visual and spatial relationships throughout the entirety of the Hirshhorn Sculpture Garden. They must provide this *essential foundation* of adverse effects on visual and spatial relationships before any other action is undertaken. They have not yet done so.

Sincerely,



Charles A. Birnbaum, FASLA, FAAR
President and CEO