

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
STATE HISTORIC PRESERVATION OFFICER



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 #3: Sculpture Garden Contributing Features*

<i>Feature</i>	<i>Contributing/Non-Contributing</i>
Sunken plan	Contributing
Concrete walls (perimeter and inner partition)	Contributing
South stairs	Contributing
North stairs	Contributing
Reflecting pool	Contributing
Setting for the display of rotating sculpture	Contributing
Interior ramps and stairs	Non-Contributing
Raised planting beds	Non-Contributing
Vegetation	Non-Contributing
Paving	Non-Contributing
Enclosed arts education space (at former stair opening)	Non-Contributing
Guard booth	Non-Contributing
Moveable site furniture, trash receptacles, etc.	Non-Contributing

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.

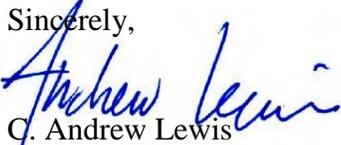
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If you should have any questions or comments regarding any of these matters, please contact me at [andrew.lewis@dc.gov](mailto:andrew.lewis@dc.gov) or 202-442-8841. Otherwise, thank you for providing this initial opportunity to comment. We look forward to consulting further with the Smithsonian Institution and all consulting parties to continue the Section 106 review of this project.

Sincerely,

A handwritten signature in blue ink that reads "Andrew Lewis". The signature is written in a cursive style with a large initial "A".

C. Andrew Lewis

Senior Historic Preservation Officer  
DC State Historic Preservation Office

19-0361 (Sculpture Garden) and 19-0362 (Building Envelope)