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DWIGHT D. EISENHOWER MEMORIAL
APPROVAL OF SITE SELECTION AND DESIGN PRINCIPLES,
MARYLAND AND INDEPENDENCE AVENUES, 4TH AND 6TH STREETS, SW

WASHINGTON, D.C.

Finding of No Significant Impact
AUG 31 2006

Pursuant to Section 10 of the Commission's Environmental Policies and Procedures, I have reviewed the National Park Service's plans for the proposed site location of the Dwight D. Eisenhower Memorial, as shown on NCPC Map File No. 1.71(73.10)-42093. I find that, with the mitigation specified in the design principles of attachment A, to be further developed in the National Historic Preservation Act Section 106 process and a resulting Memorandum of Agreement, and that will be enforced by the Commission in design reviews for this memorial, the Commission's approval of the submitted project site at Maryland and Independence Avenues, 4th and 6th Streets, SW, will not significantly affect the human environment.

Consequently, I have adopted the prepared National Park Service Environmental Assessment, dated June 2006, as authorized under delegated authority, and have determined that Commission approval of the site location would not significantly affect the quality of the human environment pursuant to Section 102(2)(C) of the National Environmental Policy Act with the specified mitigation, and complies with the Council on Environmental Quality Regulations (40 CFR, Parts 1500-1508).


Patricia E. Gallagher, AICP
Executive Director

Background

Public Law 107-117 provides for the establishment of a memorial to President Dwight D. Eisenhower pursuant to the Commemorative Works Act. In May 2006, Congress enacted Public Law 109-220, noting that, "the location of the commemorative work to honor Dwight D. Eisenhower, authorized by section 8162 of the Department of Defense Appropriations Act, 2000 (40 U.S.C. 8903 note), within Area I as depicted on the map referred to in section 8908(a) of title 40, United States Code, is approved." This approval pertained to the aspect of utilizing land within Area I and the justification of the memorial as a preeminent subject.

The National Park Service, on behalf of the Eisenhower Memorial Commission (EMC), on August 4, 2006 filed a submission seeking approval from the National Capital Planning Commission for a site location for the memorial designated at Maryland Avenue, SW, that consists of approximately 4 total acres situated south of the National Mall. The location is approximately four blocks west of the U.S. Capitol Building. The site is bordered by Independence Avenue, 4th and 6th Streets, SW, and the Department of Education Building (DoEd) and it features an altered segment of Maryland Avenue, SW, that bisects the site into two parcels of unequal size. Three government agencies currently control the site, which is entirely federally owned.

The EMC worked with the National Park Service in 2001-2002 to initially identify 24 potential sites for the memorial in the District of Columbia. These sites were located within Area I, the central Monumental Core, and Area II, outside of the Core. In March 2002, sixteen locations were eliminated from consideration by the EMC due to various factors as presented in the EA. The remaining eight sites were further reviewed for consideration. However, creation of the Reserve, established in the 2003 Commemorative Works Clarification Act to prohibit new memorials from the central portion of the Mall, eliminated four of the remaining sites. A site was also eliminated separately due to its existing use by the Architect of the Capitol (AOC). By 2004, the EMC was considering four sites, which are discussed in the EA. Summaries noted within the EA discuss how limitations found by the Park Service and EMC establish the infeasible nature of all but one site, the proposed location.

The site contains a mix of uses, with Maryland Avenue, SW, passing through it in the southwest-northeast direction, bisecting the site into two triangular parcels of unequal size. Independence Avenue along the north edge of the preferred site was designated as B Street in the L'Enfant Plan for the original city of Washington. The roadway was extended and renamed Independence Avenue following the development of the McMillan Plan. Previously, where Independence Avenue is now routed, residential development occurred, a use that existed for many years until the developed blocks were acquired and cleared to make way for the extension of Independence Avenue. Maryland Avenue is one of the grand avenues radiating from the U.S. Capitol Building that was established by the L'Enfant Plan of 1791 for Washington D.C. Maryland Avenue has a 160-foot-wide right-of-way (ROW), with a 60-foot-wide historic cartway/view corridor running through the center of the ROW. Due to its historical significance as a L'Enfant street, the Avenue offers limited development opportunities within the cartway.

In compliance with NCPCH's Environmental and Historic Preservation Policies and Procedures (April 1, 2004), the National Park Service developed an Environmental Assessment (EA) analyzing the site and a no action alternative. The Park Service noticed the availability of the EA

for public comment in June 2006. The National Park Service received six comments and prepared a Summary and Analysis of Public Comments that responds to those comments. The EA, the comments that the National Park Service received, and the Park Service summary and response to the public comments.

NCPC staff has independently reviewed the EA and the impacts assessed therein, the public comments and response, and confirms the analysis presented by the EA and its findings.

The Alternatives Considered in the EA.

The EA analyzes the proposed site location and the no action alternative, with further discussion presented as to the reasons other sites did not meet the purpose and need of the planned memorial. Additionally, the applicant has established that its evaluation has studied, developed, and described appropriate courses of action for the proposal that involve no unresolved conflicts concerning alternative uses of available resources. Moreover, it has been recognized by the Council on Environmental Quality that the discussion of alternatives need not be exhaustive in an EA. The effort is bounded by the rule of reason and that the level of analysis should be commensurate with the severity of impacts. Also, the U.S. Court of Appeals review of a NEPA EA has cited that although a "hard look" should involve the discussion of adverse impacts, such information does not automatically make the project "highly controversial" or "highly uncertain" for the purposes of determining whether substantial questions exist as to the significance of the effect. Further; "The statutory and regulatory requirement that an agency must consider 'appropriate' and 'reasonable' alternatives does not dictate the minimum number of alternatives that an agency must consider."

The proposed site location currently includes fifteen General Service Administration permitted parking spaces and 54 metered parking spaces, operated by the District of Columbia that are primarily used by employees of the DoEd in Federal Office Building No.6 (FOB#6), which is located adjacent to the site. Metered and permitted spaces are also provided along the curb of the roadways adjacent to the site. The site also includes a below-grade courtyard associated with the DoEd building, managed by the General Service Administration. In addition, an existing basement extends into the preferred site from the DoEd building. This basement structure could restrict underground and surface site development within approximately 40 feet of the DoEd building. The site near the northwest area contains a small area devoted to community gardens where residents, under permit to the Park Service, grow vegetables and flowers. Near the gardens, an exercise course exists which serves any visitor to the site.

The memorial would be located within the site's general boundaries once the closure of a section of Maryland Avenue that currently passes through the site is achieved. The memorial would essentially be envisioned as a landscaped plaza, providing an open and accessible site for visitors. The memorial could include outdoor shade elements and a small visitor support structure. The goals of the memorial and the development constraints of the proposed site will guide the ultimate design of the plaza and associated elements. A summary of the primary goals for the Eisenhower Memorial is:

- Commemorate the life of Dwight D. Eisenhower by memorializing major themes and events in his life.

- Incorporate commemorative features and interpretive elements to convey multiple themes.
- Capitalize on the thematic connections of surrounding buildings to the preferred site.
- Create an attractive, year-round destination with an inviting physical setting.
- Facilitate a variety of activities on the site that would be accessible to the public.

Under the No Action alternative, the memorial would not be built at this time. The existing features of the Maryland Avenue site would remain unchanged at this time. There would be no new development or reconfiguration of the site, and the roadways and parking would be maintained under the multi-jurisdictional management as currently established. The site would remain available for use as a memorial location as identified by the NCPC museum and memorials master plan until such time that a subsequent development proposal could be approved and implemented. Given that Congressional legislation directs the EMC to formulate plans for the memorial's location and construction in the District of Columbia, under the No Action Alternative, the EMC would need to continue to explore other potential sites for the President Dwight D. Eisenhower Memorial.

Potential impacts and Mitigation

NCPC staff, in its independent review of the EA and related materials has found few significant potential environmental impacts. The design principles in attachment A as further developed through the Section 106 process and the Memorandum of Agreement, when implemented in the design, will mitigate potential adverse impacts so that they are not significant. The principles focus on historic resources and visual impacts, especially to views protected as historic views including the historical and cultural components of the environment regarding the nature of the closure of a portion of a L'Enfant street.

Commission enforcement of the mitigation through the future review process of the memorial design will ensure that the location of the proposed Dwight D. Eisenhower Memorial will not cause significant impact to the human environment under the criteria established within NEPA and the Council on Environmental Quality regulations and the Commission's environmental policies and procedures.

The EA specifies a number of mitigation measures to alleviate environmental impacts for the proposed site. While the National Park Service submission material does not directly undertake to provide such mitigation, in its Summary and Analysis of Public Comments, the National Park Service states that "The purpose of the EA is to assess and mitigate the environmental consequences of the proposed action relating to the selection of a site for the Center; it is not intended to serve as a design review document." (at p. 2). In the same Summary, the Park Service also states that: "The NPS and NCPC will each respectively develop site approval criteria for use in their decision-making. These criteria will likely be formalized as mitigation measures that will be conditions of approval for the preferred site." (at p. 2).

Impacts presented in the National Park Service EA and considered by the NCPC

Planning Impacts. The proposed memorial would be in compliance with the relevant requirements and guidelines established by federal and local planning policies. Within the context of general zoning, any possible building heights would be well below the allowable 90 feet and

the Floor Area Ratio would be much less than the permissible maximum of 6.5, even though zoning does not apply to federal property.

Under the Commemorative Works Act, Commemorative Zone Policy, and NCPC Memorials and Museums Master Plan, the construction of the proposed memorial on the submitted site would be consistent with, and help implement, the 2002 Commemorative Zone Policy (based on the 1986 Commemorative Works Act and authored by the NCPC Joint Task Force for Memorials), and also the NCPC *Memorials and Museums Master Plan*. The memorial would be located, in part, within Area I, which is designated for commemorative works of preeminent national and historic significance. The memorial would also be located on a Prime Candidate site of the *Memorials and Museums Master Plan*. Consistent with these guiding documents, the memorial would establish a public space that would respect and reinforce the location as a civic plaza and incorporate existing vistas on Maryland Avenue, SW.

With regard to the *Comprehensive Plan for the National Capital, Federal Elements*, The proposed memorial location would serve to maintain and conserve federal open space, thereby enhancing the southwest neighborhood. The location is close to public transportation and adheres to transportation goals of the Plan. Consequently, conformance is not a significant impact.

Cultural Resources—Historic features.

Impact on the L'Enfant Plan. The EA cites that construction of the memorial would allow no parking within the historic cartway at the proposed site, and landscaping elements would be added to frame the historic vista. It also notes that if a memorial feature is to be located within the area of the historic cartway, it should be consistent in character with other L'Enfant squares or circles, allowing for an open plaza and continuing the historic view corridor to the northeast and southwest on Maryland Avenue. Since the current operational alignment of Maryland Avenue is not the historic alignment, further redirecting vehicular traffic around the preferred site would not represent a National Historic Preservation Act (NHPA) adverse effect. However, the treatment of Maryland Avenue within the site, as discussed in the EA, is not fully consistent with the principles of the L'Enfant Plan and the use of the proposed site location could potentially impact on this historic resource unless mitigated. The historic right-of-way of Maryland Avenue is a L'Enfant street viewshed and the closure of a portion of the street, which would be required at the specific location of the planned site, will potentially have an impact on historic resources unless mitigated by consultation under Section 106 of the NHPA and a Memorandum of Agreement. However, because the Park Service has not been able to fully document that National Historic Preservation Act, Section 106 issues, as required by NCPC procedures, the viability of some conclusions toward historic feature effects is minimally presented by the EA mitigation conclusion.

To assist in NCPC staff's analysis, NCPC has expended efforts to obtain additional expert evaluation of the L'Enfant Plan impact from the District of Columbia Historic Preservation Office (DC SHPO) and to document initial issues of the Section 106 process for this planned project location. Steps to date include documentation, to the extent possible, of identification of consulting parties; establishing a public participation effort for the commemorative work site location review pursuant to Section 106 with the assistance of the Park Service; and identifying in consultation with the DC SHPO, the Commission, and other consulting parties, the historic

properties and characteristics at the site being considered for the commemorative work. NCPC staff finds that dialogue on the Commission's proposed design guidelines, before the Commission acts on them, is a component of Section 106 consultation. A consultation meeting at the Commission offices, on August 29, 2006, provided opportunity for consulting parties to review and advise NCPC about the proposed design guidelines developed by NCPC. Additionally, this meeting provided information to the staff on what were perceived by these various parties as possible adverse impacts to historic and visual attributes of the site location. The attending staff of the DC SHPO also characterized the general evaluation of the site location and its effects to the L'Enfant historic street plan, and cited evidence that informed Commission staff and that evaluated, on a verbal basis, issues about impacts based on the DC SHPO's generally accepted approach to analysis of L'Enfant plan effects. See attached letter from the Acting DC SHPO dated August 31, 2006.

Impact on Building Lines. The memorial, as noted by the EA, would respect the historic building line along 4th Street, SW, and the height of the memorial elements would be compatible with the height of the surrounding buildings. As a result, the effects should be minor. Mitigation noted within the Park Service EA is augmented by NCPC design principles and will be further developed in the NHPA Section 106 process and the Memorandum of Agreement.

U.S. Capitol Building Vista. The development of the proposed site has the potential to impact the historic qualities and characteristics of this vista described in the EA. NCPC staff finds this mitigation needs further elaboration, as specified by the NCPC proposed design principles described in Attachment A and as further developed in the NHPA Section 106 process and the Memorandum of Agreement.

Cultural Resources--Archeological features. The EA acknowledges that there may be cultural resources effects, and that participation in a consultation process under the National Historic Preservation Act is ongoing. The EA notes for archaeological resource effects: "Mitigation: In the event that archaeological resources are uncovered during ground-disturbing activities, construction should stop while appropriate archaeological studies are completed in accordance with Section 106 of NHPA." The National Park Service is required by the NHPA to complete the Section 106 Historic Preservation review process that would include this mitigation. With this mitigation there are no significant environmental impacts.

Visual Impacts. The area of visual influence provides the context for assessing visual consequences. As described in Section 3.2.3 of the EA, the area includes the submitted site, important street corridors, and the views of and from the historic and cultural resources that surround the site. While the memorial has not yet been designed, visual impacts are addressed by implementation of the Attachment A design principles, as further developed in the NHPA Section 106 process and the Memorandum of Agreement.

For the purpose of the visual analysis in the EA, the proposed memorial is defined to be a landscaped plaza, primarily open in character, with possible support buildings. The memorial would potentially have shade protective elements on some part of the site, undetermined in size or height at this point. Additionally, the existing sunken courtyard in front of DoEd is noted to be addressed by the design. Lastly, there would be no parking within the memorial site.

Due to the current extent of roadway infrastructure, the limited landscaped areas on the site, and the existence of somewhat ordinary architecture from the 1960s, the existing visual character of the site is generally lacking focus or any clearly defined character. However, certain aspects of some federal buildings are viewed by consulting parties to have important visual qualities. On other issues of visual relevance, a memorial would likely introduce a consistent theme for the entire site, where materials such as plantings and site furniture would be coordinated and potentially recount materials that exist in the surrounding area from its proximity to the National Mall.

The EA identifies that any support building on the proposed site would be required to respect and maintain the setback line of the corridor established by adjacent buildings. A unified open space or landscaped plaza would enhance this area by providing a more consistent street edge and improved visual experience in the area where Maryland Avenue currently crosses 6th Street, SW. Similarly, along 4th Street, SW, a landscaped plaza should enhance the quality of open space in the area and add a consistent street edge that would improve the visual experience along the corridor. Clearly, the open space quality of the preferred site should remain the dominant feature. The view within the historic cartway from 6th Street to the Capitol could be diminished by the increased number of tour buses and parked cars on streets surrounding the preferred site. The final location of permitted parking for buses in the design would affect the extent of the impact. Impacts from cars would be less due to their reduced body profile. These impacts are addressed by implementation of the attachment A design principles, as further developed in the NHPA Section 106 process and the Memorandum of Agreement.

Transportation impacts. The segment of Maryland Avenue, SW that is located within the proposed site, (extending between 6th Street, SW and Independence Avenue, SW) and the Maryland Avenue spur that connects the Maryland Avenue segment to 4th Street on-site, would be realigned as a result of the proposed Eisenhower Memorial. The pavement of the roadway would be demolished, and vehicles would be re-routed onto 6th Street and Independence Avenue. As part of the road conversion, the adjacent intersections of Maryland Avenue with Independence Avenue, 6th Street, SW, and 4th Street, SW, would be modified.

Conversion of the Maryland Avenue segment would eliminate vehicular traffic and parking on the proposed site. However, according to the 2006 Traffic Impact Study, average daily traffic volumes of approximately 2,900 vehicles (identified in the EA Section 3.3.2) utilize the segment, which has a capacity of 10,000 vehicles (Earth Tech, 2006). The EA notes that most vehicles use the segment to park at the 69 parking spaces on-site, 54 of which are short-term metered public parking spaces. With the conversion of the segment, these parking spaces would be eliminated. The vehicular traffic patterns on roadways adjacent to the site would be minimally affected with the redirection of traffic given the low traffic volumes on the segment of Maryland Avenue within the site. While there would be a slight traffic reduction for some turning movements, and a slight traffic increase for other turning movements, the combined increase in distance and delay would be minor (Earth Tech, 2006).

Based on the level of service (LOS) analysis, all of the intersections studied currently operate at LOS C or better, except for the unsignalized intersection of Independence Avenue and Maryland Avenue, which operates at LOS D. It is not signalized and the LOS reflects the delay (29 seconds) for side street traffic (Maryland Avenue) attempting to enter the mainline (Independence

Avenue). This current situation not as efficient as a signalized intersection assigning the right of way and conversion of the Maryland Avenue segment would eliminate this LOS D intersection. Despite the loss of this intersection and a minor increase in vehicles due to diverted traffic, the other intersections in the area would be LOS C or better. Particularly during the peak PM period, some eastbound traffic west of the site utilizes Maryland Avenue on-site to access eastbound Independence Avenue at a yield sign, rather than at the 6th Street, SW, signalized intersection. Under the submitted site location, this traffic movement option would be eliminated, and the traffic would be diverted to the signalized 6th Street, SW intersection. Therefore, conversion of this intersection as part of the proposed memorial would provide a safer vehicle access route to Independence Avenue during peak traffic periods.

Overall, the proposed removal of the current alignment of Maryland Avenue within the site is not, by itself, anticipated to have any major adverse impact on existing vehicular volumes and traffic patterns (Earth Tech, 2005). In addition, conversion of the Maryland Avenue and Independence Avenue intersection would have a positive impact on traffic safety at the intersection. Using the Year 2013 No-Build and Build traffic volumes, the site intersections were analyzed for level of service (LOS) using the HCM module of the SYNCHRO traffic simulation program and existing District of Columbia Department of Transportation traffic signal timings.

Under the Year 2013 No-Build condition, the resulting LOS is similar to existing conditions, with slightly more delay, consistent with normal traffic growth. All site intersections for this condition would operate at an LOS C (acceptable) or better, except for the unsignalized intersection of Independence Avenue and Maryland Avenue, with some approach movements operating at LOS D (acceptable), as identified for existing conditions in the Transportation Impact Study of 2006.

Under the Year 2013 site development condition, which includes memorial generated trips, the resulting LOS is similar to the Year 2013 No-Build condition with all site intersections operating at LOS C or better (although some individual intersection approach movements would operate at LOS D). In addition, the existing Maryland Avenue, SW and Independence Avenue intersection configuration, which would operate at LOS D, would be eliminated under the Build condition. The Park Service has received comment from the District of Columbia Department of Transportation dated June 9, 2006, indicating support of the concept of Maryland Avenue closure within the site. The Department of Transportation also noted implementation of the memorial will result in a loss of existing metered parking and that the loss revenue from the parking is a concern to the Department. No significant impact results from the physical alteration of traffic lanes as identified in the EA.

Pedestrian effects. The final development of the memorial on the proposed site is anticipated to attract museum visitors across Independence Avenue. Pedestrian volumes would be greater than currently exist on Independence Avenue at 4th and 6th Streets SW, as noted in the EA, creating additional confluence points of vehicles and Memorial visitors on foot. Vehicular traffic turning from Independence Avenue on to 4th and 6th Streets would likely encounter pedestrians crossing from the NASM to the Memorial. The proposed infill development on Maryland Avenue to the west would likely use 7th and 12th Streets to travel north and, thus, would not contribute to traffic volumes near the proposed site.

The site is located within an area well served by public transit including Metrorail and Metrobus, commuter and national rail lines, and tourist oriented shuttle buses including the Tourmobile and the DC Circulator. Based on a transportation study, the applicant anticipates that visitation to the Memorial would come primarily from the visitors already in the area for the National Air and Space Museum (NASM) and the National Museum of the American Indian (NMAI) across Independence Avenue to the north and northeast. Therefore, the EA notes that ridership on the transit systems in proximity to the site would not measurably increase over the long term, and that the parking supply to remain after the road closure will adequately meet demands of the memorial. Consequently, these effects are not significant.

Mitigation on the Site Approval action

In order to assure that approval of the Maryland Avenue site will not have a significant impact on the human environment, I require the applicant to design the Memorial using the design principles in attachment A, as further developed in the NHPA Section 106 process and the Memorandum of Agreement, and that supersede those submitted by the applicant. Such implemented measures mitigate the above discussed adverse impacts.

Public Comment. The National Park Service solicited public comments on the EA from June 16 to July 17, 2006. A public meeting for comment on the proposal was held by the Park Service on June 29, 2006. As an action requirement of the Commission's environmental procedures, the adoption of an EA and Finding of No Significant Impact by the Commission staff is to be announced to the general public. The Commission will place the Finding of No Significant Impact on the Commission website at www.ncpc.gov and specify that a printed review copy of the EA and of the NPS Summary and Analysis of Comments is available. Additionally, the Commission Tentative Agenda for the Commission's September 7 meeting contained a notice that review of the proposed project site selection and guideline approval is scheduled. The Tentative Agenda is distributed to over 750 recipients.

Standard for evaluation. Under NEPA, CEQ regulations, and NCPC Environmental and Historic Preservation Policies and Procedures, an EA is sufficient and an Environmental Impact Statement need not be prepared if the EA supports a finding that the federal action will not significantly affect the human environment. The regulations of the Council on Environmental Quality define "significantly" as used in NEPA as requiring consideration of both context and intensity of impacts. 40 CFR §1508.27. Context means that the significance of the action must be analyzed in several contexts such as society as a whole, the affected region, the affected interests and the locality. Intensity takes into account a number of factors specified in the regulation.

NCPC's requirements for a Finding of No Significant Impact (FONSI) are set forth in the Environmental and Historic Preservation Policies and Procedures (April 1, 2004) at Section 10(E). They provide that the FONSI must specify: "Any commitments to mitigation that are essential to render the impacts of the proposed action not significant, beyond those mitigations that are integral elements of the proposed action."

Finding of No Significant Impact. Applying the standards, factors, and analysis here, the Executive Director must make the assessment of whether selection of the submitted site will "significantly" affect the human environment based on the EA and the mitigation set forth here.

As to the factor of the context, this is a site-specific action, and the Executive Director looks at the effects on the locale. In regard to intensity, with the mitigation stipulation of adherence to the Commission's design principles along with the, the effects on the human environmental of approving the Maryland Avenue site for the Dwight D. Eisenhower Memorial will be reduced and will not be significant. I specifically note that intensity of any possible effect must assess "The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources." (40 CFR §1508.27(b)(8). The required applicant action set forth by me for adherence to the cited planning principles within is necessary to assure that NCPC's action—the approval of the Park Service's submitted site—will not adversely affect such resources of the proposed site. Staff has reviewed the action for extraordinary circumstances that may contribute, in any form, to environmentally significant effects to the proposal. These conditions include whether the action establishes a precedent for further action with significant effects; and whether the action is related to other actions which may have individually insignificant, but cumulatively significant impacts. Staff finds none of those circumstances exists. The requirement of the applicant's utilization of the attachment A design principles, as further developed in the NHPA Section 106 process and the Memorandum of Agreement, will be enforced by the Commission through its further review of the development stages of this project. I find that with the mitigation specified above, approval of Maryland Avenue site location for the Dwight D. Eisenhower Memorial will not significantly affect the human environment.

Attachments:

- 1) Attachment A – Design Principles
- 2) District of Columbia State Historic Preservation Officer letter, dated August 31, 2006
- 3) National Park Service Summary and Response, dated August 4, 2006, including public comments.

ATTACHMENT A

DESIGN PRINCIPLES

1. Preserve reciprocal views to and from the U.S. Capitol along Maryland Avenue, SW.
2. Enhance the nature of the site as one in a sequence of public spaces embellishing the Maryland Avenue vista.
3. Create a unified memorial site that integrates the disparate parcels into a meaningful and functional public gathering place that also unifies the surrounding precinct.
4. Reflect L'Enfant Plan principles by shaping the Memorial site as a separate and distinct public space that complements the Department of Education Headquarters and other surrounding buildings.
5. Respect and complement the architecture of the surrounding precinct.
6. Respect the building lines of the surrounding rights-of-way and the alignment of trees along Maryland Avenue.
7. Incorporate significant green space into the design of the memorial.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
HISTORIC PRESERVATION OFFICE



August 31, 2006

Ms. Vikki Keys
Superintendent
National Mall & Memorial Parks
National Park Service
900 Ohio Drive, SW
Washington, D.C. 20024-2000

Dear Ms. Keys:

I am responding to your letter of August 9, 2006, regarding the proposed reconfiguration of U.S. Reservation 5 and other parcels including a portion of Maryland Avenue to establish a site for the Dwight D. Eisenhower Memorial. This consultation is conducted in accordance with the provisions of Section 106 of the National Historic Preservation Act and implementing regulations.

The SHPO has reviewed your letter, the proposed Design Guidelines for the Eisenhower Memorial, and the Site Selection Environmental Assessment issued by NPS and the Eisenhower Memorial Commission in June 2006. We have also participated in several preliminary consultations on this project, including a National Capital Memorial Advisory Commission meeting, and most recently a Section 106 consultation meeting held at the National Capital Planning Commission on August 30, 2006. We appreciate the careful attention that you and the Eisenhower Commission have given to the historic qualities of the city plan during the site selection process, and your recognition of the urban design sensitivities inherent in the proposed site.

We believe this project offers a significant opportunity to realize a national memorial goal while enhancing the symbolic qualities of the historic L'Enfant Plan. It properly utilizes a prime site identified in the Memorials and Museums Master Plan, and we believe that reconfiguration of the site and its administrative jurisdiction is a necessary corollary of this utilization. We recognize however that there are divergent views on how to address the L'Enfant Plan sensitivities of the site. Under these circumstances we agree with your assessment that the preparation of design guidelines is an appropriate means to ensure that the project takes these historic considerations into account. Because of the significance of the project we also agree that the Advisory Council on Historic Preservation should be a participant in the consultation.

Based on the discussion at our August 30 consultation meeting at NCPC, we do not believe it is necessary to make an official determination of effect for the project at this time. There appears to be

concurrence on the identification of interested consulting parties, and on an area of potential effect that would include the frame of buildings surrounding the site as well as the Maryland Avenue vista. We believe that further discussion of the proposed guidelines among the parties will be beneficial, and appreciate your invitation to continue consultation toward a Memorandum of Agreement. In our opinion an agreement that incorporates design guidelines and indicates a procedure for review of the memorial design would be an appropriate vehicle to address the effects of the project on historic features.

Given the timing of your site selection review at NCPC, we have enclosed comments on the NCPC staff's Draft Design Principles for the site. This statement of design principles appears useful for the purpose of forging a consensus during the site selection phase, but we agree with your assessment that the Eisenhower Commission and its design team need a more detailed set of guidelines before embarking on the design phase. We look forward to working with you, the other consulting parties, and the Commission of Fine Arts in developing these guidelines.

If you have any questions, please do not hesitate to contact me at 442-8841. Thank you for the opportunity to comment in this historic preservation matter.

Sincerely,

David Maloney
Acting State Historic Preservation Officer

**Dwight D. Eisenhower Memorial
Environmental Assessment
Summary and Analysis of Public Comments
August 4, 2006**

This Environmental Assessment (EA) was made available for public review and comment from June 16 to July 17, 2006. The EA was published on the NPS web site and a press release announcing the document's availability was published in a local newspaper. The EA was distributed to Federal and District of Columbia agencies, as well as interested citizen organizations. A public reading copy was made available in the regional office headquarters building at 1100 Ohio Drive, SW; at Martin Luther King, Jr. Memorial Library at 901 G Street, NW; and at the National Capital Planning Commission Library at 401 9th Street, NW. The NPS hosted a public open house on June 29, 2006 to provide an opportunity for the public to ask questions about the Environmental Assessment and to enter comments into the NPS Planning Website.

The NPS received comments on the Environmental Assessment from six individuals, organizations, and government agencies, including the DC Office of the Fire Marshall. The comments concerned the NEPA process, the potential design of the memorial, the treatment of Maryland Avenue, and emergency access and protection. After careful review of the comments, we believe that all the issues that are raised by these comments have been addressed in the EA. We have organized the comments into the topical sections listed below; our response to the comments follows.

NEPA Process: The site selection for the proposed memorial involved the thorough review of 26 total sites. Nearly all of the sites were eliminated as a result of various constraints, as summarized in Chapter 2, Description of Alternatives, in the EA. The NPS and Commission spent considerable time and effort evaluating the constraints and benefits of each site, resulting in the selection of the preferred site. The preferred site is a relatively larger site that will allow greater flexibility of design for a landscaped plaza and small support structures. Most importantly, the Maryland Avenue site offers multiple thematic associations with Eisenhower due to its surroundings. The preferred site was also identified as a location appropriate for a memorial and designated as Prime Candidate Site #3 in the National Capital Planning Commission's *Memorials and Museums Master Plan*. The EA also included two design alternatives for the preferred site that involved modifications to the configuration of the site and existing roadways.

The public and agency review process has involved coordination with agencies and the public throughout the EA process. Public involvement in the project has included a scoping meeting held on February 16, 2006 to convene the interested parties and generate further discussion of issues; a public review meeting held on June 29, 2006 to allow for public comment on the EA; agency review throughout the production of the EA; and the public review and comment period from June 16 through July 17, 2006. Agencies, organizations, and individuals were notified of the availability of the EA by letter; hard copies of the EA were made available at three locations

throughout the District; and electronic copies of the EA were made available through the NPS's Planning, Environment, and Public Comment web site.

The purpose of the EA is to assess and mitigate the environmental consequences of the proposed action relating to the selection of a site for the memorial; it is not intended to serve as a design review document. Therefore, in accordance with NEPA, the EA documents the potential effects of the proposed memorial, provides project parameters to anticipate the potential design, and acknowledges that the design will undergo numerous reviews prior to final approval.

As the project progresses, approvals and concurrence will be sought from federal and District agencies as required, including: US Department of the Interior- National Park Service, General Services Administration, the Commission of Fine Arts, the National Capital Planning Commission, and the Advisory Council on Historic Preservation, the DC State Historic Preservation Office, and the District of Columbia Department of Transportation.

Memorial Design: The proposed memorial project is currently in its site selection stage. While specific design details have not yet been developed, the design of the memorial will be consistent with the assumptions identified in the EA. Currently, the memorial is envisioned as a landscaped plaza, providing an open and accessible site for visitors. The memorial could include outdoor shade elements and small visitor support structures. The design of the memorial will respect the historic significance of Maryland Avenue and its historic vista through appropriate design guidance and development limitations similar to the site development constraints presented in the EA.

As provided in the Commemorative Works Act, the NPS, NCPC, and CFA may respectively develop design guidelines at the time of site approval. The respective site approval criteria will likely be formalized as mitigation measures that will be conditions of approval for the preferred site. Subsequent to the site selection process, the memorial will enter a design development state. The resulting concept, schematic, and final designs will undergo a thorough design review process to obtain approval by NPS, NCPC, and CFA.

Treatment of Maryland Avenue: The proposed memorial would not close Maryland Avenue. Under the preferred alternative, the historic vista along Maryland Avenue would be protected and enhanced. Views to and from the U.S. Capitol along the 160-foot wide right of way would be strengthened by the establishment of an outdoor memorial consisting of green space, commemorative elements, and landscaping.

With respect to vehicular circulation, the brief diversion of traffic from the Maryland Avenue spur onto 6th Street, SW, would have a positive impact on traffic flow and vehicular and pedestrian safety relative to the current configuration. The slight modification to the roadway alignment would result in a more standard configuration of intersections, improve signalization patterns, and reduce potential vehicular/pedestrian conflicts, without reducing the capacity of the roadway network.

It is important to note that there is no historical basis for maintaining vehicular traffic on Maryland Avenue. Because of its original residential character and the long-term presence of a railroad line along the corridor, Maryland Avenue does not have an established alignment. In

addition, there is a tradition in Washington of diverting traffic around key memorial and institutional sites.

The relationship and physical configuration of Maryland and Independence Avenues should not attempt to replicate the intersection of Pennsylvania and Constitution Avenues, which resulted in two failed public spaces at the expense of vehicular traffic. A more appropriate precedent would be Freedom Plaza, where traffic on Pennsylvania Avenue is diverted onto E Street, NW (although the Eisenhower Memorial would be a more attractive green space with much less hardscape).

While substantial development of infill residential and commercial space along the western portion of Maryland Avenue is speculative at this point, the potential for increased traffic generation would not likely affect the Independence Avenue/6th Street intersection. Because of the east/west connectivity provided by Independence Avenue, the general Southwest Federal Center area is in greater need of additional north/south roadway options. Therefore, traffic generated by new development is more likely to utilize 12th, 9th, and 7th Streets to reach the primary vehicular destinations

Emergency Access/Safety: Safety access and fire protection will be considered and addressed in the design of the memorial. Development of the memorial will be coordinated with appropriate agencies and will include appropriate considerations for access to the memorial and nearby buildings, as well as connections to the public water supply in the area.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DISTRICT DEPARTMENT OF TRANSPORTATION



Transportation Policy and Planning Administration

June 9, 2006

Mr. Dan Feil, FAIA
Executive Architect
Eisenhower Memorial Commission
1629 K Street, NW Suite 801
Washington, DC 20006

Dear Mr. Feil:

The District Department of Transportation has reviewed the Eisenhower Memorial Traffic Impact Study and supports in general your request to close the Maryland Avenue right of way between Independence Avenue and 6th Street, SW to vehicular traffic.

While we support in concept the closure of this Street, the Department will require that you submit your proposal for the design of the Right of Way including cross sections, materials and a maintenance plan for the portion of Maryland Avenue proposed for closure for our review.

Additionally, since the project will result in a loss of forty existing metered parking spaces, the Department will require the applicant to reimburse the District for lost revenue.

We stand ready to work with you as you move this project forward. Should you have any questions, please feel free to contact me or Ms. Ann Simpson-Mason, Manager, Neighborhood Transportation Planning at 671-0493.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ken Laden", is written over a horizontal line.

Ken Laden
Associate Director

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Correspondence Text

To: National Park Service July 17, 2006
National Capital Region

From: Barbara Zartman
Immediate Past Chair
The Committee of 100 on the
Federal City

Re: Environmental Assessment
Eisenhower Memorial

This will serve as the comments of The Committee of 100 on the Environmental Assessment prepared in connection with the site selection for the Eisenhower Memorial.

The Site

The preferred alternative calls for the closing of a L'Enfant Street, retaining only the View Corridor, but citing its potential use for landscaping, sculptures, and artworks. Such structures fight, rather than contribute to, a sense of the historic roadway.

As the memorial becomes a reality and visitors attend the site, this "preservation" will have little meaning as Maryland "Avenue" becomes a pedestrian park. Pressures to further burden this 60' corridor with other functions will eradicate the very goal that the EA acknowledges is important.

The Committee has been a staunch defender of the L'Enfant Plan, often referred to deferentially even as development plans call for closing its streets. We believe its original contribution to the very character of the Nation's Capital is beyond measure; we believe it continues to this day to deserve the highest protections. This memorial must be designed with retention of Maryland Avenue, moved to another site, or postponed.

This is not to say that we would support the "Maryland Avenue Dominant" alternative. While we and others would wish such a restoration of its original character would be possible, it is not an alternative for today. The inability to effect such a restoration should not, however, be used as an excuse to close this portion of a L'Enfant Street.

entirely.

The Process

We must take strong exception to the way in which this "consultation" has taken place. Despite repeated written and phoned requests, we have received no material until this EA arrived by FedEx just days before the comment period closed on July 17. Obviously this precluded our ability to participate in the June 29 event and to research portions of the EA for comment.

Both I and C100 Chairman Don Hawkins have requested that materials and notices be sent to me at either my email or postal address, but not a single communication related to this project has come. In light of the years of involvement in §106 and EA/EIS processes during which communication has never been a problem, I call into question the due diligence of this EA process, as well as the adequacy of the "integrated" §106 review.

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Correspondence Text

17 July 2006

Mr. Glenn DeMarr By Email Only
Department of the Interior
National Park Service
1100 Ohio Drive SW
Washington, DC 20242

Re: Comments on EA/Site Selection: Proposed Dwight D. Eisenhower Memorial

Dear Mr. DeMarr:

As you know, I have been working on the realization of Maryland Avenue -- the missing avenue of the L'Enfant Plan -- and I welcome the Eisenhower Memorial to its adopted site at Maryland and Independence Avenues, indeed, this memorial has the potential of a gateway to the city's grand new boulevard, which will be lined with apartment buildings, restaurants, offices, museums and several other memorials.

Appropriately, everyone steps lightly and in concert in this area of the Federal City in deference to its historic importance; in that creative spirit, I would like to point out that several comments on the Maryland Avenue Dominant Alternative need to be reconsidered:

1. The comment that this alternative makes the site into triangles -- thereby limiting options on the memorial -- is not true because the triangle forms are inherent in the site. Even if traffic is routed to 6th Street, the 160' wide scenic vista of Maryland Avenue -- in which no structure can be built -- makes the site into two triangles, traffic or not. I do not expect that the alternative will affect the vista down Independence Avenue.
2. The comment on page 2-18 and illustration on page 2-19 that the scenic vista is limited to a 60' wide "historic cartway/view corridor" is not our understanding. Approximately 9 or 10 new buildings have been constructed recently on Maryland Avenue, and all have strictly respected the 160' scenic vista with no encroachments, and

were built in full anticipation of the exclusive reservation for the future 160' wide avenue. The Maryland Avenue Alternative certainly respects the 160' ROW -- as should any future development of this site.

3. The Maryland Avenue Dominant Alternative follows the L'Enfant Plan, the McMillan Plan, and the Legacy Plan, which was prepared and recently reaffirmed by, the NCPD. Furthermore, it is the exact mirror image of the intersection of Pennsylvania and Constitution Avenues -- an intersection which respects the dominant angular Avenue, and at the same time, functions very well from a traffic standpoint. Mr. Alan Harwood of EDAW, the EA consultant,

Mr. Glenn DeMarr

17 July 2006

Page Two.

maintained at one meeting that Independence Avenue carries more traffic than Constitution. Alas, with the closing of Pennsylvania Avenue in front of the White House and E Street below the White House, the traffic on Constitution has considerably increased and the intersection -- the mirror of this alternative -- continues to perform well.

Using my drawing in the EA without my explanation (or attribution or permission) unfairly obscures the amenity and practical benefits of our Maryland Avenue Plan, and this alternative, to all new participants in this EA effort; those benefits are, however, well known to all who have been involved.

By refining more precisely the general configuration, utilizing a professional survey, which the Memorial group now has, the amount of land available for this Memorial -- after eliminating the 160' ROW -- should be the same as existing whether traffic uses the ROW or not. My drawing intended only to suggest that there might be a third possible triangular area which could be used for this memorial's programs linking the Air and Space Museum, at the designer's option. The two triangular areas which result from this configuration on the drawing to the right (east of 4th Street) were new options for new memorials unrelated to the Eisenhower. (I hereby request the opportunity to provide an explanation of my drawing which will be included in future printings of the EA, and which would be mailed to all current recipients of the EA.)

As a professional designer and planner working in the area of the proposed Memorial, I strongly believe we all should consider it our joint responsibility not only to protect, respect, and uphold the historic L'Enfant, McMillan, and Legacy Plans -- but to decisively discourage any proposal contrary to those plans -- such as closing a L'Enfant/McMillan grand avenue -- since they are the very platform of planning for our nation's capitol.

The Eisenhower Memorial in no way needs to depend on planning alternatives to honor our beloved President who possessed the best of American values -- it needs only to look at how a creative designer solved the separation of parcels in the National Gallery East and West wings, where a presumed negative has turned out to be a real positive.

Very truly yours,

Arthur Cotton Moore FAIA

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Correspondence Text

The office of the Fire Marshal would like to comment on 2 subjects:

1- Access to the Dept Of Education Building. This building currently has no access on the rear or back side of the structure. Access for fire apparatus is extremely important, and an access road between the DoE building and the DDE Memorial should be included. This would also provide access to the rear of the memorial for all public safety organizations.

2- Water supply [hydrants]: Water supply should be assured during the construction phase as there are many important buildings surrounding the site and access to that water supply is critical. Additionally, water supply [hydrants] should be considered for the Memorial.

Correspondence (187879)

[Edit](#)

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Correspondence Text

We have just attended our initial meeting of the Commission. We think the proposed site is ideal and hope it is approved for the Eisenhower memorial. We think it should reflect the greatness of Eisenhower. If there is not to be an above ground shelter (and we think it would be good if there were an open air shelter) but more important Eisenhower should come to life- build an underground shelter complete with a replica of his headquarters in WWII- under London- the sand bags, his telephone, his chairs- medical cots, conference table he used with Churchill- show him as the General that saved the Free world- and because of his great leadership became the President- children today should see more than experience things and people electronically- they should be able to feel and touch his life- More later

Correspondence (187878)

[Edit](#)

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Correspondence Text

Great presentation. Great job fielding comments and worries from various members of the community.

POSTED AS AN INTERNAL DOCUMENT AS IT DID NOT COME VIA PEPC POSTING.

**National Coalition to
Save Our Mall**
Preserving Our Monument to Democracy



Judy Scott Feldman, Ph D, Chair
301-340-3938

www.savethemall.org

PLEASE REPLY TO:
National Coalition to Save Our Mall
9507 Overlea Drive
Rockville, MD 20850

Comments on Site Selection Environmental Assessment
Dated June 2006
For proposed
Dwight D. Eisenhower Memorial

The National Coalition to Save Our Mall (Coalition) offers the following comments, to the Dwight D. Eisenhower Memorial Commission and the National Park Service, on the June 2006 Proposed Dwight D. Eisenhower Site Selection Environmental Assessment (EA):

- As stated in the title of the document and in the purpose and need for the proposed action, the EA **only deals** with the preferred site for the Memorial at Maryland and Independence Avenues SW Washington DC, and a no-action alternative.
- The environmental impact of the to be designed memorial will have to be assessed later and incorporated in the EA.
- The Coalition feels this bi-fabricated approach falls short of the Environmental Protection Act (42 U.S.C. 4321 et seq., Section 1508.9) intent to assess all potential impacts as a combined unit to assist decision makers in providing information about the positive and negative environmental effects of the proposed undertaking and its alternatives. **This means more than site selection only.**
- The EA document favors the preferred site for stated reasons not environmental considerations.
- Even though the examination of 26 sites are mentioned in the EA, with 9 sites recommended for further study, only the preferred site and the no-action alternative are analyzed.
- EA's are to describe, in equal detail, the environmental impact of a range of reasonable alternatives that meet the objectives laid out in the purpose section and that reduce or eliminate impacts to important environmental resources.
- The Coalition believes there are other reasonable alternatives among the 9 sites suggested for further environmental analysis and study.
- Reading the EA one gets the immediate impression that the preferred site has been pre-determined and only this site can meet stated objectives. The EA then justifies the preferred site.
- Asking the National Capital Memorial Advisory Commission to approve the preferred site before the EA is complete, is also an indication of pre-determination.
- Section 1.7, Cumulative Relationship of Nearby Projects, lists 14 ongoing or planned projects in the vicinity of the preferred site which could result in cumulative construction and operational impacts when considered together with the effects of the proposed action. Listing is only partially

useful. No actual cumulative environmental analysis is undertaken. Particularly the cumulative traffic increase from the various building projects is not examined.

- In the immediate site area to the west, the proposed Maryland Avenue corridor revitalization has the potential of adding 6-7 million sq. ft of office, residential, and museum uses. This major development potential is not taken into account by the EA.
- Another major issue, the proposed closing of Maryland Avenue to thru traffic, in order to create a larger memorial site, is inadequately analyzed for impacts on this historic environmental view corridor resource. Maintaining only the 60' cartway free from new structures "...the Avenue offers limited development opportunities within the cart way" (EA page 2-15) is historically incorrect. The Avenue originally established 160 foot street right-of-way (R.O.W.), similar to Pennsylvania Avenue north of the National Mall, has always been intended to be free of any structures other than view framing tall street trees. Routing east-west traffic into 6th Street will reduce the level of traffic service at 6th and Independence Ave. (As indicated on EA page 3-23 and 4-14). With the future potential traffic increase from the Maryland Avenue revitalization, more attention is needed to the proposed traffic movement alteration.
- The Coalition believes Maryland Avenue and Independence Avenue can be restored to its originally intended intersection configuration just as Pennsylvania and Constitution Avenues have been as part of the Pennsylvania Avenue Development Corporation Plan.
- The Visual Resources analysis is inadequate. The EA states that the memorial has not yet been designed. However "some of the parameters developed to guide the design...address the visual relationship that the memorial should have with the adjacent area". Two of these parameters deal with "maintain the direct vista to the Capitol along Maryland Avenue" and "strengthen the view corridor and create a welcoming entrance along Independence Avenue". These parameters are too general and no clear view corridor width dimensions are provided.
- The EA's page 4-9 states "The enhancement of the preferred site with a memorial, a landscaped plaza and possibly **two small visitor services structures** has the potential to improve the **four** view corridors that would be affected by the memorial". This is speculative. No evidence is provided to support this statement. Allowing even small structures within the R.O.W. is inconsistent with the two stated parameters.
- The EA also states (page 4-9), "The location of the visitor service buildings is currently unknown, however, they would be located outside the Maryland Avenue view corridor so that they do not interfere with the vista, especially when viewed from a distance". **Such generalizations need more specific guidance and direction** in order to conclude "Overall, if the memorial design is consistent with the established parameters, there would be no adverse impact on Maryland Avenue." **The design of the memorial is part of the impact on the environment.**

The Coalition supports the proposal for a Dwight D. Eisenhower Memorial near the National Mall. However we believe that the EA is inadequate in its present form.

The EA needs more objective analysis which can help the decision makers conclude, from the reasonable alternatives examined, which site has the least adverse environmental impacts.