

**Comments on the Vietnam Veterans Memorial Visitors Center
to the National Capital Planning Commission
by the
National Coalition to Save Our Mall
June 4, 2009**

Good afternoon, Chairman Cogbill and Commissioners. I am Judy Scott Feldman, chair of the National Coalition to Save Our Mall, a nonprofit citizens groups dedicated to the protection and enhancement of the National Mall as our nation's premier civic space.

We commend the staff of the National Capital Planning Commission for careful review, in the Executive Director's Recommendation (EDR), of some of the complicated issues around this project which, as you are well aware, has been controversial from the beginning. The EDR points out that the proposed design – even after 2 years of revisions and changes – still does not meet the guidelines. Indeed, the proposed design needs further significant changes in order to meet those guidelines.

We concur with comments submitted by the National Trust for Historic Preservation that the proposed design “would create a major gash in the landscape of the Lincoln Memorial grounds”; that the sloping ramps mimic the Wall itself in a way that would detract from the power of the Memorial. We also agree with the National Trust in recommending that NCPC direct the NPS to remove the existing food kiosk at this site as it is a major intrusion on the landscape and views to the Lincoln Memorial.

Another topic not in the EDR that has come up several times during the Section 106 meetings is how visitors will encounter the Visitors Center. NPS and the Fund say the majority of visitors will come by bus. The fact is that when you get off the bus there at the drop-off for tour buses and Tourmobile on Henry Bacon Drive, the first thing you will see is the descending ramps and walls of this Visitor Center. It is not invisible. On the contrary, it is likely visitors will go there and after an extended visit will forego a visit to The Wall itself – a tragedy all in all for The Wall, for the visitor, and for the powerful symbolism of the Mall in which The Wall plays an integral part.

The National Trust for Historic Preservation also is correct in pointing out a disconnect in the NEPA and Section 106 review process for the project, leading to decision-making by NPS before the public consultation process has taken place. This is backwards and the opposite of transparency and accountability that are the stated goals of the new administration.

This point is reinforced by letters sent yesterday by the federal Advisory Council on Historic Preservation to the National Park Service, and we hope you have read those letters. The Advisory Council raises concerns about consideration of alternatives to the proposed design and the adequacy of the public consultation process to date. These questions need to be answered and acted upon. Moving forward by voting on the EDR recommendations without first having answers can compromise the integrity of the public consultation process itself. It also postpones the real issue.

In our view, after more than two years of design development and revision, it is highly unlikely any design will be able to fully meet the design guidelines and avoid significant adverse impacts on the historic landscape and the Vietnam Veterans Memorial itself. The question is, what to do? We believe this is an opportunity to step back and evaluate this project. We urge NCPC to report back to Congress that the project needs to be reevaluated for 3 reasons: We hope the Congressional members sitting here will take our comments back to the oversight Committees.

1. **Congress said “the visitor center shall be located underground”** but the simple fact is that it is NOT underground.
2. Congress said that **“the size of the visitor center shall be limited to the minimum necessary.”** In 2007 the Fund proposed a 34,000 square foot facility to tell about the Memorial and the War. **But new factors now at play raise questions about the interpretive need.** The American History

Museum has now reopened with an exhibit “The Price of Freedom” that tells the story of the Vietnam War and indeed all wars, providing new depths of interpretation only blocks away. “Minimum necessary” now takes on new meaning. It is possible to reduce the program and the size – and also the cost.

3. **There is no urgency to provide any approvals at this time, nor probably any time in the near future.** Cost estimate by the Fund for this project is \$75-100 million. According to a Dec. 9, 2008 Press Release from the Fund, they have raised about \$18 million, not even a quarter of what is needed, now 6 years after the project was authorized in 2003. Because Congress established time limits for projects under the Commemorative Works Act, and that time limit is close approaching, this is the opportunity for NCPC to tell Congress about the intractable problems, and the need for a full reevaluation.

In conclusion, there is good reason NCPC should not vote on the EDR recommendations at this time and instead go back to Congress. Conditions that led Congress to authorize the Visitors Center in the first place have changed substantially with the opening of the “Price of Freedom” exhibit at the American History Museum. For a project as potentially destructive to the Lincoln Memorial grounds and the most iconic memorial of the last half-century as this one, it is incumbent on all of us to proceed with the utmost care, transparency, and accountability.

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