

STAFF RECOMMENDATION

D. Sullivan

NCPC File No. 6597



VIETNAM VETERANS MEMORIAL VISITOR CENTER

On the Grounds of the Lincoln Memorial bounded by Constitution Avenue,
Henry Bacon Drive, Lincoln Memorial Circle, and 23rd Street, NW
Washington, D.C.

Submitted by the National Park Service

May 28, 2009

Abstract

The National Park Service, on behalf of the Vietnam Veterans Memorial Fund, has submitted a revised concept design for the Vietnam Veterans Memorial Visitor Center. The Visitor Center's site is 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.

Commission Action Requested by Applicant

Approval of comments on revised concept design pursuant to Public Law 108-126 and the Commemorative Works Act (40 U.S.C. 8905).

Executive Director's Recommendation

The Commission:

Acknowledges the significance of this project and the difficult challenge of designing it at this historically significant and sensitive site on the National Mall.

Notes that the National Capital Planning Commission and the Commission of Fine Arts jointly developed site specific design guidelines for the project to comply with the Commemorative Works Act requirement to "ensure that the proposed work shall be so located as to prevent interference with, or encroachment upon, any existing commemorative work and to protect, to the maximum extent practicable, open space and existing public use." The design guidelines also serve as mitigation for the Executive Director's Finding of No Significant Impact for site selection under the National Environmental Policy Act.

Confirms that the design meets the following design guidelines:

- *“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 not interfere with or encroach upon the Vietnam Veterans Memorial.” (#2)*
- *“To maintain the character of the historic landscape, the Visitor’s 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.” (#3)*

The revised concept has raised the grade of the site by three and a half feet to better accommodate the entry ramp.

- *“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.” (#7)*

The revised concept has reduced the length of the paved ramps from Henry Bacon Drive and Constitution Avenue to the entrance by raising the grade of the site.

- *“The project will not include new vehicle parking areas.” (#8)*
- *“The Visitor Center will have a single entrance for both visitors and service.” (#9)*
- *“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.” (#11)*

The applicant has reoriented the Center further to the north to move it away from the perimeter tree root zone. The applicant has noted that the technical survey of the critical root zone of the existing elm trees is underway.

- *“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 and will maintain the open grass panel on the site surrounded at the site’s perimeter by elm trees.” (#12)*

Requires that with regard to the established design guidelines that also serve as mitigation under NEPA, and in concert with the CFA comments dated April 24th, 2009, that the design be modified to meet the following design guidelines:

- *“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.” (#1)

The scale of the building openings has not been reduced and as a result the building is still visible from the Lincoln Memorial and the surrounding sidewalks. The courtyard and newly added guardrails will be visible from the Lincoln Memorial Stairs. While raising the grade of the site has reduced the visibility of the Center from the corner of 23rd and Constitution Avenue, the south wall of the Center and the entry court are now more visible from Constitution Avenue near 22nd Street; and, the south and east walls are now more visible from Henry Bacon Drive. The ramp from Constitution Avenue and the related berms are also visible from Constitution Avenue and from Henry Bacon Drive. Finally, while the skylights are now flush with the grass level, NPS has not demonstrated that interior lighting emanating from the skylights and the courtyard will not be visible from these viewpoints.

- *“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.” (#5)*

While raising the grade has reduced the visibility of the skylights from the sidewalks, the sunken entry way is now more visible from Henry Bacon Drive and from Constitution Avenue near 22nd Street.

- *“The Visitor Center design will not impede the use of the site for multi-purpose recreation on the site.” (#13)*

The submission shows an area measuring approximately 20% of the site will be available for formal recreational uses. However, the above ground footprint of the Center changes the nature of the landscape overall and limits the types of both passive and active activities that can be accommodated on the site because of the amount of area impacted by the skylights, courtyard, walkway and associated slopes from Constitution Avenue.

- *“The Visitor Center will be designed without guardrails or perimeter security elements.” (#14)*

The design of the two-story courtyard will necessitate a complex geometry of guardrails. In addition to the guard rails at the bottom of the ha-ha walls along the south and west sides of the courtyard, the revised concept shows that a screen wall on the north side of the courtyard will extend upward to function as a guardrail. There will also be a guardrail in the entryway area that overlooks the courtyard and around the roof of the emergency access stairwell. Finally, NPS will need to certify at final approval that the project will not have any perimeter security.

Advises the applicant to focus on the following revisions to the building design:

- Eliminate the walk from Constitution Avenue and associated berms so that the Center is less visible from Constitution Avenue and Henry Bacon Drive. This will also allow for more multi-recreational use on the site.

- Eliminate the skylights to minimize the Center's intrusion on the landscape and to allow for multi-recreational use on the site.
- Reduce the size of the open courtyard and the length of needed guardrails to minimize visibility from the Lincoln Memorial.

Notes that the following design guidelines have yet to be addressed, as indicated by the applicant:

- *“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.” (#4)*

The applicant has not yet designed the project lighting

- *“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.” (#6)*

The applicant has not yet designed the project lighting.

- *“The Visitor Center's associated pedestrian street crossing points will be designed to address traffic impacts effectively and to protect pedestrian safety.” (#10)*

The applicant has not yet designed the project's pedestrian crossing points.

- *“Requires the National Park Service to reconstruct softball fields lost as a result of this project on another site within one-half (1/2) mile of Site A, in accordance with the mitigation required in the Executive Director's finding of no significant impact for the project.”*

NPS has not yet responded to this requirement.

Reminds the applicant that:

- The Commission's policies and procedures require supplemental NEPA documentation and further Section 106 Consultation as the design develops, beginning with the preliminary approval.

* * *

PROJECT DESCRIPTION

Site

The proposed 5.2 acre site 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 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 (Center) of approximately 31,250 gross square feet.



Proposed Site

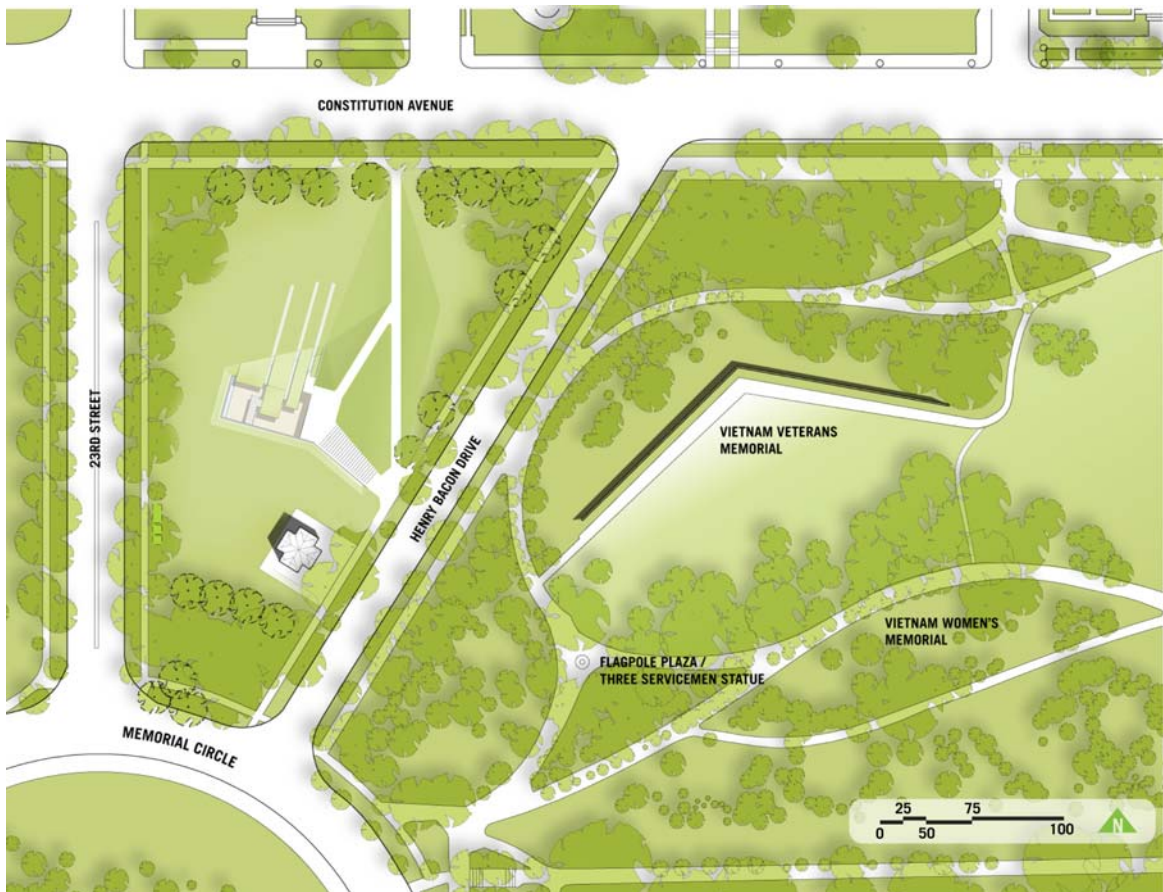
The submission materials indicate that the disturbed area of the site will be limited to that portion of the parcel that is outside of the existing drip line of the site's perimeter elm trees.

Authorizing Legislation

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. 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. Title I states that this restriction does not apply to the Visitor Center and that they may locate within the reserve in addition to being able to locate elsewhere on federal land in the District of Columbia. Title I also states that NCPC and CFA have approval of the Center and that final approval by NCPC and CFA 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.



The Reserve



June 2009 Submission

Background

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) with mitigation. In June of 2007, the NPS presented three alternative concept designs to NCPC during an information presentation. In October of 2007, CFA approved the concept design with comments and conditions. In December of 2007, the National Capital Planning Commission commented on the concept design.

The Commission found that the applicant met six of the design guidelines, did not meet two of the design guidelines, and needed to provide more information on the remaining seven guidelines. With regard to the two design guidelines that the concept did not meet (design guideline #1 and #5), the Commission required the applicant to reduce the scale of the building openings and the protrusion of building elements that are visible from the areas mentioned in design guideline #1. The Commission also required that the project design revisions should ensure that the elements in design guideline #2 are not visible from the surrounding sidewalks.

June 2009 Submission

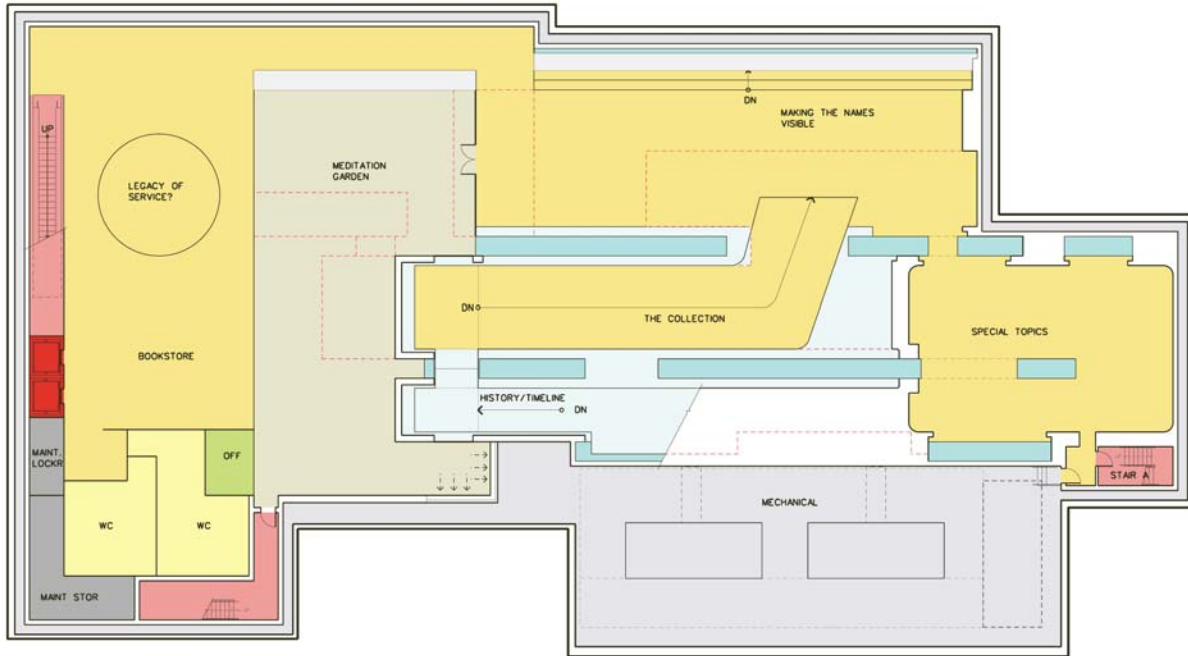
The basic design concept of the Vietnam Veterans Visitor Center has not changed since the earlier concept in December of 2007. According to the applicant, the architecture and exhibits are designed to be as integrated as possible so that visitors are enveloped within an all encompassing environment. 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."



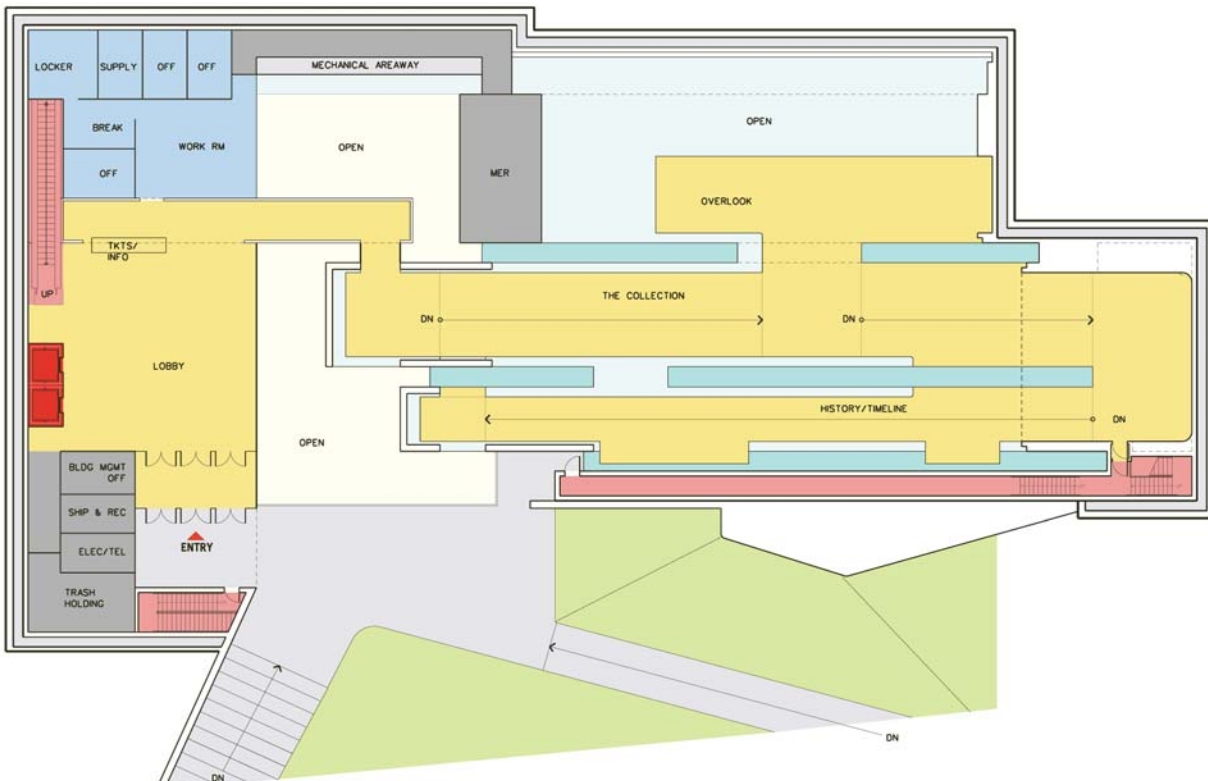
Conceptual View of the Collections Case Exhibit Wall

According to the June 2009 submission, the Center will have the following floor plans:

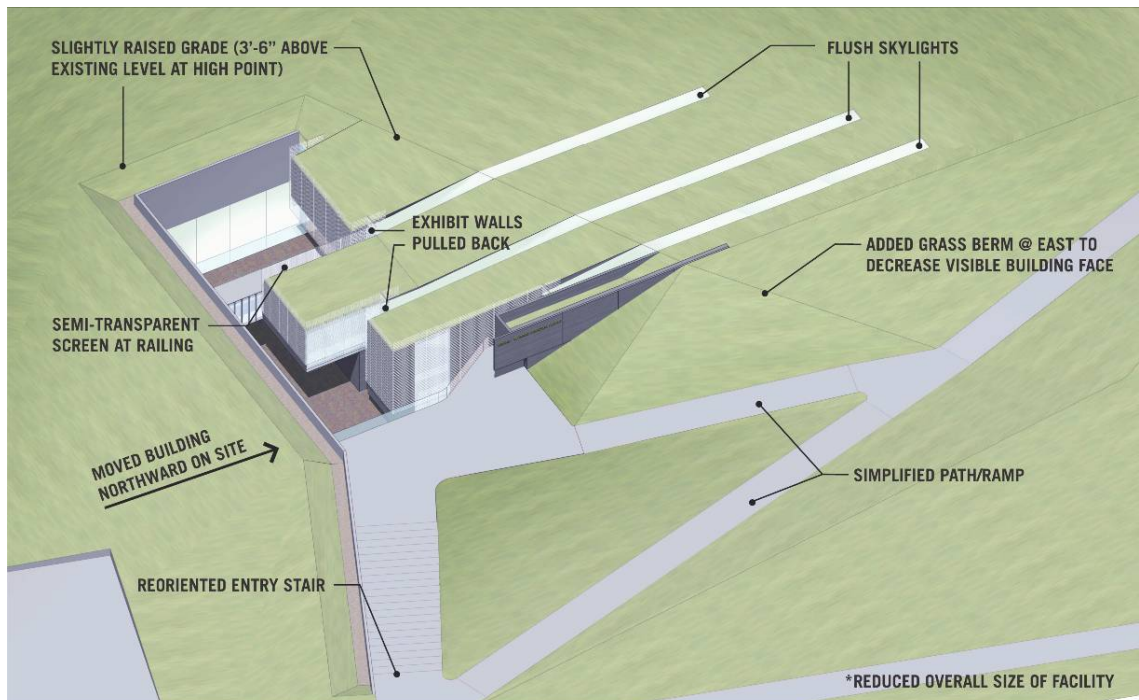
REVISED LOWER LEVEL PLAN



REVISED UPPER LEVEL PLAN



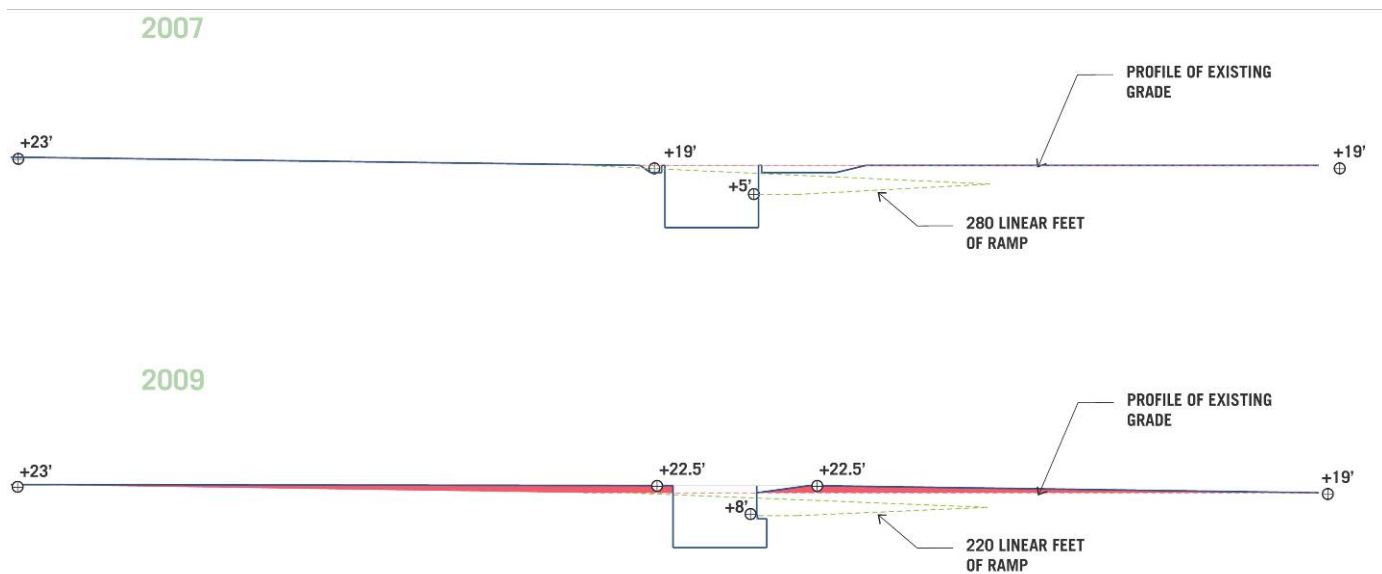
The June 2009 submission includes changes to the building siting and grading, specific building elements, and the building size. A summary of the revisions is in the following illustration:



The revisions are discussed in more detail below:

Siting and Grading

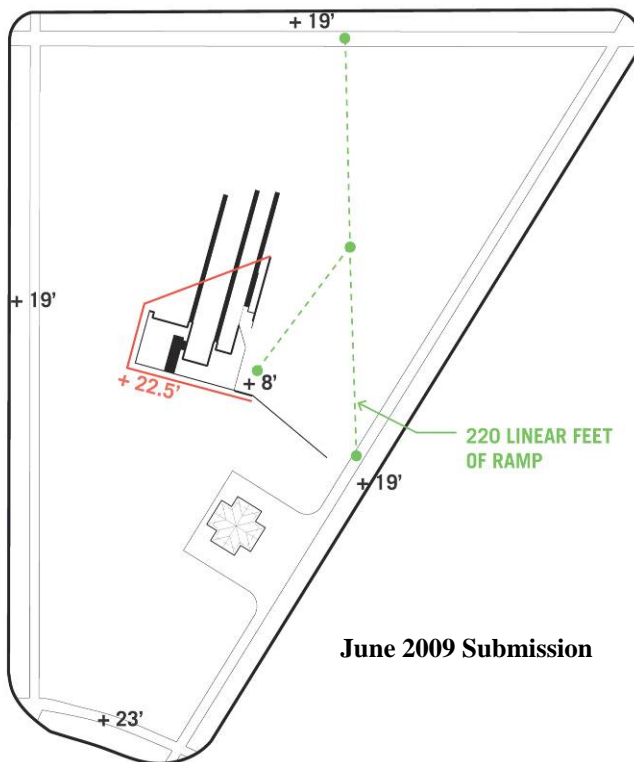
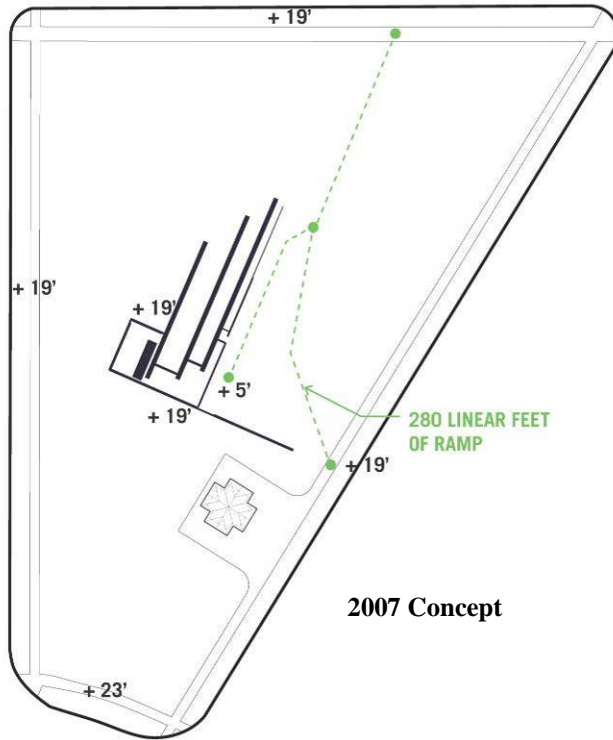
In the June 2009 submission, the applicant has raised the elevation of the existing grade approximately 42" above the grade of the 2007 concept design to reduce the ramp length from Constitution Avenue and Henry Bacon Drive.



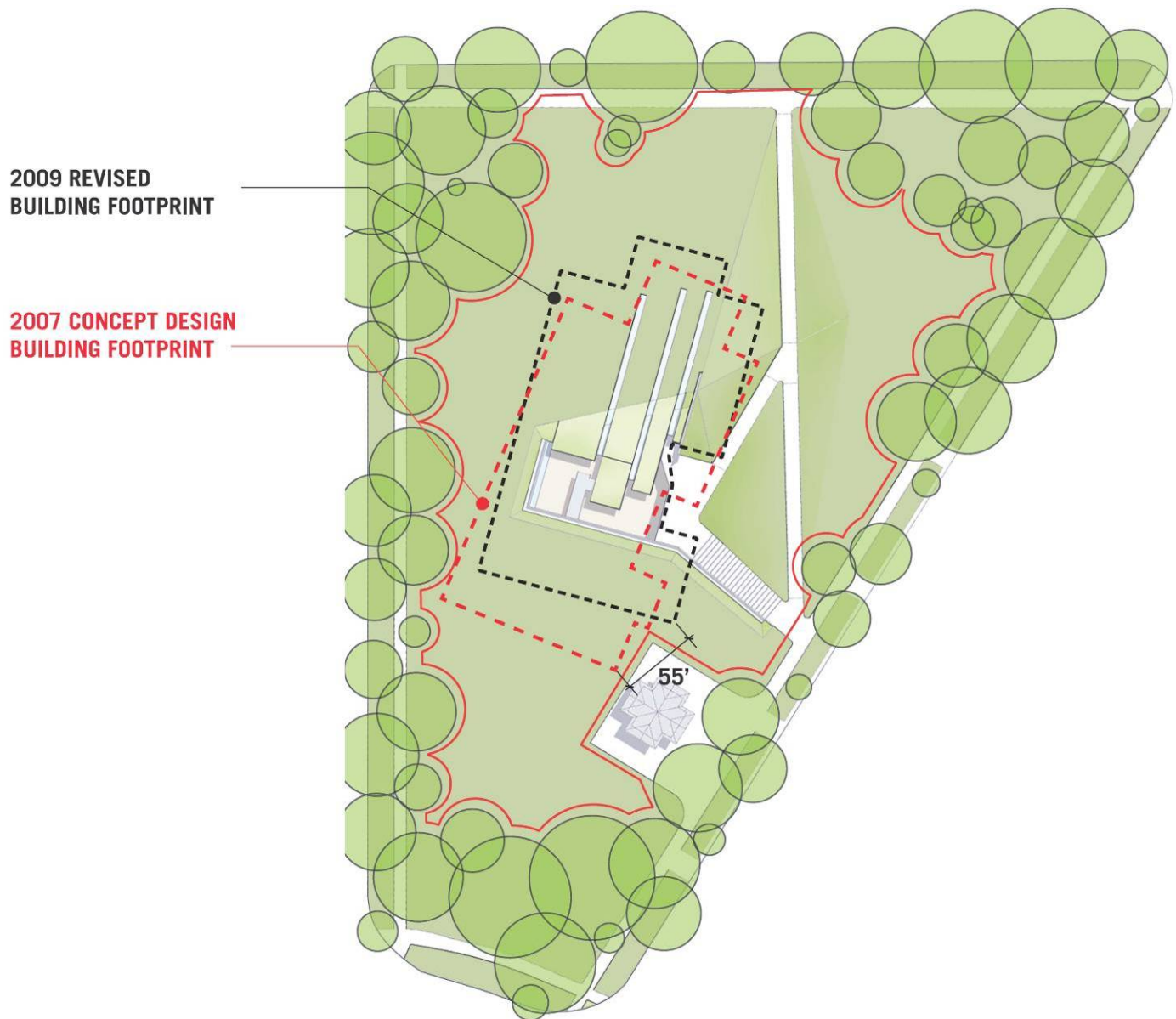
Raising the grade of the area underneath the building by 42" results in an entry level at 8' instead of 5'. Thus, the linear ramp does not need to descend as much as it did in the 2007 concept.

NPS indicates that the reduction in ramp length, in turn, results in several other modifications. These include:

1. A simpler ramp configuration.



2. An adjustment of the building siting further to the north. The building is now axial to the centerpoint of the Lincoln Memorial and the site stairs are axial to the Vietnam Veterans Memorial flagpole across Henry Bacon Drive. The building is also further away from the NPS Kiosk and the perimeter tree root zone in the southwest corner.

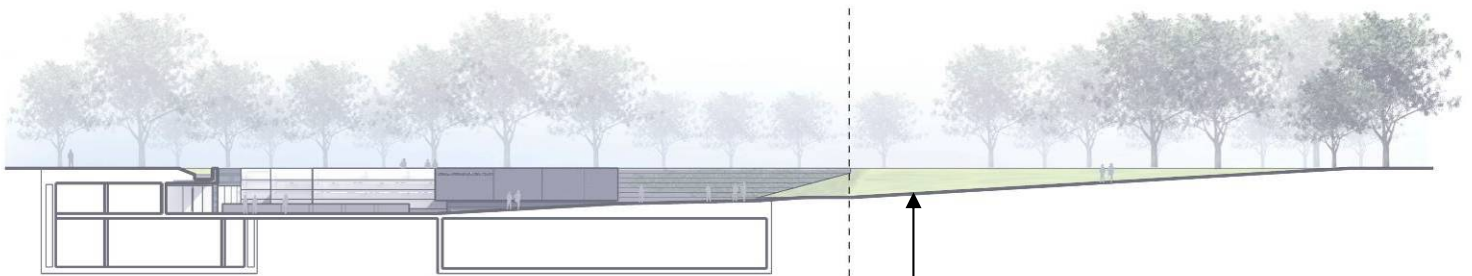


The June 2009 submission is located further to the north which moves the Center away from the National Park Service Kiosk and the perimeter tree root zone in the southwest corner.

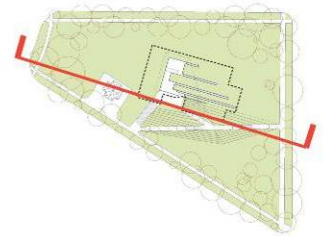
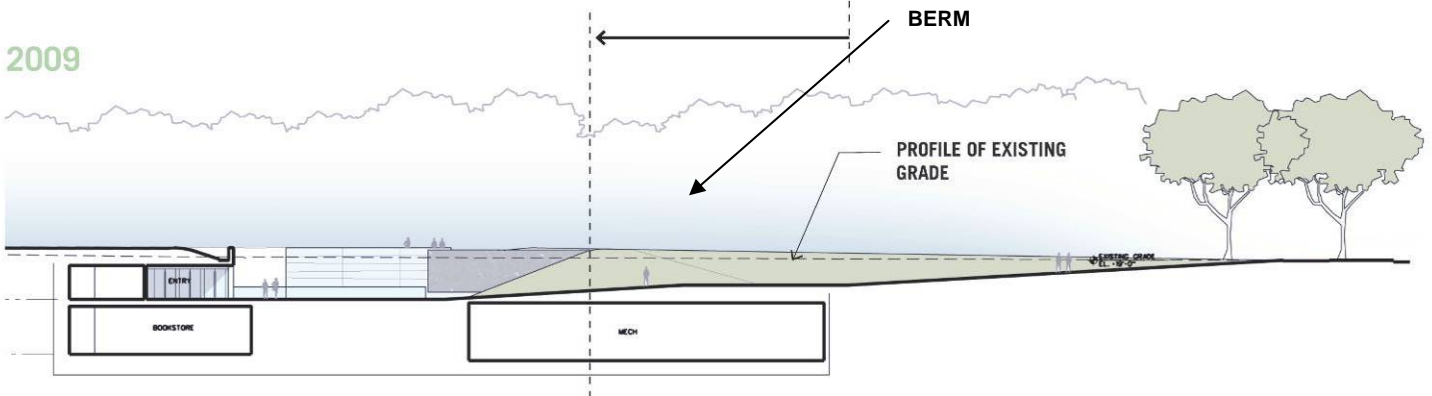
3. A more substantial berm along the east face of the Center which reduces the overall area of visible façade from Henry Bacon Drive.

COMPARATIVE NORTH/SOUTH SECTION

2007



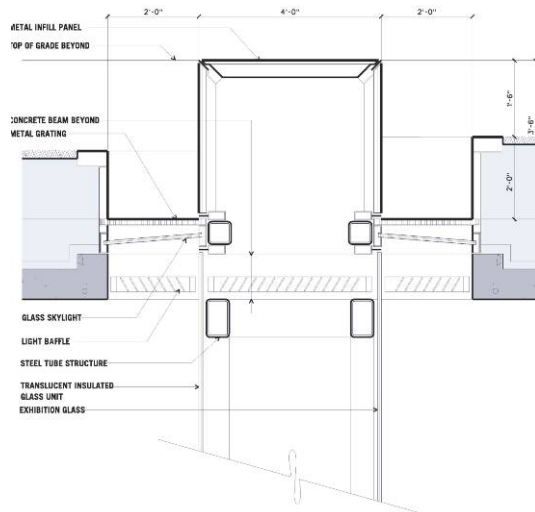
2009



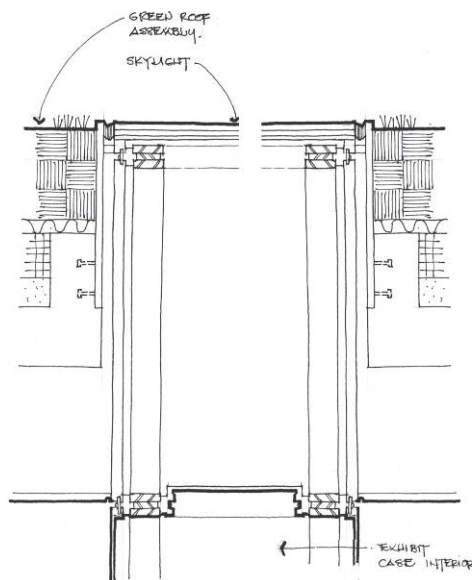
Specific Building Elements

The applicant has also made revisions to specific building elements in the revised concept. These include:

1. The exhibit wall skylights have been pulled down in section so that they are flush with the adjacent grade (the grass) instead of rising above the grass as they did in the original concept.



The skylight/exhibit wall in the 2007 concept

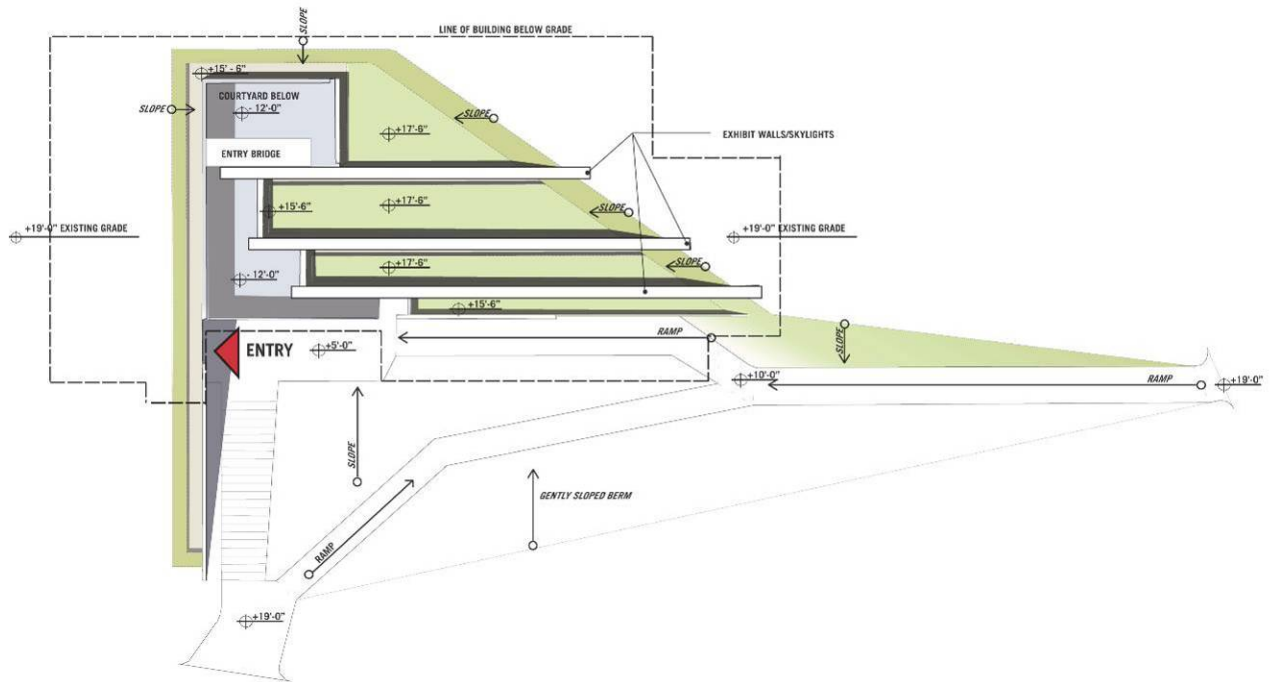


The skylight/exhibit wall in the June 09 submission

- The exhibit walls and skylights have been pulled back in plan so that they no longer extend into the courtyard.

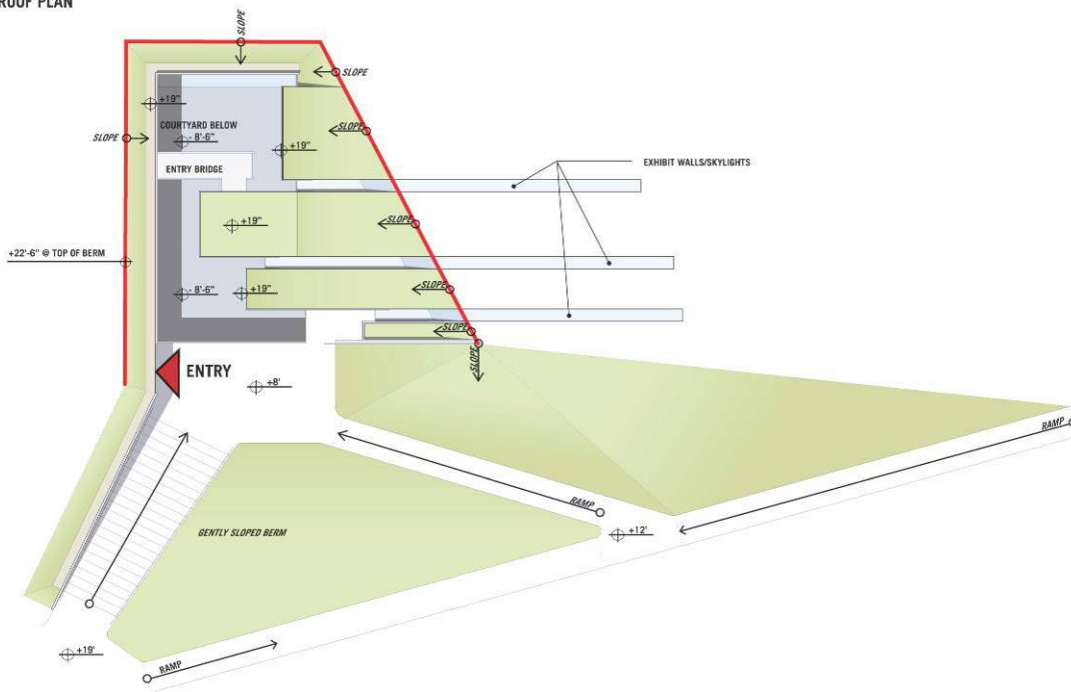
2007

2007 CONCEPT DESIGN REVIEW - Roof Plan



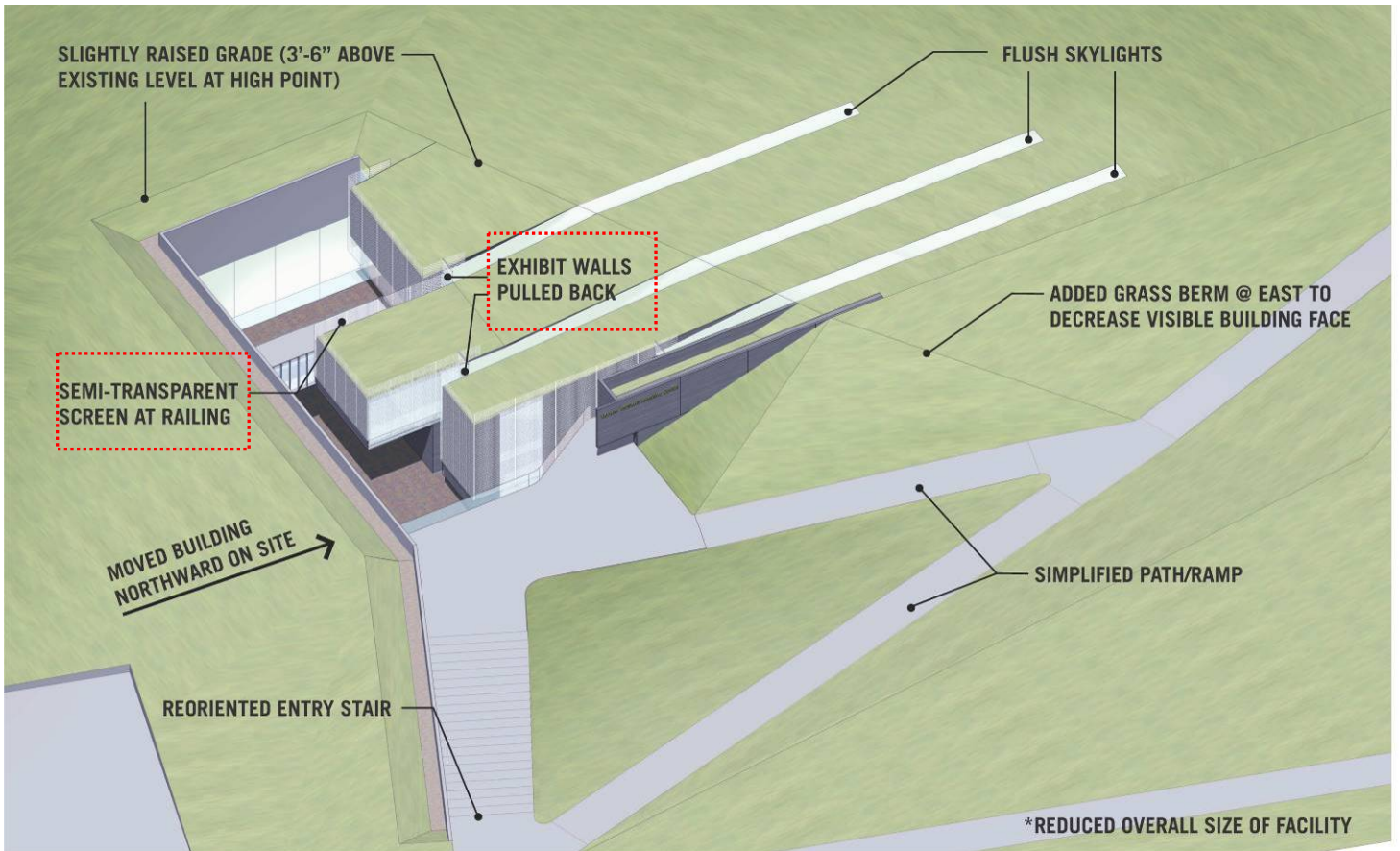
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REVISED ROOF PLAN

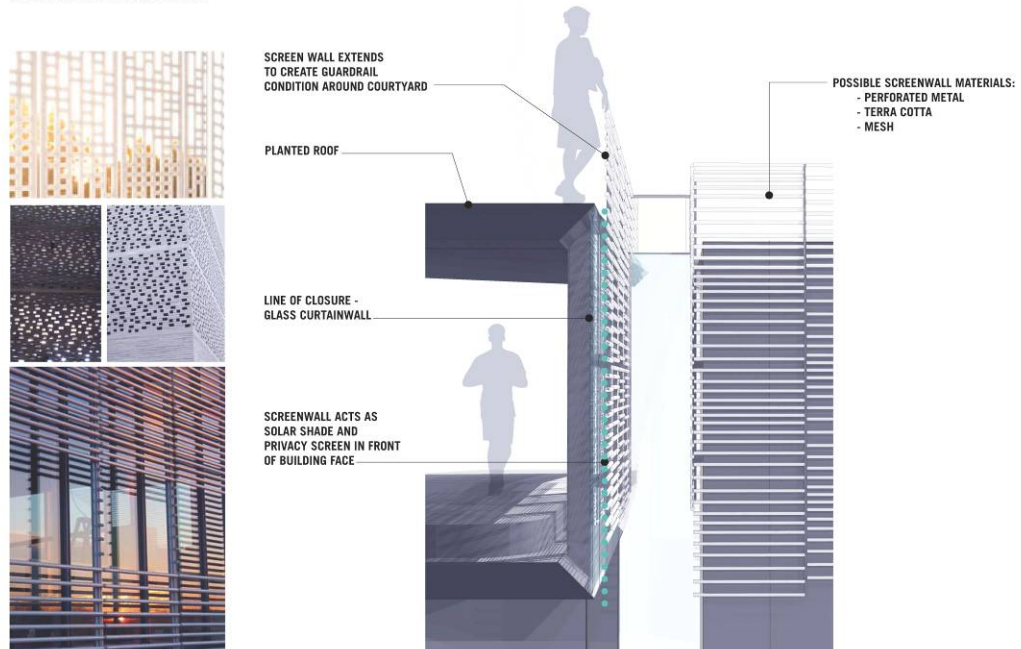


The exhibit walls and skylights have been pulled back from the courtyard in the revised concept.

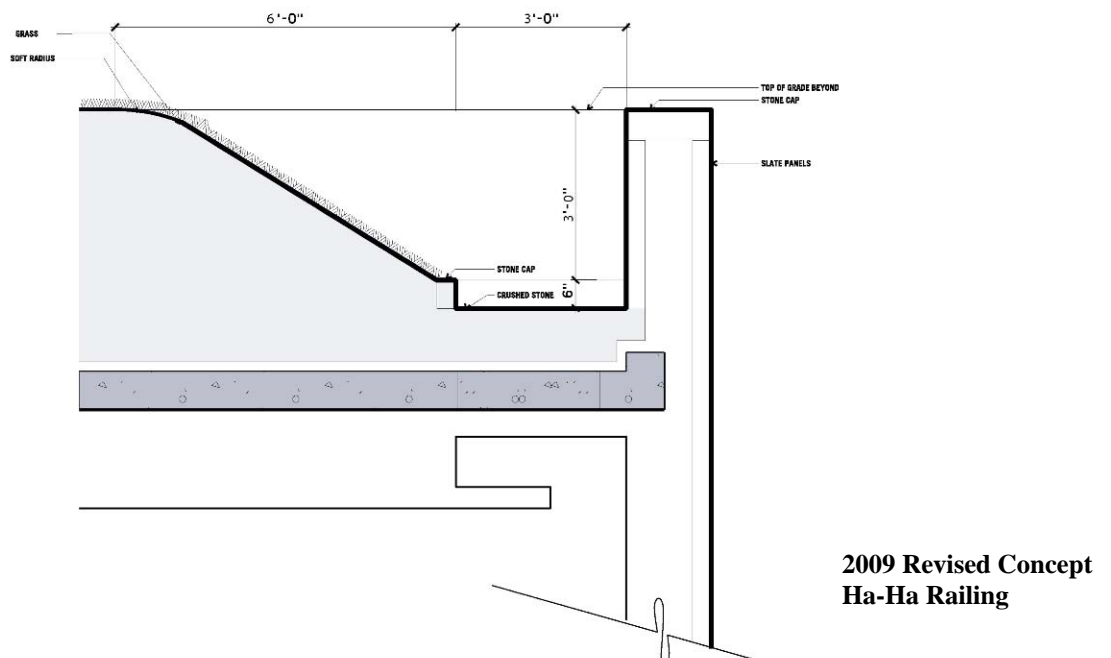
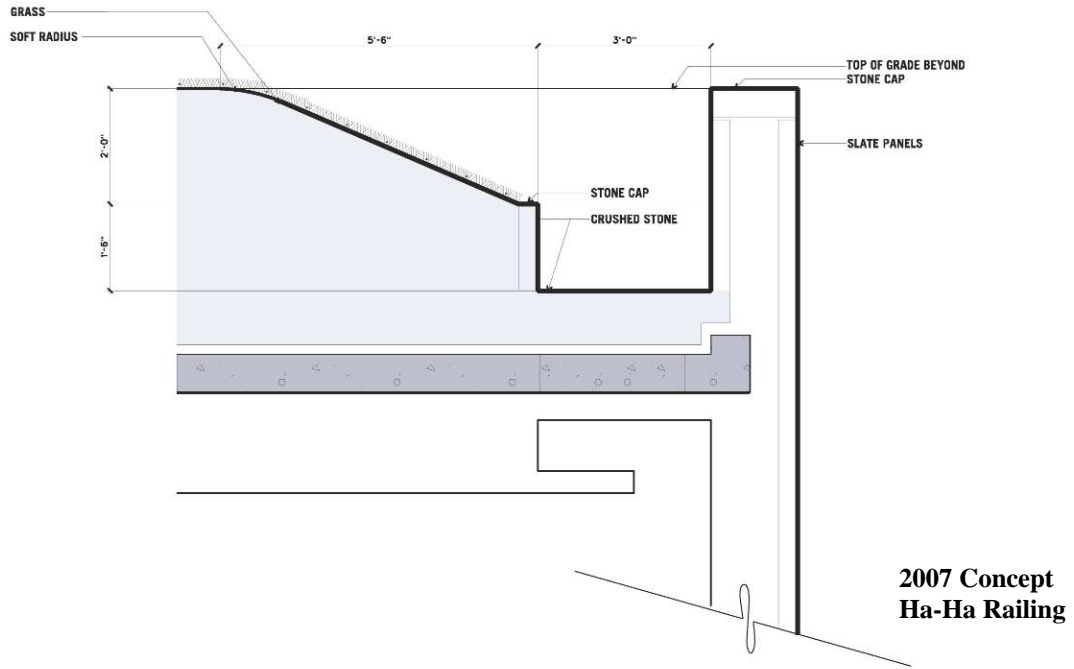
- The guardrail condition along the northern perimeter of the courtyard is no longer achieved through the use of the exhibit walls, but is now created through the use of a lightweight architectural screen which extends upward from the courtyard below.



SCREEN FACADE SECTION DETAIL

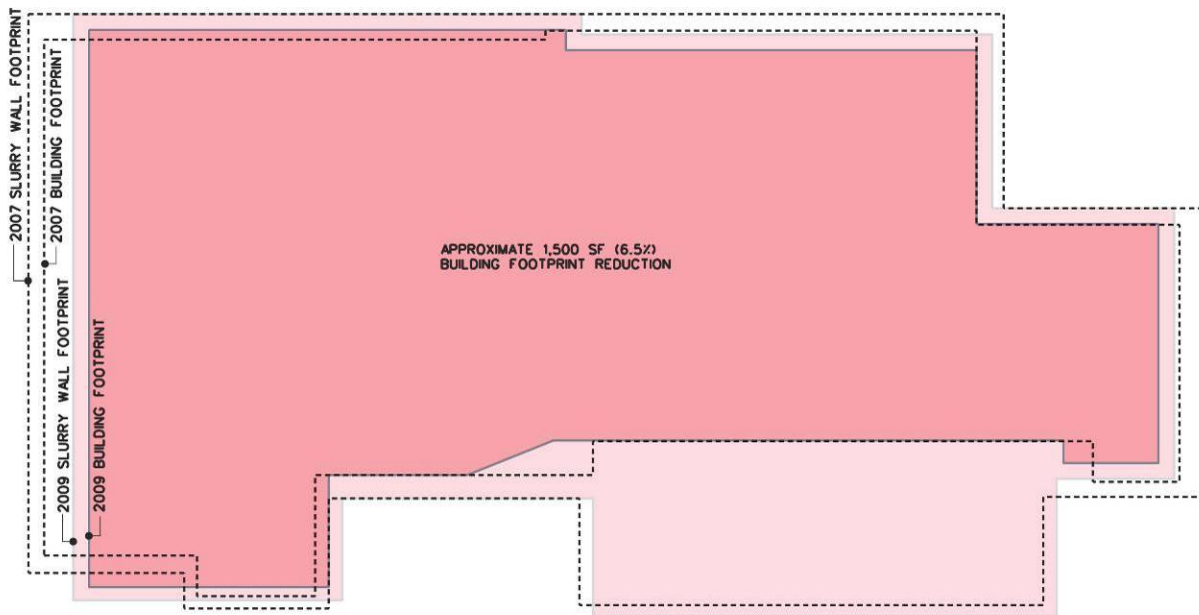


4. The step at the bottom of the slope in front of the ha-ha wall has been reduced from 18" to 6".

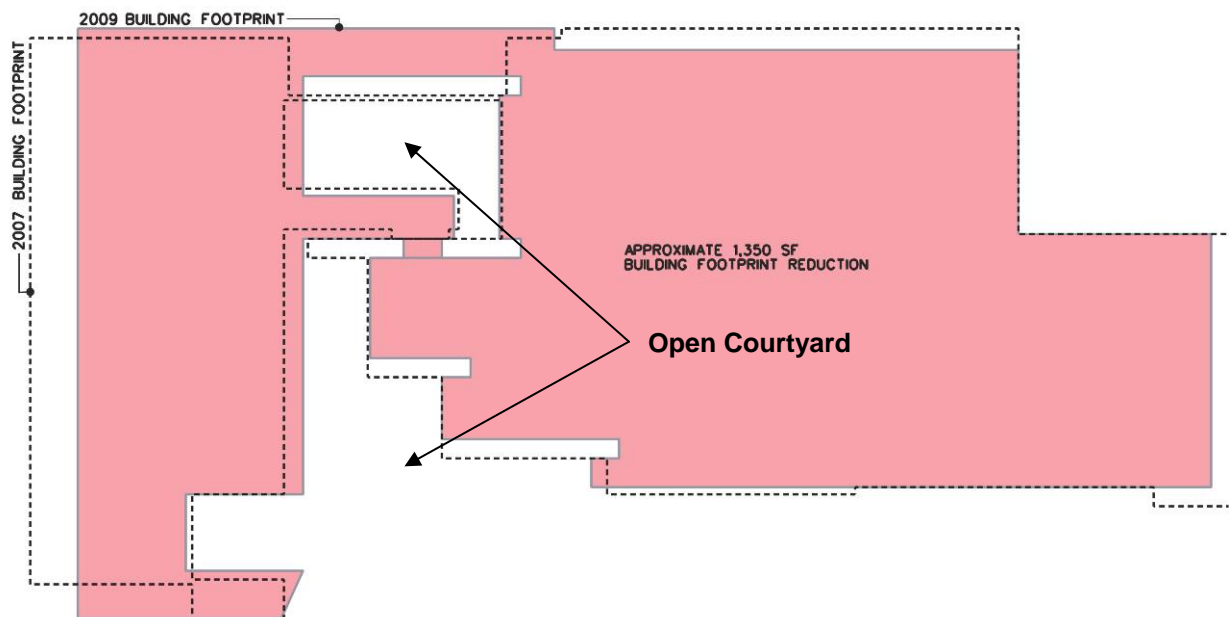


Building Size

The overall size of the building footprint as well as the overall gross area of the building have been reduced. The footprint comparison below shows that the lower level footprint, which is fully below ground, has been reduced by approximately 1,500 square feet. The reduction mostly comes from the perimeter of the building where mechanical and support services are located. The upper level footprint, also fully below ground, has been reduced by approximately 1,350 square feet. The reduction also comes largely from the perimeter of the building. The courtyard, which is open to the sky and visible from above ground, is still approximately 3,200 square feet.



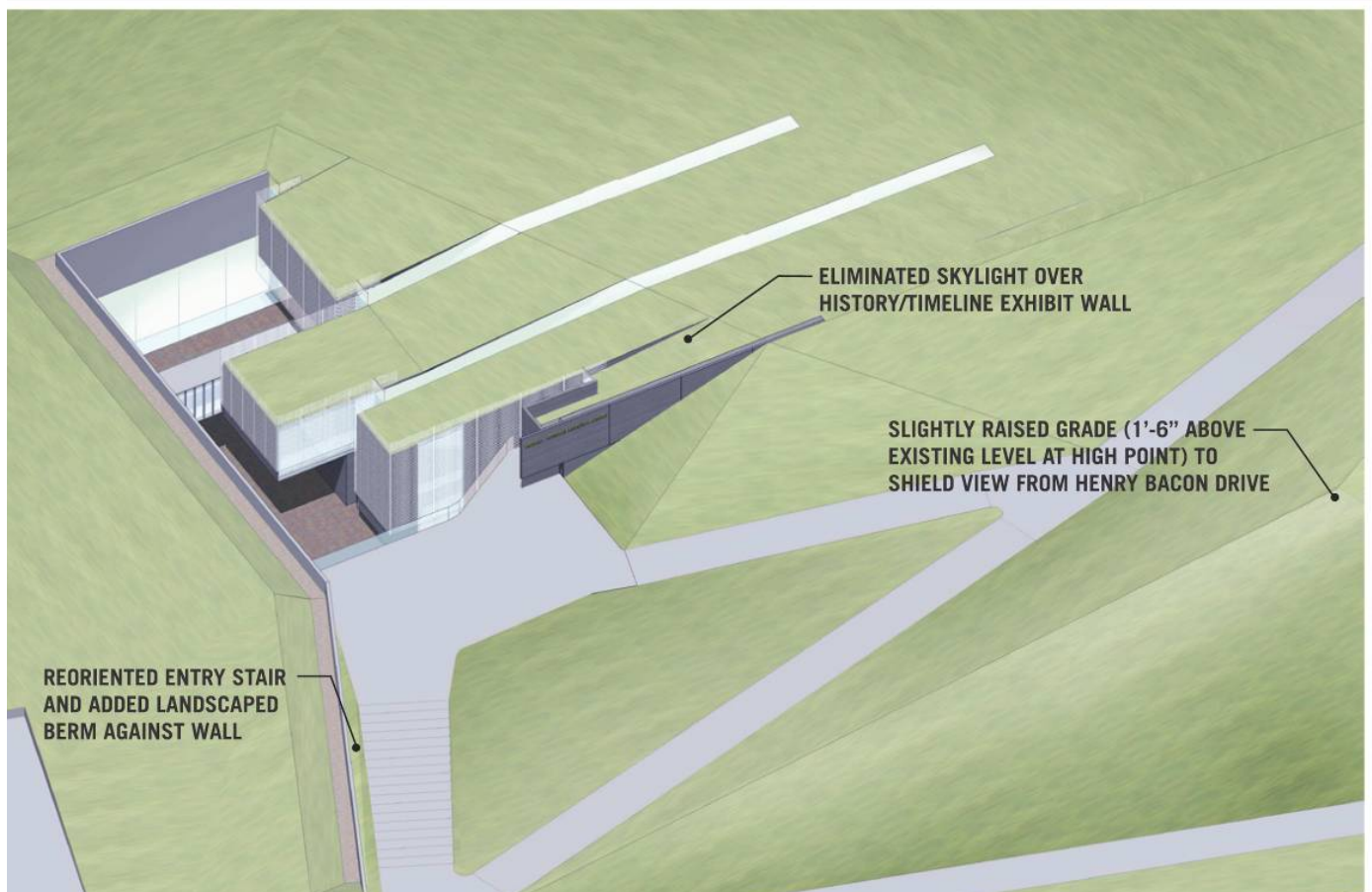
Footprint Comparison – Lower Level: 2007 vs. Revised



Footprint Comparison – Upper Level: 2007 vs. Revised

Revisions to the June 2009 Submission

As a result of a consultation meeting between NCPC and the applicant that occurred on May 13, the applicant submitted further revisions to NCPC on May 20. These revisions, which are described below and referred to as “Revised June 2009 Submission”, have been incorporated into staff’s analysis.



Summary of Revisions

Revisions to the June 2009 Submission (continued)

1. The applicant indicates that a landscaped and bermed zone was added between the site stair and the adjacent retaining wall, both to alleviate concerns that the experience "mimics" the Memorial, and to make the wall less visible.

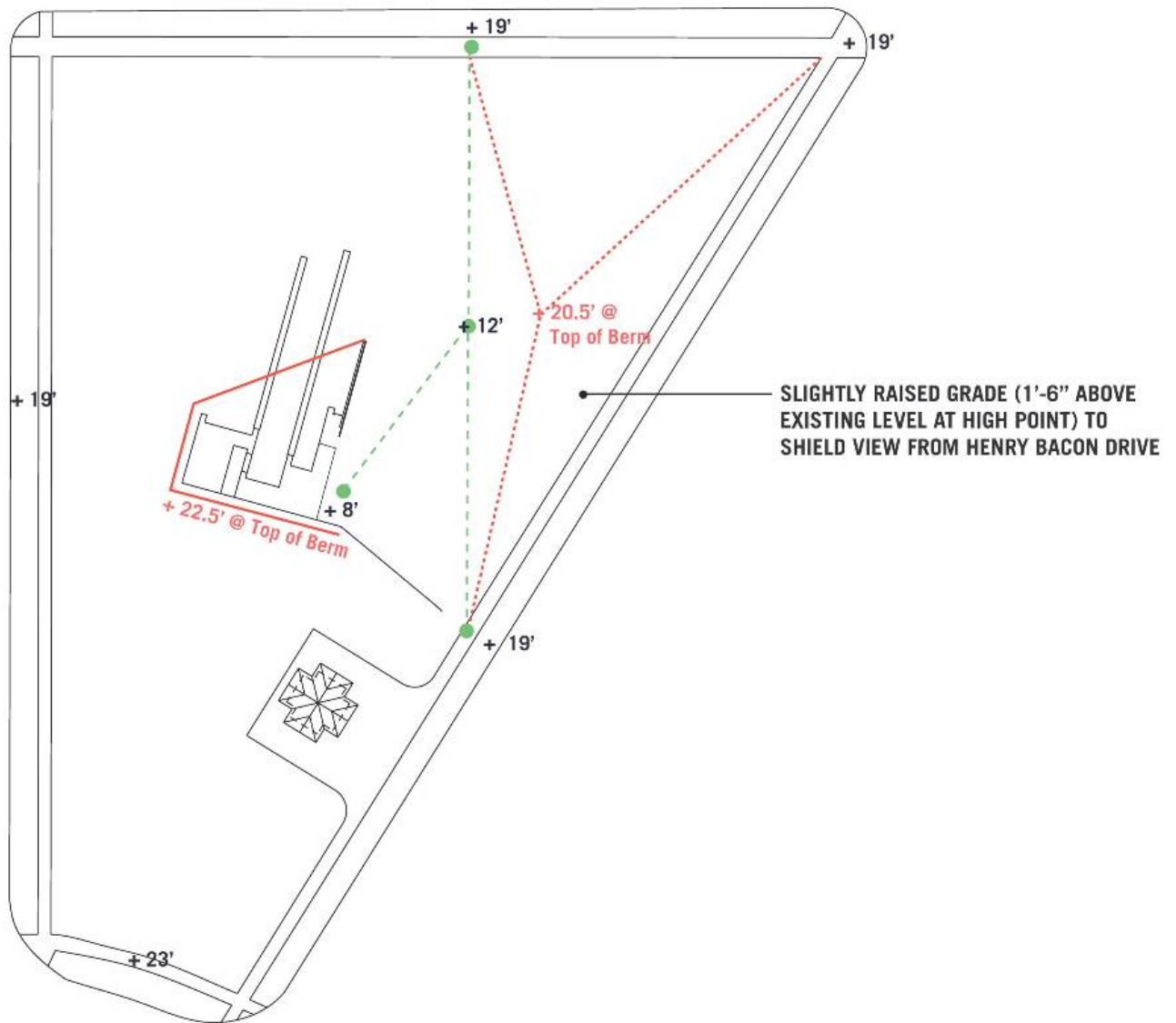


June 2009 Submission: View from the crosswalk near 22nd Street and Constitution Avenue



Revised June 2009 Submission: View from the crosswalk near 22nd Street and Constitution Avenue.
In the revised 2009 submission, the applicant has added a grass berm in between the staircase and the south façade wall.

2. A slight raise in grade was added to the zone between Henry Bacon Drive and the entry ramp, such that the highest point of this raised grade is about 1'-6" higher than the existing elevation. NPS indicates that the additional raise in grade will make the Center less visible from the view along Henry Bacon Drive.





June 2009 Submission: View from Henry Bacon Drive

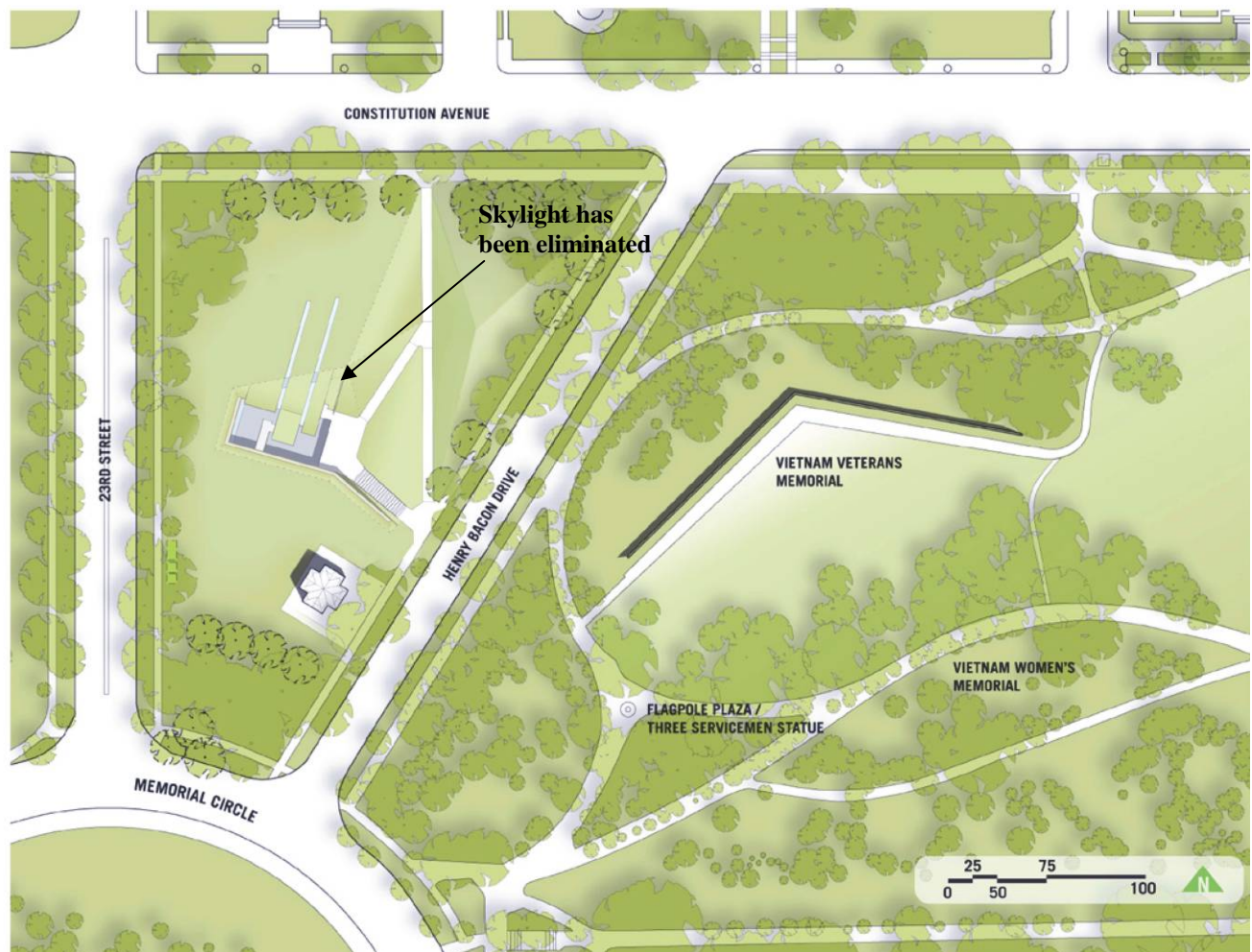


Revised June 2009 Submission: View from Henry Bacon Drive.

In the revised June 2009 submission, the applicant has added a subtle grass berm in the northeast corner of the site in an effort to make the south and east façade walls of the Center less visible.

- The applicant indicates that the skylight above the History/Timeline exhibit wall (the eastern most) has been eliminated, since this portion of the exhibit will likely make use of both print and some media components, and the soft glow effect of light from above is less critical. The applicant also states that the skylights are still a core idea of the two exhibit walls where Collection is displayed because they will contribute to an uplifting environment.

Site Plan



Revised June 2009 Site Plan showing the elimination of the skylight over the history/timeline exhibit wall.

PROJECT ANALYSIS

NCPC staff acknowledges the significance of this project and the challenge of designing it 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 Mall. The Commission adopted the design guidelines to protect this nationally significant place during design development of the project. The guidelines are required mitigation for site selection under NEPA.

In 2007, the Commission requested that the applicant reduce the scale of the building openings and the protrusion of building elements to meet the design guidelines. In response, the applicant raised the grade of the site to reduce the size of the entry ramps, reoriented the building, and made the skylights flush with the grass. With the exception of eliminating one of the skylights, the applicant has not reduced the scale of the building openings and the protrusion of building elements.

Concealing the Center with grade changes has reduced the Center's visibility from some viewpoints but increased its visibility from others. Most importantly, the placement of a ramped walkway through the elevated grade exposes the Center's south entry wall from Constitution Avenue, an important ceremonial street in Washington D.C. As a result, the Center appears to be more prominent than the Vietnam Veterans Memorial itself, which is not visible from Constitution Avenue. The ramp also interrupts a large portion of the site that would otherwise be available for passive recreation. Rather than trying to conceal the building by manipulating the landscape, the applicant would be more successful in creating a design that meets the design guidelines if it eliminated the walkway from Constitution Avenue, reduced the scale of the building openings, and eliminated building elements that are visible above ground.



The diagram illustrates the area of the site that is impacted by the project's skylights, courtyard, walkways and associated slopes

Design Guidelines (required mitigation under NEPA)

The following section analyzes the revised concept 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 the applicant's response to meeting the guideline followed by NCPC staff's analysis. At the end of this section, staff provides its recommendations for Commission action.

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.

NPS Revised June 2009 Proposal:

The applicant proposes that the slight raise in grade reduces the overall visibility of the Center by reducing the sight lines from various vantage points along the perimeter sidewalks of the site. The design team has simulated and depicted the various view sheds for the Commission's review. The applicant states that grade change reduces the overall vertical travel required from the perimeter sidewalks of the site and therefore reduces the length of the overall approach ramp. It also allows for a more substantial berm along the east face of the Center that reduces the overall area of visible façade from Henry Bacon Drive. Finally, the exhibit wall skylights have been brought down in section so that they are flush with the adjacent grade instead of rising above the adjacent grass level.

Staff Analysis:

The scale of the building openings has not been reduced and as a result the building is still visible from the Lincoln Memorial, Constitution Avenue, and from within the axial view sheds of 23rd Street, NW and Henry Bacon Drive. The courtyard and newly added guardrails will be visible from the Lincoln Memorial Stairs. While raising the grade of the site has reduced the visibility of the Center from the corner of 23rd and Constitution Avenue, the south wall of the Center and the entry court are now more visible from the crosswalk at Constitution Avenue and 22nd Street; and, the south and east walls are now more visible from Henry Bacon Drive. In response to staff concerns about visibility, the applicant raised the site of the northeast corner by 1.5 feet; however, it does little to reduce the visibility of these building elements.

The ramp from Constitution Avenue and the resulting cut in the bermed area of the site make the south wall and the entryway of the Center more visible from Constitution Avenue. The ramp descends 11' to the entryway which creates a cut in the site that breaks up the landscape and limits the potential for recreational use. Staff contends that the most critical relationship of the proposed Center is to the Vietnam Veteran's Memorial across Henry Bacon Drive, not to Constitution Avenue. The majority of people will come to the Center from the Memorial at the mid-block crossing and by tour buses that will unload in the parking lane along Henry Bacon Drive (near the Center's entry stairs and ADA ramp). Pedestrians wishing to reach the Memorial from Constitution Avenue would have to navigate a circuitous route descending first into Center's entry plaza, then back up to Henry Bacon Drive, and finally doubling back to the Memorial's entry point. While the existing desire line at the northeast corner of the site shows that some visitors are arriving from the north, the proposed ramped walkway will not replace the

desire line path. Therefore it is staff's opinion that given the ramp's impact on the site and on views from Constitution Avenue, and given its limited utility, that it should be eliminated.

Finally, while one skylight has been removed and the remaining two are flush with the grass level, they are approximately 130 feet long. NPS has not demonstrated that interior lighting emanating from the skylights and the courtyard will not be visible from these viewpoints.



2007 Concept: View from corner of 23rd Street and Constitution Ave



The Center is less visible from this viewpoint

Revised June 2009 submission: View from corner of 23rd Street and Constitution Ave
The pathway and exhibit skylights are less visible because of the 3.5' raise in grade



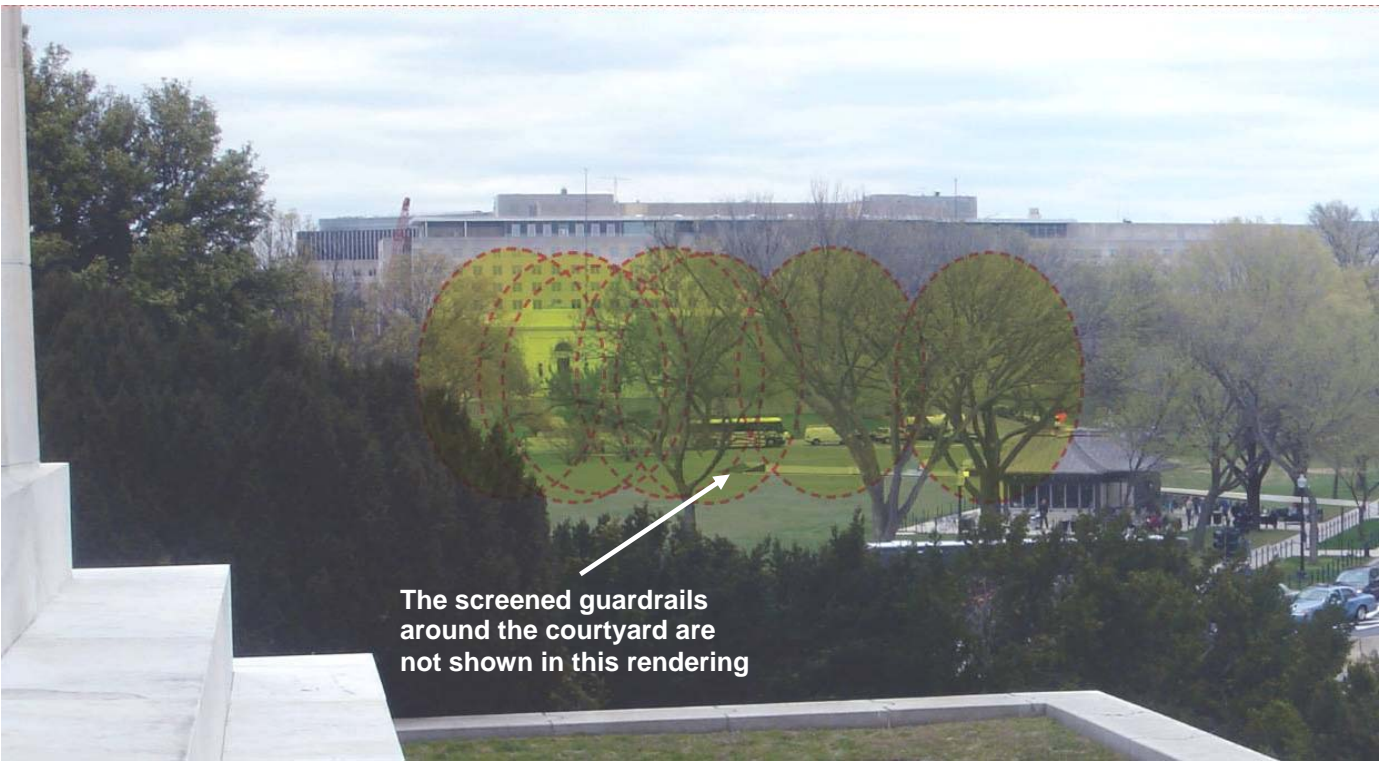
2007 Concept: View from the crosswalk at 22nd Street and Constitution Avenue



Revised June 2009 submission: View from corner of 23rd Street and Constitution Ave
The exhibit skylights are less visible because the grade of the site has been raised and the skylights are now flush with the grass. The south wall of the building and the walkway and adjacent slopes are now more visible.



2007 Concept: View from the top stair of the Lincoln Memorial Steps
The yellow circles represent tree coverage from new Elm trees to be planted per the Historic Plan.

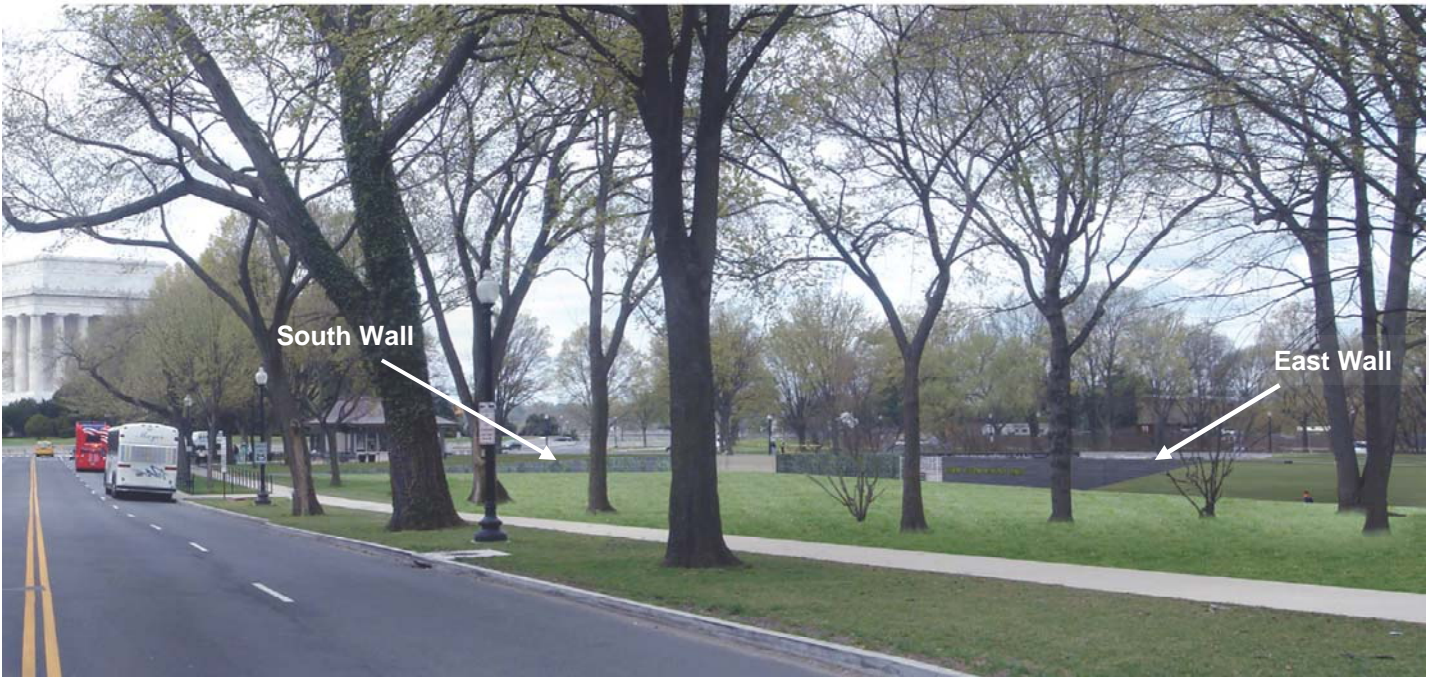


The screened guardrails
around the courtyard are
not shown in this rendering

June 2009 submission: View from the top stair of the Lincoln Memorial Steps
The opening of the courtyard is still visible in the landscape below. The new guardrails are not shown in this rendering and would be visible. Even if the proposed Elm trees help to block the view of the Center when they are fully grown, it will only be for the time of year when they have leaves.



2007 Concept: View from Henry Bacon Drive Looking South



Revised June 2009 Concept: View from Henry Bacon Drive Looking South
The east and south façade are now more visible from Henry Bacon Drive.

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.

NPS Revised June 2009 Proposal:

NPS included a simulation in the submission that addresses the visibility of the Visitor Center from the pathways of the Vietnam Veterans Memorial. They contend that due to the heavy foliage, the traffic on Henry Bacon Drive, the bus drop off, and the shear distance between the Memorial and the Visitor Center's entrance, there is little visibility of the Center at all. In addition, the downward sloping ramp at the Memorial has the resultant effect of lowering visitor sight lines, making any view to the Center across the street from the Memorial virtually impossible.

Staff Analysis:

The revisions to the concept do not affect staff's initial analysis. Staff concurs that the Visitor Center is minimally visible from the Vietnam Veterans Memorial.



*The view from the Vietnam Memorial has not changed from the 2007 Concept.
The Visitors Center will not be seen from this viewpoint.*

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.

NPS Revised June 2009 Proposal:

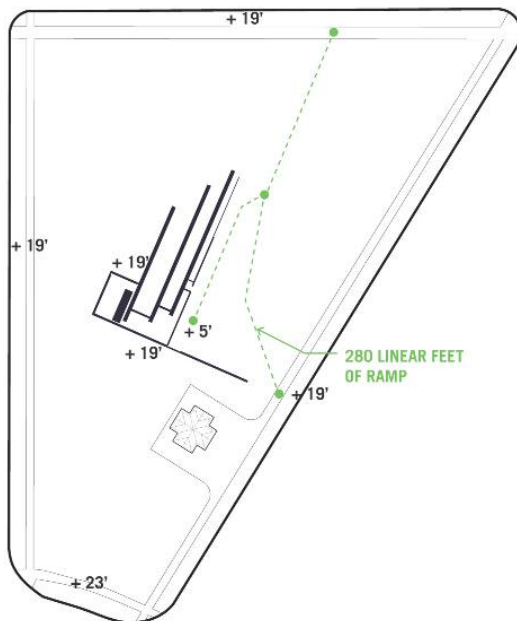
The revised concept raises the grade of the 2007 concept by an additional 3.5' to better accommodate the entry ramp. A raise in grade reduces the overall vertical travel required from the perimeter sidewalks of the site to the Center's entry one story below. As a result, the length of the ramp can be shortened. The revised concept still incorporates gradual slopes downward, which are related either to the approach to the center's entry, or as a result of the need for "ha-ha" earth berms to shield views of guard walls around the courtyard area. Transitions between the flat planes of grass and sloped areas will be incorporated into the design concept. The slope into the existing grade provides universal access without the need for extensive ramps.

Staff Analysis:

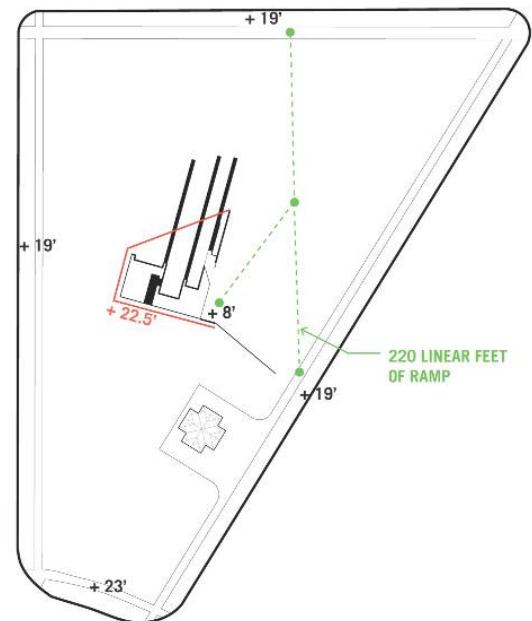
Staff concludes that the revised concept design has raised the grade of the site by 3.5' to better accommodate the approach ramp and reduce its overall length. The result is a simpler ramp configuration. The entryway to the Visitor's Center is now at 8' instead of 5'.

COMPARISON OF RAMP LENGTH

2007

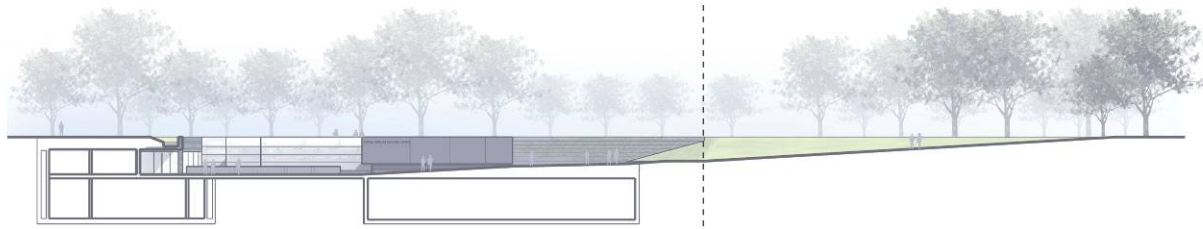


2009

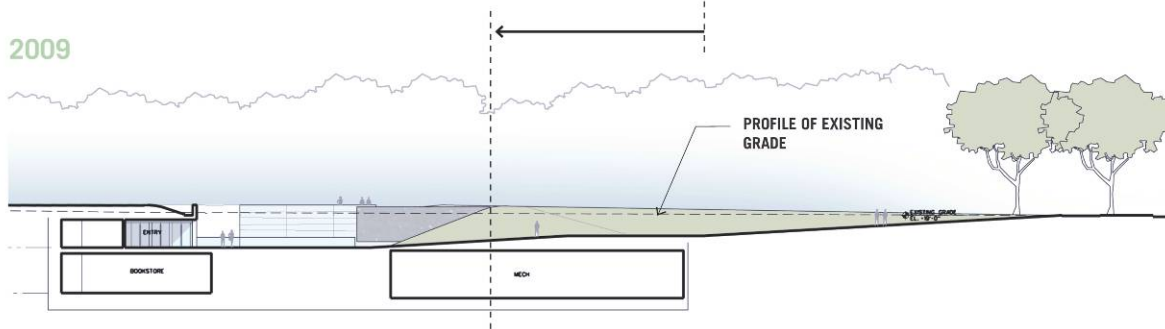


COMPARATIVE NORTH/SOUTH SECTION

2007



2009



Site Section depicting grade change of 3.5'

Raising the grade and reducing the ramp length have also enabled the design team to adjust the building siting further north which creates a better relationship to the existing National Park Service kiosk as well as to the perimeter tree root zone.

Staff notes that raising the grade of the site also increases the view of the south wall of the Center from Constitution Avenue and the east wall of the Center from Henry Bacon Drive, and consequently conflicts with design guideline #1. The reason for this is that the entire building now sits 3.5' higher than it did before and is therefore more obvious when viewed from the sidewalks where the grade has not changed. Staff's recommendation to address this concern is discussed in the section for design guideline #1.

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.

NPS Revised June 2009 Proposal:

The applicant has stated that any building light will not have visible sources from the surrounding site and that the program type and exhibits do not require high interior ambient light levels. The light control devices at the skylights will control incoming light levels as well as light emission. Regular facility hours will not require building lighting through the evening.

The applicant has stated that compliance with this mitigation requirement will be presented in more detail during design development when a lighting concept for the interior space has been

developed, and evening lighting conditions at the site have been studied and can be simulated. NPS states that it is not their intent to have the Center open or illuminated after dark.

Staff Analysis:

The applicant has not yet demonstrated compliance with this design guideline. Staff concludes that additional environmental analysis and design development is required to adequately assess the impact of interior lighting that may emanate from the Center. Staff continues to have concerns that potential lighting will emanate internally from exhibit walls through the skylights and from the courtyard, impacting views to and from the Lincoln Memorial and from the perimeter sidewalks. Any lighting that may emanate from within the structure through the courtyard may have an adverse affect upon the environs of the Lincoln Memorial, the Vietnam Veterans Memorial, and the National Mall by interfering with or encroaching upon the views to and from existing memorials in this part of the National Mall.

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.

NPS Revised June 2009 Proposal:

NPS states that the proposed raise in grade reduces the overall visibility of the Center by reducing the sight lines from various vantage points along the perimeter sidewalks of the site. The skylights have also been pulled down so that they no longer rise above the grass.

Staff Analysis:

While raising the grade and pulling the skylights down so that they are flush with the grass have reduced the visibility of the skylights from the sidewalks surrounding the site, the sunken entry way is now more visible from Henry Bacon Drive and from the viewpoint at Constitution Avenue and 22nd Street. Staff is also concerned that potential lighting will emanate internally from exhibit walls through the skylights and from the courtyard.

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.

NPS Revised June 2009 Proposal:

NPS states that it does not anticipate the need to provide site lighting beyond the minimal amount required for public safety. The Center is expected to be in operation during the day only, and will have only low level site lighting to allow pedestrian circulation along entry paths. Existing perimeter lamp-post lighting will provide some site ambient light. NPS states there will be new indirect lighting with no visible sources from the surrounding site. Minimal lighting levels at the steps, access paths, the entry and the courtyard will be installed to ensure public safety and security.

The applicant has stated that compliance with this mitigating guideline will be studied and presented in more detail during design development.

Staff Analysis:

The applicant has not yet studied the lighting in full detail.

Design Guideline #7

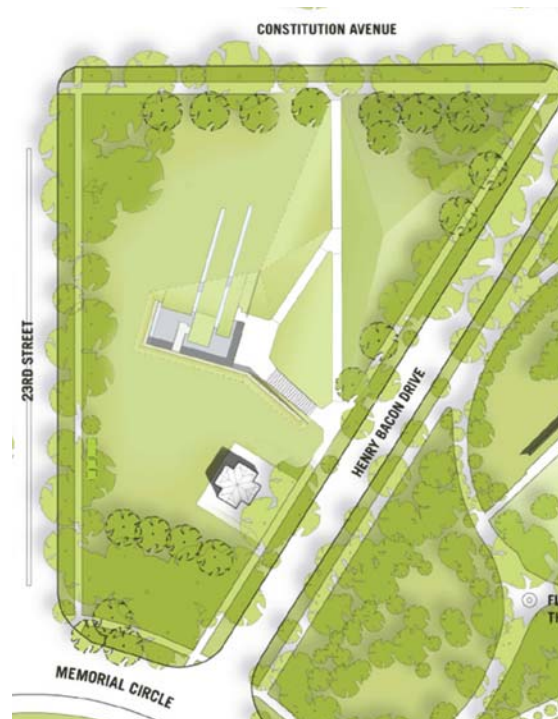
The Visitor Center's design will provide only the paved area necessary for visitors to enter and exit the building and which will also provide service access. The design will not include additional paved area for gathering space or queuing.

NPS Revised June 2009 Proposal:

NPS has stated that the design concept includes only the minimum necessary paved area for the number of expected visitors to the Center. The majority of the exterior paving accommodates the ramping approach walks from Henry Bacon Drive and Constitution Avenue and the entry stair from Henry Bacon Drive.

Staff Analysis:

The revised concept has reduced the paved area of the walkway from Henry Bacon Drive and from Constitution Avenue by raising the grade of the site by 42". The applicant continues to meet this design guideline with the revision; however, staff would like to see the walkway from Constitution Avenue eliminated to better meet design guidelines #1 and #5 (which are discussed in their respective sections).



Pedestrian walkway and ramp system

Design Guideline #8

The project will not include new vehicle parking areas.

NPS Revised June 2009 Proposal:

NPS has stated that no new vehicle parking areas are included or proposed as part of the project.

Staff Analysis:

Staff concurs that the applicant's concept design has no new parking areas proposed.

Design Guideline #9

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

NPS Revised June 2009 Proposal:

NPS has stated that the entries for both service and visitors are combined at the same point, and are recessed via the same site approach. No loading dock is required as part of the facility. Holding spaces for daily trash removal and incoming exhibit related materials are incorporated within the building envelope such that no exterior service enclosures are required.

Staff Analysis:

Staff concurs that the applicant's concept design has a single entry for visitors and service.



View of Entry

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.

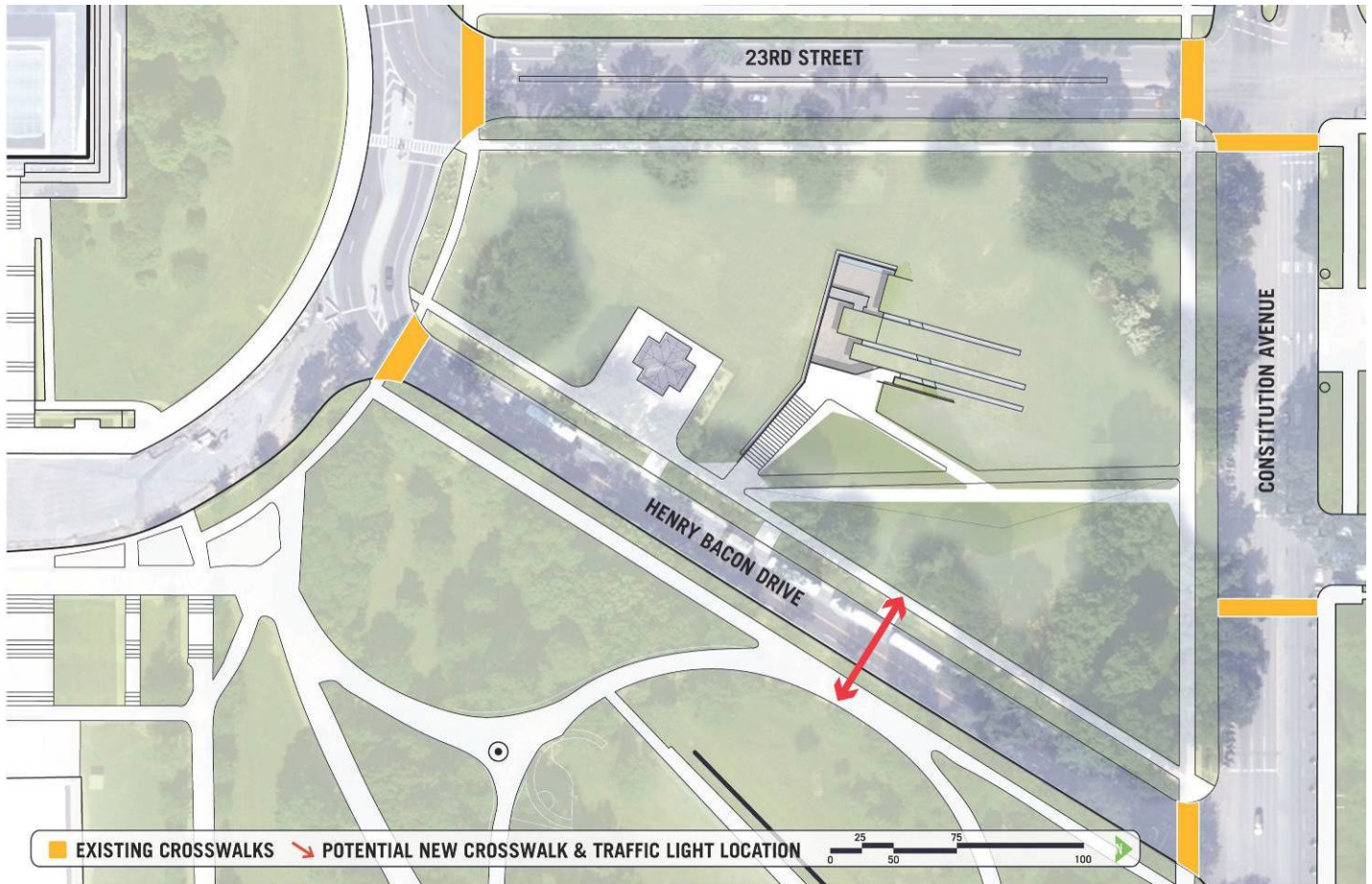
NPS Revised June 2009 Proposal:

The pedestrian street crossing points in the revised concept have not changed. The points will occur at existing signaled intersections, at the traffic light on Henry Bacon Drive at Lincoln Two other crossing opportunities with signals occur at the crosswalks at 22nd and 23rd Streets and Constitution Avenue. The design team has stated that the issue of a midblock street crossing on Henry Bacon Drive should be ultimately addressed through the National Park Service in discussion with the District Department of Transportation.

Staff Analysis:

NPS has not yet designed the project's pedestrian crossing points even though designs for the Center are moving forward. Since the crossing points will have an impact on the design of the site, it is important that both move forward in coordination. The crossing points must be designed to meet the design guideline. The design team should work with the District Department of Transportation and the National Park Service to design any required crossing

points including the mid-block crossing on Henry Bacon Drive to address traffic impacts effectively, to design the building orientation accordingly, and to protect pedestrian safety.



*FURTHER DISCUSSION REQ'D WITH NPS & DC DOT

Vietnam Veteran

Existing and Proposed Crossings

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.

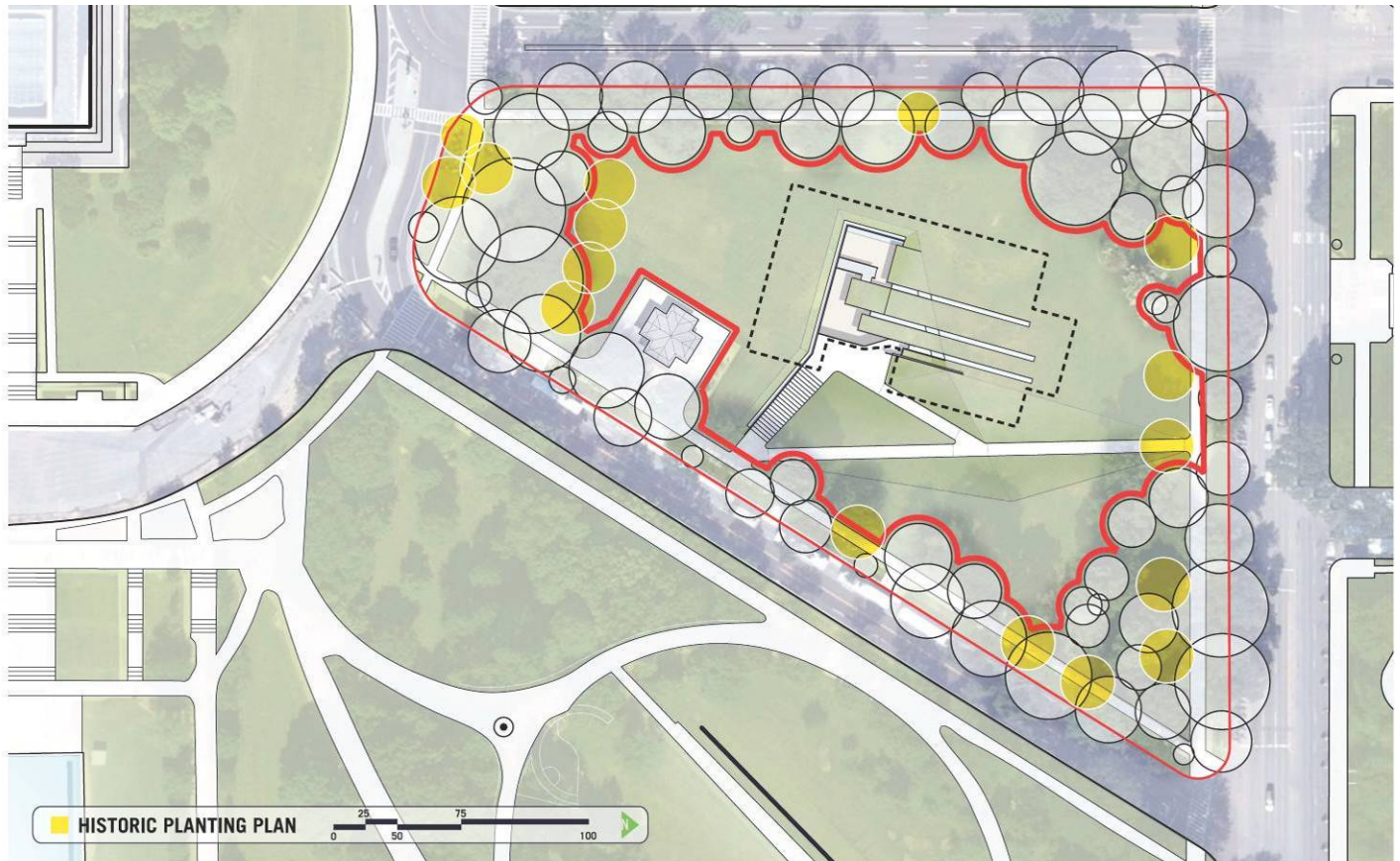
NPS Revised June 2009 Proposal:

NPS has stated that the siting and grading revisions have further moved the building away from the tree root zone and that a technical survey of the site including the tree root zone is underway.

Staff Analysis:

The applicant has reoriented the Center further to the north and to the east to move it away from the perimeter tree root zone. The applicant has noted that the technical survey of the critical root zone of the existing elm trees is underway.

The site is surrounded on its perimeter by mature elm trees that are part of the historic grounds of the Lincoln Memorial. Construction of a building on this site will require that heavy construction equipment pass among the trees during the construction period. It is imperative that the applicant develop a tree protection plan in accordance with standard construction procedures.



*SITE SURVEY IN PROGRESS

Proposed critical root zone (a technical survey is underway)

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.

NPS Revised June 2009 Proposal:

NPS states that the proposed design concept incorporates a landscape design that is in accordance with the Lincoln Memorial Grounds CLR and that grass panels are maintained, and the project proposes to plant new elm trees that are now missing from the site's perimeter.

Staff Analysis:

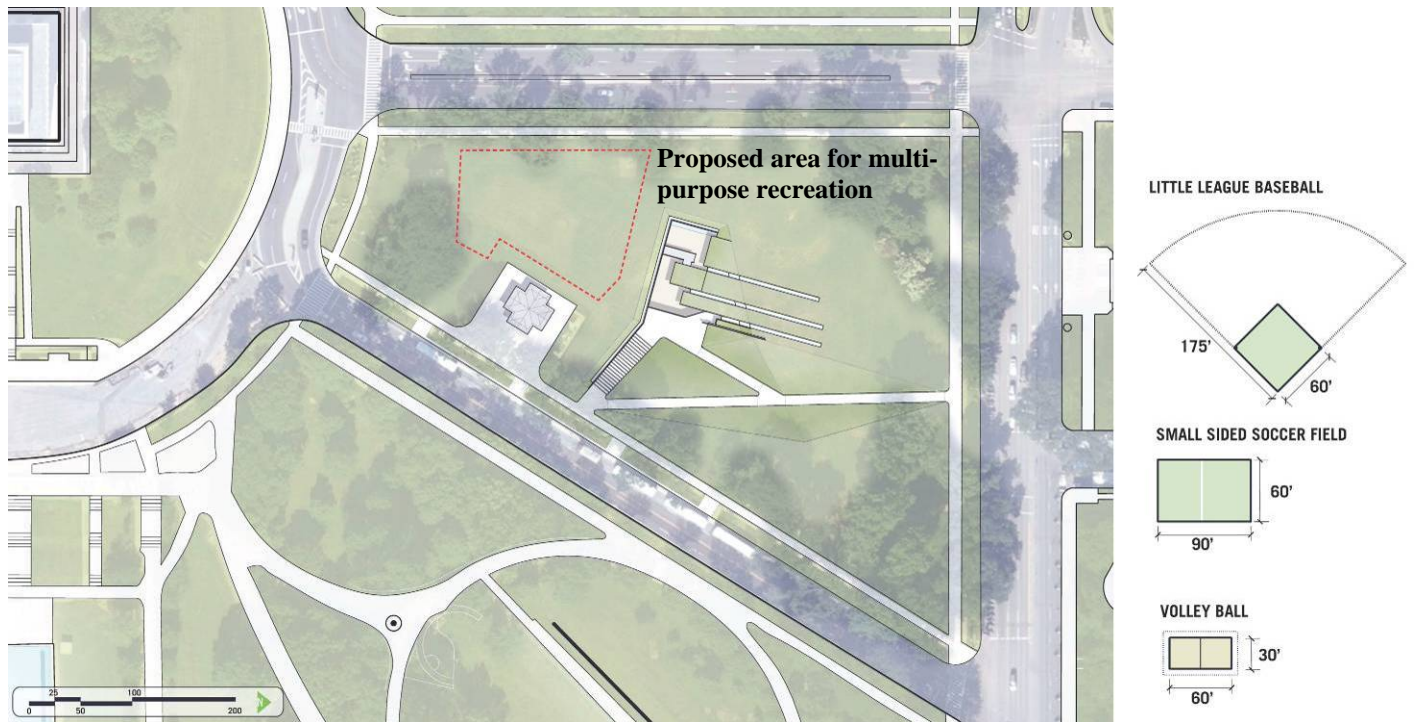
Staff concurs that the concept design proposal incorporates a landscape design consistent with the CLR.

Design Guideline #13

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

NPS Revised June 2009 Proposal:

The applicant states that there will be space for some passive recreation activities such as small-sided soccer and volleyball. Larger organized sports such as little league baseball will not fit on the site. The outlined area below is the area that NPS proposes for multi-purpose recreation.



Proposed multi-purpose recreation area outlined in red.

Staff Analysis:

The submission depicts that an estimated 20% percent of the site will be available for multi-purpose recreation because the configuration of the space changes the nature of the landscape and limits the types of activities that can be accommodated on the site. Project revisions show that few active and passive recreational uses will fit on the site because of the amount of area impacted by the skylights, courtyard, walkway and associated slopes from Constitution Avenue. Currently, in addition to hosting baseball games, the site is informally used by residents and visitors for active and passive recreation. It also allows for overflow onto the site from the food kiosk. If the walkway from Constitution Avenue and the skylights were removed and if the size of the courtyard was reduced, approximately 60% of the site would be available for multi-purpose recreation.

Design Guideline #14

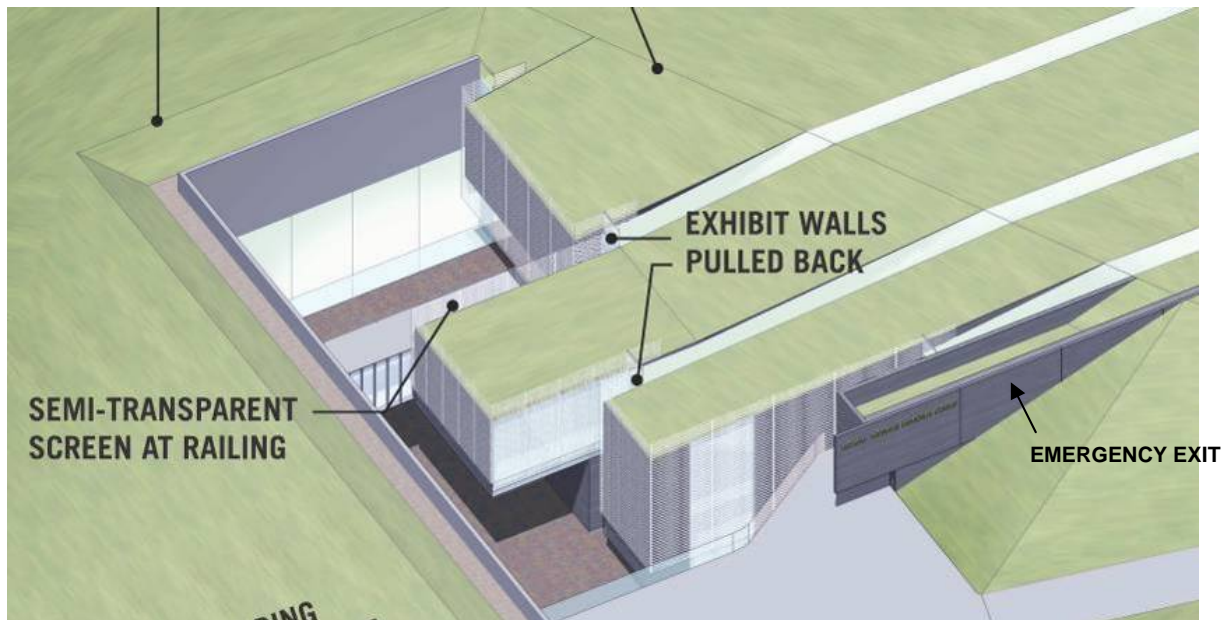
The Visitor Center will be designed without guardrails or perimeter security elements.

NPS Revised June 2009 Proposal:

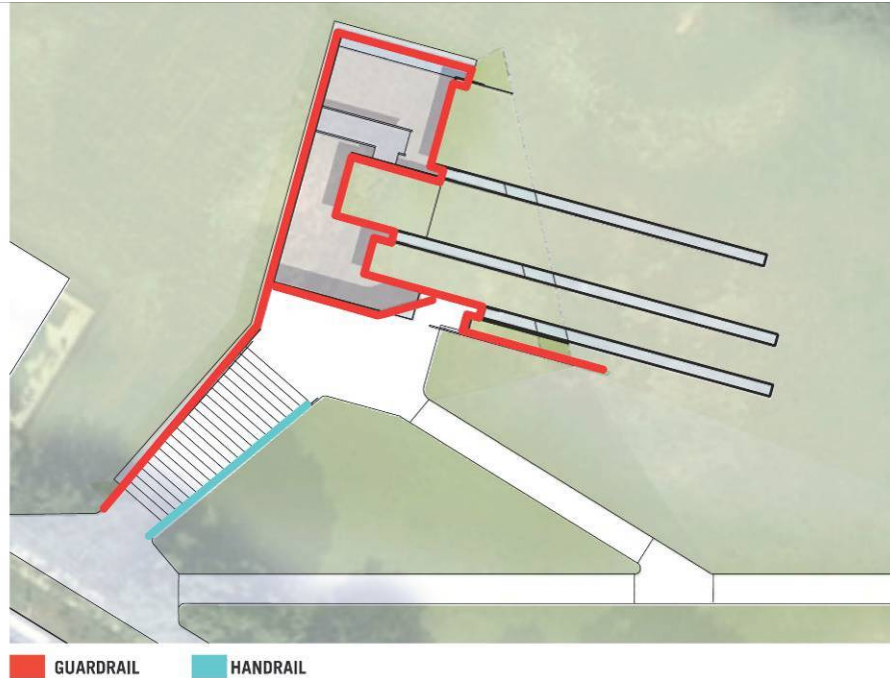
Project revisions show that guard walls are incorporated at the perimeter edge of the courtyard. NPS states that these portions of the structure do not protrude above the level of existing finished grade. A code-required handrail is proposed for the entryway stairs. NPS has stated that the design team has had several preliminary meetings with the U.S. Park Police to assess the overall security needs of the Center. The Center is not currently categorized as a high threat target. As a result, NPS does not anticipate any other perimeter security devices at this time.

Staff Analysis:

The complex design of the two-story courtyard will necessitate a circuitous system of guardrails. In addition to the guard rails at the bottom of the ha-ha walls along the south and west side of the courtyard, the revised concept shows that a screen wall on the north side of the courtyard will extend upward to function as a guardrail. There will also be a guardrail in the entryway area that overlooks the courtyard and around the roof of the emergency access stairwell. Staff is concerned that system of guardrails along the north side of the courtyard will be visible from the Lincoln Memorial since the courtyard itself is visible from this viewpoint.



A semi-transparent screen (guardrail) is proposed for the north side of the courtyard

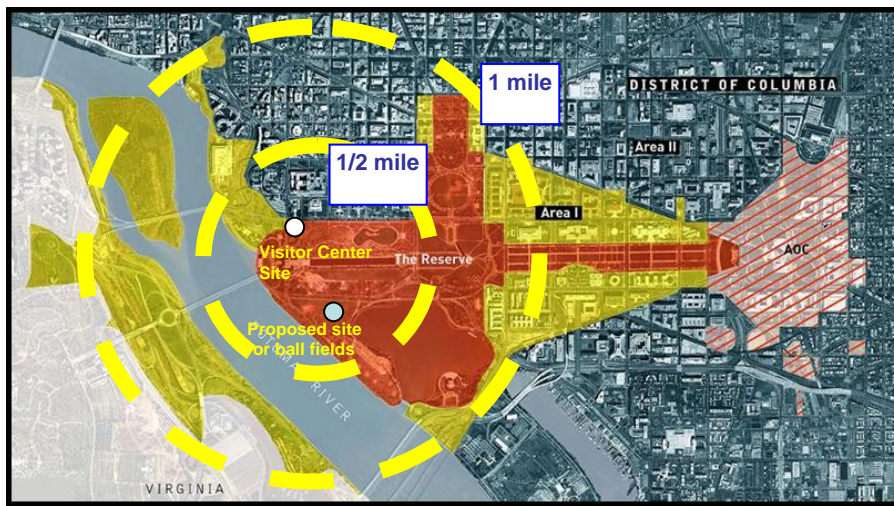


NCPC Required Mitigation:

“**Requires** the National Park Service to reconstruct softball fields lost as a result of this project on another site within one-half (1/2) mile of Site A, in accordance with the mitigation required in the Executive Director’s finding of no significant impact for the project.” (#15)

NPS Revised June 2009 Proposal and NCPC Staff analysis:

NPS has not yet responded to this requirement.



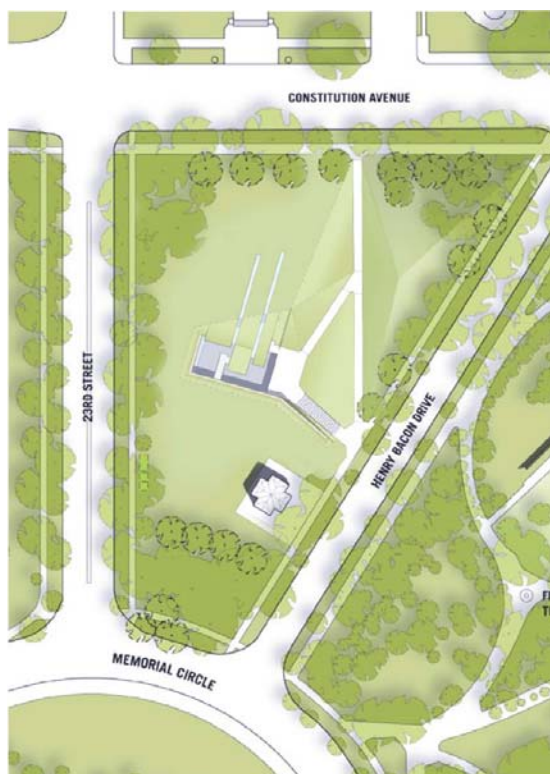
Map depicting location of proposed relocation of softball fields

Staff Recommendation

The revisions submitted by NPS have reduced the Center's visibility from some viewpoints but increased its visibility from others. Most importantly, the placement of a ramped walkway through the elevated grade exposes the Center's south entry wall from Constitution Avenue, an important ceremonial street in Washington D.C. As a result, the Center appears to be more prominent than the Vietnam Veterans Memorial itself, which is not visible from Constitution Avenue. The ramp also interrupts a large portion of the site that would otherwise be available for passive recreation. Rather than trying to conceal the building by manipulating the landscape, the applicant would be more successful in creating a design that meets the design guidelines if it eliminated the walkway from Constitution Avenue, reduced the scale of the building openings, and eliminated building elements that are visible above ground.

Staff recommends that the Commission advise the applicant to focus on the following revisions to the building design:

- **Eliminate the walk from Constitution Avenue and associated berms so that the Center is less visible from Constitution Avenue and Henry Bacon Drive. This will also allow for more multi-recreational use on the site.**
- **Eliminate the skylights to minimize the Center's intrusion on the landscape and to allow for multi-recreational use on the site.**
- **Reduce the size of the open courtyard and the length of needed guardrails to minimize visibility from the Lincoln Memorial.**



2009 Revised Concept



The hatched area shows the amount of area that would be made available with the recommendations.



Revised June 2009 Concept: View from corner of 23rd Street and Constitution Ave
While raising the grade has helped to minimize the visibility of the skylights from Constitution Avenue, the south facade wall and cut in the site needed for the walkway from Constitution Avenue are now more visible.



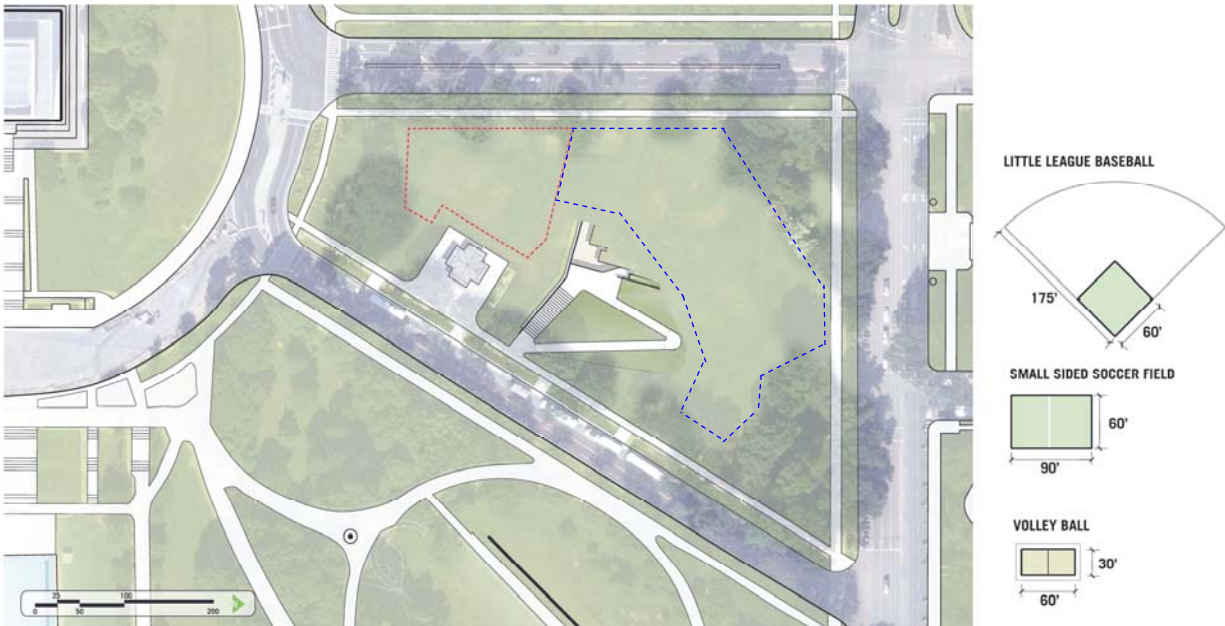
Eliminating the walkway and associated berms that are needed for the walkway to descend 11' to the entryway of the Center would minimize visibility of the Center from Constitution Avenue and maintain a large open area for multi-purpose recreation.



June 2009 Submission: Rendering of the ramp and the Center from Constitution Avenue



Eliminating the walkway and associated cut in the bermed area needed for the walkway to descend 11' to the entryway of the Center would minimize visibility of the Center from Constitution Avenue and maintain a large open area for multi-purpose recreation.



In the June 2009 submission, the applicant has illustrated in red that approximately 20% of the site is available for multi-purpose recreation. If staff's recommendations were implemented, approximately 60% of the site would be maintained for multi-purpose recreation (as outlined in blue).

Additionally staff recommends that the Commission:

Acknowledges the significance of this project and the difficult challenge of designing it at this historically significant and sensitive site on the National Mall.

Notes that the National Capital Planning Commission and the Commission of Fine Arts jointly developed site specific design guidelines for the project to comply with the Commemorative Works Act requirement to “ensure that the proposed work shall be so located as to prevent interference with, or encroachment upon, any existing commemorative work and to protect, to the maximum extent practicable, open space and existing public use.” The design guidelines also serve as mitigation for the Executive Director’s Finding of No Significant Impact for site selection under the National Environmental Policy Act.

Confirms that the design meets the following design guidelines:

- *“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 not interfere with or encroach upon the Vietnam Veterans Memorial.” (#2)*
- *“To maintain the character of the historic landscape, the Visitor’s 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.” (#3)*

The revised concept has raised the grade of the site by three and a half feet to better accommodate the entry ramp.

- *“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.” (#7)*

The revised concept has reduced the length of the paved ramps from Henry Bacon Drive and Constitution Avenue to the entrance by raising the grade of the site.

- *“The project will not include new vehicle parking areas.” (#8)*
- *“The Visitor Center will have a single entrance for both visitors and service.” (#9)*
- *“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.” (#11)*

The applicant has reoriented the Center further to the north to move it away from the perimeter tree root zone. The applicant has noted that the technical survey of the critical root zone of the existing elm trees is underway.

- *“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 and will maintain the open grass panel on the site surrounded at the site’s perimeter by elm trees.” (#12)*

Requires that with regard to the established design guidelines that also serve as mitigation under NEPA, and in concert with the CFA comments dated April 24th, 2009, that the design be modified to meet the following design guidelines:

- *“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.” (#1)*

The scale of the building openings has not been reduced and as a result the building is still visible from the Lincoln Memorial and the surrounding sidewalks. The courtyard and newly added guardrails will be visible from the Lincoln Memorial Stairs. While raising the grade of the site has reduced the visibility of the Center from the corner of 23rd and Constitution Avenue, the south wall of the Center and the entry court are now more visible from Constitution Avenue near 22nd Street; and, the south and east walls are now more visible from Henry Bacon Drive. The Center is more visible from Constitution Avenue than the Memorial itself. Finally, while the skylights are now flush with the grass level, NPS has not demonstrated that interior lighting emanating from the skylights and the courtyard will not be visible from these viewpoints.

- *“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.” (#5)*

While raising the grade has reduced the visibility of the skylights from the sidewalks, the sunken entry way is now more visible from Henry Bacon Drive and from Constitution Avenue near 22nd Street.

- *“The Visitor Center design will not impede the use of the site for multi-purpose recreation on the site.” (#13)*

The submission shows an area measuring approximately 20% of the site will be available for formal recreational uses. However, the above ground footprint of the Center changes the nature of the landscape overall and limits the types of both passive and active activities that can be accommodated on the site because of the amount of area impacted by the skylights, courtyard, walkway and associated slopes from Constitution Avenue.

- *“The Visitor Center will be designed without guardrails or perimeter security elements.” (#14)*

The design of the two-story courtyard will necessitate a complex geometry of guardrails. In addition to the guard rails at the bottom of the ha-ha walls along the south and west sides of the courtyard, the revised concept shows that a screen wall on the north side of the courtyard will extend upward to function as a guardrail. There will also be a guardrail in the entryway area that overlooks the courtyard and around the roof of the emergency access stairwell. Finally, NPS will need to certify at final approval that the project will not have any perimeter security.

Notes that the following design guidelines have yet to be addressed, as indicated by the applicant:

- *“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.” (#4)*

The applicant has not yet designed the project lighting

- *“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.” (#6)*

The applicant has not yet designed the project lighting.

- *“The Visitor Center’s associated pedestrian street crossing points will be designed to address traffic impacts effectively and to protect pedestrian safety.” (#10)*

The applicant has not yet designed the project’s pedestrian crossing points.

- *“Requires the National Park Service to reconstruct softball fields lost as a result of this project on another site within one-half (1/2) mile of Site A, in accordance with the mitigation required in the Executive Director’s finding of no significant impact for the project.”*

NPS has not yet responded to this requirement.

Reminds the applicant that:

- The Commission’s policies and procedures require supplemental NEPA documentation and further Section 106 Consultation as the design develops, beginning with the preliminary approval.

CONFORMANCE

The Commemorative Works Act

The Commemorative Works Act provides that NCPC and CFA have approval authority over site selection and design of the Vietnam Veterans Memorial Visitor Center. The Act requires NCPC, in considering site proposals for commemorative works, to ensure that the proposed work “shall be so located as to prevent interference with, or encroachment upon, any existing commemorative work and to protect, to the maximum extent practicable, open space and existing public use.” The Executive Director’s Finding of No Significant Impact with mitigation for site selection relies upon the applicant meeting the required mitigation measures to the Commission’s satisfaction. These mitigation measures were developed in part to address the Act’s requirement that NCPC ensure the proposed work is “located as to prevent interference with, or encroachment upon, any existing commemorative work and to protect, to the maximum extent practicable, open space and existing public use.”

Comprehensive Plan for the National Capital

The following policies from the August 5, 2004 update of the Comprehensive Plan for the National Capital: Federal Elements apply to the Visitor Center project:

Parks and Open Space Element

Preservation and Maintenance Policies, p. 104

The federal government should:

1. Enhance parks and preserve open green space for future generations.

Parks and Landscapes Policies, p. 109 (Monumental and Designated Landscape Parks)

The federal government should:

4. Enhance the great cross-axes of the National Mall, and protect them from inappropriate development.
5. Use monumental parks and landscapes to provide settings for public buildings, monuments, and memorials, and to create special environments for limited activities.

8. Maintain East and West Potomac Park as an extension of the Mall, as a valuable recreational open space, and as a space that can be used for outdoor cultural events, gatherings, and celebrations.

Parks and Landscapes Policies, p. 112 (Historic Parks)

The federal government should:

1. Establish and preserve historic parks as important legacies of national, historic, architectural, and landscape significance.

Preservation and Historic Features Element

National Capital Image Policies, p. 161

The federal government should:

2. Plan carefully for appropriate uses and compatible design in and near the monumental core to reinforce and enhance its special role in the image of the nation's capital.

4. Protect and enhance the vistas and views, both natural and designed that are an integral part of the national capital's image.

8. Design exterior lighting to contribute to the capital's nighttime image and suggest an appropriate hierarchy among the symbols and features of the nation's capital.

Stewardship of Historic Properties, p. 164

The federal government should:

1. Sustain exemplary standards of historic property stewardship.

2. Identify and protect its historic properties and disseminate information about their significance to the public.

5. Identify and protect both the significant historic design integrity and the use of historic landscapes and open space.

6. Protect the settings of historic properties, including views to and from the sites where significant, as integral parts of the historic character of the property.

11. Ensure that new construction is compatible with the qualities and character of historic buildings and their settings, in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and the Guidelines for Rehabilitating Historic Buildings.

13. Work cooperatively with local agencies to ensure that development adjacent to historic properties [does] not detract from their historic character.

The Historic Plan of Washington, D.C., p. 166

The federal government should:

1. Develop the monumental core in accordance with the principles of the *Legacy Plan* and the policies of the *Memorials and Museums Master Plan*. The National Mall's historic open space and monumental character should be respected and preserved for the benefit of future generations.

Visitors Element

Federal Visitor Attractions

The federal government should:

1. Support the location of information kiosks and visitor centers at federal facilities and at appropriate locations throughout the monumental core (in accordance with the Commemorative Works Act) and beyond.

National Capital Urban Design and Security Plan

The Commission's policies on urban design and security discourage locating physical perimeter security elements in public space. The June 2009 submission indicates that no perimeter security devices are anticipated. Until this decision has formally been made, staff notes that to comply with the Commission's policies, and with mitigation measure #14, the Center must be designed to preclude the need for physical perimeter security elements or guardrails. The imposition of such elements upon the historic landscape of the site would adversely affect views and could adversely affect public use of the space, potentially having significant impacts under NEPA. NPS has stated that they do not anticipate needing perimeter security. The applicant needs to commit that the site will not have perimeter security to comply with design guideline #14.

National Environmental Policy Act (NEPA)

The Commission's Environmental and Historic Preservation Policies and Procedures, adopted by the Commission in April 2004, require an environmental document (Environmental Assessment or Environmental Impact Statement) at the site selection stage and subsequent stages for all Commemorative Works. At its meeting of August 4, 2005, the Commission determined that it would comment on concept designs, and approve designs at the preliminary and final design stages.

NPS developed an EA, completed on May 24, 2006, for the site selection stage that evaluated three alternatives for siting, and selected its preferred alternative. The Park Service received comments from nine parties on the EA, including comments submitted by NCPC staff. Based on the EA and the comments, NCPC's Executive Director determined that the Center could be sited at the preferred location with no significant impacts provided that the applicant complied with mitigation measures required in the Commission's conditional site approval of August 3, 2006. These mitigation measures reiterate the design guidelines developed jointly by NCPC and CFA staff, and add the requirement to relocate the ball fields being displaced by this project. Without these mitigation measures, significant impacts may result from the project development on this site, as established by NCPC's review and adoption of the May 2006 EA, and the NCPC finding that resulted from that NEPA review.

On November 1, 2007, NPS provided, with its submission materials for review of the concept design, a FONSI for the entire project including design. The staff finds that the applicant has not yet demonstrated that some of the required mitigation measures for site selection will be met by the current design, both because the design is still being developed and because it will undergo further refinement. NPS must provide additional environmental information and review to supplement the site selection Environmental Assessment with appropriate public process before the preliminary design submission in order for staff to demonstrate that all of the required mitigation measures have been met and to satisfy NCPC's NEPA mitigation.

National Historic Preservation Act (NHPA)

NPS wrote to the D.C. State Historic Preservation Officer (DC SHPO) on February 17, 2005, requesting comments on the Site Selection Study and Environmental Analysis for the proposed Center. The SHPO responded in writing on March 14, 2005, encouraging a “measured, balanced, and inclusive consultation process.”

NPS held an informational meeting for consulting parties in May 2005 and a further scoping meeting in June 2005. The National Capital Memorials Advisory Commission also heard testimony from members of the public and interested organizations at two meetings on the proposal and the selection of the site in the spring of 2005.

Site Approval

On May 24, 2006, the Environmental Assessment was distributed to interested parties, some of whom provided written comments on the EA. The National Trust for Historic Preservation, the National Coalition to Save Our Mall, the Advisory Council on Historic Preservation, and interested individuals provided comments that were available to the Commission prior to its 2006 conditional approval of the site.

NPS’s May 24, 2006 Environmental Assessment for the proposed memorial at the proposed site, its East and West Potomac Parks Historic District National Register nomination, and its Cultural Landscape Report (CLR) for the Lincoln Memorial Grounds identify and describe the historic properties in the vicinity. These include the Lincoln and Vietnam Veterans Memorials, certain view sheds that had been previously identified as contributing elements, and qualities and features of the historic landscape such as open turf lawn and the elm trees. NPS established the Area of Potential Effect to encompass these contributing elements in consultation with the DC SHPO.

On September 12, 2007 and on October 24, 2007 NPS held Section 106 consultation meetings with the consulting parties which included individuals representing a range of interested organizations. The purpose of the meetings was to provide an update on the project, to present the three development proposals for the approved site, and to invite comments and concerns.

A considerable amount of correspondence was generated between NPS and consulting parties in the fall of 2007. Concerns expressed by consulting parties include the scheduling of the meetings and the information provided; the location, design, and visibility of the proposed Visitors’ Center and its relationship to and effect on the Vietnam Veterans Memorial, the Lincoln Memorial, and West Potomac Park; and its compliance with the requirement of the authorizing legislation that the Center be located underground.

The Commission staff incorporated comments from the consulting parties, including testimony before the National Capital Memorial Advisory Commission (NCMAC), about the sensitivity and character of the site. The Commission adopted design guidelines for the project in August of 2006. The guidelines reflect information documented in the National Register and the Cultural Landscape Report documentation. In addition, staff consulted informally with staff at the DC SHPO during the drafting of the design guidelines. The Commission’s site approval was conditioned upon the mitigation measures contained in the design guidelines, also reflected in the Executive Director’s FONSI for use of the site for the Visitors Center.

Concept Design

In December 2007, the Commission commented on the concept proposal, noting that some design guidelines had been met while others had not.

Revised Concept Design

NPS is resuming 106 consultation on the undertaking, having posted the submission on its public comment website on April 15, 2009 and held meetings on May 4th and May 18th for consulting parties, in advance of the Commission June 4th meeting. NPS will proceed with Section 106 consultation as design development continues.

CONSULTATION

Coordinating Committee

The Coordinating Committee reviewed the initial concept on November 14, 2007, and forwarded the proposal to the Commission with the statement that the project has been coordinated with all agencies represented. The participating agencies were NCPC, the District of Columbia Office of Planning, the District Department of Transportation, the General Services Administration, the National Park Service, and the Washington Metropolitan Area Transit Authority.

Commission of Fine Arts

The Commission of Fine Arts reviewed the revised concept design at its April 16th, 2009 meeting. While supporting the worthy purpose of the memorial center, the Commission reiterated its reservations about the impact of the facility on the sensitive context and required further development of the design. The letter states the following:

“The Commission members expressed support for many of the proposed alterations to the general siting of the building – its slight elevation, rotation, and location further north on the site – as helping to mitigate its impact on the setting. However, they continued to advocate for minimizing the visibility of what is intended to be an underground facility and encouraged further program reductions to lessen its impact. They continued to express concern that the proposed entry sequence of a descending walkway along a tapered wall would be inappropriately reminiscent of the Vietnam Veterans Memorial itself and should be modified.

The Commission members encouraged conceptual treatment of the memorial center as a “landscape solution” which should guide all decisions about developing the design: simplifying and reducing the architectural presence of the building; increasing earthen berms to cover or replace vertical walls; and minimizing or eliminating the skylights, which they commented were a significant technical challenge and questionable given their intrusion into the landscape and marginal benefit for the interior. They suggested that the articulation of the entrance area, courtyard, guardrails, and internal bridge be restudied with the visibility of these elements minimized and simplified. In their discussion, the Commission members also suggested restudying the access walkways leading to the entrance, particularly in their relationship to the adjacent service kiosk and street frontage.”