



United States Department of the Interior

NATIONAL PARK SERVICE

National Capital Region
1100 Ohio Drive, S.W.
Washington, D.C. 20242

AUG 21 2008

IN REPLY REFER TO:

D20 (NCR-LRP)

National Coalition to Save Our Mall
9507 Overlea Drive
Rockville, Maryland 20850

Dear Ms. Feldman:

I am writing in response to your letter of August 11, 2008 regarding the Memorandum of Agreement for the establishment of the Martin Luther King Jr. Memorial. According to your letter, the greatest concern of the National Coalition to Save Our Mall at this stage of design development is the Visitor Contact/Bookstore/Restroom facility. I will attempt to address the major issues raised in your letter.

Initial Size and Location of the Visitor Services Facility

We must respectfully disagree with your assertion that the Visitor Services Facility was not part of the 2005 design. The December 2005 Concept Plan for the Memorial, as presented to the National Capital Planning Commission (NCPC), included a visitor services facility of approximately 3600 square foot (SF) which was intended to be similar to the 2800SF visitor services facility at the Franklin Delano Roosevelt (FDR) Memorial. The exact size, configuration, and location of the facility have changed over the course of design development, in part as a result of Section 106 consultation, but the basic program has not changed. In fact, the size of the facility has instead been reduced by approximately 15 percent to approximately 3100SF. Attached is a drawing which was part of the NCPC presentation as confirmation that the facility has been part of the program for the memorial since 2005.

Section 106 Consultation Meetings during 2006 and 2007

As you know, the initial Section 106 consultation meeting occurred in September 2005 upon release of the Environmental Assessment (EA). After the submission of the Concept Design to the Commission of Fine Arts (CFA) and the NCPC in the fall of 2005, the size, configuration, and location of the visitor services facility was refined through consultation with the staff of the commissions and through a series of Revised Concept submissions. The Revised Concept submission was approved by NCPC in December of 2006. Between January and November of 2007, the Martin Luther King, Jr. Foundation reorganized its design team, and it was not until the November that the design of the Memorial was again moving forward. In the February of 2008, the Section 106 process was recommenced and the consulting parties were re-engaged. For further illumination of the history of the development of the design of the visitor facility, attached is the chronology that was developed at your request during the Section 106 process.

Inclusion of the Visitor Services Facility in the Environmental Assessment

We must also disagree with the assertion that the visitor services facility is not addressed in the Environmental Assessment. The need for visitor services for the initial 2-5 million annual visitors to the Memorial and the expected long-term average of 1.2 million visitors per year is clearly expressed in the EA. Section 4.0, Environmental Consequences, provides the framework for the services that are to be provided by the memorial project. In particular, on page 4-5, the need for visitor services created by the memorial are described:

Visitors to the Memorial, particularly families and the elderly, would generate the need for a variety of on-site service, including restroom and interpretive facilities. Given that the nearest restrooms would be located more than 750 and 1000 feet away, at the World War II and FDR Memorials, respectively, numerous Memorial visitors would be inconvenienced and discomforted by a lack of restroom facilities. In addition, Memorial visitors typically desire a bookstore or interpretive ranger or museum space to learn more about the subject matter.

Your letter correctly states that the provision of such visitor services at the site of a new memorial were inconsistent with a National Park Service (NPS) policy which had guided the establishment of design parameters for the memorial, as recognized in the EA:

However, such facilities would be inconsistent with the design parameters established for the site under a previous NPS policy that emphasized centralized restrooms in the Mall area.

The discussion of visitor facilities does not end with this recognition, however. Rather the provision of the visitor facility is suggested as mitigation for the environmental effect of the newly created visitor needs:

Because the Memorial would attract more than 1.2 million visitors per year, restroom facilities should be provided. An attractively designed structure located in the southwest corner of the site would enhance visitor comfort and could also be used to house ranger or interpretive functions.

The Visitor Services Facility is not a Visitor Center

NPS's Visitor Facility Planning Model (December 2004) describes the services that are typically found in a "Visitor Center", which include, but are not limited to a lobby, information desk, exhibit area, public restrooms, theater, interpretation offices, and support spaces. In contrast, the proposed visitor services facility for the Martin Luther King Jr Memorial includes only restrooms, mechanical space to support the Memorial, a ranger contact station, and a bookstore to serve the interpretive needs of the public. The proposed facility does not include an exhibit area, theater, or interpretive offices that are part of a typical NPS Visitor Center. It is also worth noting that according to the planning model, NPS Visitor Centers typically achieve a minimum size of 5000SF to 7000SF.

The NPS policy has been consistent with regard to what is or is not a Visitor Center. The restrooms/bookstore services that are currently provided at the Lincoln Memorial, the Washington Monument, the Jefferson Memorial, and at the FDR Memorial are basic services, necessary to the visitor experience. These facilities do not constitute Visitor Centers.

The Proposed Visitor Services Facility is Within the Boundaries of the Approved Site

During the Section 106 process and consultation with NCPC and the Commission of Fine Arts (CFA), the design has been refined and the Memorial has been reduced in scale. As a result of that refinement and the proposed reconstruction of West Basin Drive, the entire Memorial, including the visitor services facility, fits within the approved 4-acre site. Attached is a diagram based on the “Station and Offset Plan” from Construction Documents for the Memorial on which we have superimposed the dimensions of the 4-acre site as identified in the EA. As it is still within the limits of the originally-defined site, its impact to recreation in West Potomac Park is no greater than that of the original Concept Design. We also note that various locations for the visitor support facility were considered through the Section 106 process and ultimately the location west of the roadway was selected because it minimized impacts on the existing cherry trees and upon historic views within West Potomac Park. Finally, we note that the District of Columbia State Historic Preservation Officer (DCSHPO) has agreed that the visitor services facility creates no significant impacts beyond those of the Memorial itself, which the Memorandum of Agreement seeks to mitigate.

Further Responses Issues Raised by the Coalition

Your letter includes a list of ten specific questions, some of which have been addressed above. For the sake of completeness we have addressed any unanswered questions below.

1. The visitor support facility is considered part of the Memorial undertaking, as necessary support to the primary purpose of the Memorial as authorized by Congress.
2. The issue of the need for interpretive services was addressed in the narrative above.
3. The decision to locate the visitor facility west of West Basin Drive was made during 2006, between the March and December presentations to NCPC, as a result of consultations with NCPC, CFA, and the Memorial Foundation’s design team. The effects on recreation are discussed above.
4. As discussed above, the visitor facility is within the 4-acre site.
5. As described above, the visitor facility conforms to the Commemorative Works Act.
6. The NPS definition of a Visitor Center is described above.
7. The National Mall Plan, now in progress, will address broader NPS policies with regard to the development of additional comfort facilities.
8. The proximity of restrooms at other memorials is addressed above and in the EA.
9. There is no universal policy regarding visitor support facilities at memorials – the need for such facilities is evaluated based on the location, subject matter, expected visitation, and other factors. Retail facilities are considered only to the extent that such services are necessary to the interpretation of the memorial. These policies are consistent with the Commemorative Works Act.

10. NPS's support of the proposed visitor services facility is based on the information provided above, not just on the premise that a portion of the Memorial site the former location of temporary buildings.

Conclusion

We appreciate the Coalition's comments on the development of the Martin Luther King Jr. Memorial and we hope that we have addressed your concerns regarding the visitor support facility. However, we also recognize that the Coalition, and other consulting parties, may wish to discuss further the development of the visitor support facility. Toward this end we have amended the MOA to include the treatment of the visitor services facility as one of the three issues subject to further consultation. We hope that the Coalition will agree to support the MOA as it has been amended.

I would like to thank you for your patience in working out the MOA and I want to thank you for agreeing to review this response expeditiously.

Sincerely,



Peter May
Associate Regional Director
Lands, Resources and Planning

Enclosures