



Executive Director's Recommendation

Commission Meeting: July 12, 2012

PROJECT Vietnam Veterans Memorial Visitor Center Lincoln Memorial Washington, DC	NCPC FILE NUMBER 6597
	NCPC MAP FILE NUMBER 1.43(73.10)43574
SUBMITTED BY United States Department of the Interior National Park Service	APPLICANT'S REQUEST Preliminary approval of site and building plans
REVIEW AUTHORITY Approval Public Law 108-126 and 40 U.S.C. 8905	PROPOSED ACTION Approve as requested
	ACTION ITEM TYPE Staff Presentation

PROJECT SUMMARY

The National Park Service, on behalf of the Vietnam Veterans Memorial Fund, has submitted preliminary site and building plans for the Vietnam Veterans Memorial Visitor Center. The Visitor Center will be located on the northern grounds of the Lincoln Memorial, a site approved conditionally by the Commission on August 3, 2006. The site is currently available as an active and passive recreation space and contains one softball field and a National Park Service concession facility. The Vietnam Veterans Memorial Visitor Center is authorized by Public Law 108-126 which states the facility will be built underground.

KEY INFORMATION

- Visitor Center site was approved by the Commission in 2006 is located on the Lincoln Memorial Grounds
 - The authorizing legislation for the Visitor Center stated that it shall be built underground
 - Pursuant to the Commemorative Works Act, staffs of the National Capital Planning Commission (NCPC) and the Commission of Fine Arts developed design guidelines for the Visitor Center. These guidelines were incorporated as mitigation in the Finding of No Significant Impact issued by NCPC at the time of site selection in 2006.
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RECOMMENDATION

The Commission:

Approves the preliminary site and building plans for the Vietnam Veterans Memorial Visitor Center on the Lincoln Memorial Grounds.

Notes that the applicant has addressed the Commission's comments provided in June 2009.

Finds that the design of the Visitor Center is consistent with the design guidelines included in the Finding of No Significant Impact.

Notes that as a condition of the Section 106 MOA, additional consultation on the design of Visitor Center will address the courtyard opening, the skylight over the entrance, the development of the landscape treatment of the site, and night lighting of the Visitor Center prior to the Commission's final approval.

PROJECT REVIEW TIMELINE

Previous actions	August 2006 – Commission approved site for Vietnam Veterans Memorial Visitor Center December 2007 – Commission provided comments on concept design June 2009 – Commission provided comments on revised concept design
Remaining actions (anticipated)	– Final approval of site and building plans

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07/03/2012

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I. PROJECT DESCRIPTION

Site

The 5.2 acre site for the Vietnam Veterans Memorial Visitor Center is located on the grounds of the Lincoln Memorial at the west end of the National Mall. It is situated north of the Lincoln Memorial across Lincoln Memorial Circle and west of the Vietnam Veterans Memorial across Henry Bacon Drive, and is bounded by Constitution Avenue, Henry Bacon Drive, Lincoln Memorial Circle, and 23rd

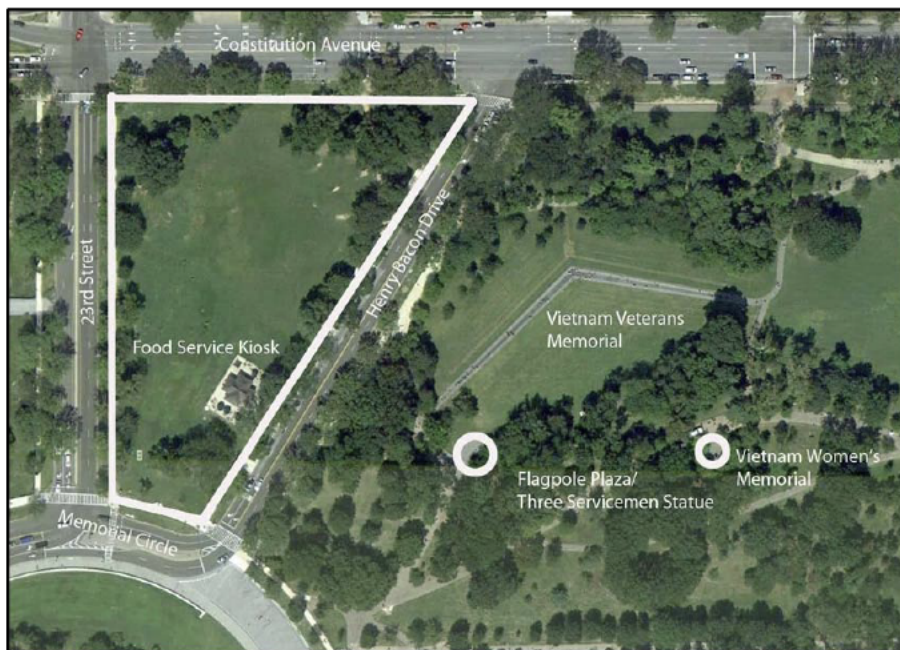


Figure 1: Project Location

Street, NW. The site is an open grass panel surrounded on its perimeter by mature elm trees that are part of the site's historic landscape. The site currently has one softball field, an NPS concession kiosk, and grass areas for active and passive recreation. The site is relatively flat, but is approximately three feet lower in its center than at its edges along the surrounding streets. The applicant proposes to use the central portion of the site to construct the Vietnam Veterans Memorial Visitor Center (Visitor Center) of approximately 37,000 gross square feet.

Background

Title I of Public Law 108-126 authorizes the Vietnam Veterans Memorial Fund to construct a Vietnam Veterans Memorial Visitor Center "at or near the Vietnam Veterans Memorial on federal land in the District of Columbia, or its environs." The legislation requires that the Visitor Center be limited in size to the minimum necessary to educate the public about the Vietnam Veterans Memorial and the Vietnam War, and requires that the Visitor Center be constructed underground. The authorizing legislation also requires NPS to "develop a written interpretive plan for the visitor center in accordance with National Park Service policy."

Title II of Public Law 108-126 amends the Commemorative Works Act (CWA) to establish a Reserve area within the great cross-axis of the Mall where the siting of new commemorative works is prohibited. However, Title I states that this restriction does not apply to the Visitor Center and that the Visitor Center may locate within the Reserve. Title I also states that NCPC

and the U.S. Commission of Fine Arts (CFA) have approval of the Center and that final approval of the Visitor Center shall not be withheld. Title II amends U.S.C. 40 § 8905(b) of the Commemorative Works Act to state that NCPC and CFA may develop site specific criteria or guidelines for commemorative works that are mutually agreed upon. NCPC and CFA adopted joint design guidelines for the design of the Visitor Center, and these guidelines were subsequently incorporated as mitigation in NCPC's Finding of No Significant Impact (FONSI) issued at the time of site selection in 2006.

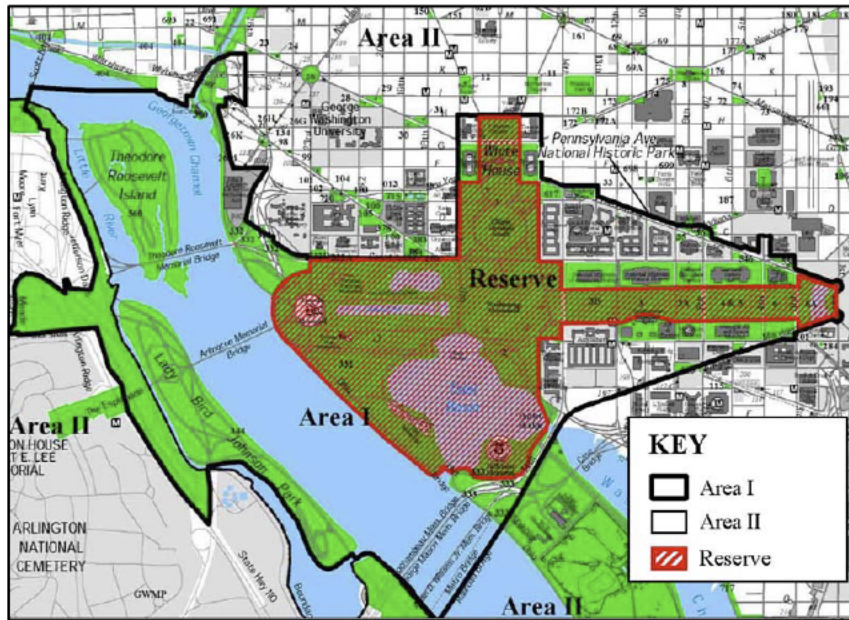


Figure 2: Commemorative Works Act Memorial Zones



Figure 3: Site of the Vietnam Veterans Memorial Visitor Center on the Lincoln Memorial Grounds

The Commission approved the site for the Vietnam Veterans Memorial Visitor Center on August 3, 2006 conditioned upon the NPS implementation of mitigation measures necessary to reduce the otherwise significant impacts of the site selection outlined in the Executive Director's Finding of No Significant Impact (FONSI). Both the FONSI and the Commission Action included the design guidelines developed by NCPC and CFA staffs. In June 2007, the NPS presented three alternative concept designs to NCPC during an information presentation. In October 2007, CFA approved the concept design with comments and conditions. In December 2007, the Commission commented on the concept design and indicated that while the design met some of the design guidelines, it did not meet others and the scale and visibility of the Visitor Center needed to be reduced. The Commission noted that while the Visitor Center was designed as an underground facility, the proposal included a system of linear ramps that would need to be constructed as well as linear skylights that intruded into the landscape.

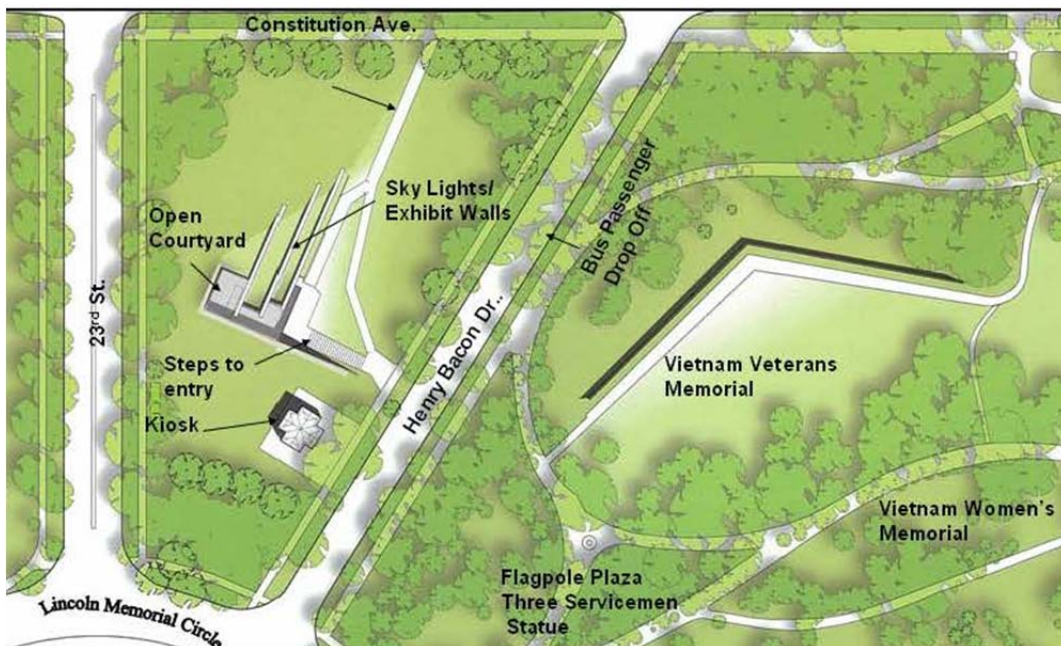


Figure 4: Concept Design Review – December 2007

In June 2009, the Commission commented on a revised concept design and found that while improvements had been made since the December 2007 concept design review, additional modifications were required to satisfy the design guidelines. The concept design retained a linear walkway from Constitution Avenue as well as a system of skylights that interrupted the landscape. The Commission requested the following modifications: 1) reduce the scale of the building openings in order to reduce the visibility of the Visitor Center from the Lincoln Memorial and surrounding sidewalks; 2) reduce the visibility of the sunken entrance; 3) increase the area on the site available for multi-purpose recreation; and 4) design the Visitor Center so that a complex system of guardrails is not needed.

The Commission advised the applicant to: 1) eliminate the proposed walk from Constitution Avenue and associated berms so that the Visitor Center was less visible from Constitution Avenue and Henry Bacon Drive; 2) eliminate the skylights to minimize the Center's intrusion on the landscape and to allow for multi-recreational use on the site; 3) reduce the size of the open courtyard and the length of needed guardrails to minimize the visibility from the Lincoln Memorial.

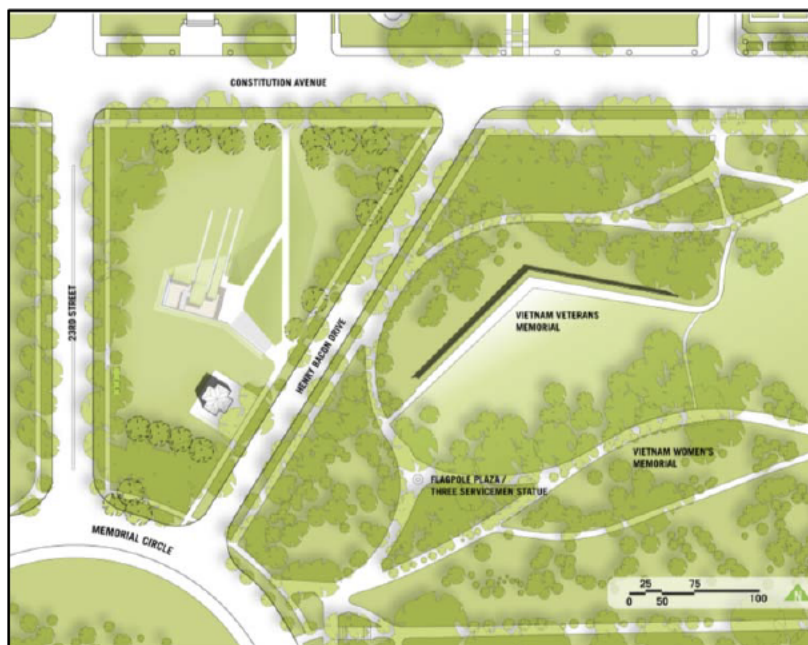


Figure 5: Revised Concept Design - June 2009

Proposal

The basic layout of the Visitor Center has not changed since the design was reviewed by the Commission in June 2009, but visible elements have been modified to improve conformance with NCPC/CFA joint design guidelines and in response to the Commission's June 2009 comments. Modifications also reflect comments received during the environmental review process and recommendations made by CFA, NCPC, the District of Columbia State Historic

Preservation Officer, and other consulting parties. Below is a summary of major design refinements since the Commission reviewed the Visitor Center in 2009:

1. The exterior courtyard has been partially covered with a planted roof so that less of the courtyard opening is visible from the surrounding sites. The project maintains a gradual rise in the grade (approximately 3'6" above existing levels) and the "ha-ha" condition that was previously proposed in order to shield the main opening to the courtyard below and the surrounding railing.
2. A "horizontal rail" condition was designed along the edge of the planted roof and at the edge of the retaining wall along the entry stair. The concept of this "horizontal rail" is one which prevents people from approaching the edge of the roof, thereby protecting them from falls, while maintaining a horizontal and visually unobtrusive configuration.
3. The long linear skylights that were placed above the exhibit cases have been eliminated and the maximum possibly uninterrupted grass area for passive recreation has been allocated.
4. The ramp from Constitution Avenue to the entry has been eliminated, thereby minimizing the impact of the Visitor Center on the overall site.
5. The approach ramp from Henry Bacon Drive to the entry has been reconfigured to be more compatible with the gently curving paths of the surrounding area. A mound has been added to the middle of the approach ramp to provide additional screening of the building entry.

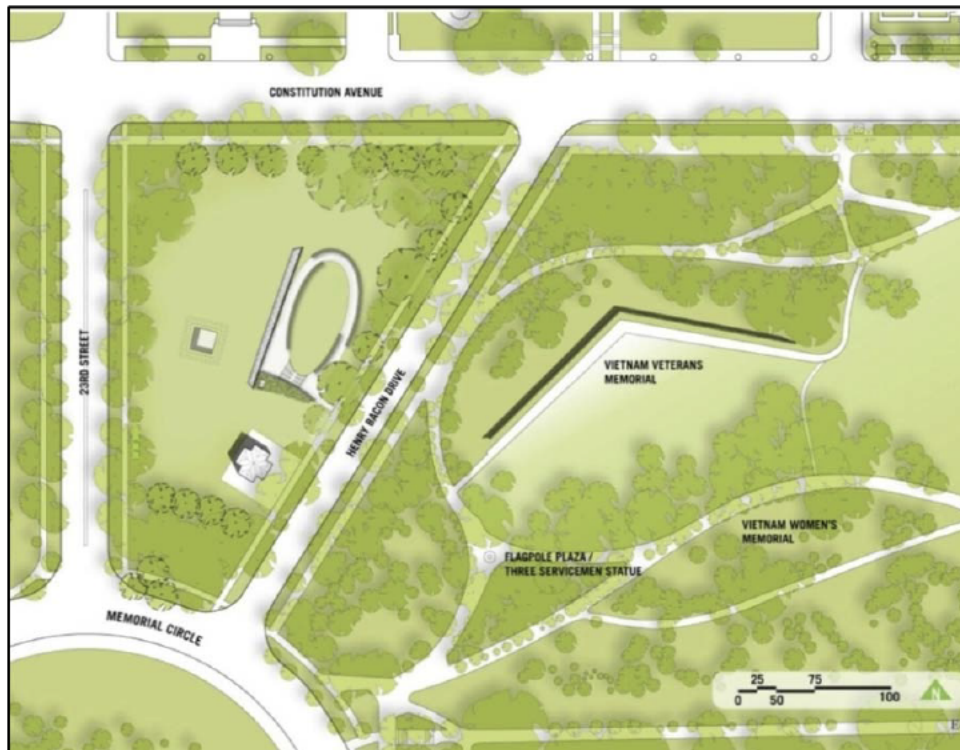


Figure 6: July 2012 site plan of the Vietnam Visitors Memorial Visitor Center

The intent of the design of the Visitor Center is to minimize its visibility while welcoming visitors and supporting the Vietnam Veterans Memorial experience. The experience of visiting the Visitor Center is intended to be secondary to visiting the Vietnam Veterans Memorial. The two-level structure will house exhibit space, a bookstore, restrooms, and lobby areas. The architecture and exhibits are designed to be as integrated as possible so that visitors are enveloped within a cohesive environment. The applicant indicates that the building and content are planned to be unified into a single and simple concept of layered transparent walls. Exhibit themes are organized into the following layers: "Making the Names Visible, The Wall Collection, and The History Timeline."

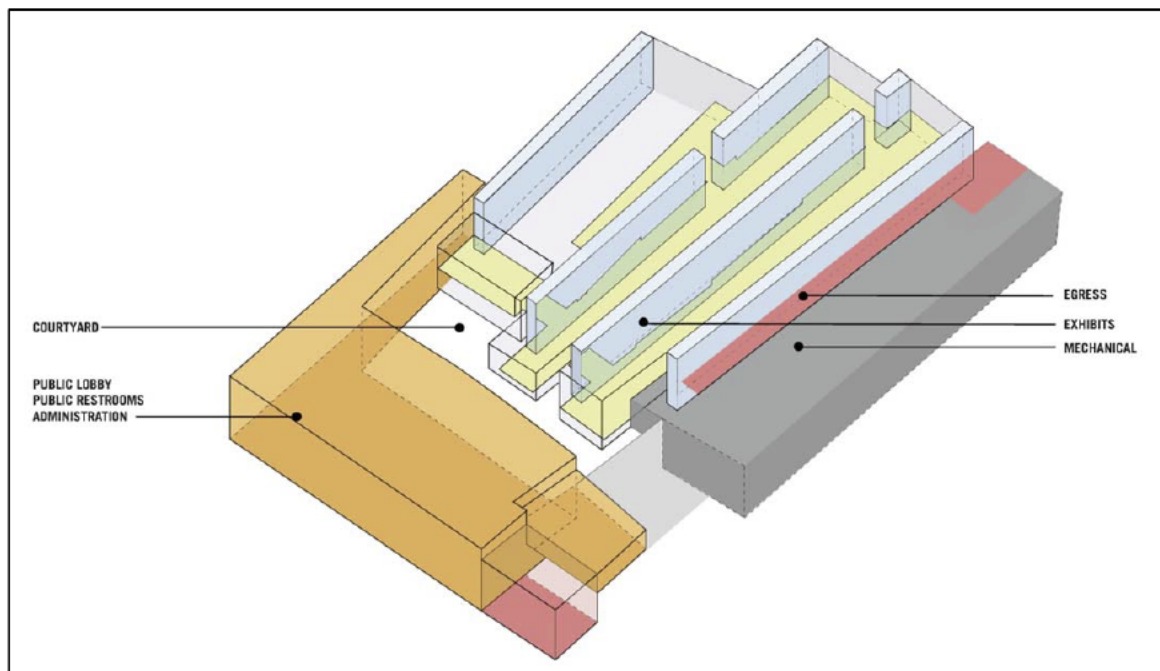


Figure 7: Building Parti

In order to build the underground facility, the grade of the site will be raised with berms by approximately 3'6" so that the center of the site will be approximately 22'6" above mean sea level (AMSL). The elevation north of the Visitor Center will continue to be approximately 19 feet AMSL, while the grade south of the building will continue to be approximately 20.5 feet AMSL. A central feature of the Visitor Center is a courtyard that will be partially covered by a green roof. The courtyard opening will be approximately 600-square feet, a reduction from June 2009 when the opening was approximately 800 square feet. Another skylight, approximately 96 square feet, will be located over the entry vestibule and will provide daylight to the lobby.

Visitors will use a curved path located directly off the sidewalk along Henry Bacon Drive to gain access to the entrance of the structure. Along with the curved path, stairs next to a curvilinear

retaining wall will lead visitors to the below-grade entry. The curved path surrounds an elliptical green area and stone seat walls with recessed lighting will border a portion of the elliptical green area.



Figure 8: Axonometric view of the Vietnam Veterans Memorial Visitor Center



Figure 9: View towards Vietnam Veterans Memorial Visitor Center from Henry Bacon Drive

The horizontal rail condition along the entry stair and edge of the green roof has been designed in two different variations. Along the entry stair, a low ground cover will be planted in a wide

zone along the edge to prevent people from walking in this area. At the edge of the green roof, a cantilevered structure supports an area of unwalkable infill consisting of metal frames and tension wires at four inches on center. This design is intended to keep people away from the edge as well as protect anyone from falling should they go beyond the planted area of the roof.

The design of the Visitor Center will raise the grade of the site by 3'6" in order to accommodate the curved approach ramp. In addition, the curved ramp is less intrusive to the landscape than the ramps proposed in previous designs. The entryway to the Visitor Center will be at 7' and the slope of the curved ramp is gradual. By raising the grade and changing the orientation of the ramp, the impact on the landscape will be minimized.

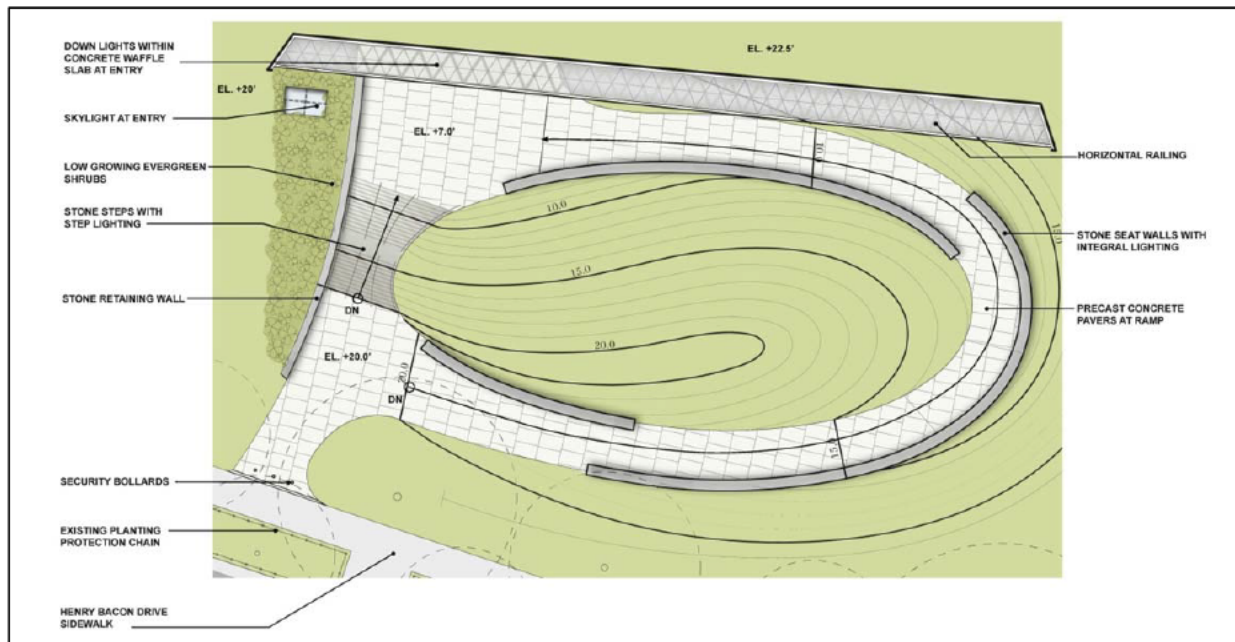


Figure 10: Partial site plan at entry

In addition, the design incorporates a “ha-ha” condition to shield the main opening in the lawn created by the courtyard. The ha-ha condition consists of a low concrete curb and wall to separate the open lawn from the courtyard opening. An oxidized stainless steel guardrail will be installed on top of the low wall. This ha-ha detail is picture below.

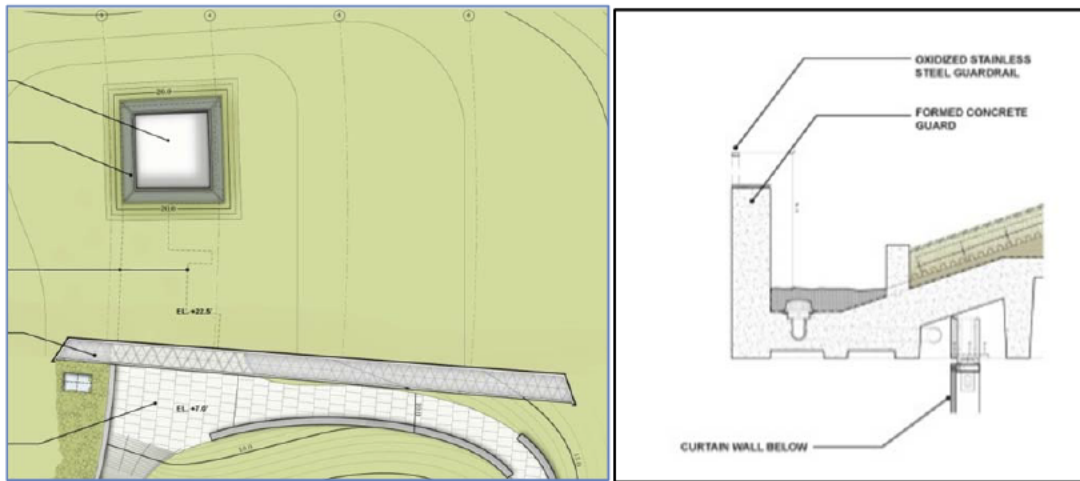


Figure 11: Ha-ha condition at the courtyard opening

In order to minimize the visual impacts of the Visitor Center on the historic landscape and reduce the need for visible mechanical equipment, the building has been designed around a central courtyard. In addition, a geothermal well system will provide the building's heating and cooling needs. The courtyard and use of geothermal technology minimizes the need for air intake grilles along the surface and eliminates the need for a cooling tower which will lower the noise generated by the building.



Figure 12: Section perspective at courtyard

The landscape design for the Visitor Center maintains most of the trees surrounding the perimeter of the site and incorporates recommendations from the Lincoln Memorial Cultural Landscape Report. Landscape rehabilitation will reestablish, on two sides of Lincoln Circle (north and south), the intent of the original implemented historic planting plan for the Lincoln

Memorial and Grounds. Non-historic trees and shrubs will be removed and replaced according to the historic planting plans in the CLR.

Project Analysis/Conformance

Executive Summary

NCPC staff acknowledges the significance of this project and the challenge of designing an underground facility at this historically significant and sensitive site on the National Mall. In 2003, Congress defined the National Mall as a “completed civic work of art”. The Mall’s spatial layout, circulation pattern, landscape elements, memorials and buildings together create the historic place revered by Americans. The challenge is to achieve a design that balances the creation of an underground Visitor Center with respect for the National Mall. The Commission adopted the design guidelines to protect this nationally significant place during design development of the project and the design guidelines are required mitigation for site selection under NEPA.

Overall, the modifications made since the Commission last reviewed the project in June 2009 have improved the project and brought it into conformance with the design guidelines. The Visitor Center has been designed with respect for the historic character of the National Mall and surrounding memorials and monuments. The design is sensitive to the context of the Vietnam Veterans Memorial and will enhance the contemplative experience of the Memorial. Design modifications made have reduced the impact of the Visitor Center to the landscape and minimized views of the Visitor Center from the surrounding sidewalks and memorials. By incorporating a curved entry ramp that surrounds an elliptical green, the visibility of the sunken entrance from the surrounding streets has been minimized. The horizontal rail system has eliminated the need for vertical guardrails and minimized the visibility of the Visitor Center from the Lincoln Memorial and the surrounding streets. In addition, by minimizing the number of skylights and grade changes, multi-purpose recreational uses can continue on the site. Finally, the applicant has committed to a lighting plan that will respect the existing hierarchy established by the lighting at the Lincoln Memorial and only lighting that is necessary for life safety, security, and maintenance will be provided.

Analysis

The following section analyzes the design of the Visitor Center against the 14 design guidelines and one additional requirement, all of which are required mitigation by the Commission action for site selection on August 3, 2006. After each design guideline, staff has provided an analysis against the guideline. At the end of this section, staff provides its recommendations for Commission action on the preliminary design of the Visitor Center.

Design Guideline #1

The Visitor Center will be constructed underground as required by the authorizing legislation for the project with no portion of the building or related building elements visible from any portion of the Lincoln Memorial steps and podium, from Constitution Avenue, and from within the axial view sheds of 23rd Street, NW and Henry Bacon Drive, NW.

The Visitor Center has been designed as an underground facility and the building is as inconspicuous as possible. Minimal or very few portions of the Visitor Center are visible from the Lincoln Memorial steps and podium. In response to the Commission's comments, the applicant has eliminated the ramp from Constitution Avenue thereby minimizing the impact that the Visitor Center will have on the landscape and allowing for the site to continue to be used for multi-purpose recreation. In addition, by raising the grade of the site and the design of a green roof to cover a portion of the courtyard, the Visitor Center will only be minimally visible from the intersection of Constitution Avenue and 23rd Street. While a small portion of the Visitor Center will be visible from Henry Bacon Drive, its size has been minimized and does not dominate the view shed.



Figure 13: View of the Visitor Center from the Lincoln Memorial



Figure 14: View of the Visitor Center from Constitution Avenue and 23rd Street NW

Design Guideline #2

The Visitor Center's entrance will be only minimally visible from the Vietnam Veterans Memorial to satisfy the project's purpose and need, but in accordance with the authorizing legislation will not interfere with or encroach upon the Vietnam Veterans Memorial.

The Visitor Center will be minimally visible from the Vietnam Veterans Memorial. In addition to the distance between the Memorial and the Visitor Center, by placing the facility underground, it will be virtually impossible to see the Visitor Center from the Vietnam Veterans Memorial. Only the top of the horizontal rail along the edge of the green roof will be visible from the Vietnam Veterans Memorial. Views of the Visitor Center will be obscured by foliage, the traffic on Henry Bacon Drive, and the bus drop off.

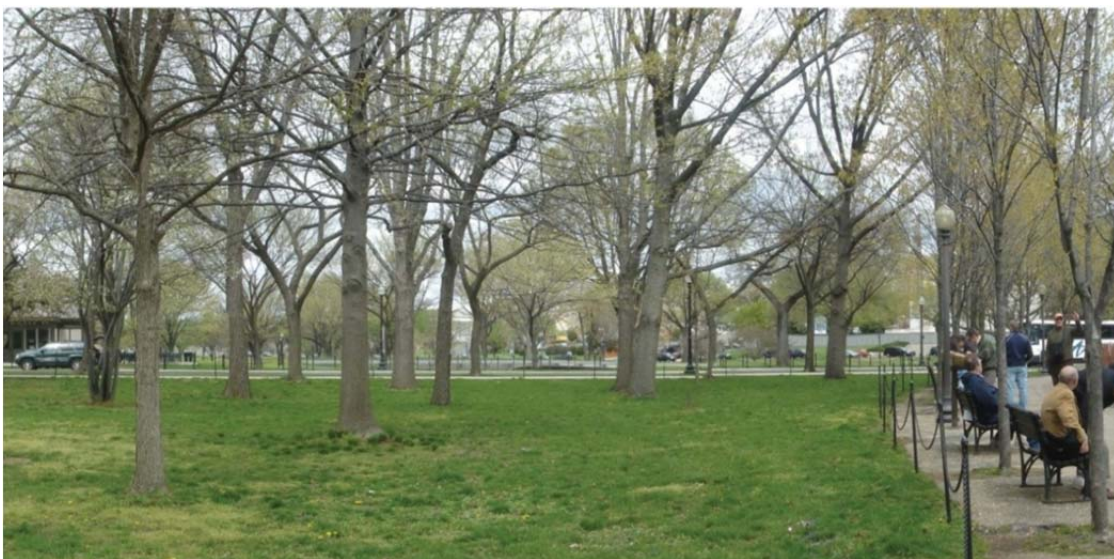


Figure 15: View of the Visitor Center from the Vietnam Veterans Memorial

Design Guideline #3

To maintain the character of the historic landscape, the Visitors Center's design concept will be based on maintaining the existing grade, and any new slopes will be gradual. The project will raise the existing site grade only to allow for an accessible entry ramp.

The design of the Visitor Center will raise the grade of the site by 3'6" in order to accommodate the curved approach ramp. The curved ramp will be less intrusive to the landscape than the ramps proposed in previous designs. The entryway to the Visitor Center will be at an elevation of 7' and the slope of the curved ramp is gradual in order to descend from the top of the ramp at an elevation of 20' AMSL. By raising the grade and modifying the design of the ramp from a linear configuration to curved, the impact on the landscape has been minimized.

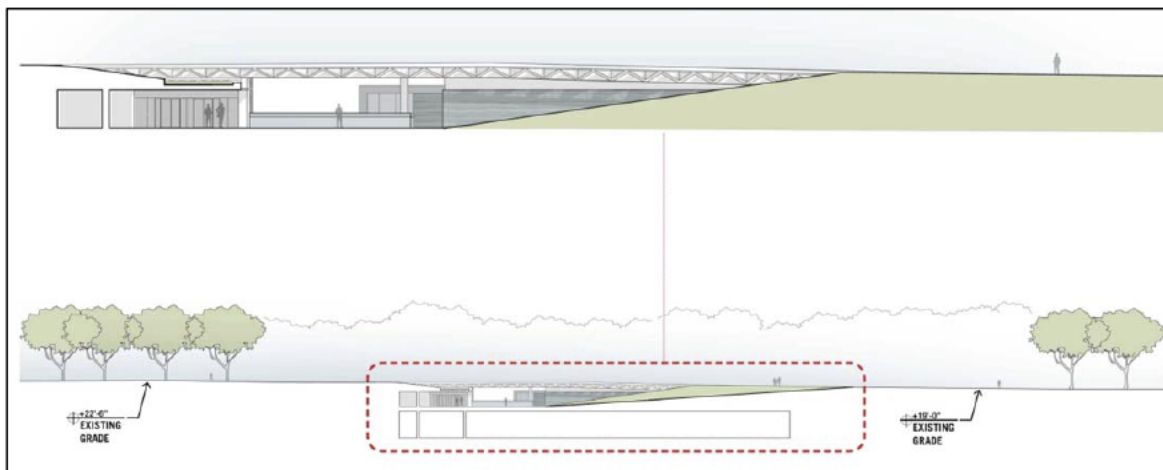


Figure 16: Proposed grade change

Design Guideline #4

The Visitor Center will be designed such that light emanating from the Center's interior will not be visible from any portion of the Lincoln Memorial, from Constitution Avenue, and from the Vietnam Veterans Memorial so as not to interfere with or encroach upon the Lincoln Memorial or the Vietnam Veterans Memorial.

Afterhours, the interior of the Visitor Center will have limited illumination to what is required for life safety, security, and maintenance. Any lighting that is visible from the Lincoln Memorial, the Vietnam Veterans Memorial, or Constitution Avenue will be indirect or ambient lighting that will be less noticeable than the lighting from the surrounding street lamps, vehicular traffic, and the adjacent buildings. Light emanating from the Visitor Center's interior will not interfere or encroach on the surrounding memorials and streets due to both the low level of illumination that will be provided and the indirect nature of the lighting. In addition, as stipulated in the Section 106 Memorandum of Agreement, as the lighting design is refined, additional consultation is anticipated.

Design Guideline #5

The Visitor Center will not intrude into the landscape. No protrusions, such as skylights, monitors, light wells, or sunken areaways, will be visible from the sidewalk surrounding the site.

The skylights that extended into the landscape in previous designs for the Visitor Center have been eliminated and the Visitor Center has been oriented on the site with minimal intrusions in the landscape. By eliminating the skylights as well as the walk from Constitution Avenue, the number of disruptions in the landscape has been reduced to the courtyard opening and the curved entry ramp. The mound at the center of the approach ramp will provide screening of the building entry and will minimize the visual impact on the landscape. Though the courtyard opening may be visible from portions of the surrounding sidewalk, it has been designed to be as minimally intrusive as possible. Overall, design modifications made since the Commission reviewed the project in June 2009 have reduced the impact of the Visitor Center to the landscape and minimized views of the Visitor Center from the surrounding sidewalks.

Design Guideline #6

The Visitor Center's site lighting for public safety will not interfere with or encroach upon views to and from the Lincoln Memorial and the Vietnam Veterans Memorial.

Lighting for the Visitor Center will be restricted to the minimum necessary for building code and lighting safety standards. By limiting the illumination levels to the minimum necessary, the Visitor Center will not interfere with or encroach upon views to and from the surrounding memorials on the National Mall. Lighting will be provided under the seat walls to illuminate the curved entry path at night and down lights will be installed under the horizontal rail at the waffle slab to illuminate the area adjacent to the entry. An average illumination level of one footcandle is required at the exit passageway. The lighting fixtures will light the path, but the light source will be obscured by the built in seat wall and the lamps will be shielded from illuminating the night sky. The lighting plan has been designed in deference to the surrounding context and will continue to be developed to respect the hierarchy of lighting in Washington in the final design. The applicant is working with the U.S. Park Police to determine whether lighting around the ha-ha condition is needed for safety and security. Additional consultation through the Section 106 process is anticipated to follow the Commission's preliminary approval and additional details on lighting will be provided prior to final approval.

Design Guideline #7

The Visitor Center's design will provide only the paved area necessary for visitors to enter and exit the building and which will also provide service access. The design will not include additional paved area for gathering space or queuing.

The amount of paving that will be used for the Visitor Center has been reduced since June 2009 by the elimination of the walk from Constitution Avenue. The paving from Henry Bacon Drive to the entrance is the minimum necessary for the expected number of visitors. No additional paving area for gathering space or queuing is proposed and the design incorporates seat walls along the curved entry path for visitors to use while waiting to enter the center. Paving will

constitute approximate 8,400 square feet, divided between the entry plaza (approximately 2,600 square feet) and the entry walkway (5,800 square feet).

Design Guideline #8

The project will not include new vehicle parking areas.

No new parking areas are proposed for the Visitor Center.

Design Guideline #9

The Visitor Center will have a single entrance for both visitors and service.

The Visitor Center has one entrance for visitors and service.

Design Guideline #10

The Visitor Center's associated pedestrian street crossing points will be designed to address traffic impacts effectively and to protect pedestrian safety.

No new crosswalks will be added with the construction of the Visitor Center. Existing crosswalks are located at signaled intersections including at the traffic light on Henry Bacon Drive and Lincoln Circle. Most pedestrians will use this crosswalk to access the Visitor Center. Two other pedestrian crossing points are located across Constitution Avenue at the intersections of 22nd and 23rd Streets. NPS has indicated that after the Visitor Center is open, they will evaluate whether a midblock crossing from the Vietnam Veterans Memorial on Henry Bacon Drive is needed. If NPS determines a mid-block, signalized crosswalk is needed, NPS will return to the Commission with their proposal.

Design Guideline #11

The Visitor Center will be constructed only on the portion of the site that lies outside of the critical root zone of existing elm trees. The applicant will develop a tree protection plan to protect and preserve the trees both during and after construction in accordance with standard design and construction procedures.

The Visitor Center will be constructed outside of the critical root zone of the existing elm trees. The applicant has developed a tree protection plan to preserve the existing trees on the site. Two designated construction entrances have been identified, one off of 23rd Street and one off of Henry Bacon Drive.



Figure 17: Critical root zone

Design Guideline #12

The project will place new landscaping on the site in accordance with the National Park Service's Cultural Landscape Report (CLR) for the Lincoln Memorial referenced in the Environmental Assessment. NPS will maintain the open grass panel on the site surrounded at the site's perimeter by elm trees.

The landscape design takes into account recommendations in the Lincoln Memorial CLR. Non-historic trees will be removed and replaced with American elms as appropriate on the edge of the site in order to reestablish the original planting plan for the Lincoln Memorial Grounds. Landscape rehabilitation will reestablish, on two sides of Lincoln Circle (north and south), the intent of the original implemented historic planting plan for the Lincoln Memorial and Grounds. In addition, the landscape design will minimize the addition of non-historic plant material (including trees, shrubs, and ground cover) and by incorporating a green roof in the design of the Visitor Center much of the existing site will remain open.



Figure 18: Planting plan for the Visitor Center

Design Guideline #13

The Visitor Center design will not impede the use of the site for multi-purpose recreation on the site.

An estimated 26% of the site is available for multi-purpose recreation. In previous designs, due to the long skylights that extended into the landscape, the size of the courtyard opening, and the configuration of the walkway from Constitution Avenue, only 20% of the site was available for multi-purpose recreation. In response to the design in June 2009, the Commission requested the applicant to eliminate the skylights, reduce the size of the courtyard opening, and eliminate the walk from Constitution Avenue in order to increase the amount of space available for multi-purposes recreation. The applicant has complied with all of these requests and two fields will be available for recreation.



Figure 19: Multi-purpose recreation areas

Design Guideline #14

The Visitor Center will be designed without guardrails or perimeter security elements.

The design of the Visitor Center incorporates a system of horizontal rails to protect against potential falls and eliminates the need for vertical guardrails. The ha-ha condition around the courtyard opening features a concrete guard wall capped with an oxidized stainless steel guardrail. This guardrail will be minimally visible as it will be finished in a dark bronze color.

Along with the horizontal rail system, minimal perimeter security elements are proposed. Based on a threat assessment completed by the U.S. Park Police, three bollards are proposed for the top of the curved path adjacent to the sidewalk on Henry Bacon Drive. These bollards are needed to keep an errant vehicle from crashing into the Visitor Center. The Visitor Center has also been designed to allow for visitor screening in the lobby. Design refinements related to perimeter security elements are anticipated prior to the Commission's final approval.



Figure 20: Proposed security improvements

NCPC Required Mitigation

At the time of site selection NCPC required “the NPS to reconstruct softball fields lost as a result of this project on another site within one-half (1/2) mile of Site A.” This mitigation measure was incorporated into NCPC’s FONSI and was intended to address potential significant adverse effects to recreational resources. NPS issued a FONSI in 2007 for the selection of the site for the Visitor Center and this FONSI states that in order to mitigate the loss of ball fields on the site, the NPS will establish multi-purpose fields south of Independence Avenue and west of the proposed (now constructed) Martin Luther King, Jr. Memorial. Currently, there are multi-purpose fields in this location and NPS is committed to maintaining this recreational resource. In addition, the design of the Visitor Center and its orientation on the project site allow for multi-purpose recreational uses as 26% of the project site is available for recreation.

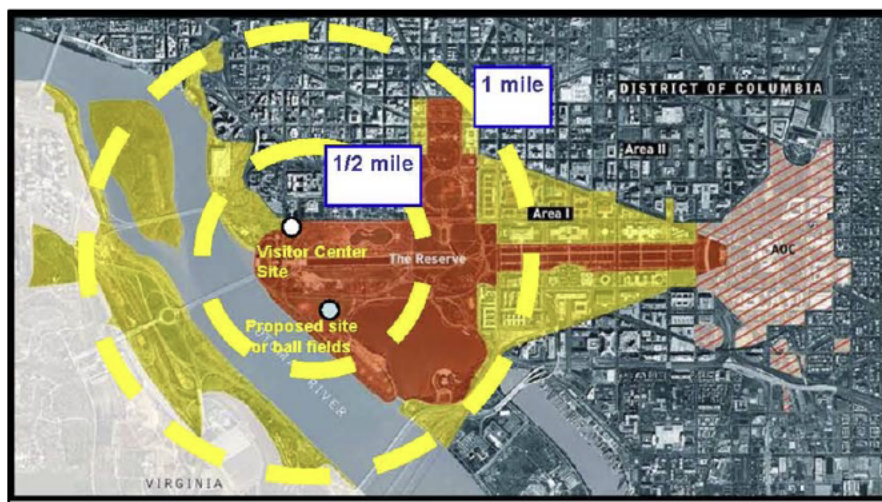


Figure 21: Proposed location of multi-purpose recreational fields

Recommendation

Based on the analysis provided above, staff recommends **the Commission approve the preliminary site and building plans for the Vietnam Veterans Memorial Visitor Center on the Lincoln Memorial Grounds.** Since the Commission last reviewed the project in June 2009, the applicant has modified the design to reduce the scale of the building openings in order to minimize the visibility of the Visitor Center from the Lincoln Memorial and surrounding sidewalks. By incorporating a curved entry ramp that surrounds an elliptical green the visibility of the sunken entrance has also been reduced. In addition, by eliminating elements proposed in a previous design including the walk from Constitution and the skylights that extended into the landscape the area on the site available for multi-purpose recreation has increased. In addition, a horizontal rail system has been designed so that vertical guardrails are not needed and the visibility of the Visitor Center from the Lincoln Memorial, Constitution Avenue, and Henry Bacon Drive has been minimized. Therefore, staff recommends **the Commission note that the applicant has addressed the Commission's comments provided in June 2009 and find that the design of the Visitor Center meets the design guidelines included in the FONSI issued by NCPC at the time of site selection in 2006.**

The applicant will continue to refine elements of the design prior to final approval, and therefore staff recommends **the Commission note that as a condition of the Section 106 MOA, additional consultation on the design of Visitor Center will address the courtyard opening, the skylight over the entrance, the development of the landscape treatment of the site, and night lighting of the Visitor Center prior to the Commission's final approval.**

Comprehensive Plan for the National Capital

Overall, the project is consistent with policies in the Federal Elements of the Comprehensive Plan for the National Capital, and in particular those contained in the Preservation and Historic Features Element, Parks and Open Space Element, and the Visitor Element. These policies encourage the federal government to preserve and maintain parks and open space, enhance historic designed landscapes while protecting their unique characteristics, and provide educational facilities for visitors. The proposed Visitor Center will satisfy each of these areas.

The Visitor Center has been designed with respect for the historic character of the National Mall and surrounding memorials and monuments. The design of the Visitor Center is sensitive to the context of the Vietnam Veterans Memorial and will enhance the contemplative experience of the Memorial. The design is respectful of the surrounding monumental core and will contribute to the special role the monumental core plays in the nation's capital. In addition, views to and from the Lincoln Memorial as well as the view sheds of streets surrounding the project site will be protected as an integral part of the national capital's image. The exterior lighting of the Visitor Center will contribute to the capital's nighttime image and will respect the existing night lighting hierarchy of monuments, memorials, museums, and other prominent features on the National Mall.

The Visitor Center is consistent with the parks and open space policies pertaining to monumental and designed landscape parks. With its location in West Potomac Park, the Visitor Center will contribute to the extension of the Mall as a valuable open space and create a special environment for formal and informal gatherings. A portion of the site will also remain available for passive and active recreation. By minimizing the impact of the Visitor Center on the grounds of the Lincoln Memorial, the integrity of a nationally significant historic landscape will be maintained. Finally, the project conforms to policies in the Visitor Element as the Visitor Center will provide an opportunity for the public to gain a greater understanding of the Vietnam War and those who served the country during the war.

National Mall Plan

The National Mall Plan seeks to rehabilitate and refurbish the National Mall so that very high levels of use can be perpetuated and the needs of all visitors and users can be met in an attractive, high-quality, energy-efficient, and sustainable manner. The National Mall Plan establishes a framework to protect memorials and landscapes while maintaining large areas of unprogrammed open space. The plan seeks to balance contemporary uses while respecting the planned historic landscapes of the L'Enfant and McMillan plans. The plan acknowledges the Visitor Center as a project authorized by Congress that will be implemented to educate visitors on the Vietnam Veterans Memorial and Vietnam War.

National Capital Urban Design and Security Plan Objectives and Policies

The Commission's policies on urban design and security discourage locating physical perimeter security elements in public space. NPS has proposed minimal security elements for the Visitor Center based on a threat assessment conducted by the U.S. Park Police. Security elements include the installation of bollards at the top of the curved entry ramp along the sidewalk on Henry Bacon Drive. The seat walls along the curved ramp have been designed to protect against an errant vehicle that may veer off course. The ha-ha detail around the courtyard opening has also been designed to address safety and security concerns.

The proposed perimeter security is not extensive, but staff recommends the applicant explore the potential for relocating the bollards at the top of the curved entry ramp to the top of the entry stairs. By relocating the bollards, views from Henry Bacon Drive would be improved and the entry to the Visitor Center would appear open and accessible, while also providing the necessary security.

National Environmental Policy Act (NEPA)

NCPC and NPS each have an independent responsibility to comply with the National Environmental Policy Act (NEPA); NCPC's responsibility stems from its approval authority over the project. In accordance with the Council on Environmental Quality's rules for implementing NEPA, and the Commission's Environmental and Historic Preservation Policies and Procedures, NPS prepared an Environmental Assessment (EA) for the project, to which NCPC was a cooperating agency. The EA analyzed a no action alternative and two development alternatives; the preferred alternative was identified as "Alternative 2." Topics analyzed in the

EA include: cultural resources, visitor use and experience, park operations and management, soils, transportation systems, vegetation, and utilities. NPS issued a Finding of No Significant Impact (FONSI) for Alternative 2 on June 25, 2012.

Of the environmental topic areas analyzed, staff's analysis of the EA focused primarily on the potential impacts to cultural resources. Staff focused on these areas given the potential for impacts to visual resources and historic properties based on the project's location on the National Mall on the grounds of the Lincoln Memorial. The EA analyzed cultural resources within three categories: archaeological resources, historic structures and districts, and cultural landscapes. Alternative 2 has the potential to cause long-term moderate adverse impacts on archaeological resources due to the possible presence of historic and pre-historic resources. In addition, the EA concluded impacts to historic structures and districts range from minor to moderate adverse impacts.

The EA determined that the Visitor Center will cause minor to moderate long-term adverse impacts on the L'Enfant Plan for the City of Washington, the Lincoln Memorial, East and West Potomac Park Historic District, and the Lincoln Memorial Grounds cultural landscape. Adverse impacts to the L'Enfant Plan, which includes the L'Enfant Plan and McMillan Plan will result from modifications to the character of the open lawn with a courtyard, curved elliptical ramp, and horizontal rails. The Visitor Center will be located within a portion of West Potomac Park at Reservation 332, which was identified in the McMillan Plan. Though no changes will be made to Constitution Avenue, Henry Bacon Drive, or 23rd Street, NW, there will be impacts to vistas along these streets. Adverse impacts to the Lincoln Memorial and its Grounds will result from changes in the existing grass panel that has been historically used for active and passive recreation. The original design for the panel called for an open lawn surrounded by rows of trees and the construction of the Visitor Center will introduce a ramp and courtyard. Adverse impacts to the East and West Potomac Park Historic District will result from alterations to the character of a portion of the Lincoln Memorial Grounds, a contributing element to the historic district. Though the EA did not identify an adverse impact to the American Pharmacists Association Building, the FONSI issued by NPS stated that due to alternations of views to the site and changes to the setting of the American Pharmacists Association Building there will be long-term minor adverse impacts. The EA concluded that there would be long-term minor adverse impacts to the Vietnam Veterans Memorial and Vietnam Women's Memorial due to the visibility of the Visitor Center from both memorials.

The EA concluded Alternative 2 would have long-term beneficial impacts on visitor use and experience as the Visitor Center will augment an existing attraction, the Vietnam Veterans Memorial, by providing information and context for the Vietnam War. The Visitor Center will cause a reduction of multi-purpose recreation space and this will result in a long-term minor adverse impact for participants by limiting the opportunities for simultaneous activities, such as multiple organized ball games. There will also be short-term moderate adverse impacts to those who use the site for recreation while the Visitor Center is constructed due to limited site access. The construction of the Visitor Center will require changes to NPS funding and staffing, but as the park incorporates the new operational needs into their annual budget and staffing levels,

these encumbrances will decline so that these adverse impacts on park operations and maintenance will be short-term.

The EA concluded the Alternative 2 will result in short and long-term minor adverse impacts on soils due to the loss of land that will be replaced by impervious surface. Though there will be an increase in the number of pedestrian in the area, vehicular traffic is not expected to increase as public transit is very accessible near the site and on-site parking will not be provide. Therefore, long-term adverse impacts on transportation will be negligible-to-minor. Short-term impacts to utilities would be negligible because of brief service interruptions and long-term impacts to utility systems would be negligible with energy efficiency and stormwater management techniques used on the site. Vegetation is expected to be disturbed during construction, although mitigation measures such as root pruning will be used to ensure the existing trees on the site survive the construction process. The EA concluded the long-term adverse impacts on vegetation are considered minor as the overall quantity of trees will increase after the landscape design is implemented and the changes to the open lawn will be confined to a portion of the project site rather than a large area.

On June 27, 2012, the NCPC Executive Director issued a Finding of No Significant Impact (FONSI) for "Alternative 2".

National Historic Preservation Act (NHPA)

NCPC and NPS each have an independent responsibility to comply with the National Historic Preservation Act (NHPA); NCPC's responsibility stems from its approval authority over the project. NPS initiated consultation with the District of Columbia State Historic Preservation Officer (SHPO) on February 17, 2005, requesting comments on the Site Selection Study and Environmental Analysis. Section 106 consultation did not conclude at the time of site selection but continued from 2005-2012 and 6 consultation meetings were held. NPS notified the Advisory Council on Historic Preservation of their determination that the Visitor Center had the potential to cause adverse effects on historic properties and the ACHP elected to participate in the consultation. In addition to NPS, NCPC, SHPO, and ACHP, Consulting Parties included CFA, Vietnam Veterans Memorial Fund (VVMF), the National Trust for Historic Preservation, the National Coalition to Save Our Mall, Equal Hone for All, and the Vietnam Veterans Memorial Volunteers. NPS defined an Area of Potential Effect (APE) that included the following historic properties: L'Enfant Plan of the City of Washington, Lincoln Memorial, Arlington Memorial Bridge, American Pharmacists Association Building, Harry S Truman Building, National Academy of Sciences, Federal Reserve Board Building, Vietnam Veterans Memorial, Lockkeeper's House, 56 Signers Memorial, Vietnam Women's Memorial, World War II Memorial, Northwest Rectangle Historic District, and East and West Potomac Park Historic District. Cultural landscapes in the APE include the Lincoln Memorial Grounds, Constitution Gardens, and Washington Monument and Grounds.

NPS determined that the construction of the Visitor Center would have an adverse effect on the L'Enfant Plan of the City of Washington, East and West Potomac Park Historic District, and the Lincoln Memorial and Grounds cultural landscape. After additional consultation with the SHPO,

NPS also determined the Visitor Center would have an adverse effect on the American Pharmacists Association Building due to the impact on significant view sheds and the setting of the building. Following this determination of effect, NCPC designated NPS lead agency for Section 106 compliance. NPS, NCPC, SHPO, ACHP, and VVMF executed a Memorandum of Agreement to resolve the adverse effects. The MOA stipulates that the night lighting shall not exceed the minimum levels required by building code and lighting safety standards so that the Visitor Center's night lighting does not affect the visual prominence of the Lincoln Memorial or the night lighting hierarchy of the other monuments and memorials, the museums, and other prominent features on the National Mall. The MOA also stipulates that the landscape plan for the Visitor Center will be revised in accordance with the recommendations of the 1999 Lincoln Memorial Cultural Landscape Report. Landscape design for the Visitor Center will minimize the addition of non-historic plant material (including trees, shrubs, and ground cover) and incorporate American elm trees, as needed, in the concentric rows of elms planted around Lincoln Circle and in the rows of adjacent street trees. Landscape rehabilitation will reestablish, on two sides of Lincoln Circle (north and south), the intent of the original implemented historic planting plan for the Lincoln Memorial and Grounds. Finally, the MOA stipulates that VVMF will provide funds to NPS so that NPS can complete a Cultural Landscape Inventory and update the National Register nomination for the Lincoln Memorial and Grounds.

II. CONSULTATION

National Capital Memorials Advisory Committee

Section 8905(a)(1) of the Commemorative Works Act requires memorial sponsors to consult with the National Capital Memorials Advisory Committee (NCMAC) on the selection of alternative sites and design concepts prior to submitting the project to NCPC for formal design review. In fulfillment of this requirement, VVMF presented the preferred design concept at the March 29, 2012 NCMAC meeting. In general, the Commission expressed support for the project, but some Commission members felt that the visitor center was taking on a larger role and competing with the Vietnam Veterans Memorial. Commission members expressed that while the Visitor Center should support the visitors' experience at the Memorial, the Visitor Center should not give the impression that it is being elevated to be an independent destination and of a scale which would compete with the commemorative landscape. Commission members also felt the long horizontal canopy over the recessed courtyard entry should be reconsidered to reduce its visibility in the landscape.

The Commission also complimented the palette of materials which had been chosen as they felt it would give the visitor center a character more reflective of the subtlety of the Vietnam Veterans Memorial. Some Commission members questioned the value and pattern of triangular skylights (these have been removed from the design), encouraging the sponsor to reconsider the use of skylights particularly since the visitor center would also rely on artificial lighting and high-quality indoor lighting is widely available. Commission members reminded the sponsor that the design guidelines adopted by NCPC and CFA directed that no lighting would encroach upon the views from the Lincoln Memorial. One Commission member recommended the NPS consider relocating the food service kiosk as there was concern that the kiosk would be in a

discordant location with the Visitor Center once the center was open. Finally, some members expressed discomfort at the level of detailed technical review that was prompted by this consultation.

Pursuant to the Commemorative Works Act, no approval action was taken by NCMAC, but the NCMAC would provide a written summary of members' consultative comments to the VVMF.

Coordinating Committee

The Coordinating Committee reviewed the proposal at its June 20, 2012 meeting and forwarded the proposal to the Commission with the statement that it has been coordinated with all participating agencies. The participating agencies were NCPC; the National Park Service; the General Services Administration; the District of Columbia Office of Planning; the State Historic Preservation Office; and the Washington Metropolitan Area Transit Authority.

U.S. Commission of Fine Arts

The Commission of Fine Arts reviewed the revised concept design at its February 16, 2012 meeting. In its support for the project, the Commission noted the improvement of the design since its last review in April 2009 and reiterated its concerns regarding the impact and architectural character of the proposed underground building. At its February 2012 meeting, CFA recommended the elimination of the triangular skylights and "suggested that the length of the horizontal canopy and guard be reduced to minimize visual impact on the landscape and avoid association with the memorial's broad horizontal form." CFA also "recommended refining the design of the retaining walls, seating, and lighting of the entrance ramp in order to orient these elements towards the entrance wall."

III. APPENDIX

NCPC Finding of No Significant Impact

VIETNAM VETERANS MEMORIAL VISITOR CENTER

Lincoln Memorial Grounds
Bound by Constitution Avenue, Henry Bacon Drive, Lincoln Memorial Circle, and 23rd Street,
NW
Washington, DC

Finding of No Significant Impact

JUN 27 2012

Pursuant to Section 102(2)(C) of the National Environmental Policy Act, the Council on Environmental Quality Regulations (40 CFR, Parts 1500-1508), and NCPC's Environmental and Historic Preservation Policies and Procedures, I have evaluated the preliminary site and building plans for the Vietnam Veterans Memorial Visitor Center on the grounds of the Lincoln Memorial in Washington, DC, as shown on NCPC Map File No. 1.43(73.10)43574; the Vietnam Veterans Memorial Center Design Environmental Assessment (EA) prepared by the National Park Service in which NCPC was a cooperating agency; the comments that the National Park Service received in response to the EA; and the National Park Service's June 25, 2012 Finding of No Significant Impact, and have determined that the proposal will not have a significant impact on the human environment.¹

Proposed Action

The Vietnam Veterans Memorial Visitor Center (Visitor Center) was authorized by Public Law 108-126, 117 Stat. 1348 (November 17, 2003). The legislation requires that the Visitor Center be limited in size to the minimum necessary to educate the public about the Vietnam Veterans Memorial and the Vietnam War, and requires that the Visitor Center be constructed underground.

After the Visitor Center was authorized, NPS prepared a Site Selection EA (Vietnam Veterans Memorial Center Site Selection Environmental Analysis, May 2006), to which NCPC was a cooperating agency. The Site Selection EA identified the area bound by Constitution Avenue, Henry Bacon Drive, Lincoln Memorial Circle, and 23rd Street, NW as the preferred site. NCPC issued a Finding of No Significant Impact (FONSI) on July 27, 2006 that incorporated 14 Design Guidelines as required mitigation. NCPC's FONSI also included one additional mitigation measure pertaining to the potential loss of existing ball fields on the site. To mitigate the loss of these fields, NPS was required to reconstruct ball fields within ½ mile of the preferred site. NPS issued a FONSI for the Site Selection EA on November 1, 2007.

Following the Site Selection EA, NPS prepared a second EA (Vietnam Veterans Memorial Center Design Environmental Assessment, February 2012), to which NCPC was a cooperating agency, to analyze the potential environmental impacts that could result from the design and construction of

¹ The Vietnam Veterans Memorial Center Design Environmental Assessment (February 2012) is incorporated by reference into this Finding of No Significant Impact. In this FONSI, the term "EA" refers to the February 2012 EA.

the Vietnam Veterans Memorial Visitor Center (Visitor Center) on the preferred site. In addition to a No Action Alternative, the EA analyzes two development alternatives described as “Alternative 1,” and “Alternative 2”. Alternative 2 is identified as the preferred alternative and is the alternative on which NCPC is issuing this FONSI.

Visitor Center Design

The intent of the design of the Visitor Center is to minimize its visibility while welcoming visitors and supporting the Vietnam Veterans Memorial experience. The experience of visiting the Visitor Center is intended to be secondary to visiting the Vietnam Veterans Memorial. The two-level, underground building will house exhibit space, a bookstore, restrooms, and lobby areas.

Visitors will use a curved, elliptical path located directly off the sidewalk along Henry Bacon Drive to gain access to the below-grade facility. The curved, elliptical path will surround a green (turf) area and stone seat walls with recessed lighting will border a portion of the path. In order to construct this path and the underground building, the grade of the site will be raised slightly. In addition to the curved path, stairs next to a curvilinear retaining wall will lead visitors to the entrance.

In order to minimize the visual impacts of the Visitor Center on the historic landscape and reduce the need for visible mechanical equipment, the building will be built around a central courtyard and a geothermal well system. The courtyard opening will incorporate a “ha-ha” condition that consists of a low concrete curb and wall to separate the open lawn from the courtyard opening. An oxidized stainless steel guardrail will be installed on top of the low wall. The courtyard will be partially covered by a green roof, which will appear as lawn. A system of horizontal rails along the edge of the green roof and adjacent to the curvilinear retaining wall will provide protection from potential falls and eliminate the need for vertical guardrails.

The landscape design for the Visitor Center maintains most of the trees surrounding the perimeter of the site and incorporates recommendations from the 1999 Lincoln Memorial Cultural Landscape Report. New American elm trees will be installed and the landscape will be reestablished, on two sides of Lincoln Circle (north and south), according to the historic planting plan. Most of the trees will be installed along the perimeter and in the southern corner of the site. The remaining portion of the site will be a lawn with the exception of the courtyard opening.

The design of the Visitor Center is consistent with the Design Guidelines and the authorizing legislation. The design of the Visitor Center respects the historic character of the National Mall and surrounding memorials and monuments. The design of the Visitor Center is sensitive to the context of the Vietnam Veterans Memorial and will enhance the contemplative experience of the Memorial. The scale of the building is appropriate and by incorporating a curved entry ramp that surrounds an elliptical green the visibility of the sunken entrance from the surrounding streets has been minimized. The horizontal rail system eliminates the need for vertical guardrails and will minimize the visibility of the Visitor Center from the Lincoln Memorial and the surrounding streets. By minimizing the number of skylights and grade changes, multi-purpose recreational uses can continue on a substantial portion of the site. In addition, NPS has identified an area south of

Independence Avenue and west of the Martin Luther King, Jr. Memorial for multi-purpose fields to meet the additional mitigation requirement included in NCPC's July 27, 2006 FONSI.

Standard for evaluation

Under NEPA, the Council on Environmental Quality (CEQ) regulations, and NCPC Environmental and Historic Preservation Policies and Procedures, an environmental assessment is sufficient and an Environmental Impact Statement need not be prepared if the environmental assessment supports a finding that the federal action will not significantly affect the human environment. As noted in 40 CFR §1508.27, the CEQ regulations define "significantly" as requiring consideration of the context and intensity of impacts.

Potential impacts

There will be no significant environmental impacts as a result of the proposed action. The EA does, however, identify several areas where there will be short and long-term minor to moderate adverse impacts caused by the proposed action and possible ways to mitigate these impacts. The EA also indicates that there will be several beneficial impacts as a result of the proposed action.

The EA analyzed 7 environmental impact topic areas. These topic areas are generally categorized as: cultural resources, visitor use and experience, park operations and management, soils, transportation systems, vegetation, and utilities. NPS issued a Finding of No Significant Impact (FONSI) for Alternative 2 on June 25, 2012.

Of the environmental topic areas analyzed, NCPC's analysis of the EA focused primarily on the potential impacts to cultural resources. NCPC focused on this area given the potential for impacts to visual resources and historic properties based on the project's location on the National Mall on the grounds of the Lincoln Memorial. Impacts to visual resources were addressed under historic properties in the EA.

The EA analyzed cultural resources within three categories: archaeological resources, historic structures and districts, and cultural landscapes. An Area of Potential Effect (APE) was defined through the Section 106 consultation process under the National Historic Preservation Act (NHPA). Historic properties in the APE include the following: L'Enfant Plan of the City of Washington, Lincoln Memorial, Arlington Memorial Bridge, American Pharmacists Association Building, Harry S Truman Building, National Academy of Sciences, Federal Reserve Board Building, Vietnam Veterans Memorial, Lockkeeper's House, 56 Signers Memorial, Vietnam Women's Memorial, World War II Memorial, Northwest Rectangle Historic District, and East and West Potomac Park Historic District. Cultural landscapes in the APE include the Lincoln Memorial Grounds, Constitution Gardens, and Washington Monument and Grounds.

Alternative 2 has the potential to cause long-term moderate adverse impacts on archaeological resources due to the possible presence of historic and pre-historic resources.

Alternative 2 will cause long-term moderate adverse impacts on the L'Enfant Plan of the City of Washington, which includes both the L'Enfant Plan and the McMillan Plan, by modifying the

character of the open lawn on the site with an entrance, courtyard, and horizontal rails. The Visitor Center will be located within a portion of West Potomac Park at Reservation 332, which was identified in the McMillan Plan. No physical changes will be made to Constitution Avenue, Henry Bacon Drive, or 23rd Street, NW, but there will be impacts to vistas along these streets.

There will be a long-term moderate adverse impact on the Lincoln Memorial caused by the Visitor Center lighting. Though the site lighting for the Visitor Center will be engineered to minimize interference with the Lincoln Memorial, the Visitor Center will be located on a site that currently has no lighting beyond streetlights and that necessary for the existing food service kiosk. In addition, interior lighting from the Visitor Center may be minimally visible during the night through the courtyard opening which could also compete with the lighting of the Lincoln Memorial.

The construction of the Visitor Center will result in long-term moderate adverse impacts to the Lincoln Memorial Grounds due to changes in the historic landscape. The grade of the site will be modified, new trees will be installed and character-defining vistas along Henry Bacon Drive will be impacted. The vistas along Henry Bacon Drive, 23rd Street, and east from the Lincoln Memorial are contributing features to the cultural landscape. Small sections of the Visitor Center entrance and curved walk will be slightly visible from these streets, thus the views will be interrupted.

As noted above, Alternative 2 will have a long-term moderate adverse impact on the Lincoln Memorial and Lincoln Memorial Grounds. The Lincoln Memorial and its surrounding grounds are considered to be contributing elements to the East and West Potomac Parks Historic District. Therefore, it is considered that Alternative 2 will also have long-term moderate adverse impacts to the historic district.

Alternative 2 will cause long-term minor adverse impacts on the American Pharmacists Association Building due to alteration of significant views. By altering the solid grass panel with the construction of an underground building and installing openings in the lawn, the views to and from the American Pharmacists Association Building will be disrupted.

Alternative 2 will cause long-term minor adverse impacts to the Vietnam Veterans Memorial and the Vietnam Women's Memorial because the entrance to the Visitor Center will be slightly visible from both memorials. There will be negligible impacts on the Arlington Memorial Bridge, the National Academy of Sciences, and the Harry S Truman Building due to the interruptions of the solid grass panel, courtyard, and horizontal rail. There will be no impacts to the Lockkeepers House, the 56 Signers Memorial, or the World War II Memorial.

Although the Visitor Center will alter views from the Northwest Rectangle Historic District, the Visitor Center will not diminish the integrity of the District and therefore there will be no impacts to the historic district with the construction of Alternative 2.

Alternative 2 will cause negligible impacts to Constitution Gardens as the views from Constitution Gardens to the Lincoln Memorial will continue to be filtered through trees. In addition, the Visitor Center will only be minimally visible from Constitution Gardens. There will be negligible impacts on the Washington Monument Grounds as views towards the project site are very limited and with the addition of new trees views will be more limited.

Under Section 106 of the NHPA, NPS determined Alternative 2 will cause adverse effects on historic properties. Alternative 2 has the potential to cause adverse effects to archaeological resources and will cause an adverse effect on the L'Enfant Plan of the City of Washington, the Lincoln Memorial and Grounds cultural landscape, American Pharmacists Association Building, and the East and West Potomac Park Historic District.

Mitigation defined in the Section 106 Memorandum of Agreement (MOA) and executed by NPS, NCPC, the District of Columbia State Historic Preservation Officer, Advisory Council on Historic Preservation, and the Vietnam Veterans Memorial Fund will address the adverse effects identified. The MOA stipulates that the night lighting shall not exceed the minimum levels required by building code and lighting safety standards so that the Visitor Center's night lighting does not affect the visual prominence of the Lincoln Memorial or the night lighting hierarchy of the other monuments and memorials, the museums, and other prominent features on the National Mall. The MOA also stipulates that the landscape plan for the Visitor Center will be implemented in accordance with the recommendations of the Lincoln Memorial Cultural Landscape Report. The landscape design for the Visitor Center will minimize the addition of non-historic plant material (including trees, shrubs, and ground cover) and incorporate American elm trees, as needed, in the concentric rows of elms planted around Lincoln Circle and in the rows of adjacent street trees. Landscape rehabilitation will reestablish, on two sides of Lincoln Circle (north and south), the intent of the original implemented historic planting plan for the Lincoln Memorial and Grounds. Finally, the MOA stipulates that VVMF will provide funding so that NPS can complete a Cultural Landscape Inventory and update the National Register nomination for the Lincoln Memorial and Grounds.

The EA concluded Alternative 2 will have long-term beneficial impacts on visitor use and experience as the Visitor Center will augment an existing attraction, the Vietnam Veterans Memorial, by providing information and context for the Vietnam War. The Visitor Center will cause a reduction of multi-purpose recreation space and this will result in a long-term minor adverse impact for participants by limiting the opportunities for simultaneous activities, such as multiple organized ball games. There will also be short-term moderate adverse impacts to those who use the site for recreation while the Visitor Center is constructed due to limited site access. The construction of the Visitor Center will require changes to NPS funding and staffing, but as the park incorporates new operational needs into their annual budget and staffing levels, these encumbrances will decline and these adverse impacts on park operations and maintenance will be short-term.

The EA concluded that Alternative 2 will result in short and long-term minor adverse impacts on soils due to the loss of land that will be replaced by impervious surface. Though there will be an increase in the number of pedestrian in the area, vehicular traffic is not expected to increase as public transit is available near the site and on-site parking will not be provided. Therefore, long-term adverse impacts on transportation will be negligible-to-minor. Short-term impacts to utilities will be negligible because of brief service interruptions and long-term impacts to utility systems will be negligible with the use of energy efficiency and stormwater management techniques. Vegetation is expected to be disturbed during construction, although mitigation measures such as root pruning will be used to ensure the existing trees on the site survive the construction process. The EA concluded that long-term adverse impacts on vegetation are considered minor as the overall

quantity of trees will increase after the landscape design is implemented and the changes to the open lawn will be confined to a portion of the project site rather than a large area.

Cumulative Impacts

Implementation of Alternative 2 will have no significant cumulative impacts on any of the topic areas covered in the EA. As described in the EA, future actions and projects within the project area include the following: Potomac Park Levee (Phases 1 and 2); the Lincoln Memorial Reflecting Pool and Grounds Rehabilitation; the Constitution Avenue Street Improvements; the Mall Turf Rehabilitation, the Jefferson Memorial Vehicular Security Barrier project; the Arlington Memorial Bridge Repairs; the President's Park South Improvements; further implementation of the National Mall Plan; and the Redesign of Union Square, Sylvan Theater Area, and Constitution Gardens; and the construction of other buildings on or near the National Mall, including the National Museum for African American History and Culture (NMAAHC), the American Veterans Disabled for Life Memorial, the Dwight D. Eisenhower Memorial, the National Women's History Museum, the National Aquarium Renovation at the Department of Commerce building, and the National Museum of the American Latino.

Alternative 2 has the potential to have long-term moderate adverse impacts on archeological resources. In order for the selected alternative to contribute to cumulative impacts on archeological resources, similar types or classes of archeological sites would need to be impacted by multiple projects. Based on the current available information for projects in the vicinity of the National Mall and the classes of archeological sites, there would be no cumulative impacts on archeological resources.

Alternative 2 will cause negligible to moderate adverse cumulative impacts on historic structures and districts as well as cultural landscapes. When combined with the Potomac Park Levee Project and Lincoln Memorial Reflecting Pool Rehabilitation, there could be cumulative impacts to the L'Enfant and McMillan Plans, the Lincoln Memorial, and the East and West Potomac Park Historic District as a result of changes to views cause by the introduction of the curved path, courtyard, and horizontal rail. Through changes to the existing grass panel, Alternative 2 could also result in minor adverse cumulative impacts on the Vietnam Veterans and Vietnam Women's Memorials and moderate cumulative adverse impacts on the East and West Potomac Parks Historic District. When combined with the Lincoln Memorial Reflecting Pool and Grounds Rehabilitation, Alternative 2 will result in moderate adverse cumulative impacts on the Lincoln Memorial and Grounds because the Visitor Center will alter views to and from the Lincoln Memorial and Grounds.

When combined with the construction of new facilities in the vicinity, Alternative 2 will result in overall long-term beneficial cumulative impacts on visitor use and experience by providing an additional visitor educational opportunity. Alternative 2 will also result in minor adverse cumulative impacts on other visitors who use the site for multi-purpose recreation when combined with the NMAAHC, which will further reduce multi-purpose recreation space.

Alternative 2 will result in minor short-term adverse cumulative impacts on park operations and maintenance because when combined with the other projects listed above that will improve NPS

facilities additional staffing will be required. However, NPS budgets will be adjusted over time to support additional resources.

Alternative 2 will result in long-term negligible-to-minor adverse cumulative impacts on vehicular transportation due to changes in the number of people who will visit the site when the Visitor Center is operational. In addition, expected traffic increases that will occur with or without the construction of the Visitor Center will contribute to these cumulative impacts. Beneficial cumulative impacts for pedestrian connections will result from streetscape improvements on Constitution Avenue, including new street lighting. Temporary closure of travel lanes and sidewalks will cause short-term, minor adverse cumulative impacts on vehicular traffic and pedestrians due to construction of the Visitor Center, Constitution Avenue Improvements, and the Arlington Memorial Bridge Repairs.

The selected alternative will result in minor adverse cumulative impact on soils and vegetation as a result of the disturbance of soils, the removal of vegetation, and the increase in impervious surface at the site and in the vicinity. The selected alternative will result in long-term negligible cumulative impacts on utilities with the implementation of energy efficiency and stormwater management techniques.



Marcel C. Acosta
Executive Director