



May 24, 2019

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

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 Tracerics, 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



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Thomas Luebke, Secretary, U.S. Commission of Fine Arts
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