

This project involves the replacement of the existing "In Memory Plaque" located at the Vietnam Veterans Memorial. The new plaque will be raised slightly above the ground (it is currently flush with ground level) in order to facilitate visibility. But it is substantially the same as the existing plaque

Decision: I find that the action fits within the categorical exclusion above. Therefore, I am categorically excluding the described project from further NEPA analysis. No extraordinary circumstances apply.

Superintendent:  _____ Date: 3/21/17

Extraordinary Circumstances:

If implemented, would the proposal...	Yes/No	Notes
A. Have significant impacts on public health or safety?	No	
B. Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation, or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (Executive Order 11990); floodplains (Executive Order 11988); national monuments; migratory birds; and other ecologically significant or critical areas?	No	
C. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA section 102(2)(E))?	No	
D. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?	No	
E. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?	No	
F. Have a direct relationship to other actions with individually insignificant, but cumulatively significant, environmental effects?	No	
G. Have significant impacts on properties listed or eligible for listing on the National Register of Historic Places, as determined by either the bureau or office?	No	
H. Have significant impacts on species listed or proposed to be listed on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat for these species?	No	
I. Violate a federal, state, local or tribal law or requirement imposed for the protection of the environment?	No	
J. Have a disproportionately high and adverse effect on low income or minority populations (EO 12898)?	No	
K. Limit access to and ceremonial use of Indian sacred sites on federal lands by Indian religious practitioners or adversely affect the physical integrity of such sacred sites (EO 130007)?	No	
L. Contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act and Executive Order 13112)?	No	



ASSESSMENT OF ACTIONS HAVING AN EFFECT ON HISTORIC PROPERTIES

A. DESCRIPTION OF UNDERTAKING

1. Park: National Mall and Memorial Parks

2. Project Description:

Project Name: Vietnam Veterans Memorial 'In Memory' Plaque Improvements

Prepared by: Michael Comisso **Date Prepared:** 01/25/2017 **Telephone:** 202-619-7229

PEPC Project Number: 70054

Locations:

Describe project:

The National Mall and Memorial Parks proposes to make improvements to the "In Memory" plaque within the Three Servicemen Statue Plaza at the Vietnam Veterans Memorial.

The "In Memory" plaque was added to the Vietnam Veterans Memorial site in 2004. It honors veterans who died after the war as a direct result of the injuries suffered in Vietnam, but who fall outside the Department of Defense guidelines for inclusion on the Wall. Originally, the plaque was a carved block of granite stone inset at the northeast corner of the plaza surrounding the Three Servicemen sculpture. Due to difficulty in reading the inscription, the "In Memory" plaque was reinstalled in 2012 with bronze inlay lettering to match the patina of the adjacent Three Servicemen sculpture. However, despite these efforts to improve conditions of the plaque, the issues with legibility and condition persist and continue to inappropriately honor those commemorated by the plaque.

Over the past year, NAMA, in collaboration with Vietnam Veterans Memorial Fund, Associates of Vietnam Veterans of America, Inc., Vietnam Veterans of America, and James Cummings, AIA, have explored multiple options to improve the existing conditions of the plaque. The preferred option will include the installation of a 1.25-inch lift base stone overlaid by a bronze plaque with raised lettering. The overlaying plaque will be the minimal size permitted by the authorizing legislation, which is 24 inches by 36 inches. In an effort to improve drainage of the site, the lawn directly north of the plaza will be slightly regraded and a dry well will be installed beneath the regraded lawn. Also, the large paving stones will be modified in place during the installation of the new plaque (see attachment for more information).

The Area of Potential effect (APE) encompasses the Three Servicemen Statue Plaza within the Vietnam Veterans Memorial. The Vietnam Veterans Memorial is situated within the National Mall (1981, revised 2016) and East and West Potomac Parks (1973, revised 2001) National Register Historic Districts.

Area of potential effects (as defined in 36 CFR 800.16[d])

The Area of Potential effect (APE) encompasses the Three Servicemen Statue Plaza within the Vietnam Veterans Memorial. The Vietnam Veterans Memorial is situated within the National Mall (1981, revised 2016) and East and West Potomac Parks (1973, revised 2001) National Register Historic Districts.

3. Has the area of potential effects been surveyed to identify historic properties?

Assessment of Effect Form - Vietnam Veterans Memorial 'In Memory' Plaque Improvements - PEPC ID: 70054

No
 Yes

Source or reference:

4. Potentially Affected Resource(s):

Archeological Resources Notes: The Area of Potential effect (APE) encompasses the Three Servicemen Statue Plaza within the Vietnam Veterans Memorial. The Vietnam Veterans Memorial is situated within the National Mall (1981, revised 2016) and East and West Potomac Parks (1973, revised 2001) National Register Historic Districts.

Historical Structures/Resources Affected:

Name and number(s): Vietnam Veteran's Memorial - Res. 332 LCS 46830 Asset 33280001

Location:

NR status:

Name and number(s): Vietnam Veteran's Memorial - Statue - Res. 332 LCS 46831 Asset 33280002

Location:

NR status:

Historical Structures/Resources Notes: The "In Memory" plaque was added to the Vietnam Veterans Memorial site in 2004. It honors veterans who died after the war as a direct result of the injuries suffered in Vietnam, but who fall outside the Department of Defense guidelines for inclusion on the Wall. Originally, the plaque was a carved block of granite stone inset at the northeast corner of the plaza surrounding the Three Servicemen sculpture. Due to difficulty in reading the inscription, the "In Memory" plaque was reinstalled in 2012 with bronze inlay lettering to match the patina of the adjacent Three Servicemen sculpture. The inscription on the plaque reads, "IN MEMORY OF THE MEN AND WOMEN WHO SERVED IN THE VIETNAM WAR AND LATER DIED AS A RESULT OF THEIR SERVICE. WE HONOR AND REMEMBER THEIR SACRIFICE." However, despite these efforts to improve conditions of the plaque, the issues with legibility and condition persist and continue to inappropriately honor those commemorated by the plaque.

5. The proposed action will: (check as many as apply)

- Yes Destroy, remove, or alter features/elements from a historic structure
- No Replace historic features/elements in kind
- Yes Add non-historic features/elements to a historic structure
- Yes Alter or remove features/elements of a historic setting or environment (inc. terrain)
Add non-historic features/elements (inc. visual, audible, or atmospheric) to a historic setting or cultural landscape
- No Disturb, destroy, or make archeological resources inaccessible
- No Disturb, destroy, or make ethnographic resources inaccessible
- No Potentially affect presently unidentified cultural resources
- No Begin or contribute to deterioration of historic features, terrain, setting, landscape elements, or archeological or ethnographic resources

No Involve a real property transaction (exchange, sale, or lease of land or structures)
 Other (please specify): _____

6. Supporting Study Data:
(Attach if feasible; if action is in a plan, EA or EIS, give name and project or page number.)

B. REVIEWS BY CULTURAL RESOURCE SPECIALISTS

The park 106 coordinator requested review by the park's cultural resource specialist/advisors as indicated by check-off boxes or as follows:

No Reviews From: Curator, Archeologist, Historical Architect, Historian, 106 Advisor, Other Advisor, Anthropologist, Historical Landscape Architect

C. PARK SECTION 106 COORDINATOR'S REVIEW AND RECOMMENDATIONS

1. Assessment of Effect:

- No Potential to Cause Effects
- No Historic Properties Affected
- No Adverse Effect
- Adverse Effect

2. Documentation Method:

A. STANDARD 36 CFR PART 800 CONSULTATION
Further consultation under 36 CFR Part 800 is needed.

B. STREAMLINED REVIEW UNDER THE 2008 SERVICEWIDE PROGRAMMATIC AGREEMENT (PA)

The above action meets all conditions for a streamlined review under section III of the 2008 Servicewide PA for Section 106 compliance.

APPLICABLE STREAMLINED REVIEW Criteria
(Specify 1-16 of the list of streamlined review criteria.)

C. PLAN-RELATED UNDERTAKING

Consultation and review of the proposed undertaking were completed in the context of a plan review process, in accordance with the 2008 Servicewide PA and 36 CFR Part 800.
Specify plan/EA/EIS:

D. UNDERTAKING RELATED TO ANOTHER AGREEMENT

The proposed undertaking is covered for Section 106 purposes under another document such as a statewide agreement established in accord with 36 CFR 800.7 or counterpart regulations.

E. COMBINED NEPA/NHPA Document

Documentation is required for the preparation of an EA/FONSI or an EIS/ROD has been developed and used so as also to meet the requirements of 36 CFR 800.3 through 800.6

G. Memo to SHPO/THPO

H. Memo to ACHP

SHPO/THPO Notes: Thank you for consulting with the DC SHPO regarding the above-referenced undertaking which we understand involves improvements to the existing plaque, depicted in the far left of the image below. We have reviewed the various options under consideration (see below) and have determined that all of the proposals will have "no adverse effect" on historic properties.

3. Additional Consulting Parties Information:

Additional Consulting Parties: No

4. Stipulations and Conditions:

Following are listed any stipulations or conditions necessary to ensure that the assessment of effect above is consistent with 36 CFR Part 800 criteria of effect or to avoid or reduce potential adverse effects.

5. Mitigations/Treatment Measures:

Measures to prevent or minimize loss or impairment of historic/prehistoric properties:
(Remember that setting, location, and use may be relevant.)

No Assessment of Effect mitigations identified.

D. RECOMMENDED BY PARK SECTION 106 COORDINATOR:

Compliance Specialist:

NHPA Specialist

Michael
Commisso



Date: 3/9/17

E. SUPERINTENDENT'S APPROVAL

The proposed work conforms to the NPS *Management Policies* and *Cultural Resource Management Guideline*, and I have reviewed and approve the recommendations, stipulations, or conditions noted in Section C of this form.

Signature

Superintendent:



Date: 3/21/17

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICE



**DC STATE HISTORIC PRESERVATION OFFICE
FEDERAL AGENCY SECTION 106 REVIEW FORM**

TO: Michael Commisso, NPS, National Mall and Memorial Parks

ADDRESS: Via email to: michael_commisso@nps.gov

PROJECT NAME/DESCRIPTION: Proposed Improvements to the "In Memory" Plaque

PROJECT ADDRESS/LOCATION DESCRIPTION: Vietnam Veterans Memorial

DC SHPO PROJECT NUMBER: 17-0434

The DC State Historic Preservation Office (DC SHPO) has reviewed the above-referenced federal undertaking(s) in accordance with Section 106 of the National Historic Preservation Act and has determined:

This project will have **no effect** on historic properties. No further DC SHPO review or comment will be necessary.

There are **no historic properties** that will be affected by this project. No further DC SHPO review or comment will be necessary.

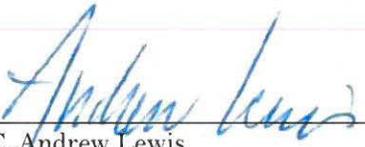
This project will have **no adverse effect** on historic properties. No further DC SHPO review or comment will be necessary.

This project will have **no adverse effect** on historic properties **conditioned upon** fulfillment of the measures stipulated below.

Thank you for consulting with the DC SHPO regarding the above-referenced undertaking which we understand involves improvements to the existing plaque, depicted in the far left of the image below. We have reviewed the various options under consideration (see below) and have determined that all of the proposals will have "no adverse effect" on historic properties.



BY:


C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office

DATE: March 9, 2017