

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



March 23, 2016

Mr. Marcel Acosta
Executive Director
National Capital Planning Commission
401 9th Street, NW
North Lobby, Suite 500
Washington, DC 20004

Ms. Gay Vietzke
Superintendent
National Mall and Memorial Parks
National Park Service
900 Ohio Drive, SW
Washington, DC 20024-2000

RE: Assessment of Effects Report for the Kennedy Center Connection Project

Dear Mr. Acosta and Ms. Vietzke:

Thank you for continuing consultation with the DC State Historic Preservation Office (DC SHPO) regarding the above-referenced undertaking. As you are aware, the connection project is directly related to the earlier expansion project for which a Memorandum of Agreement (MOA) was executed in January of 2015, and an amendment was signed in June of 2015. The purpose of the connection project is to establish a pedestrian connection between the future expansion project site and the existing paved recreation trail that runs parallel to the Potomac River on the other side of the Rock Creek and Potomac Parkway. We have reviewed the Assessment of Effects Report and are writing to provide comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

Based upon our review of the report and the discussions held during the project's two consulting parties meetings, we concur with the recommended findings of effect for the various alternatives and the historic properties within the Area of Potential Effect (APE), including the "adverse effect" findings related to Kennedy Center and the Rock Creek and Potomac Parkway. We also understand that the preferred alternative is the "Bridge Access with Ramp and Stairs" and we generally agree that this is a reasonable approach despite the "adverse effect" that will result on the Rock Creek and Potomac Parkway.

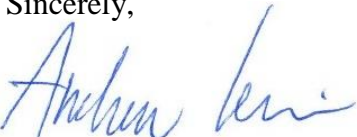
In our opinion, however, alternatives that will not be visible from a given historic property will have "no effect" on that property (or will not affect that property) rather than having "no adverse effect" on that property. For example, the At-Grade Crossing Alternative described on page 27 of the report will not affect the Arlington Memorial Bridge because it will not be visible from the bridge. The "no adverse effect" finding would only be appropriate if the implemented alternative were to be visible or other, indirect effects were to be identified.

Findings of “adverse effect” require consultation to continue so that alternatives to avoid, minimize or mitigate those effects can be developed and considered. The original MOA for the expansion project identified mitigation measures for the Rock Creek and Potomac Parkway which were never implemented because the pedestrian connection and a “River Pavilion” were eliminated from the earlier proposal. However, those measures remain valid options for mitigation.

The adverse effects of the pedestrian connection can also be minimized by refining the designs so that all of the new structures will be as minimally visible as possible. As discussed during the most recent consulting parties meeting, potential minimization options include eliminating the north stair; substituting cable railing for the proposed frosted glass; and ensuring that lighting focuses on the floor of the bridge rather than any vertical elements. We understand that these refinements are currently being studied and we look forward to reviewing the results of those efforts. If final designs cannot be developed in advance of the newly required MOA, stipulations for design review should be incorporated into the agreement.

If you should have any questions or comments regarding this matter, please contact me at andrew.lewis@dc.gov or 202-442-8841. Otherwise, we look forward to continuing consultation and completing the required MOA. Thank you for providing this additional opportunity to review and comment.

Sincerely,



C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office

16-0058

cc: Catherine Dewey, NPS
Jennifer Hirsch and Carlton Hart, NCPC
Thomas Whitaker, Kennedy Center