

An Endangered American Building



Drawing courtesy Jason Hart, CUBE design + research, LLC, Boston, MA.

The National Park Service plans to remove the historically significant Cyclorama Building at Gettysburg, designed by world-renowned architect Richard Neutra. Preservationists are working world-wide to save the structure.

- The Cyclorama Center at Gettysburg National Military Park was designed by the firm of Neutra & Alexander as part of the Park Service's landmark *Mission 66* program, a billion-dollar postwar government initiative aimed at improving America's national parks with the construction of new facilities.
- As part of *Mission 66*, five parks were selected to host flagship projects designed by prominent private architects:
 - Wright Brothers National Monument, NC
 - Dinosaur National Monument, UT
 - Rocky Mountain National Park, CO
 - Petrified Forest National Park, AZ
 - Gettysburg National Military Park, PA
- The building is among the finest public examples of modern architecture nationwide, retains high integrity, and is eligible for listing in the National Register of Historic Places. It is a rare example of architect Richard Neutra's institutional designs and is significant within the range of federal buildings commissioned during America's prosperous mid-twentieth century boom years.
- Citing a desire for new facilities, the Park Service recently opened a new visitor's center at Gettysburg. The Park Service has stopped maintaining the Cyclorama Center, and plans to remove the building.
- U.S. District Court for the District of Columbia, Report and Recommendation in Civil Action, Recent Past Preservation Network, et al., Plaintiffs, v. John Latschar, et al., Defendants (abridged, dated 2009), found that

“Defendants failed to meet the procedural obligations required of federal agencies under NEPA. The Park Service did not properly evaluate the site-specific environmental impacts of demolition of the Cyclorama Center and did not properly consider alternatives to demolition. These failures amount to both an action unlawfully withheld and an action that is arbitrary, capricious, and otherwise not in accordance with the law.”
- Despite national and worldwide support for preservation of the Cyclorama Building, and a concurrent rise of public interest in the mid century modern architecture of the United States, the National Park Service has continually refused to re-consider its decade-old decision to remove the building.

Support for Preservation

- ***From the World Monuments Fund, 2006 Listing for 100 Most Endangered***

Preservationists have labored for nearly a decade to save this building, one of the first "visitor centers" ever built in the national park system and a landmark in the work of famed architect Richard Neutra. The National Park Service, the primary public agency charged with protecting significant American sites, has so far refused to preserve the structure, one recognized by the U.S. National Register of Historic Places for "its exceptional historic and architectural significance." The Cyclorama Center remains on a short list for demolition; the Gettysburg National Battlefield Museum Foundation, a private partner of the National Park Service and headed by Robert Wilburn, plans to raze the structure.

- ***From J. Carter Brown, Chairman, The Commission of Fine Arts, 1999***

"The theme-park concept of falsely recreating a landscape that can never be put back to 1863 is an unconscionable intellectual travesty... Every conceivable effort should be made to protect and restore this exceptional building."

- ***American Institute of Architects (AIA), Historic Resources Committee, Resolution to Preserve the Cyclorama Building, 16 March 2000***

"[We view] with alarm the pending demolition of the Visitor Center and Cyclorama Building at Gettysburg...it was, and is one of the most important buildings constructed by the NPS during the 20th century....This Committee...cannot condone the demolition of this nationally important 20th century icon, designed by an internationally acclaimed 20th century architect, and urge that the decision to demolish the building be reconsidered and reversed."

- ***Sir Norman Foster, Architect, Foster and Partners architects and designers, London, England, to the National Register of Historic Places, 20 October 2000***

"The legacy of modern architecture by architects of the stature of Richard Neutra is critical beyond your shores....Once gone it can never be returned....Here in Europe we look to you for inspiration and leadership in more matters than heritage issues. It gives me no satisfaction to tell you that if Neutra's building were here in the European Union it would have been listed and preserved decades ago."

- ***Susan Eisenhower, Co-Chairman, White House Millennium Council to Secretary of the Interior, 23 January 2000***

"Are we willing to tear this monument down simply because it was built by our generation and therefore is somehow disposable? If left standing, I have no doubt that our grandchildren will see the significance of Neutra's expression, just as we appreciate today the impulse that prompted the construction of other battlefield monuments in times past."

History

Mission 66 in the National Parks

- *Mission 66* was a federally-sponsored program to improve deteriorated and dangerous conditions in the national parks, the result of a massive visitor boom after World War II.
- *Mission 66* projects began in 1956 and ended in 1966. During those ten years, more than \$1 billion was spent on infrastructure and other improvements in the parks.
- *Mission 66* planners and architects developed the concept of the "visitor center" to streamline and standardize visitor services at federal parks nationwide. Approximately 100 new visitor centers were built during the ten-year program.
- *Mission 66* visitor centers have been recognized by the National Register of Historic Places as significant historic structures and as important representatives of a new building type.



PROGRESS AND MODERNIZATION

Mission 66 represented the largest program for park improvements ever initiated by the National Park Service and is one of the most significant federal undertakings of the twentieth century. In 1955, responding to mounting political and public pressure, Conrad Wirth, Director of the National Park Service, proposed a ten-year building improvement program to regenerate and modernize the national parks. New accommodations were desperately needed by 1966, the fiftieth anniversary of the Park Service, to serve an expected eighty million annual visitors. With the goal-oriented ideology of the project in mind and the proposed date of completion set, the committee chose the name "Mission 66" for the program.

By the end of the billion-dollar program, the parks and the public enjoyed a wealth of modern services, including 584 new comfort stations, 221 administrative buildings, 36 service buildings, 1,239 units for employee housing, and more than 100 new visitor centers. The Park Service also acquired 78 additional park units under the program, an increase of almost forty percent over the 180 parks held in 1956. New parks authorized during Mission 66 included the Chesapeake & Ohio Canal National Historical Park in Maryland and West Virginia; Frederick Douglass National Historic Site in Washington, D.C.; Canyonlands National Park in Utah; and the Edison National Historic Site in New Jersey.

Several of the most impressive building projects associated with the Park Service today resulted from Mission 66 efforts. The Gateway Arch, designed by architect Eero Saarinen in 1949 for the Jefferson National Expansion Memorial National Historic Site in St. Louis, remained unfinished until Mission 66 funding permitted its completion. Another significant Mission 66 project is the Blue Ridge Parkway, a 469-mile scenic road running through Shenandoah National Park in Virginia to the Great Smoky Mountains National Park in North Carolina and Tennessee. Only about one-third of the total planned distance had been finished when work stopped in the 1940s. Construction began again under Mission 66, which contributed "better than 75 per cent of the cost" for the route.

The scenic Colonial Parkway connecting Jamestown to Williamsburg in Virginia was completed, as was a seven-mile extension of the George Washington Memorial Parkway from Spout Run to the Capital Beltway in Washington, D.C.

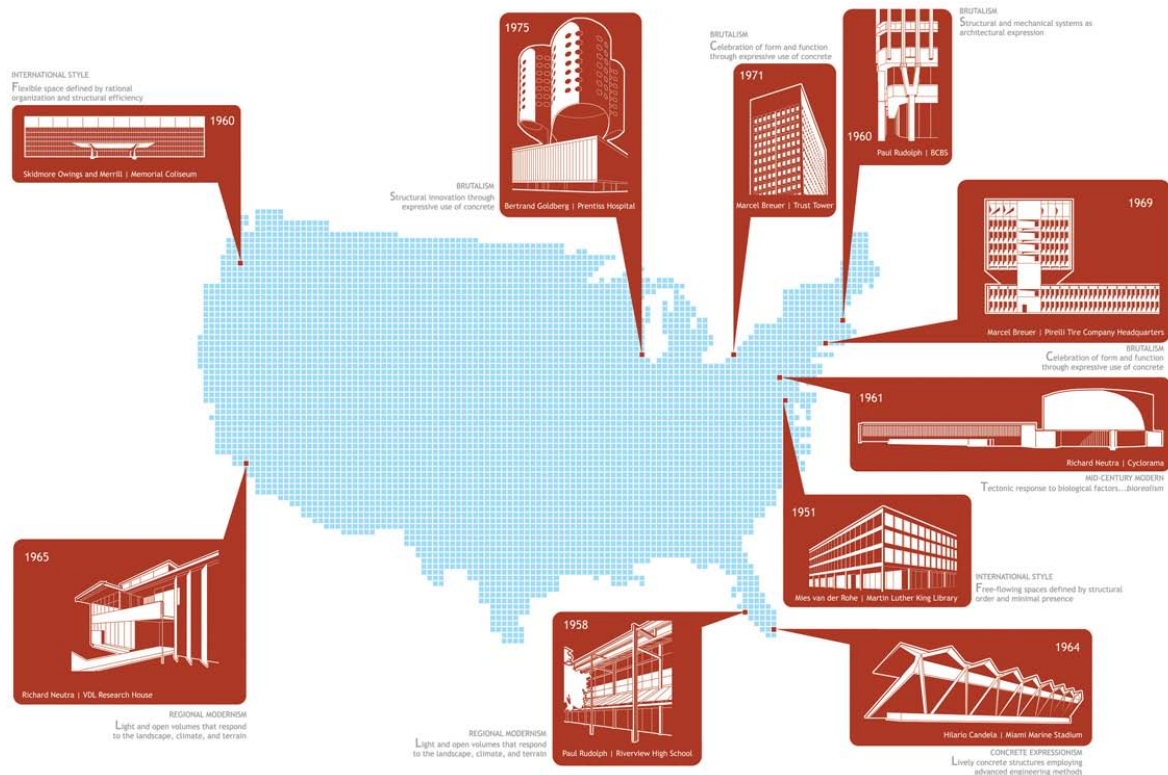
The Visitor Centers

The buildings of Mission 66 arose during the prosperous years of the mid-1950s. Post World War II wealth and optimism led enormous numbers of Americans to pack their cars for visits to the national parks. Once they arrived, tourists found small, rustic-style nature centers and museums built by the Civilian Conservation Corps in the 1930s, often containing less than 500-square feet of space and no interior bathrooms. The Park Service, unprepared for the onslaught, lacked a systematic method and enough on-site rangers to communicate to visitors the importance of preserving the geysers, forests, and wildlife. Tourists unwittingly (and some purposefully) vandalized and abused resources at Yellowstone, the Grand Canyon, and other parks. By the early 1950s the crisis had grown to overwhelming proportions. In 1955, the Director of the National Park Service, Conrad Wirth, envisioned a plan to improve conditions at the parks by developing modern conveniences and implementing a system-wide method of educating the visiting public. A key element in the new plan, named "Mission 66" was the introduction of the now ubiquitous "visitor center."

The visitor center, a familiar building type constructed for use by private corporations and governmental organizations alike, was created during the National Park Service Mission 66 program. Park Service planners, architects, and landscape architects devised the concept to incorporate visitor facilities, interpretive programs, and administrative offices in one structure. In a departure from the rustic-style buildings constructed by the Civilian Conservation Corps (CCC), Mission 66 designers embraced a contemporary structural form for the new centers. As the construction program continued, the distinctive and prominently located buildings became emblematic of the massive improvement project and demonstrated the new commitment of the Park Service to interpretation of park resources and accommodation of visitors and personnel.

Contrasting with the reserved residential character of the CCC administrative buildings, the Mission 66 visitor centers conveyed a bold commercial appearance to entice and attract visitors. Prominently sited on major entry roads, the buildings became an instantly recognized feature of the parks, advertising public service, orientation information, and other amenities. Modern materials and design characterized the new park architecture, with open interior spaces and expansive areas of glazing to provide views of nearby natural and cultural resources. The strikingly contemporary buildings in the parks symbolized, for the visiting public and the agency itself, the achievements of the Mission 66 program and a new era in the National Park Service.

Text courtesy Chris Madrid French, www.mission66.com



The Cyclorama Building (at far right, center) is one of a number of significant American modern buildings whose future is not secure.

A number of the structures in this image are already lost, including the Riverview High School, by Paul Rudolph and Pirelli Tire Company Headquarters by Marcel Breuer. Miami Marine Stadium by Hilario Candela, was nominated to the National Trust for Historic Preservation's 11 Most Endangered List and was recently saved from demolition. The mayor of Portland reversed city plans to demolish the Memorial Coliseum by Skidmore Owings and Merrill, and the sons of Richard Neutra (Raymond and Dion) are working with building steward Cal Poly Pomona and a number of allied organizations to protect and promote the Neutra home and studio in Los Angeles, known as the VDL Research House.

Drawing courtesy Jason Hart of CUBE design + research, LLC, of Boston, MA.

Background Materials

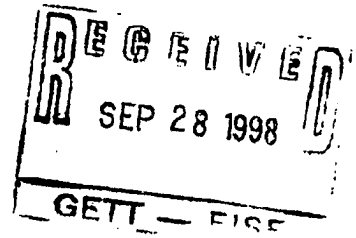
- Determination of Eligibility Notification for the Gettysburg Cyclorama Building, for listing on the National Register of Historic Places. Note four other Mission 66 visitor centers are listed here also, including the Neutra-designed Painted Desert Community at Petrified Forest National Park in Arizona, dated 24 September 1998.
- Letter from James V. Hansen, Chairman, Subcommittee on National Parks and Public Lands, to National Park Service, dated 7 May 1999.
- Letter from Susan Eisenhower to Secretary of the Interior, 23 January 2000.
- Letter from internationally noted architect Frank Gehry, in support of preservation, to National Park Service, dated 13 November 2000.
- List of 100 Most Endangered Sites 2006, World Monuments Fund, demonstrating international recognition of Gettysburg Cyclorama Building, its significance, and its endangered status.
- U.S. District Court for the District of Columbia, Report and Recommendation in Civil Action, Recent Past Preservation Network, et al., Plaintiffs, v. John Latschar, et al., Defendants (abridged, dated 2009).

Photographs, history, letters of support and more documents can be downloaded from www.mission66.com/cyclorama

For more information, contact: Yolita Rausche, 216-469-0615,
yrausche@sbcglobal.net

DETERMINATION OF ELIGIBILITY NOTIFICATION

National Register of Historic Places
National Park Service



Name of Property: Cyclorama Building

Location: Gettysburg National Military Park

State: Pennsylvania

Request submitted by: Advisory Council on Historic Preservation

Date received: 03/30/98

Additional information received 3/98 - 9/98

Opinion of the State Historic Preservation Officer:

☐ Eligible

☒ Not Eligible

☐ No Response

☐ Need More Information

Comments:

The Secretary of the Interior has determined that this property is:

☒ Eligible

Applicable criteria: A,C

☐ Not Eligible

Comments:

See attached comments.

☐ Documentation insufficient

(Please see accompanying sheet explaining additional materials required)

Carol D. Shull
Keeper of the National Register

Date: September 24, 1998

DETERMINATION OF ELIGIBILITY NOTIFICATION

National Register of Historic Places
National Park Service

Cyclorama Building

Gettysburg National Military Park, PENNSYLVANIA

The Cyclorama Building is eligible for the National Register of Historic Places for its exceptional historic and architectural significance under criteria A and C.

Constructed in 1958 as part of the National Park Service's massive and influential Mission 66 program, the Cyclorama Building is one of only five of the newly conceived building type, the Visitor Center, designed for the National Park System by noted, world class architects.

The Mission 66 program, a nearly billion dollar, ten year master planning and construction effort, was an exceptionally important undertaking in the history of conservation and the architecture of the National Park System. Designed to meet dramatically increased park visitation following World War II, and to coincide with the 50th anniversary of the National Park Service in 1966, Mission 66 had a profound impact on the physical infrastructure of the National Parks. Envisioned as a bold and forward-looking initiative, Mission 66 adopted modernism as its creed.

Reflecting a much more visitor-oriented management operation, the Mission 66 program conceived an innovative new building type--the Visitor Center--to centralize the management of visitors and interpretation of park resources. Strategically placed at centers of primary interest in parks and functioning as the hub of interpretive programs, visitor centers were collaborative designs of architects, landscape architects and museum specialists. Often, this collaboration involved professionals both within and outside the Service. Of the approximately 100 Visitor Centers either built or converted from existing buildings (79 newly constructed, 21 refurbished) the National Park Service selected five parks to receive the services of acclaimed architects:

Gettysburg Visitor Center (Cyclorama Building) at Gettysburg National Military Park, Gettysburg, PA; Richard Neutra & Robert Alexander, Los Angeles, CA, architects, 1958.

Visitor Center, Wright Brothers National Memorial, Cape Hatteras National Seashore, Manteo, NC; Mitchell, Cunningham & Giurgola, architects, 1958.
Listed in the National Register as a contributing resource in the Wright Brothers National Memorial nomination, 2/26/98.

Quarry Visitor Center, Dinosaur National Monument, vicinity of Jensen, UT; Anshen and Allen, San Francisco, CA, architects, 1956-57. Listed in the National Register as a component of the Dinosaur National Monument MRA, 12/19/86.

Headquarters Building (Beaver Meadows Visitor Center/Administration Building), Rocky Mountain National Park, Estes Park, CO; Taliesin Associated Architects, 1965-66. Listed in the National Register as a component of the Rocky Mountain Park Utility Area (Rocky Mountain National Park MRA) as of 3/18/82.

Painted Desert Community (including the Visitor Center), Petrified Forest National (Monument) Park, AZ; Richard Neutra & Robert Alexander, architects, 1959-61.

From his earlier work designing innovative International Style residences in California to his later commissions on major public buildings such as the Cyclorama Building, the U.S. Embassy in Karachi, Pakistan, and the Los Angeles Hall of Records, Neutra is recognized as a master architect of Modern design by scholars in numerous publications. The recipient of many design awards and citations, in 1977 Neutra was posthumously honored by the American Institute of Architects, which awarded him its Gold Medal for lifetime achievement.

While it is undebatable that Neutra has been highly and widely acclaimed for his earlier residential designs for some time, it is not unusual for the significance of his later work to be gaining attention with the passage of time. Scholars are now placing his later works too into the context of modern architecture of the period. As such, the Cyclorama Building is a rare example of Neutra's institutional design on the east coast and one of his very few Federal commissions. While not currently analyzed in detail in publications, it is one of a very few of his later works often mentioned or illustrated. Similarly, the evolving scholarship on the history and impact of the Mission 66 program on design in the parks clearly indicates the seminal importance of the visitor center as a building type and of the examples designed by master Modern architects mentioned above, including the Cyclorama Building.

JAMES V. HANSEN
107 DISTRICT, UTAH

COMMITTEES:
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May 7, 1999

Robert Stanton, Director
National Park Service
1849 C Street N.W.
Washington, D.C. 20040

Dear Director Stanton:

I would like to thank the National Park Service for responding to the twenty questions I submitted dealing with Gettysburg National Military Park. Although some of the questions were adequately responded to, I still find that many others were not. As such, I feel compelled to respond to the Park Service response (dated April 2, 1999).

Questions #1, #2, and #3 are all related as to how supportive the public is of this proposal and that half of the Gettysburg residents are in support. Yet, the flip side is equally valid, i.e., half of the Gettysburg residents are opposed, as is the Borough, and the many other Civil War groups and associations. The point is that there is a great deal of clear and unmistakable opposition to this and the Park Service needs to step back and take another look at the proposal and the GMP. It is agreed that any project probably will not get 100% support, but having the Borough of Gettysburg and many of its residents in adamant opposition should send a clear message to the Park Service that there is something very wrong with both the proposal and the process used to get where you are today. Instead of being divisive, the Park Service needs to be forging partnerships with those most affected by their actions - the local residents and the community. Moving ahead with this project in its current form will certainly exacerbate an already deteriorating situation with the local government at Gettysburg.

Furthermore, it must be mentioned that the Letter of Intent the Park Service signed with the Borough of Gettysburg is not part of the GMP; therefore, its mention in your response is irrelevant. In no manner should this Letter of Intent be construed as endorsement or support for the proposed visitor center and GMP.

Clearly, arrogant and self-serving statements such as those made by Superintendent Latschar that "there's nothing in our mission statement that says we're supposed to look out for businesses surrounding the park" are needless and unproductive in anyone's opinion. The Park Service's attempt in trying to justify this callous and contemptible comment is convincing no one, especially me. Statements such as these made by Superintendent Latschar are justly simply uncalled for and unprofessional.

Questions #4, 5, and 6 regard the GMP, DCP, and the EIS and EA which accompany these documents. Instead of fully answering the questions, the Park Service chose to restate their position. The fact is, in terms of timing, the DCP EA, which had different alternatives from the Kinsley proposal, was withdrawn, then the Kinsley proposal was selected, and finally the DEIS was issued. All the alternatives in the DEIS had the Kinsley proposal as a central component, except the no action alternative. Without debate, the Park Service had chosen the Kinsley proposal before the GMP EIS. Without debate, all the action alternatives mandated the Kinsley proposal. NEPA states (as a matter of fact, twice) that EISs shall not serve to rationalize or justify decisions already made (40 CFR §§ 1502.2(g) and 1502.5). Unarguably, the Park Service selected the Kinsley visitor center before the issuance of the DEIS. Clearly, this is a NEPA violation and is also counter to Park Service planning policy. For example, Director's Order 2 essentially states that general management planning (which the GMP is) will be the first phase in decision making followed by decisions for site-specific actions (which the Kinsley proposal is). Like NEPA, the Park Service has clearly violated their own policy guidelines in moving forward with and in defense of this project.

A primary reason the NEPA regulations prohibit the use of a predetermined decision in developing an EIS is so that a full range of alternatives can be developed and so that the public has a choice in providing meaningful input. This full range of alternatives is, in fact, the heart of any EIS (40 CFR § 1502.14). By selecting the Kinsley proposal beforehand and making it part of all the action alternatives, the Park Service has effectively violated NEPA once again and has prohibited the public from commenting on other reasonable alternatives that could have been developed and, in fact, were developed in the DCP EA.

The Park Service states that the "findings" of the DCP were brought into the GMP EIS because it better served the public interest. First of all, I am not aware of any "findings" of the DCP or the EA. If there are findings please send them to me. Secondly, it is impossible to simply "bring in" or apply public comment on alternatives to a document (the EIS) which has completely different alternatives from the alternatives the public commented on (the DCP EA).

The Park Service also responds that the public has had ample opportunity to comment on the EA, the Kinsley proposal, and EIS. However, one document, the EA, was withdrawn. Details on another, the Kinsley proposal, were not forthcoming from the Park Service and only released via FOIA requests after the proposal was already selected. And the other, the EIS, really only gave the public one choice to comment on - the Kinsley proposal. Taken together, the way the Park Service proceeded makes a mockery of NEPA, public comment, and public concern.

In Question #7, the Park Service states that their policies provide for the construction of this visitor facility within the park. However, the 1990 law states otherwise - that the lands within the boundaries are to be protected. Thus, it seems as the contention of the Park Service is that policy supercedes law. I certainly do not believe this to be the case, especially when coupled with another Park Service policy that states if adequate facilities exist to serve the park visitors' needs for commercial services outside park boundaries, then these facilities will not be developed within the park. In the first case the Park Service uses policy to trump the law, then turn right around and disregard its own policy. This is not consistent application of Park Service policy and seems to me to possibly be illegal.

In the response to Question #9, the Park Service, in regard to Section 110 of the NHPA, states that federal agencies must use, to the maximum extent feasible, historic properties. I am not sure how the Park Service can use the historic Cyclorama building "to the maximum extent feasible" and simultaneously plan for its demolition. At the very least, this is very poor planning on the part of the Park Service and, at the most, would seem to be a violation of the law.

Regarding Question #10, it was the Park Service, no one else, which stated at the Senate hearings that Mr. Kinsley, when accepted as the cooperator, would get the construction contract. The response also states that the Board of Directors of the the Gettysburg National Battlefield Museum Foundation will select the construction company - not Mr. Kinsley. I can hardly see a difference between Mr. Kinsley, the contractor, and Mr. Kinsley, who is the president of the Board of Directors of the Gettysburg National Battlefield Museum Foundation. The Park Service is playing word games and not being fully honest.

The Park Service chooses yet again not to come clean in its response to Question # 12. The question was - will there be commercial activity in the proposed visitor center or not? The obvious answer to anyone but the Park Service is "yes" - there will be some commercial activity at the proposed visitor center. And, instead of stating the full truth that the food service being proposed at the Kinsley visitors center will seat the largest number of people compared to any other food service establishment in Gettysburg, the Park Service states that the food service is only "5%" of the space of the proposed facility. More of the same pattern of not being completely forthright.

With Question #14, the Park Service again skirts the truth. Regardless of whether the Peer Review Panel was specifically asked for their opinions on the appropriateness of siting a new visitors center facility on the LeVan Tract, the fact is that many of them voiced this opinion anyway. The Park Service ignored this in answering this question. In fact, at least three of the reviewers, Snell, Pfanz, and Rollins, have considerable concerns with constructing the Kinsley proposal on the LeVan Tract. Of course, the Park Service never admits that these experts are opposed to constructing the Kinsley visitors center on the LeVan Tract.

The response to Question #15, yet again, follows the Park Service pattern of avoiding answers which are completely truthful. The Park Service responds that, indeed, an estimate was conducted in regard to rehabilitating the Cyclorama Building insofar as only correcting health, life-safety, and accessibility deficiencies. However, the estimate, conducted in 1993, did much more than this. That estimate was a package for the rehabilitation of the Cyclorama Center which, among other things, would remove and replace the roof, remove the asbestos ceiling (which was the cause of closing the building down recently), patching the cracks and treating the masonry material, and included a redesign of the building's interior for greater efficiency of visitor use and for better design of exhibit space. This was to be done for a net cost of \$2.7 million. Of course, the Park Service never mentions any of this.

Interestingly, the estimate proposal also states that "[i]n the last 30 years, no major rehab of the building's exterior has been undertaken, and significant masonry, roof, and cleaning/painting work is needed" and also that "[f]urther delay on mitigation of study and corrective action will lead to accelerated structural problems as interior steel rusts, cracks widen, and the threat of serious asbestos contamination increases". Obviously, serious problems existed at the Cyclorama Building since at least

1993, yet the Park Service never included rehabilitation of this building in their service-wide construction priority list, nor did they bother to tell the Subcommittee any of these problems.

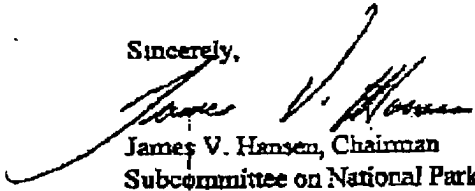
Of last note, recent information has surfaced that the Park Service has received a copy of a letter from J. Carter Brown, chairman of the U.S. Commission of Fine Arts, indicating his strong opposition to the demolition of the Cyclorama Building. In that letter (dated March 17, 1999), Mr. Brown concludes "[e]very conceivable effort should be made to protect and restore this exceptional building." Although nearly two months old, this letter was never publicized or made known by the Park Service. Yet they were quick to send to my office letters of support for the GMP and Kinsley proposal by some noted historians. J. Carter Brown's sentiments were echoed on March 23rd by Terence Riley, Chief Curator for the Museum of Modern Art. Purposely withholding comments which oppose this plan, especially by people of prestige, is simply unfair to the public who deserve an unbiased assessment of the Cyclorama Building by federal agencies. It is these sorts of tactics used by the Park Service at Gettysburg which has plagued this project from the beginning.

The simple and sufficient answer to Question #20 would have been "no", a specific economic analysis was not done for the Borough of Gettysburg. The Park Service responds further that they were not asked to do this analysis and that this analysis would not have provided additional useful information. The fact is that the Borough of Gettysburg is so tightly tied to the Military Park it is difficult to separate the two, especially economically. Concerns of the businesses in the Borough were voiced by the business community to the Park Service time and time and again, yet the Park Service paid little heed. I was not aware that a community necessarily had "to ask" for a separate economic analysis. However, it should be obvious to anyone to include a more detailed economic analysis for communities which have such close ties to any park like the relationship exhibited by the Borough and the Military Park. Contrary to the opinion of the Park Service, I believe that a Borough specific economic analysis would provide useful information.

All in all I am not pleased with the answers given by the Park Service to most of the questions that were asked relative to the oversight hearing I held on Gettysburg National Military Park. In fact, most of the answers were incomplete and seemed to be written purposely to dance around a fair and honest answer. As a result, my opinion has not changed and I continue to strongly suggest and highly recommend to the Park Service that they either withdraw the current EIS or supplement the existing one in order to address significant deficiencies and inadequacies.

Thank you for your attention to this letter.

Sincerely,



James V. Hansen, Chairman
Subcommittee on National Parks
and Public Lands

4601 North Park Avenue
Apartment 615
Chevy Chase, MD 20815

The Honorable Bruce Babbitt
Secretary of the Interior
Washington DC

January 23, 2000

Dear Mr. Secretary,

I have not been involved in the issue of what is to happen to the Visitors' Center or the Cyclorama in Gettysburg, but recently I have had reason to give it some thought. On visiting the Cyclorama last month, I was moved by how effective it is to see that magnificent 19th century painting of the battle and then to go outside and look at precisely the same view. I am convinced that if and when the painting is moved it will not have the same sense of connection to the landscape and to the events that occurred near that site.

As a long standing and dedicated preservationist, I am writing to ask you to think again about demolishing the Neutra building in which the Cyclorama is located. Perhaps the office wings could be removed, but the central cylinder, in which the painting hangs, is significant in its own right. As part of "Vision 66," a great deal of thought was given to the location of this building and it was also designed by one of our country's foremost modern architects. As such it is a monument to the Battle of Gettysburg in its own right.

We, as a community, would never consider leveling the Pennsylvania monument or other large renderings, which also obstruct the view of the battle, as the combatants would have seen it. Are we willing to tear this monument down simply because it was built by our generation and therefore is somehow disposable? If left standing, I have no doubt that our grandchildren will see the significance of Neutra's expression, just as we appreciate today the impulse that prompted the construction of other battlefield monuments in times past. Furthermore, the Neutra building—the only one of his work on the East Coast of the United States—was dedicated by the Supreme Commander of Allied Forces Europe during WWII, and former President of the United States. We certainly recognize the importance of historical linkage when considering the Peace Light Memorial, dedicated by Franklin Roosevelt. Since it is also located on battlefield territory would we consider pulling it down?

I certainly endorse moving the Visitors' Center, but I would ask you to re-think what it really means to tear down Neutra's building—our generation's (and the Park

Service's) monument to the heroic struggle at Gettysburg. Current older monuments, as well as town development, assure that the hallowed battleground of Gettysburg can never be completely returned to its civil war state. For that reason, I oppose discriminating, indeed singling out, this specific monument. With proper planting, it could be less of an imposition on the scenery than many of the older monuments that will remain.

Thank you for your consideration. With respectful best wishes.

Sincerely,

Susan Eisenhower

CC: Richard Moe

FRANK O. GEHRY & ASSOCIATES, INC.

November 13, 2000

Ms. Carol Shull
Keeper
National Register of Historic Places
National Park Service
1849 C Street, N.W., NC400
Washington, D.C. 20240

FAX: 202-343-1244


Dear Ms. Shull:

I urge the National Park System Advisory Board to heed the advice of its own expert committee, supported by leading architects from around the world, and designate Richard Neutra's Cyclorama Building at Gettysburg a National Historic Landmark.

Architecture is a small piece of the human equation, but for those of us who practice it, we believe in its potential to make a difference, to enlighten and to enrich the human experience, and to penetrate the barriers of misunderstanding. The Cyclorama building at Gettysburg, designed by one of the greatest architects of the twentieth century, embodies the transcendent qualities of fine art in its composition of elements, and its selection of forms, scale, and materials. Surely a building of this stature, a pre-eminent modern contribution to the commemorative history of the Civil War, merits landmark designation.

Richard Neutra envisioned the Cyclorama Building as a site for solemn contemplation of Lincoln's Gettysburg Address and a frame for the events that inspired it. His building reflects the highest ideals of his own time, and deserves the highest appreciation of ours.

Sincerely,



Frank Gehry
Architect

WORLD MONUMENTS WATCH

100 MOST ENDANGERED SITES 2006

- AFGHANISTAN**
Haji Piyada Mosque, Balkh
- ANTARCTICA**
Sir Ernest Shackleton's Expedition Hut, Antarctica
- AUSTRALIA**
Dampier Rock Art Complex,
Dampier, Burrup Peninsula
- BANGLADESH**
Sonargaon-Panam City, Sonargaon
- BOSNIA/HERZEGOVINA**
Mehmed-Pasha Sokolovic Bridge, Visegrad
- BRAZIL**
Convent of San Francisco and Historic Olinda,
Olinda, Pernambuco
- CAMEROON**
Bafut Palace, Bafut
- CAPE VERDE**
Tarrafal Concentration Camp, Tarrafal
- CHILE**
Tulor Village, Antofagasta
Cerro Pintados, Tarapaca
- CHINA**
Cockcrow Post Town, Cockcrow Post, Huailai
Lu Mansion, Dong Yang
Qikou Town, Shanxi Province
Stone Towers of Southwest China, Various
Tianshui Traditional Houses, Tianshui,
Qincheng, Gansu
Tuanshan Historical Village, Yunnan Province
- CROATIA**
Novi Dvori Castle, Zapresic
Saint Blaise Church, Dubrovnik
- CUBA**
Finca Vigia (Hemingway's House),
San Francisco de Paula
- EGYPT**
Sabil Ruqayya Duda, Cairo
Tarabay al-Sharif, Cairo
West Bank, Luxor
- EL SALVADOR**
San Miguel Arcangel & Santa Cruz de Roma,
Panchimalco & Huizucar
- ERITREA**
Asmara Historic City Center and Theater, Asmara
Kidane-Mehret Church, Senafe
Massawa Historic Town, Massawa
- FINLAND**
Helsinki-Malmi Airport, Helsinki
- GEORGIA**
Jvari Monastery, Mtshekta
- GREECE**
Hellike Archaeological Site, Rizomylos & Elafi, Achaia
- GUATEMALA**
Naranjo, El Peten
- INDIA**
Dalhousie Square, Calcutta
Dhangkar Gompa, Himachal Pradesh
Guru Lhakhang and Sumda Chung Temples,
Sumda Chung
Watson's Hotel, Mumbai
- INDONESIA**
Omo Hada, Nias Island
- IRAN**
Bam, Bam
- IRAQ**
Cultural Heritage Sites, Country-wide
- IRELAND**
Wonderful Barn, Kildare
- ITALY**
Academy of Hadrian's Villa, Tivoli
Cimitero Acattolico, Rome
Civita di Bagnoregio, Bagnoregio
Murgia dei Trulli, Murgia dei Trulli
Portici Royal Palace, Naples
Santa Maria in Stelle Hypogeum, Verona
Temple of Portunus, Rome
- KENYA**
Mtwapa Heritage Site, Kilifi, Mtwapa
- LAOS**
Chom Phet Cultural Landscape, Luang Prabang
- LATVIA**
Riga Cathedral, Riga
- LEBANON**
Chehabi Citadel, Hasbaya
International Fairground at Tripoli, Tripoli
- MACEDONIA**
Treskavec Monastery and Church, Treskavec
- MAURITANIA**
Chinguetti Mosque, Chinguetti
- MEXICO**
Chalcatzingo, Morelos
Mexico City Historic Center, Mexico City
Pimeria Alta Missions, Sonora
San Juan Bautista Cuauhtinchan, Puebla
San Nicolas Obispo, Morelia, Michoacan
- NEPAL**
Patan Royal Palace Complex, Patan
- NIGERIA**
Benin City Earthworks, Edo State
- NORWAY**
Sandviken Bay, Bergen
- PAKISTAN**
Mian Nasir Mohamed Graveyard, Dadu District
Thatta Monuments, Thatta
- PALESTINIAN TERRITORIES**
Tell Balatah (Shechem or Ancient Nablus),
Nablus, West Bank
- PANAMA**
Panama Canal Area, Panama Canal area
- PERU**
Cajamarquilla, Lima
Presbitero Maestro Cemetery, Lima
Quinta Heeren, Lima
Revash Funerary Complex, Santo Tomas de Quillay
Tucume Archaeological Site, Lambayeque
- POLAND**
Jerusalem Hospital of the Teutonic Order, Malborka
Mausoleum of Karol Scheibler, Lodz
- PORTUGAL**
Teatro Capitolio, Lisbon
- ROMANIA**
Oradea Fortress, Oradea
- RUSSIA**
Melnikov's House Studio, Moscow
Narkomfin Building, Moscow
Semenovskoe-Otrada, Moscow Region
- SAMOA**
Pulemelei Mound, Palauli, Letolo Plantation
- SERBIA/MONTENEGRO**
Prizren Historic Center, Prizren
Subotica Synagogue, Subotica
- SIERRE LEONE**
Old Fourah Bay College, Freetown
- SLOVAKIA**
Lednicke-Rovne Historical Park, Lednicke-Rovne
- SOUTH AFRICA**
Richtersveld Cultural Landscape,
Northern Cape Province
- SPAIN**
Segovia Aqueduct, Segovia
- SUDAN**
Suakin, Suakin Island
- SYRIA**
Amrit Archaeological Site, Amrit
Shayzar Castle, Shayzar
Tell Mozan (Ancient Urkesh)
- TURKEY**
Aphrodisias, Aphrodisias
Little Hagia Sophia, Istanbul
- UNITED KINGDOM**
Saint Mary's Stow Church, Stow, Lincolnshire
Saint Vincent's Street Church, Glasgow, Scotland
- UNITED STATES**
2 Columbus Circle, New York, New York
Bluegrass Cultural Landscape of Kentucky,
Central Kentucky
Cyclorama Center, Gettysburg
Dutch Reformed Church, Newbergh, New York
Ellis Island Baggage and Dormitory Building,
New York, New York
Ennis Brown House, Los Angeles, California
Hanging Flume, Montrose County, Colorado
Mount Lebanon Shaker Village, New Lebanon, NY
- VENEZUELA**
La Guaira Historic City, Vargas

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**RECENT PAST PRESERVATION
NETWORK, *et al.*,**

Plaintiffs,

v.

JOHN LATSCHAR, *et al.*,

Defendants.

Civil Action No. 06-2077 (TFH)(AK)

REPORT AND RECOMMENDATION¹

Pending before the Court are Plaintiffs' Motion for Summary Judgment [28], Defendants' Cross-Motion for Summary Judgment [30], and Plaintiffs' Reply in Support of Motion for Summary Judgment and Opposition to Defendants' Cross-Motion for Summary Judgment [33]. Having reviewed the submissions and oral arguments of the parties, the Administrative Record, and the relevant case law, the Court issues the following Report and Recommendation.

I. Background

A. Introduction

This case concerns whether the National Park Service's ("Park Service" or "NPS") decision to demolish the Gettysburg Cyclorama Center ("Cyclorama Center"), an historic building located at Gettysburg National Military Park ("GNMP") and eligible for listing in the National Register of Historic Places, complied with procedural requirements set forth in the

¹ United States District Judge Thomas F. Hogan referred this matter to the undersigned for proposed findings of fact and recommendations on the dispositions of the cross motions for summary judgment pursuant to Local Civil Rule 72.3. (*See* Referral Order [41]; 9/22/08 Minute Order)

level consideration of the environmental impacts of alternatives to demolition. (See AR 1605-07.) Finally, Defendants' contention that Plaintiffs waived the argument with respect to the consideration of alternatives because did not raise the possibility of relocating the Cyclorama Center during the public comment period on the GMP/EIS is of no moment. A party is not required to propose alternatives to a purported implementation program when such an implementation action was never evaluated or approved in a programmatic EIS. See *NRDC*, 6060 F.2d at 1270-71 (plaintiff not obligated to raise implementation-stage concerns during programmatic-stage NEPA review).

C. Conclusions on NEPA Claims

For the foregoing reasons, the Court finds that Defendants failed to meet the procedural obligations required of federal agencies under NEPA. The Park Service did not properly evaluate the site-specific environmental impacts of demolition of the Cyclorama Center and did not properly consider alternatives to demolition. These failures amount to both an action unlawfully withheld and an action that is arbitrary, capricious, and otherwise not in accordance with the law. 5. U.S.C. §§ 706(1), 706(2)(A).

This does not mean, however, that the Park Service may never demolish the Cyclorama Center. NEPA does not mandate any particular result. *Robertson*, 490 U.S. at 351. While in the Court's view there may be value in the Park Service working with Plaintiffs to undertake a mutually agreed upon relocation of the Cyclorama Center, that is not for the Court to decide. The Park Service need only comply with the procedural mandates of NEPA before it may proceed with its intended course of action. Therefore, the Court recommends that Plaintiffs' Motion for Summary Judgment on their NEPA claims be granted, and Defendants' Motion for

Summary Judgment on those claims be denied. The Court further recommends that Defendants be ordered to undertake a full implementation-level and site-specific environmental analysis on the demolition of the Cyclorama Center and non-demolition alternatives before any implementing action is taken on the Center.

V. NHPA

Plaintiffs remaining claim under NHPA comes to a quick resolution. Plaintiff claims that under NHPA § 110(a)(2) the Park Service was required to maintain a preservation program for the protection of historic properties that included the Cyclorama Center, and that the Park Service does not have such a program. Plaintiffs' main argument in support of this claim is that the Park Service, when faced with a FOIA request to provide information relating to a preservation program that applies to the Cyclorama Center, the Park Service replied that there "are no records responsive to your request." (*See* Pls.' Mot. at 33). Defendants respond that the Park Service maintains an agency wide preservation program that is in accordance NHPA and set forth in various agency management policies. (*See* Defs.' Mot. at 41-43.) Defendants further contend that the scope of Plaintiffs' FOIA request was simply too narrow in that it requested information specifically about a preservation program for the Cyclorama Center and as such information about the agency-wide preservation program was not responsive. (*See id.* at 42.)

While the Court is sympathetic to Plaintiffs' complaint regarding the FOIA response that "Defendants' explanation is simply too cute to be convincing," this case does not include FOIA claims. Plaintiffs acknowledged this fact at oral argument. Because Plaintiffs have failed to point to evidence in the record that the Park Service does not have an agency-wide preservation program and because the Park Service has demonstrated that an agency-wide program for