

June 3, 2009

National Capital Planning Commission
401 9th Street, NW
North Lobby, Suite 500
Washington D.C. 20004

Re: Vietnam Veterans Memorial Visitors Center

Dear Chairman Cogbill and Members of the Commission:

The National Trust for Historic Preservation remains very concerned about the visual and physical impacts of the proposed Vietnam Veterans Memorial Visitors Center on the highly sensitive historic grounds of the Lincoln Memorial.

As you know, the National Trust has strongly opposed the placement of this proposed Visitors Center since its inception. In fact, we are opposed generally to visitors centers for specific memorials and icons on the Mall, as these facilities contribute to the inappropriate proliferation of built structures in the landscape, and detract from the experience of the memorials themselves.

We remain concerned that the proposed design for the Visitors Center would create a major gash in the landscape of the Lincoln Memorial grounds, and that the sloping ramps and entryway would mimic the Vietnam Veterans Memorial itself in a way that would detract from the power and simplicity of the Memorial.

We support the design guidelines developed in 2007 by the National Capital Planning Commission and Commission of Fine Arts, with input from the National Trust and other consulting parties, in an effort to reduce the harmful impact of the proposed Visitors Center on the Mall. We concur with the Executive Director's Recommendation, including the analysis of the ways in the proposed design does not meet the design guidelines. Indeed, we are disappointed that the proposed design has made little progress in the past year and a half in response to earlier comments from the Commission and CFA.

In addition to the proposed action in the Executive Director's Report, the National Trust requests that the Commission:

Advise the National Park Service and the Vietnam Veterans Memorial Fund to explore alternatives that locate the visitors center further to the north, closer to the intersection of Constitution Avenue and Henry Bacon Drive. This shift would reduce the center's visibility from the Lincoln Memorial, and would allow greater space for recreation. We understand that further study must be done to ensure that the existing tree roots are protected.

Recommend that the National Park Service remove the existing kiosk and locate visitor services elsewhere. In our comments to the National Park Service on the National Mall Plan, we have strongly recommended that existing and future visitor services be evaluated to create a new plan that will supply adequate visitor services

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with minimal impact to the National Mall. Removal of the existing kiosk on this parcel of the Lincoln Memorial grounds will allow more recreational activity and partially restore the vista from the Lincoln Memorial, thus mitigating impacts of the proposed Visitor Center.

Finally, we remain concerned that the review process for this project reflects a major disconnect between consultation under Section 106 of the National Historic Preservation Act, 16 U.S.C. § 470f, and review under the National Environmental Policy Act (NEPA). The National Park Service issued a Decision Notice and Finding of No Significant Impact in November 2007 for the "Design and Construction" of the proposed Visitors Center, but failed to comply with Section 106 prior to issuing this decision, which we believe was unlawful. A year and a half later, Section 106 review has still not been completed. We agree with the Executive Director's Recommendation that supplemental NEPA review is needed, and we urge the Commission to be mindful of the importance of integrating all reviews as the process goes forward.

Thank you for considering the views of the National Trust for Historic Preservation in this important matter.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Merritt".

Elizabeth S. Merritt
Deputy General Counsel

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