

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



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**TO: Ms. Vikki Keys  
Superintendent  
National Park Service**

**RE: Vietnam Veterans Memorial Center Site Selection Environmental Assessment**

The National Coalition to Save Our Mall appreciates the opportunity to respond to the Environmental Assessment for the Vietnam Veterans Memorial Visitor Center Site Selection. The Coalition is a nonprofit citizens organization dedicated to the preservation of the National Mall as symbol of our nation's founding principles and stage for American democracy. We are the only organization—public or private—devoted exclusively to working on behalf of the well-being and integrity of the National Mall as a whole; six government agencies have jurisdiction of separate parts of the Mall but none of them plan for the Mall in its entirety. The Coalition is widely recognized by the national and local media, as well as among citizens and elected leaders, as a voice for the public in matters pertaining to the Mall's past, present, and future.

The EA is inadequate in several aspects and the Coalition calls on the National Park Service and the sponsor to make substantial additions and revisions (or, better yet, conduct a complete and full Environmental Impact Statement) that recognize that both sites are integral components of the historic Lincoln Memorial Grounds and of the National Mall as designed by the McMillan Commission of 1901-1902 and that any construction at those sites will have significant and permanent adverse impacts on those historic cultural resources. In the Coalition's view, the EA gives priority to evaluating the needs of the Visitor Center at the expense of fully evaluating the significant adverse impacts on the National Mall.

Due to the time limits for public comment, the Coalition has been able to review only parts of the EA. We would ask to be given additional time to provide more in-depth comments.

We include here two main points:

1. **The EA fails to consider the full variety of available alternatives and instead focuses only on the two remaining after three others were eliminated, without public knowledge or comment, by government agencies.**
  - a. Until two sites across Constitution Avenue were unexpectedly and without public notice eliminated from possible sites for the visitor center, those were being seriously considered by all participants in the public consultation, and were preferred by the Coalition and other groups. In place of those two sites, the NPS and sponsor should identify reasonable alternatives and those should be included in a revised EA.
  - b. In the Congressional legislation authorizing the visitor center, Congress clearly left open the possibility of locations not only at the memorial but also at some remove from it, none of which are considered in the EA. The legislation states that the site shall be "at or near" the Vietnam Veterans Memorial "or its environs." Congress was clearly concerned about preserving the sacrosanct character of the Mall's historic symbolism and open space. However, during public meetings, the sponsor spent much energy and expense in explaining the meaning of "at or near" and the EA appears to follow that reasoning in

evaluating preferred alternatives. The EA fails to consider alternatives that recognize Congress's intent to provide sites beyond the narrow distance the sponsor prefers. (As the EA states in 1.1, Congress left open sites "in the Reserve, Area I, and Area II,"—a far-ranging area well beyond the narrow scope of the EA.)

- 2. In 1.6 "Cumulative Relationships of Nearby Projects," the EA fails to identify or study some significant recent and ongoing projects, including the World War II Memorial and the NPS's two new planned concession buildings to the north and south of the Lincoln Memorial. Furthermore, they fail to acknowledge that the cumulative effect will be not only on nearby *real estate*. Any construction at either of the two sites under study will add to cumulative—and serious adverse—effects in recent years on the historic Lincoln Memorial Grounds and on the National Mall as a whole.**
- a. Both sites under consideration are integral parts of the historic Lincoln Memorial Grounds, as defined and studied by the National Park Service's Cultural Landscape Report, and of the National Mall as designed by the historic McMillan Plan of 1901-1902. The most significant recent change to the Lincoln Memorial Grounds is the World War II Memorial, which required destruction and redesign of the Rainbow Pool—smaller and enclosed within granite walls, pillars, and arches, and with a new physical and compositional relationship to the Reflecting Pool and the McMillan Plan cross-axis. The Advisory Council on Historic Preservation issued a formal finding in 2000 that clearly stated the adverse effects of the WWII Memorial on the National Mall.
  - b. NPS's new concession buildings will further alter and detract from the intended pastoral character of the Lincoln Memorial Grounds.
  - c. Both sites require further degradation of the National Mall's historic character, which has been affected in recent years by numerous dramatic changes all of which add up to substantial and negative cumulative effects, including new memorials and museums, and security enhancements, as well as NPS concession buildings and other projects undertaken without ANY environmental or substantive public review. Simply because the NPS considers its own projects not to have negative effects does not make it so. The EA needs to fully identify projects past and future that should directly affect site selection.

The Coalition understands that Congress is impatient to have site selection completed in as quick a timeframe as possible. However, an inadequate EA that fails to fully understand, identify, and analyze the permanent effects of either site on the integrity and future of the National Mall is a poor framework on which to make a decision of this importance. Most important, there is simply inadequate consideration of alternatives. We believe that other alternatives consistent with legislation's intent (and beyond the limited sites originally identified by the NPS and then abruptly withdrawn from consideration) could be identified in a timely manner.

Sincerely,



Judy Scott Feldman, Ph.D.  
Chair