



NATIONAL  
ASSOCIATION *for*  
OLMSTED  
PARKS

July 3, 2012

Catherine V. Buell, Chair  
Historic Preservation Review Board  
1100 4th Street, SW Suite E650  
Washington, DC 20024

**Re: Testimony before the District of Columbia Historic Preservation Review Board – McMillan Park and Sand Filtration Site**

Dear Chairman Buell and members of the Historic Preservation Review Board,

The National Association for Olmsted Parks appreciates the opportunity to express our concerns regarding the proposed master plan and design guidelines for development of the nationally significant McMillan Park and Sand Filtration Site that are being considered during the Historic Preservation Review Board's hearing, scheduled for July 12, 2012.

We urge you to reject the proposed plans which do not take into account the historic significance of the site. The proposed plans would destroy much of the site's unique historic fabric, including most of the below-ground infrastructure that is crucial to understanding the scale and operation of the slow sand filtration plant. The proposed development plans would also destroy the character-defining visual and spatial relationships that are central to the original design intent for the site.

The "Historic Preservation Report for the Proposed Redevelopment of the McMillan Slow Sand Filtration Plant" (prepared by EHT Tracerics, Inc. for Vision McMillan Partners, July 28, 2010) comprehensively and conclusively makes the case for the historic significance of the McMillan Reservoir, based on the HPRB's McMillan Park Reservoir Historic Landmark designation. The Report also argues for the historic significance of the 25-acre McMillan Park Site as a distinct component of the McMillan Park Reservoir Historic Landmark, based on the Landmark designation as well as on EHT Tracerics' own research findings.

Based on the 2010 Historic Preservation Report (quoted below), and on the U.S. Department of the Interior's National Register Criteria for Evaluation, for which the property would be listed in the National Register of Historic Places, the McMillan Park site is historically significant, among other criteria, because of its:

- A. Association with the history of water purification.** It was the first water treatment facility in the city of Washington, and its operation resulted in the elimination of typhoid epidemics and reduced incidence of other diseases. The McMillan Site contains a majority of the infrastructure associated with the filtration capabilities of the slow sand filtration plant, and is crucial to

understanding the operation and scale of the slow sand filtration plant as a facility for water purification for the entire city of Washington.

- B. Association with Senator James McMillan.** In 1906, the reservoir and sand filtration complex were named “McMillan Park” in honor of Senator James McMillan. McMillan was the driving force in the creation and implementation of the 1901 Senate Park Committee report which established a comprehensive plan based on L’Enfant’s 1791 plan for the city of Washington. Now widely known as “The McMillan Plan,” the 1901 Senate Park Commission plan for Washington, D.C. ranks among the most significant urban plans in American history. It called for the completion of the Mall, the articulation of ceremonial boulevards throughout the city, the design of a governmental office complex (today’s Federal Triangle), the establishment of a comprehensive park and recreation system, and the overall beautification of the city. The designation of the reservoir and sand filtration site as a publicly accessible park was a testament to McMillan’s efforts to beautify the nation’s capital by enhancing its system of public open spaces at the turn of the century.
- C. Association with Frederick Law Olmsted Jr. (1870-1957).** In 1906, the Army Corps of Engineers commissioned Frederick Law Olmsted Jr.—a member of the 1901 McMillan Commission—as the landscape architect for the design of McMillan Park. The son of renowned landscape architect Frederick Law Olmsted, Olmsted Jr. was himself one of the preeminent landscape architects in the United States, and a formative figure in American city, suburban and regional planning. He not only helped develop the McMillan Plan but was instrumental in guiding its execution by serving—between 1910 and 1932—on the two federal oversight bodies for planning Washington: the U.S. Commission of Fine Arts and the National Capital Park Planning Commission. As adviser or designer, Olmsted Jr. worked on many prominent Washington landmarks, including the White House grounds, Federal Triangle, Jefferson Memorial, Roosevelt Island, Rock Creek Park and Parkway, and the National Cathedral grounds. In addition, Frederick Law Olmsted Jr. is well known for his extensive work in planning state and regional park systems across the country; for his establishment of the first formal training program in landscape architecture at Harvard University in 1900; and for writing the key language in the 1916 bill that established the National Park Service. For thirty years he advised the National Park Service on issues of management and the conservation of water and scenic resources nationwide. For more than 50 years Olmsted Jr. was a preeminent practitioner and spokesman for landscape architecture and comprehensive planning. He was a founder of the American Society of Landscape Architects and was instrumental in organizing the American City Planning Institute which evolved into the American Planning Association. The McMillan Park site was planned as a distinct component of the McMillan Reservoir. Olmsted’s design provided a unique function as a perimeter pedestrian park through which the public could stroll and visually experience the unusual landscape of the site’s open plains and structures.
- D. Distinctive design and construction as a public works facility and public park.** The McMillan Park Reservoir was a major element of the water system of the District of Columbia, and an urban American engineering resource of great historic, cultural, landscape, planning, engineering, and architectural significance. (see also the Landmark designation decision for McMillan Park Reservoir, August 21, 1991). It is an element of the McMillan Park System which

envisioned a linkage of green open spaces from Rock Creek to Anacostia through the developing suburbs north of the Federal City.

The McMillan Park Reservoir is the result of the collaboration of major figures in the City Beautiful movement who later contributed to the aesthetic and architectural development of Washington. In the 19<sup>th</sup> and early 20<sup>th</sup> century, public utilities were often integrated into a city's built fabric and prominently displayed as evidence of urban progress and accomplishments of design and technology. The McMillan Park Reservoir stands as a prominent example of "public works" of that period. The landscape design by a prominent landscape architect as a means to enhance the utilitarian infrastructure of the District of Columbia's water system represents critical understanding of the importance of public works as a part of the City Beautiful Movement.

Thoughtful reuse of the McMillan Park site can provide its neighborhoods and the city of Washington with critically needed public open space and recreational opportunities<sup>i</sup>, as well as create a nationally significant cultural destination that would benefit the entire city.

The National Association for Olmsted Parks asks that you reject the misguided master plan that will destroy the irreplaceable historic resources of this significant cultural site. We hope you will instead consider creative alternatives that are sympathetic to the unique resources of the McMillan Park site, and honor the legacy of Senator McMillan and the District's visionary 20th century planning.

Thank you for your consideration.

Sincerely,



Iris Gestram  
Executive Director

Attachment: NAOP Letter to The Hon. Kwame Brown, dated March 21, 2012

cc: Steve Calcott, Senior Preservation Planner, DC Historic Preservation Office  
George Clark, Chairman, Committee of 100 on the Federal City  
The Honorable Vincent Gray  
David Maloney, State Historic Preservation Officer  
Phil Mendelson, Chair, Council of the District of Columbia  
Rebecca Miller, Executive Director, DC Preservation League  
Robert Nieweg, Director, Southern Field Office, National Trust for Historic Preservation  
Harriet Tregoning, Director, DC Office of Planning  
Councilmember Tommy Wells  
Friends of McMillan Park

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<sup>i</sup> The Trust for Public Land's recent Park Score study identified the area east of the McMillan site as a neighborhood with "high" park need.



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March 21, 2012

The Hon. Kwame Brown  
Chair, District of Columbia City Council  
John A. Wilson Building  
1350 Pennsylvania Avenue, NW  
Washington, D.C. 20004

Dear Chair Brown,

On behalf of the National Association for Olmsted Parks (NAOP), I am writing to express our concern about plans for development of the historic 25-acre McMillan Reservoir Park.

The creation of McMillan Reservoir Park in 1905 represented significant 20<sup>th</sup> century advancement in the implementation of the Senate Park Commission's plan, also known as the McMillan Plan of 1901-1902. Frederick Law Olmsted Jr., a 20<sup>th</sup>-century landscape architect, environmental planner and seminal figure in American city planning, was the main force in the McMillan Commission's planning and implementation of parks in the District of Columbia. The McMillan Commission's effort sparked a renaissance of Washington, D.C., reviving L'Enfant's concept of the National Mall, revalidating Frederick Law Olmsted Sr.'s design for the U.S. Capitol Grounds, and calling for an "Emerald Necklace" of parks, open space and recreation facilities encircling the city.

The McMillan Plan proposed that the reservoir "be made an important supplement to the park system," as indeed it was, serving as part of an eastern complement to Rock Creek Park on the west side of the city.

The McMillan Sand Filtration Reservoir Park was a resourceful solution to two major civic needs: clean and safe drinking water and a recreational park. During this era in the late 19<sup>th</sup> and early 20<sup>th</sup> century when municipalities sought to reduce the prevalence of infectious typhoid fever, a number of reservoirs and treatment facilities were created. The McMillan Reservoir was not only the largest slow sand filtration plant in the country, but almost certainly the only one co-designed as a park.

The District of Columbia has an outstanding opportunity to take advantage of this unique site by promoting it as a recreation and heritage tourism destination.

Central Park in New York and Cal Anderson Park in Seattle are two well-known landscapes designed by Frederick Law Olmsted, Sr. and the Olmsted Brothers, respectively, where reservoirs and parks were combined.

Shortly after the creation of McMillan Reservoir Park, the Denver Water Administration built the Kassler Filtration Plant, the first slow sand filtration plant

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west of the Mississippi. In 1985, it ceased operations and was turned into the Kassler Education Center, with many of the plant's historical structures preserved. The Thorne Ecological Institute, a science and nature education organization serving children and adults operates at the Kassler Education Center.

McMillan Reservoir Park presents an equally worthy opportunity for recreation, education and heritage tourism for these reasons:

- It is an integral part of the McMillan Plan of Washington and the City Beautiful movement.
- It is a park designed by the founding firm of landscape architecture in the U.S.
- It was designated as a memorial park to Senator McMillan, the Chair of the Park Improvement Commission.
- It is a District of Columbia Historic District and is also eligible for listing on the National Register of Historic Places.
- It is an outstanding example of water treatment engineering, named an American Water Landmark by the American Water Works Association.
- The filtration complex provided clean, safe water to Washingtonians for eighty years and for more than half that time the site provided a significant amount of parkland and open space for enjoyment and recreation.

We have the opportunity to revive the site for the 21<sup>st</sup> century, taking a cue from the thinkers behind the McMillan Plan, who were not only visionary but practical, integrating infrastructure with beautification for the residents of and visitors to Washington:

Washington is growing very rapidly... its parks, like its public buildings, are not to be considered merely in reference to its resident population, but in relation to the millions of citizens from far and near who come to Washington expecting... not merely what is considered 'good enough,' but the very best that is to be had.<sup>1</sup>

The site's design and construction was the product of a historic collaboration of leading 20<sup>th</sup> century civil engineers, urban planners, artists and architects including Frederick Law Olmsted Jr., the principal planner and landscape architect of this unique site. Allen Hazen, the engineer of the filtration plant, worked on the Panama Canal and Chicago Exposition. Herbert Allen, the sculptor of the memorial fountain, also created bronze doors for the Library of Congress; some of his sculptures are held by the National Gallery of Art.

Capitalizing on its location on a topographic rise with views of the Capitol and the Washington Monument, Olmsted Jr. designed a series of plantings including rows of hawthorn trees and hedges, cork trees in the service courts, evergreens around the reservoir and ground cover plants on slopes and the filtration beds. Olmsted advised Allen Hazen on the aesthetic aspects of the siting of water works and spent a significant amount of time onsite supervising grading and planting.

Although Olmsted planned an active recreation program with gym, track, pool and fields, these were never built. However, for several decades, residents used the carriageways, walkways, played ball on the east and north ends of the property and rested and chatted on benches.

After the property was transferred from federal ownership to the District of Columbia, the Council designated it as park, recreation and open space, but later changed its designation to allow mixed-use

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<sup>1</sup> p. 77, Report of the Senate Committee on the District of Columbia on the Improvement of the Park System of the District of Columbia, 1902.

development. An unfortunate consequence of that decision was the city's removal of the remaining Olmsted landscape elements.

Development of this site and removal of the sand filtration structures —rather than preservation and rehabilitation—would result in the permanent loss of a significant public park space that was originally set aside by the McMillan Plan.

As an advocacy organization, NAOP is very interested in this issue. Established in 1980, the National Association for Olmsted Parks advances Olmsted principles and the legacy of irreplaceable parks and landscapes that revitalize communities and enrich people's lives. It is the only national organization solely dedicated to preserving the Olmsted legacy by providing the advocacy, research and outreach needed to protect, restore and maintain these exemplary parks and landscapes, particularly in urban areas.

We strongly believe that the District of Columbia has the responsibility to preserve this historic landscape and make it available to current and future generations of residents and visitors.

We ask that the District of Columbia:

- Recognize that the highest and best use of this nationally significant site is as a public park and potential educational/cultural facility to serve the needs and interests of the surrounding community and visitors.
- Reaffirm the vision of the Senate Park Commission's plan.
- Follow due process and insist that all measures afforded under Section 106 of the Historic Preservation Act and the transfer of title from the federal government to the District in 1987 are upheld.
- Preserve the historic masonry structures of the sand filtration complex.
- Rehabilitate the historic landscape design and restore the McMillan Fountain.
- Fully realize the potential for active recreation opportunities as envisioned by Olmsted.

We urge you to carefully consider the District's development plans for McMillan Reservoir Park.

Sincerely,



Iris Gestram  
Executive Director

cc: The Honorable Vincent Gray  
Councilmember Tommy Wells  
Harriet Tregoning, Director of Office of Planning  
Catherine V. Buell, Chair, Historic Preservation Review Board  
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