
NATIONAL DESERT STORM WAR MEMORIAL SITE SELECTION PUBLIC SCOPING REPORT

AUGUST 7, 2017

INTRODUCTION TO SCOPING PROCESS

Project Description

In 2014, the U.S. Congress authorized a memorial to commemorate and honor those, who, as a member of the Armed Forces, served on active duty in support of Operation Desert Storm or Operation Desert Shield to be placed on federal land within the District of Columbia in Public Law 113-291. This memorial is anticipated to be known as the National Desert Storm War Memorial (NDSWM).

The NDSWM Association, the sponsoring organization for the memorial, conducted a site selection study in 2015-2016. The Association and the National Park Service (NPS) developed a series of criteria in order to identify a suitable location for the memorial on a site and that supports the stated purpose of the memorial. These criteria were then applied to the 100 potential memorial sites listed in the National Capital Planning Commission's *Memorials and Museums Master Plan*. Many of the sites in the document did not meet the criteria; however, the NDSWM Board identified fourteen sites and areas that merited further consideration based on overall location and size. The list was later narrowed to ten sites and areas for more intensive analysis.

The Association presented its finding to the National Capital Memorials Advisory Commission (NCMAC) on January 28, 2016 and again on May 16, 2017. The Association presented the site selection process, including criteria at the 2016 meeting and NCMAC recommended the siting of the Memorial within Area I as defined by the Commemorative Works Act (CWA). In 2017, Congress authorized the potential location of the commemorative work within Area I in Public Law 115-18.

The full Site Selection Study evaluated a total of 18 sites. Two sites were selected as the most appropriate for further analysis and to explore potential concepts for how the site could accommodate a memorial: the Memorial Circle Area site along the George Washington Memorial Parkway on Columbia Island and the Constitution Avenue Terminus Area site at the southwest corner of the 23rd Street NW and Constitution Avenue NW intersection.

Subsequent to the selection of a site, the NPS will conduct a public scoping period for the design of the memorial. Following the second scoping period, the NPS will prepare an Environmental Assessment (EA) analyzing the impact of the memorial on the human and natural environment.

Construction of the memorial will be sponsored and funded by the NDSWM Association. The memorial will be maintained by the NPS.

Purpose and Need

The purpose of the NDSWM is to commemorate and honor members of the Armed Forces who served on active duty in support of Operation Desert Storm or Operation Desert Shield. The planning, design, and construction of the NDSWM is being undertaken to carry out Public Law 113-291 to address the current lack of a formal place for commemoration of those who served during Operation Desert Storm or Operation Desert Shield.

Scoping Period

The scoping period for the NDSWM site selection began on June 23, 2017 and extended through July 24, 2017. Project materials posted on the NPS Planning, Environment, and Public Comment (PEPC) website included the scoping notice letter and presentation slides and boards from the site selection scoping meeting.

DESCRIPTION OF SCOPING MEETING

A public scoping meeting was held on July 12, 2017 to present information about the NDSWM site selection process. The scoping meeting was held from 6:30 p.m. to 8:00 p.m. at AECOM's office located at 2020 K Street NW in Washington, D.C. Eighteen attendees registered on the sign-in sheet.

The scoping meeting was conducted with a formal presentation followed by an open-house format. Meeting attendees were then provided an opportunity to view and ask questions about project-related information on the presentation boards arranged in the lobby outside of the meeting room. Attendees could circulate the lobby to speak to the NPS, the NDSWM Board, and consultant representatives to address specific issues. The boards addressed the following

- Project Background and Site Locations
- Purpose and Need
- NEPA and Section 106 Processes
- What Issues will the EA Address
- Historic Resources in the Vicinity of Sites Under Consideration
- Memorial Circle Area site
- Constitution Avenue Terminus Area site

SUMMARY OF COMMENTS

Introduction

147 pieces of correspondence were received during the public comment period. Comments were received from residents of Washington, D.C. and 34 states. Comments were also received from residents of Canada, the United Kingdom, and Germany (one comment received per country). Several groups, including The Committee of 100 on the Federal City, the National Coalition to Save Our Mall, Veterans for Common Sense, and Casey Trees provided comments, which are summarized in the following section of this report.

Agency comments were received from the District of Columbia Department of Transportation (DDOT), the District of Columbia Water and Sewer Authority (DC Water), the National Capital Planning Commission (NCPC) and the U.S. Environmental Protection Agency (EPA). These

agency comments are summarized in the following section of this report. The letter summarizing the U.S. Commission of Fine Arts (CFA) discussion on the site selection submittal presentation at their July 20, 2017 meeting is also summarized in the following section of this report.

Comment analysis assists the planning team in organizing, clarifying, and addressing technical information relevant to the NDSWM site selection process. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process. The following summary of comments is provided to outline the major groupings of comments, along with examples of specific comments to illustrate the trend.

General statements that the comments included

1. **Comments in favor of the Constitution Avenue Terminus Area site:** An overwhelming majority of the comments received expressed support for locating the NDSWM at the Constitution Avenue Terminus Area site. Specifically, 103 comments received explicitly stated support for locating the NDSWM at the Constitution Avenue Terminus Area site. An additional eight comments received expressed support for locating the NDSWM on the National Mall and/or near the Vietnam Veterans Memorial. A number of commenters, including Veterans for Common Sense, supported the selection of the Constitution Avenue Terminus Area site because of the site's proximity to other 20th Century war memorials, easy access, better exposure to visitors, and thematic connection and proximity to the Vietnam Veterans Memorial. Some commenters noted that some Desert Storm veterans also served in the Vietnam War, Desert Storm was the next major conflict after the Vietnam War, and Vietnam veterans made sure Desert Storm veterans came home to a warm welcome and honor. Multiple commenters expressed support for the Constitution Avenue Terminus Area site without providing additional justification for their decision.

Representative comments supporting the selection of the Constitution Avenue Terminus Area site include the following:

- “Desert Storm veterans have a special bond with the soldiers that served during the Vietnam War... It was the Vietnam-era veterans that forged the soldiers of Desert Storm...Desert Storm vets desire- and deserve- to have this special relationship recognized. Proximity to the Vietnam Wall honors this bond.”
- “This site is more accessible to the public... the Constitution Avenue site is in keeping with the character of that part of the Memorial Parks. WWII, Korea, and Vietnam Veterans site are all there...”
- “It seems like the Constitution and 23rd Street location would be very visible to D.C. visitors and would be appropriately close to memorials for other modern wars, namely Korea and Vietnam.”

2. **Comments opposing the Constitution Avenue Terminus Area site:** Some commenters who expressed support for locating the NDSWM at the Memorial Circle Area site expressed opposition to the Constitution Avenue Terminus Area site. Sample comments opposing the selection of the Constitution Avenue Terminus Area site include the following:

- “I believe that geographically clustering memorials, as would happen with the Constitution Avenue Terminus Area, allows folks to ignore them easily, while expanding the geographic location of memorials provides greater exposure.”

- “The Mall and its adjoining memorial area is becoming a cluttered mess. There needs to be space for running, picnicking, crowds during festivals and events, sports, etc... No more monuments taking up valuable sq feet on the mall and parks.”

CFA also identified shortcomings of the Constitution Avenue Terminus Area site. CFA commented that the site is compromised by heavy automobile traffic, airplane noise, planned flood control and levee construction, and an extensive storm sewer construction project. CFA concluded that “the site would require nearly insurmountable efforts to render it a dignified setting for the memorial, involving concerted public initiatives to address these challenges and reconceive this comprehensively to serve multiple and disparate civic needs.”

3. **Comments in favor of the Memorial Circle Area site:** Eleven comments received expressed support for locating the NDSWM at the Memorial Circle Area site. Half of the commenters expressed support for the Memorial Circle Area site without providing additional justification for their decision.

Representative comments supporting the selection of the Memorial Circle Area site include the following:

- “I support the Memorial Circle area as the land area supports the general outline of the memorial, the location appears to be more tranquil and less subject to unusual maintenance and upkeep requirements...”
- “As far as Visitors of the NDSWM, I believe the location, will ensure better ease of access and safety for disabled visitors, to the NDSWM via the Memorial Avenue Bridge from Arlington National Cemetery parking lot.”
- “The Memorial Circle site appears to be a better location for the proposed Desert Storm memorial because it will also allow for future Global War On Terrorism memorials, to which the first Gulf War is historically linked.”

4. **Comments opposing the Memorial Circle Area site:** Some commenters who expressed support for locating the NDSWM at the Constitution Avenue Terminus Area site expressed opposition to the Memorial Circle Area site. Sample comments opposing the selection of the Memorial Circle Area site include the following:

- “There is no mass transit or parking. People visiting will have to cross multiple lanes of traffic to access the site. To build parking would significantly increase the cost. As a result, the Columbia Island site presents a significant safety hazard to both pedestrians and drivers.”
- “By placing the memorial South of the Potomac River the action would infer this war was not as important as others...”
- “The other site is across the river at the other end of Arlington Bridge... off by itself, no parking, no real access, and away from all the 20th Century War Memorials... Seems a bit disrespectful to put this monument on its own away from others of the same time.”
- “I fear that the Columbia Island location, though beautiful, is out of the way enough that most people would never see it.”

CFA also identified shortcomings of the Memorial Circle Area site. CFA commented that the site is “layered with many other commemorative associations” including the dedication to

President George Washington, the beautification and parkland development led by Lady Bird Johnson, and as a “symbolic axis of reconciliation between the northern and southern states after the Civil War.”

- 5. Trees and landscapes:** Four comments received expressed support for locating the NDSWM at the Constitution Avenue Terminus Area site specifically because the NDSWM would result in a lesser impact on existing trees. Casey Trees, one of these four commenters and a D.C. nonprofit with a mission to restore, enhance, and protect the tree canopy of the nation’s capital, stated that “Both locations showcase healthy, mature trees which provide shade, manage stormwater, and attract local wildlife. Designing a memorial that incorporates and preserves these trees will help the District achieve its environmental goals and enhance the visitor experience.” Casey Trees and the other commenters requested at least a 30% tree canopy in the memorial design by retaining existing trees and planting additional trees. Commenters also requested that the memorial concentrate on the use of the existing open space to protect existing mature trees.

A fifth commenter that expressed support for locating the NDSWM at the Constitution Avenue Terminus Area site summarized Memorial Circle Area site’s landscape history. The commenter stated that “a war memorial there would be an intrusion on the above-cited characteristic of naturalistic landscape plantings with flowing open spaces between them and along the parkways. Instead, Memorial Circle should remain enframed by uninterrupted landscape plantings...”

- 6. Site selection process and site alternatives:** CFA did not approve of either the Constitution Avenue Terminus Area site or Memorial Circle Area site because “both proposed sites are encumbered by significant challenges, and neither appears suitable for the memorial.” CFA expressed concern over the site selection process noting that the process seems to have been driven by the goal of locating the memorial adjacent to an existing monument, assumption that the memorial design is an expansive, landscape-based typology, and the large scale of the memorial which possibly constrained the site choices. CFA advised the team to consider the real experience of visiting the memorial and the broader setting of the memorial which is affected by noise, accessibility, shade, landscape character, and other factors. CFA also recommended anticipating the accommodation of new war memorials and “that a more comprehensive approach is needed rather than a piecemeal decision-making for individual commemorative works.” In conclusion, CFA encouraged further study of potential sites that are less constrained by size and adjacency to existing commemorative features.

The National Coalition to Save Our Mall commented that additional alternative sites outside of Area I should also be considered and asked the following:

- “What is the significance of the Desert Storm conflict in the larger scope of American history?”
- “How will the placement and size of the memorial be commensurate with the significance of that conflict’s significance to American democracy and to the American story told by the existing memorials, monuments, and museums in the Nation’s Capital?”

The National Coalition to Save Our Mall stated that consideration should be given to developing one or more war memorial cluster sites and expressed concern about “the proliferation of proposed war monuments will result in Area I soon being filled, leaving no prominent sites for future generations to tell their story.”

Out of individual comments, one commenter did not agree with the NDSWM being located in Washington, D.C. and did not provide an alternative site locations. Another commenter stated “No more monuments, etc on the Mall. there are plenty of other locations.” Another commenter recommended Valley Forge for the NDSWM because “there are many memorials of past wars and it’s the location where our 1st president fought for America.”

7. **Potomac River Tunnel Project:** DC Water summarized their DC Clean Rivers Project and described in detail how the Constitution Avenue Terminus Area site would be used if the site is selected as a mining and/or diversion site for the Potomac River Tunnel. DC Water’s comments includes the following:

- “...it appears that construction of the memorial as currently envisioned by the NDSWM presents serious challenges to the feasibility of utilizing the Site for mining.”
- “In order for mining from the Site to remain feasible, a minimum of three and a half (3.5) acres of contiguous construction staging area would need to be available for the Potomac River Tunnel Project. The NDSWM would need to be constructed as near as practicable to the northeast corner of the property... a reduction in the size of the memorial from that currently envisioned by the NDSWM team may be necessary.”

DC Water also commented that the construction of the CSO 020 diversion structure at the Constitution Avenue Terminus Area site would remain feasible. The diversion could potentially be accelerated and constructed prior to the memorial, constructed simultaneously with the memorial, or constructed along with the rest of the Potomac River Tunnel Project after the memorial is established.

8. **Memorial design considerations:** Several agencies and groups provided comments on memorial design considerations for both sites. DDOT commented that both sites should consider bike parking and the addition of a Capital Bikeshare station. NCPD requested that one or more alternative design concepts be developed for both sites and include variations in scale, placement, and orientation.

For the Constitution Avenue Terminus Area site, DDOT noted that the site does not have curbside loading/unloading, but that opportunities exist to extend the existing bus loading area and to relocate metered and disabled parking to Henry Bacon Drive. DDOT also commented that the design should factor in improvements to the Ohio Drive crossings to safely accommodate visitors. NCPD recommended the design consider how the reestablishment of Constitution Avenue and reconfiguration of the surrounding transportation network could be accommodated in the future.

The Committee of 100 on the Federal City expressed support for locating the NDSWM at the Constitution Avenue Terminus Area site and commented that the design should not detract from the Lincoln Memorial, additional studies of views of the memorial from adjacent areas and views out of the memorial will be needed, and careful attention should be given to visitor information needs and visitor service needs in the overall area north of the Lincoln Memorial.

For the Memorial Circle Area site, DDOT noted that the site does not have curbside loading/unloading and that tour bus access and disabled parking cannot be accommodated without adding impervious surface. DDOT also commented that the design should factor in improvements to pedestrian and bicycle facilities to safely accommodate visitors. NCPD recommended the design consider modifications to the surrounding transportation network to improve pedestrian accessibility.

9. **EA Considerations:** Several agencies and groups provided comments on the general EA analysis. The EPA included several technical comments for the EA document. The National Mall Coalition asked that the EA review be used to develop a site or series of sites near Arlington National Cemetery where memorials for lesser conflicts of wars can be clustered together in meaningful ways.

NCPC staff requested that the preparation of the EA be coordinated with the D.C. government, Arlington National Cemetery, Arlington County government, U.S. Army Corps of Engineers, DC Water, and on-going projects and planning studies. NCPC staff also requested that the EA analyze the following:

- Effects to surrounding historic properties and visual analyses for both sites with photo-simulations from multiple locations;
- Short and long-term impacts to pedestrian, bicycle, and vehicular circulation, including access and safety;
- Changes in vegetation and tree canopy, stormwater runoff and management, flooding, impervious surfaces, energy use, and impacts from construction;
- Utility infrastructure; and
- Each alternative's consistency with the policies and objectives of the *Comprehensive Plan for the National Capital, Memorials and Museums Master Plan*, and goals and recommendations of the *Monumental Core Framework Plan*.

If the Constitution Avenue Terminus Area site is selected, DDOT commented that the EA should consider impacts to the multi-use trail that connects to the Roosevelt Bridge, connections to the Rock Creek trail, and connections to the Roosevelt Bridge. If the Memorial Circle Area site is selected, DDOT commented that the EA should coordinate with the ongoing Memorial Circle EA.

10. **Coordination:** DDOT requested that the NPS set up a Comprehensive Transportation Review (CTR) scoping meeting to discuss any potential changes or impacts to the transportation network and whether a CTR will need to be conducted for this project. For the Constitution Avenue Terminus Area site, NCPC requested that the NPS and the sponsor work with the appropriate agencies to identify any constraints or coordination necessary and to further provide that information to the Commission as part of the next submission.