



Lincoln Memorial Rehabilitation

ENVIRONMENTAL ASSESSMENT

January 2018



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**US Department of the Interior
National Park Service
National Mall and Memorial Parks**

**Lincoln Memorial Rehabilitation
Environmental Assessment**

January 2018

SUMMARY

The Lincoln Memorial (the Memorial) is located at the western end of the National Mall in an area known as West Potomac Park near the east bank of the Potomac River. It is administered by the National Park Service (NPS) under the authority of the National Mall and Memorial Parks (the Park). The Memorial is designed in the manner of an ancient Greek temple and is significant as the foremost memorial to Abraham Lincoln, the 16th American President, as an original example of neoclassical architecture, and as the formal terminus to the National Mall in accordance with the McMillan Commission's plan for the monumental core of Washington, DC. At almost eight million visitors a year, the Lincoln Memorial is one of the most visited sites on the National Mall.

The National Park Service proposes to rehabilitate the Memorial in order to improve accessibility, enhance the chamber experience, improve visitor services, and improve the efficiency of operations at the Park. In addition, this project would introduce the experience of the undercroft in order to expand the overall interpretive and educational visitor experience of the Lincoln Memorial. This project would provide a new experience to visitors at one of the most heavily visited sites on the National Mall and would allow the Park to tell new and expanded stories related to the Memorial and its construction while respecting the historic character and intended solemnity of the Memorial.

This environmental assessment evaluates three alternatives: a no-action alternative (alternative A), the proposed action and NPS preferred alternative (alternative B), and another action alternative (alternative C). Alternative A would continue the current management of the Memorial and would result in continued undesirable impacts on visitor use and experience associated with high visitation. Alternative B would rehabilitate the undercroft to optimize visitor services, improve accessibility, remove the bookstore from the chamber level, and create an interpretive space that highlights expansive views of the undercroft. Alternative C would improve the existing visitor services and NPS operations spaces in the Memorial by reconfiguring the restrooms and creating more public space in the exhibit level while retaining the existing retail space and accessible route. Both action alternatives would result in adverse impacts on the historic structure and potentially the cultural landscapes due to changes to the structure as well as beneficial impacts to visitor use and experience due to the improvements.

Note to Reviewers and Respondents:

If you wish to comment on this environmental assessment, you may mail comments within 30 days of release of this document to the name and address below or you may post them electronically at <https://parkplanning.nps.gov/LincolnMemorialRehab>. Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment, including your personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we would be able to do so.

Superintendent
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ACRONYMS AND ABBREVIATIONS

| | |
|-------------------|--|
| ABAAS | Architectural Barriers Act Accessibility Standards |
| ADA | Americans with Disabilities Act |
| CEQ | Council on Environmental Quality |
| CFR | Code of Federal Regulations |
| DO | Director's Order |
| EA | Environmental Assessment |
| FEMA | Federal Emergency Management Agency |
| National Register | National Register of Historic Places |
| NEPA | National Environmental Policy Act |
| NHPA | National Historic Preservation Act |
| NPS | National Park Service |
| the Memorial | Lincoln Memorial |
| the Park | National Mall and Memorial Parks |
| PEPC | [NPS] Planning, Environment and Public Comment |
| USC | US Code |

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PURPOSE AND NEED

INTRODUCTION

The Lincoln Memorial (the Memorial) is located at the western end of the National Mall in an area known as West Potomac Park near the east bank of the Potomac River. It is administered by the National Park Service (NPS) under the authority of the National Mall and Memorial Parks (the Park). The Memorial is designed after an ancient Greek temple and is significant as the foremost memorial to Abraham Lincoln, the 16th American President, as an original example of neoclassical architecture, and as the formal terminus to the National Mall in accordance with the 1901 McMillan Commission's plan for the monumental core of Washington, DC. The National Park Service proposes to rehabilitate the Memorial in order to improve visitor services, improve the efficiency of operations, preserve the solemnity of the chamber level, and reveal the Memorial's undercroft to visitors.

This environmental assessment (EA) describes the no-action alternative (alternative A) and two action alternatives (alternatives B and C) and analyzes the potential impacts these alternatives would have on the natural, cultural, and human environment. This environmental assessment has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), as amended (42 United States Code [USC] 4332[2] [C]); the implementing regulations of the Council on Environmental Quality (CEQ) (40 Code of Federal Regulations [CFR] 1500-1508.9); the Department of the Interior NEPA regulations (43 CFR Part 46); and NPS Director's Order 12: *Conservation Planning, Environmental Impact Analysis and Decision-making* (DO-12) (NPS 2011) and the accompanying NPS NEPA Handbook (NPS 2015).

Compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (36 CFR Part 800) is being completed separately from and concurrently with the NEPA process, and is not included in this environmental assessment. Applicable cultural resource information, including potential impacts associated with the proposed alternatives, is documented in this environmental assessment, but does not constitute Section 106 compliance.

PURPOSE OF AND NEED FOR ACTION

PURPOSE

The purpose of this project is to improve accessibility, enhance the chamber experience, improve visitor services, and improve the efficiency of operations at the Park. In addition, this project would introduce the experience of the undercroft in order to expand the overall interpretive and

educational visitor experience of the Lincoln Memorial. This project would provide a new experience to visitors at one of the most heavily visited sites on the National Mall and would allow the Park to tell new and expanded stories related to the Memorial and its construction, while respecting the historic character and intended solemnity of the Memorial.

NEED

This project is needed because the current configuration of visitor services and NPS support facilities within the Memorial are insufficient for the heavily visited site. The existing egress from the restrooms and interpretive space do not meet current life safety code. The restrooms are wearing out and require frequent repairs. There is only one elevator to the chamber level, and it is unreliable. The retail store (bookstore), which is located on the chamber level, is too small for the large crowds, offers poor visitor circulation, creates a congestion point, and conflicts with the intended solemnity of the Memorial at the chamber level. Additionally, the undercroft is a valuable interpretative resource of the Memorial that is not known by the general public. The public's ability to experience the cathedral-like space is not being realized.

PROJECT LOCATION AND SITE DESCRIPTION

The Lincoln Memorial sits at the terminus of 23rd Street NW in West Potomac Park near the east bank of the Potomac River. It is oriented along the same axis as the Washington Monument and the US Capitol and serves as the formal terminus of the National Mall. The Memorial is surrounded by Lincoln Memorial Circle NW, which is a vehicular road to the north, south, and west of the Memorial, and a pedestrian area to the east. In the vicinity of the Memorial is the Potomac River to the west, Constitution Avenue NW to the north, Independence Avenue SW to the south, and the Lincoln Memorial Reflecting Pool to the east (see figure 1). The project area is generally bound by Lincoln Memorial Circle NW, as shown on figure 2.

The Memorial itself is divided into sections characterized by the functions and physical features of each section, as shown on figure 3. The largest and most prominent section of the Memorial, that which is surrounded by a row of columns and which houses the statue of Lincoln, is known as the chamber level. The raised platform on which the chamber level sits is known as the raised terrace. The main stairway that rises from Lincoln Memorial Circle to the raised terrace is known as the approachway. The north and south doors on the east (front) façade at the raised terrace level serve as entrances to the area known as the exhibit level, which houses additional visitor services and spaces for NPS operations (also referred to in this document as back-of-house spaces) in a raised area within the undercroft. The undercroft is a mostly unfinished space that supports the floor slabs of the chamber, the raised terrace, and the approachway. Much of the undercroft space is occupied by large concrete columns approximately 40 feet high in some places, creating a cathedral-like space.

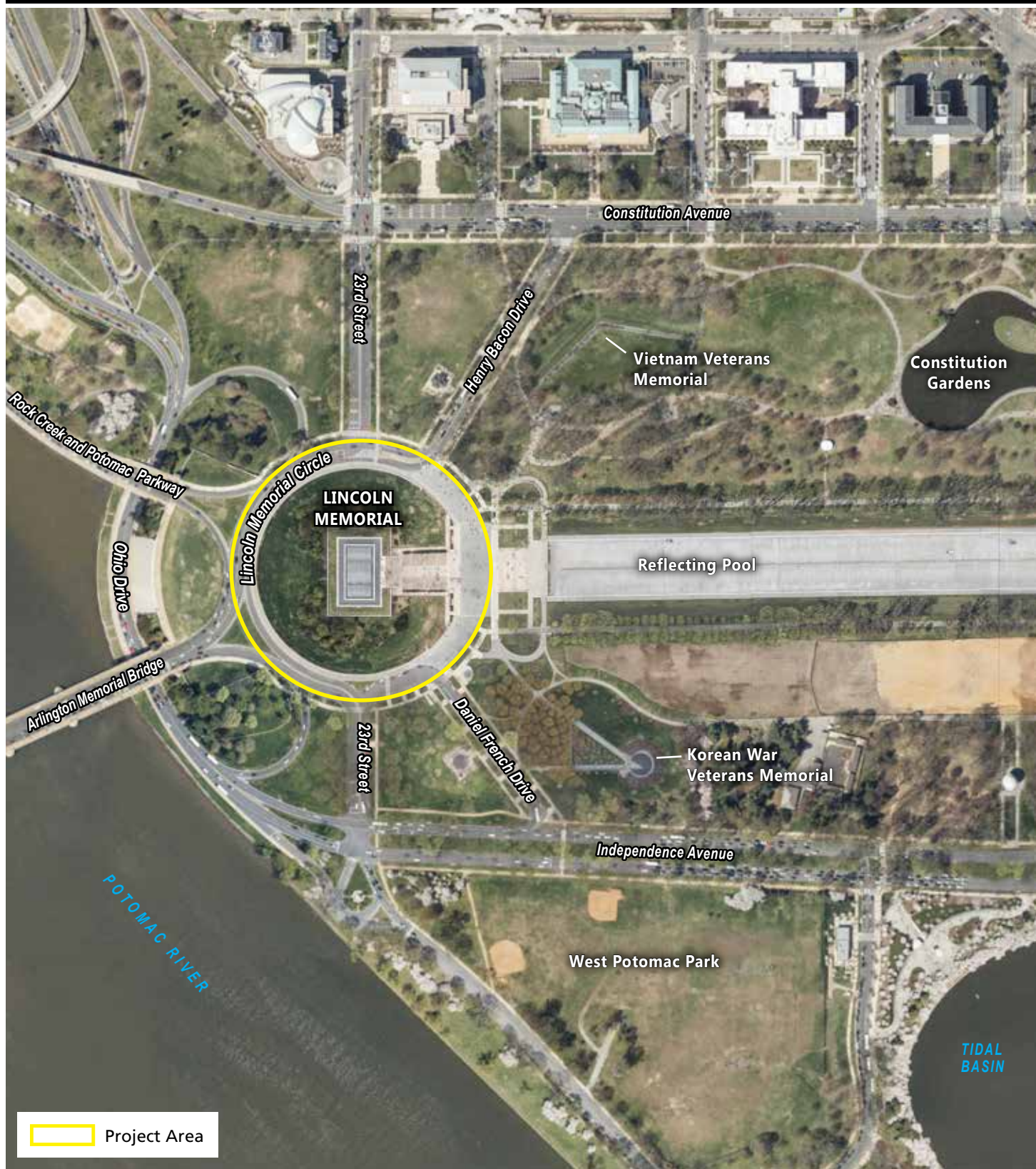
HISTORY AND SIGNIFICANCE OF THE LINCOLN MEMORIAL

The Lincoln Memorial, designed in the style of an ancient Greek temple, was constructed between 1914 and 1922. It is listed in the National Register of Historic Places (the National Register) for its significance as the foremost memorial to America's 16th President, as an original example of neoclassical architecture, and as a formal terminus to the extended National Mall in accordance with the 1901 McMillan Commission Plan for the monumental core of Washington, DC.



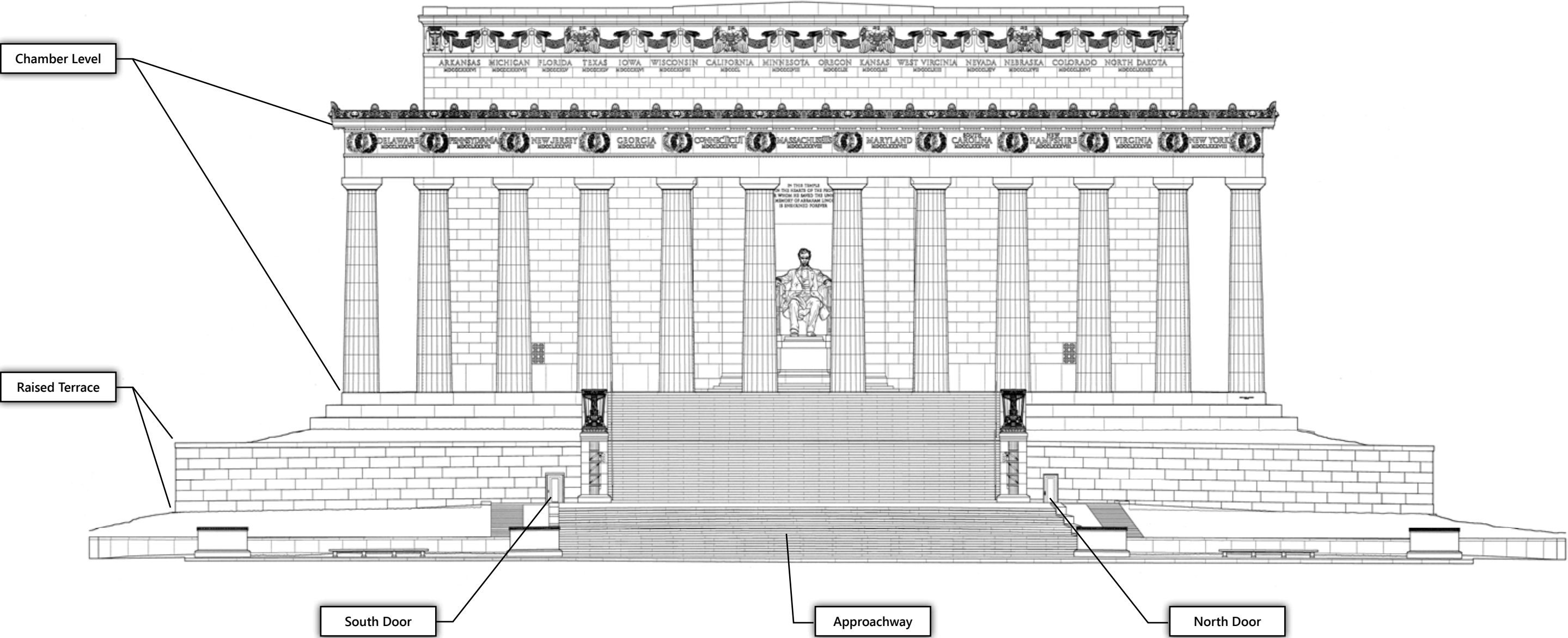
Lincoln Memorial Rehabilitation
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FIGURE 1
Project Vicinity



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The McMillan Commission was established in 1901 to develop a grand design for the future development of the city, and their plan included a “significant and highly symbolic use for Potomac Park” (NPS 1999). In 1911 the Lincoln Memorial Commission was established by Congress, and a design submitted by Henry Bacon was chosen by the commission for implementation. The location in West Potomac Park was chosen because it was situated on the same axis as the Washington Monument and the US Capitol, because it overlooked the Potomac River, and because it was surrounded by open land. Additionally, the McMillan Commission Plan identified the site as the location of a future monument comparable to that of the Washington Monument (NPS 1981). From its construction until 1933, the Memorial was maintained by the War Department. In 1933, the responsibility for the care and maintenance of the Lincoln Memorial, along with the other monuments in the National Capital, was transferred to the National Park Service. Since its dedication in 1922, the Lincoln Memorial has served as a backdrop for numerous social and political events important to American history. Today, it is one of the most visited sites on the National Mall.

ISSUES AND IMPACT TOPICS RETAINED FOR DETAILED ANALYSIS

During the internal and public scoping process, specific considerations and concerns were identified as critical to this project. Along with the purpose of and need for action, these issues guided the development of alternatives and contributed to the selection of impact topics.

ISSUES

Accessibility to Chamber Level is Limited and Unreliable. The primary entrance to the chamber level of the Memorial, where the statue of Lincoln is housed, is via the main stairway at the front façade. Universal accessibility into the chamber level is currently available through the door on the south side of the main stairway (known as the south door) where a single elevator is located. Due to limited capacity, a queue for the elevator often forms during times of high visitation, which creates congestion in the interpretive space where the elevator is located. Additionally, the elevator is antiquated and requires frequent repairs. When the elevator is out of service for repairs, there is no alternative accessible route to the chamber level. The current south door into the exhibit level to the elevator technically meets accessibility requirements under the Architectural Barriers Act Accessibility Standards (ABAAS). However, due to visitor flow, a single door used as both an entry and exit point results in difficult navigation for visitors, particularly those using wheelchairs. The single door does not allow two people using wheelchairs to pass one another while entering and exiting, which can create a congestion point.

Restrooms are Inadequate for Visitation Numbers. The existing restrooms are inadequate in terms of size, number of fixtures, and layout, for the high number of visitors to the Memorial. The restrooms are frequently crowded, with queues forming in the lobby outside the restrooms. The lobby is narrow and does not provide adequate space for easy visitor circulation into and out of the restrooms. The queue can be disruptive to the interpretive area during periods of high visitation, in terms of both sounds and smells. The existing restrooms are also wearing out and frequently require service and repairs. Because there is only one set of restrooms, cleaning, restocking, and maintaining the restrooms is difficult during times of high visitation because they cannot be closed for maintenance activities.

Retail Space is Inadequate and Detracts from Solemnity of the Chamber Level. The current bookstore, currently run by Eastern National, located in the chamber level is inadequate in terms of

size and layout for the high numbers of visitors to the chamber. The retail location has the highest sales volume per square foot for Eastern National, but it cannot support the high number of customers that visit during busy periods. Periods of high visitation result in a congested space which does not allow for free-flowing visitor circulation. A congestion point is created due to the small space and single entry/exit door. Eastern National staff have difficulty keeping the shelves stocked and assisting customers during periods of heavy congestion. The small space that serves as a stock room and office space is not adequate to allow for efficient restocking and bookstore management operations. Deliveries from an off-site location occur daily to maintain product on the shelves. In addition to the inadequate space, the retail location in the chamber level detracts from the intended solemnity and historic character of the chamber level. Also, its visibility to visitors is low due to its location in the northeast corner of the chamber, particularly when the chamber level is very crowded.

Potential of the Undercroft is not Realized. The undercroft is an important part of the structure of the Memorial and its unused space is unrealized as a valuable resource to the National Park Service. The NPS operations and visitor service spaces within the Memorial are inadequate. The undercroft is a large, unfinished area that has the potential to provide space for these improvements. Additionally, because of the undercroft's unique character and architectural features it has the potential to serve as an important educational and interpretive tool to provide new experiences for visitors to the Park. If left unused, these potential resources will continue to be unrealized and the public will continue to be unaware of the full architectural importance of the Memorial.

IMPACT TOPICS

Impact topics, simply defined, are the resources that could be affected by the actions proposed under the alternatives in this environmental assessment.

Historic Structures and Cultural Landscapes

The alternatives presented in this environmental assessment have the potential to change the appearance of the historic structure and result in a loss of historic material. This includes a loss of historic material for the improved accessibility with wider exterior doors and a new elevator, for the relocation of the retail space out of the chamber level, and for the expansion of visitor services and exposure of the undercroft in the exhibit level. Potential impacts will be described under the impact topic of "Historic Structure and Cultural Landscapes."

Visitor Use and Experience

The alternatives presented in this environmental assessment have the potential to change the visitor experience of the Memorial. The alternatives have the potential to increase the capacity and reliability of the elevator providing access to the chamber level. The alternatives have the potential to improve visitor comfort through an increase in the number of restrooms as well as improved circulation through revised layout of the restrooms and associated queueing area. The alternatives also have the potential to improve visitor services through more efficient NPS operations such as adequate space for product shelving, circulation, storage, and office space. The alternatives have the potential to improve the visitor experience of the chamber level by returning historic character and atmosphere by relocating the bookstore. These alternatives also have the potential to improve the visitor experience by allowing the National Park Service to utilize the resource of the undercroft for visitor services, NPS operations, and interpretive opportunities. Potential impacts will be described under the impact topic of "Visitor Use and Experience."

ISSUES AND IMPACT TOPICS DISMISSED FROM FURTHER ANALYSIS

The following presents an overview of impact topics that were considered but ultimately dismissed from further analysis in this environmental assessment. An impact topic was initially considered but dismissed from further analysis if it was determined that the resource is not present in the study area or because any potential impacts would be less than minor, typically temporary, and localized. The regulatory and non-regulatory context and baseline conditions relevant to each impact topic also were analyzed in the process of determining if a topic should be retained or dismissed from further analysis. The impact topics that have been considered but dismissed from further analysis are discussed below along with the reasons for dismissal.

ARCHEOLOGICAL RESOURCES

Because of the ground disturbance required for construction access on the Memorial grounds, archeological resources were considered. The land on which the Lincoln Memorial sits was created by the US Army Corps of Engineers in the late 1800s by reclaiming tidal flats on the east shore of the Potomac River. Because the land consists primarily of dredged fill from the bottom of the Potomac River, it is very unlikely that any intact archeological resources are present within the project vicinity. Additionally, an Unanticipated Discovery Plan would be developed to mitigate potential adverse impacts in the event that archeological resources are encountered during the actions proposed in the alternatives. If during construction previously unknown archeological resources were discovered, all work in the immediate vicinity of the discovery would be halted until the resources could be identified and documented and, if significant resources could not be preserved in situ, an appropriate mitigation strategy (e.g. the excavation, recordation, and mapping of cultural remains prior to disturbance to ensure that important archeological data that otherwise would be lost is recovered and documented) would be developed in consultation with the state historic preservation office and, as appropriate, associated American Indian tribes. Therefore, the impact topic of archeological resources was considered but dismissed from further analysis.

FLOODPLAINS

During the public scoping period, a concern was raised about the Memorial's proximity to the floodplain and the Potomac River. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map 1100010018C, the project area is located within an area determined to be outside the 0.2 percent annual chance floodplain (FEMA 2010). Additionally, the project does not propose any new structures or uses within the floodplain. The actions proposed in this environmental assessment would not have any impact on flood storage capacity or downstream flood elevations nor would they obstruct, restrict, or redirect flood flows. Therefore, the impact topic of floodplains was considered but dismissed from further analysis.

ENVIRONMENTAL JUSTICE

The Department of the Interior requires its bureaus to specifically discuss and evaluate the impacts of their actions on minority and low-income populations and communities in environmental documents, as well as the equity of the distribution of the benefits and risk of the decision (NPS 2015). There are minority and low-income populations in the vicinity of the Park; however, these populations would not be particularly or disproportionately affected by activities associated with the

alternatives evaluated in this environmental assessment. Therefore, the impact topic of environmental justice was considered but dismissed from further analysis.

INDIAN TRUST RESOURCES

The Department of the Interior requires its bureaus to explicitly consider effects of its actions on Indian Trust resources in environmental documents (NPS 2015). The federal Indian Trust responsibility is a legally enforceable obligation on the part of the United States to protect tribal lands, assets, resources, and treaty rights, and it represents a duty to carry out the mandates of federal laws with respect to Native American tribes. There are no known Indian Trust resources in the project corridor, and the lands comprising the Park are not held in trust by the Secretary of the Interior for the benefit of Indians due to their status as Indians. Therefore, the impact topic of Indian Trust resources was considered but dismissed from further analysis.

2

ALTERNATIVES

This environmental assessment documents the analysis of environmental consequences of three alternatives, including the no-action alternative. The no-action alternative serves as the baseline by which to compare all other alternatives. The elements of these alternatives are described in detail in this chapter. Impacts associated with the actions proposed under each alternative are detailed in the “Chapter 3: Affected Environment and Environmental Consequences.”

ALTERNATIVE A: NO ACTION

Under the no-action alternative, current management practices of the Memorial would continue. Figures 4–7 illustrate the configuration of the monument under alternative A.

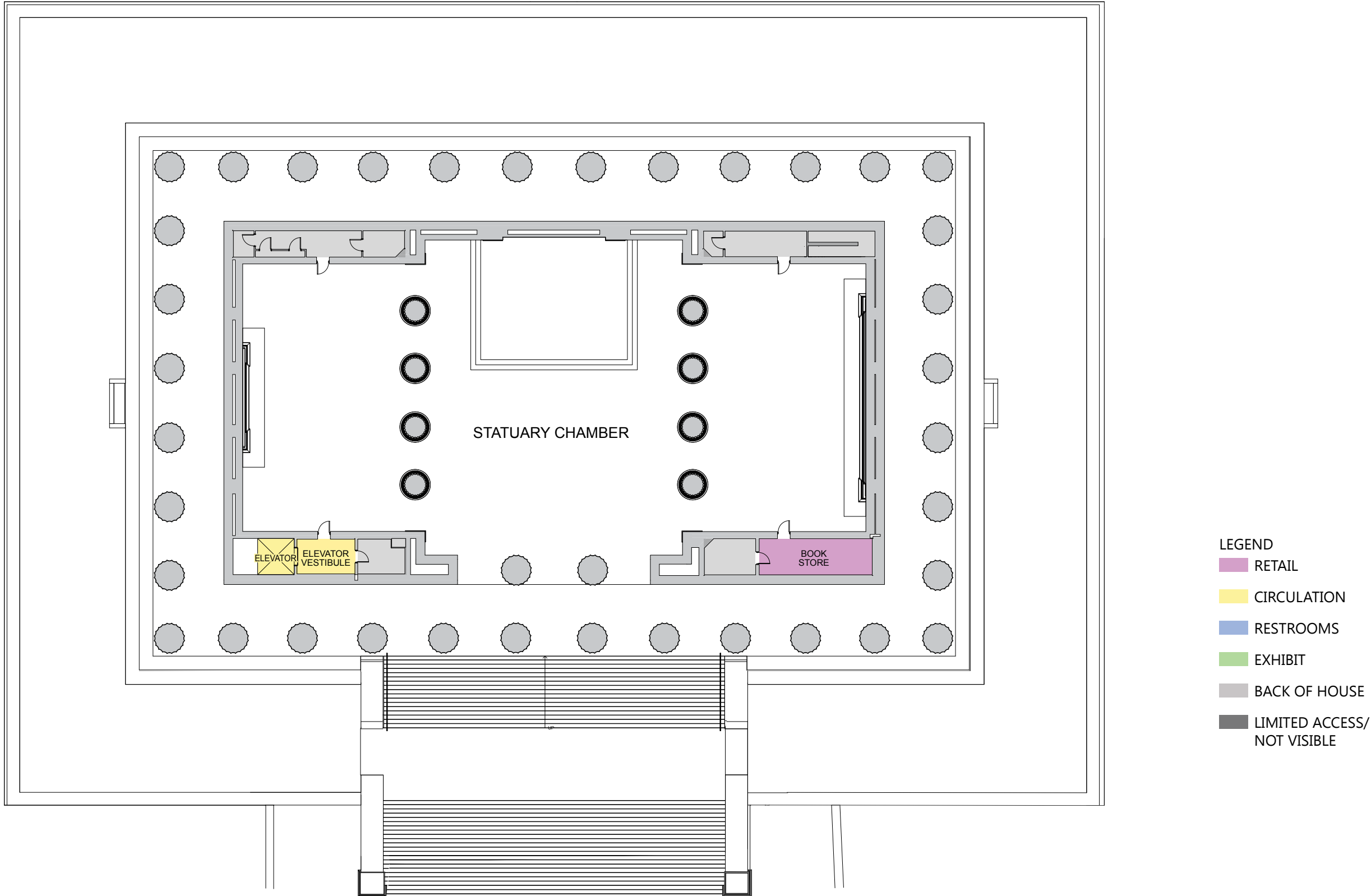
The doors on the south and north sides of the main staircase would remain at their current sizes, 36 inches wide and 80 inches high for the south door and 31 inches wide and 84 inches high for the north door. See figure 7 for the plan view and elevation of the existing doors. There would continue to be only one means of egress from the public spaces within the exhibit level.

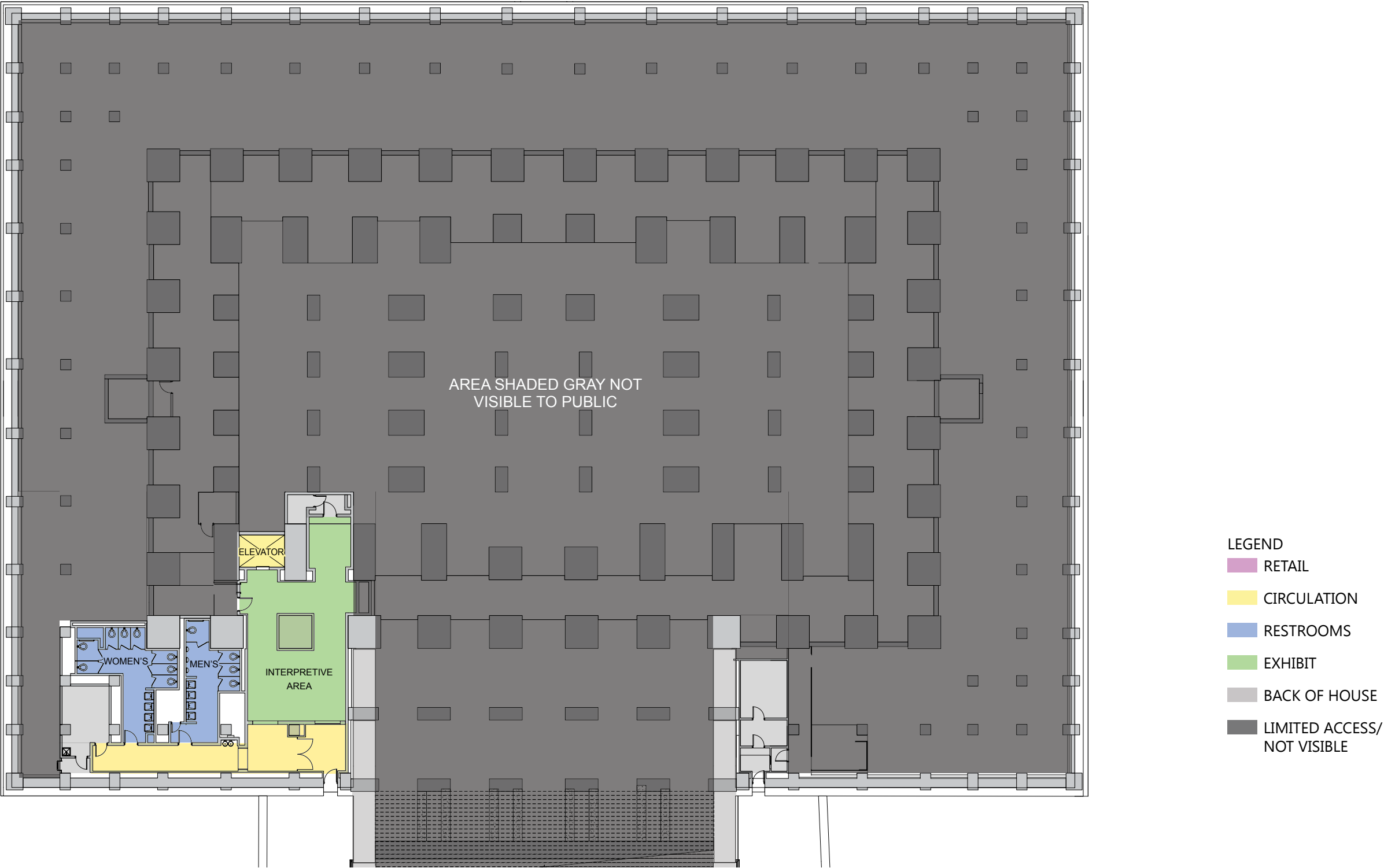
The chamber level would continue to house the statuary chamber, the existing elevator, a janitor’s closet, the NPS staff break room, [REDACTED], and the bookstore (with associated stock room), as shown on figure 4. The bookstore would remain at approximately 200 square feet in size and in its current location on the north end of the chamber level. The NPS staff break room would remain at approximately 200 square feet in size and in its current location in the south side of the chamber level. All operations spaces would remain in their current locations and configurations.

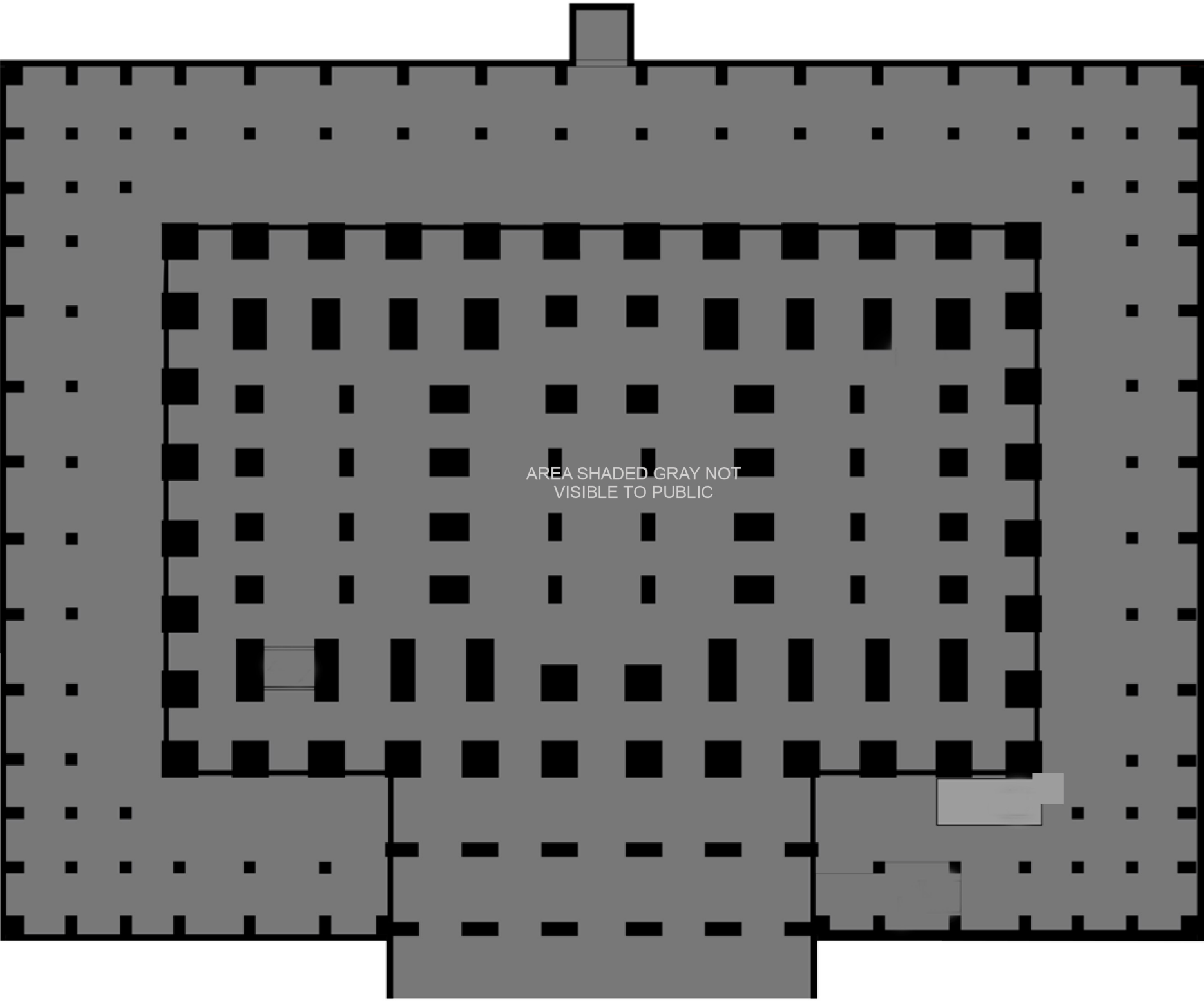
Universal accessibility would continue to be provided via the single elevator located in the interpretive space on the exhibit level, as shown on figure 5. The exhibit level would continue to be accessed via the south door, which would continue to lead through a vestibule into a corridor connecting visitors to both the interpretive area and restrooms. This area would continue to house the restrooms, interpretive space, elevator to the chamber level, restroom attendant closet, and storage space. The interpretive space would remain at approximately 950 square feet.

The existing restrooms would remain in their current configuration and location at the southeast corner in the exhibit level, as shown on figure 5. There would continue to be one women’s restroom with eight toilets and four sinks and one men’s restroom with seven toilets/urinals and four sinks.

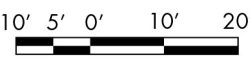
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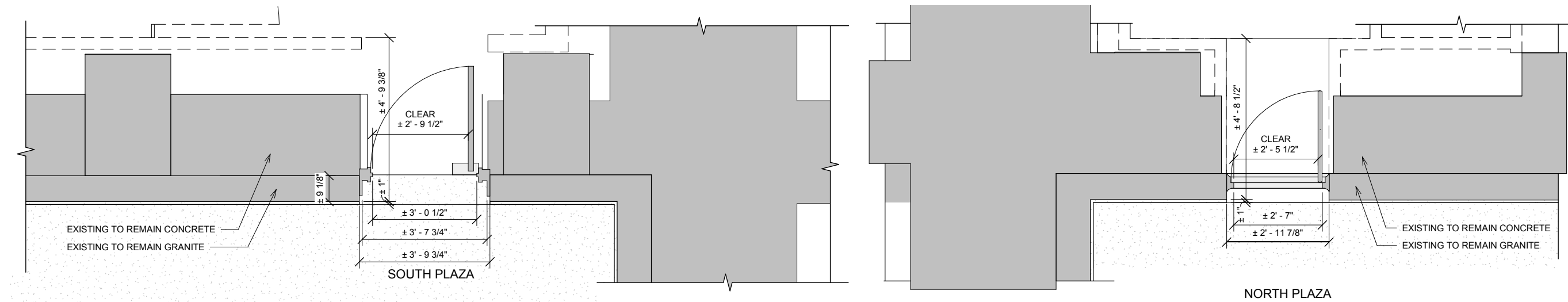




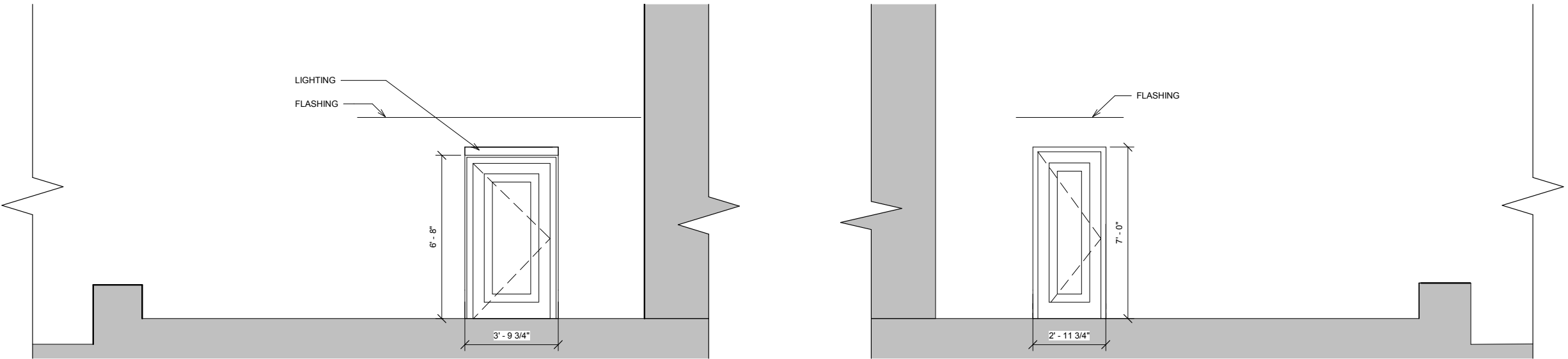


- LEGEND
- RETAIL
 - CIRCULATION
 - RESTROOMS
 - EXHIBIT
 - BACK OF HOUSE
 - LIMITED ACCESS/
NOT VISIBLE





Plan View



East Elevation

██████████ storage areas on the north side of the exhibit level would remain in their current sizes and configurations (figure 5) and would continue to be accessed by NPS staff via the north door, which would remain at its current size. There would continue to be no connection between the north and south doors.

The undercroft level would remain unfinished and completely closed to the public, as shown on figure 6. The existing catwalk, mezzanine walkway, and storage spaces would remain, and mechanical systems would continue to be housed in the undercroft level.

ALTERNATIVE B: PROPOSED ACTION AND NPS PREFERRED

Under alternative B, the National Park Service would rehabilitate the exhibit level, substantially increase the public space in the exhibit level, and rehabilitate some of the existing NPS and public spaces at the chamber level. Figures 8–11 illustrate the proposed configuration under alternative B.

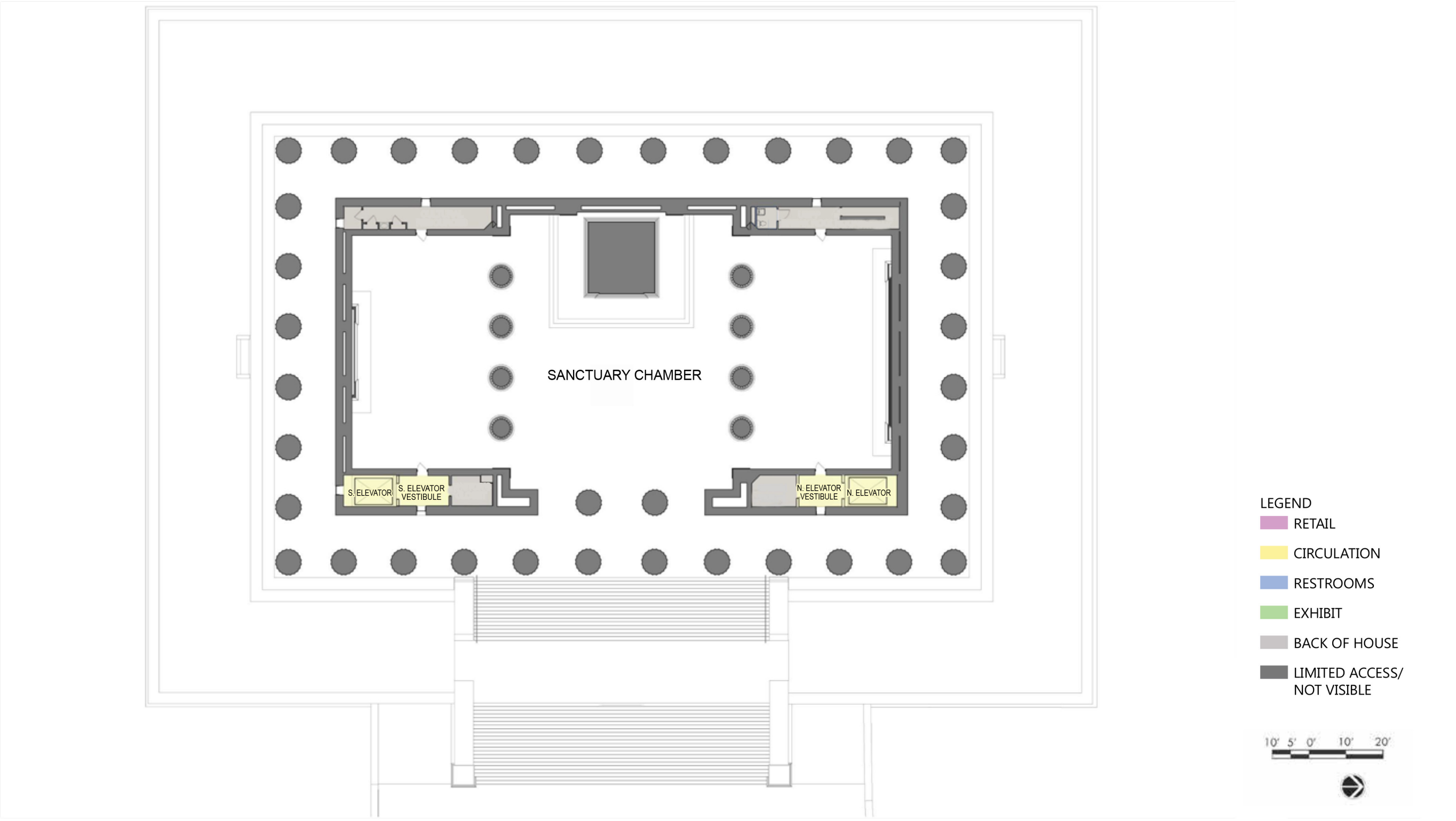
Both the south and north doors would be widened to 72-inches wide with 36-inch double doors in each opening (see figure 11). Each door height would be increased to ensure proper proportions and visual symmetry between the two doors. The full opening required in the masonry would be approximately 80 inches wide for the north and south doors and, due to a difference in grading, approximately 97 inches high for the south door and approximately 94 inches high for the north door. The threshold of the north door would be raised with a concrete slab to be level with the south door. The new doors would be similar but distinguishable from the existing doors in terms of color, materials, scale, and design. The design of the new doors would be determined at a later design stage and would be determined in consultation with the DC Historic Preservation Officer, the US Commission of Fine Arts, and the National Capital Planning Commission.

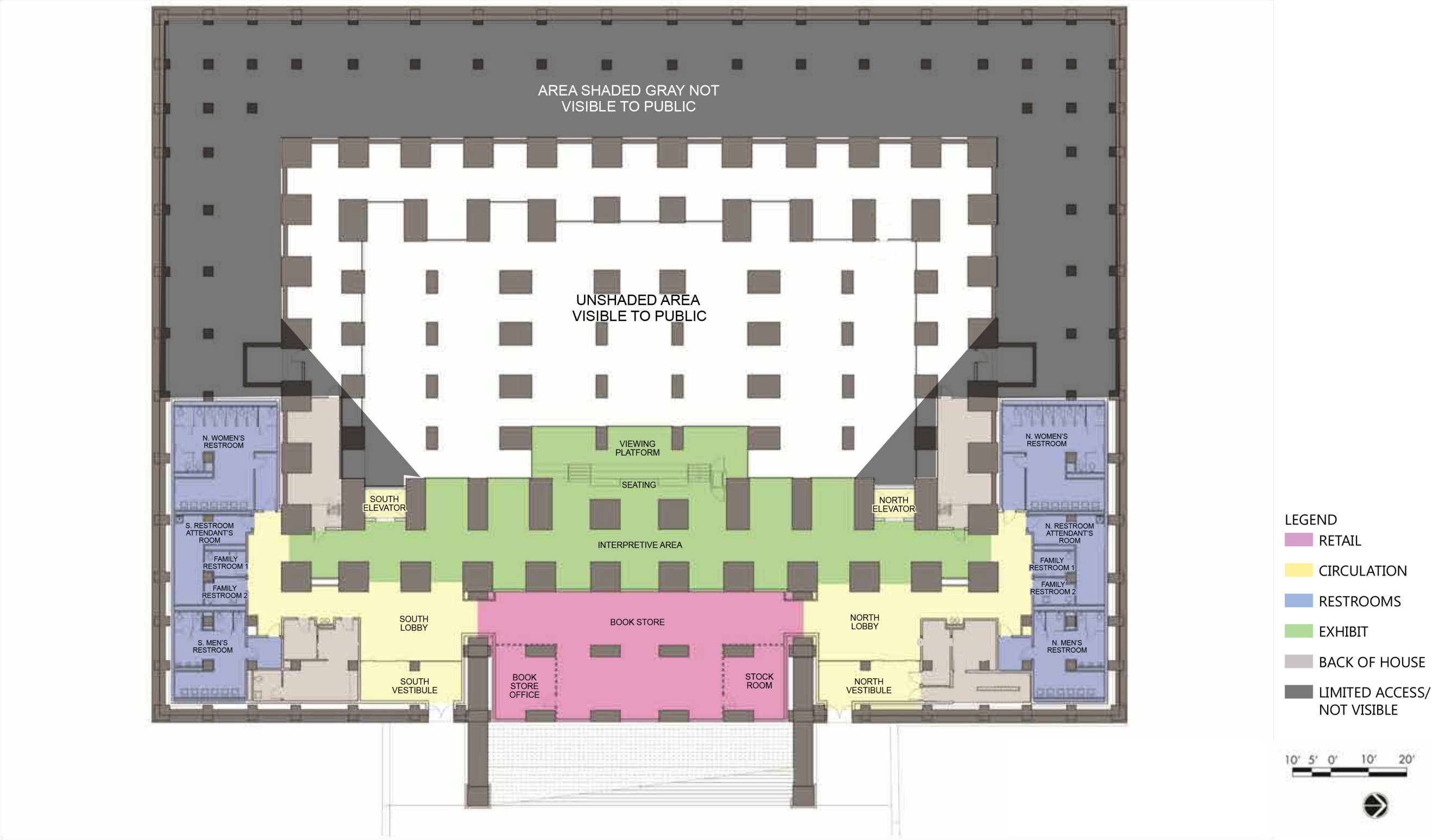
In the chamber level, the south elevator and vestibule would be renovated in their existing locations, and the elevator would be replaced. The existing bookstore on the north side of the chamber level would be removed. In its place, a second elevator and vestibule would be installed in a similar configuration as the south elevator. ██████████, but the NPS staff break room would be removed from the south side of the chamber. It would be replaced with a cultural resources storage room. See figure 8 for a plan view of the chamber level.

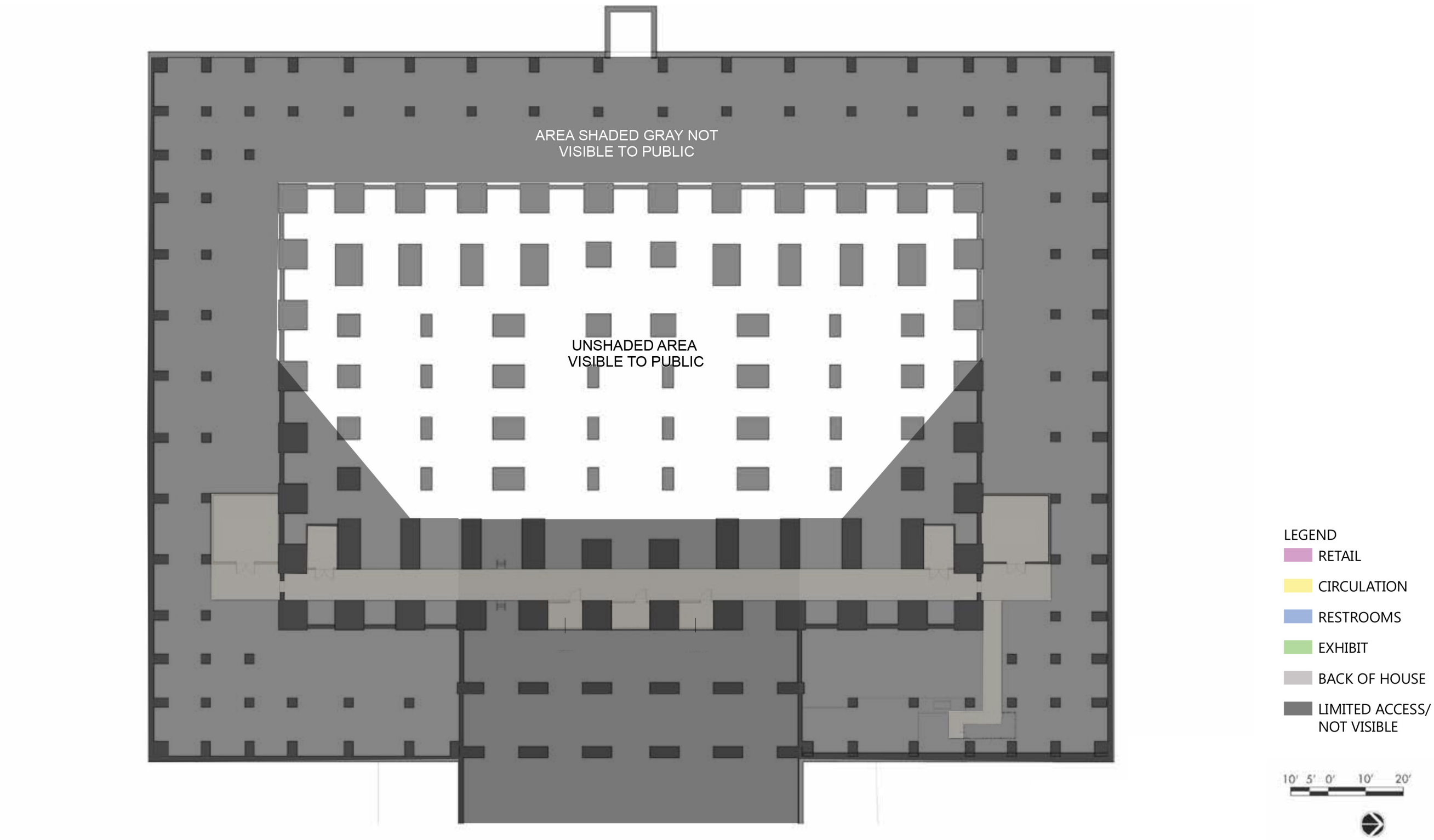
In the exhibit level (figure 9), two vestibules would be created on the interior at the north and south doors, allowing visitors to enter or exit from either door. In terms of public areas, the floorplan would be the same on both the south and north sides of the exhibit level. The lobby areas would be sized and configured in a manner that would provide area for orientation and queueing as needed for the restrooms and elevator. This would require a larger lobby than what currently exists; this lobby is illustrated on figure 9. Two elevators would be located across from the south and north vestibule and lobby area respectively, providing redundant accessibility to the chamber level.

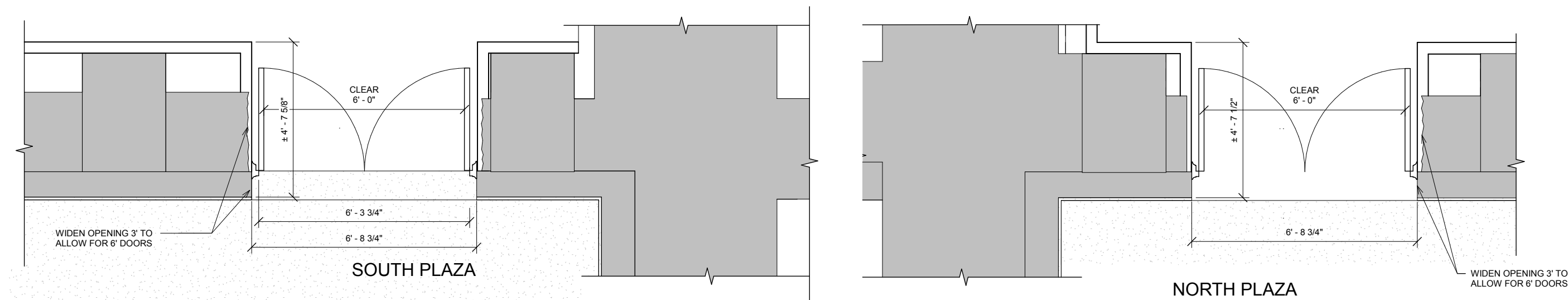
New restrooms would be constructed on both the south and north ends of the exhibit level, with one men's restroom, one women's restroom, and two family restrooms on each end of the exhibit level. These restrooms will include a total of 20 toilets and 14 sinks in the women's restrooms, 14 toilets/urinals and 12 sinks in the men's restrooms, and 4 toilets and 4 sinks in the family restrooms. Each set of restrooms would also have an attendant space where cleaning and restocking supplies would be located.

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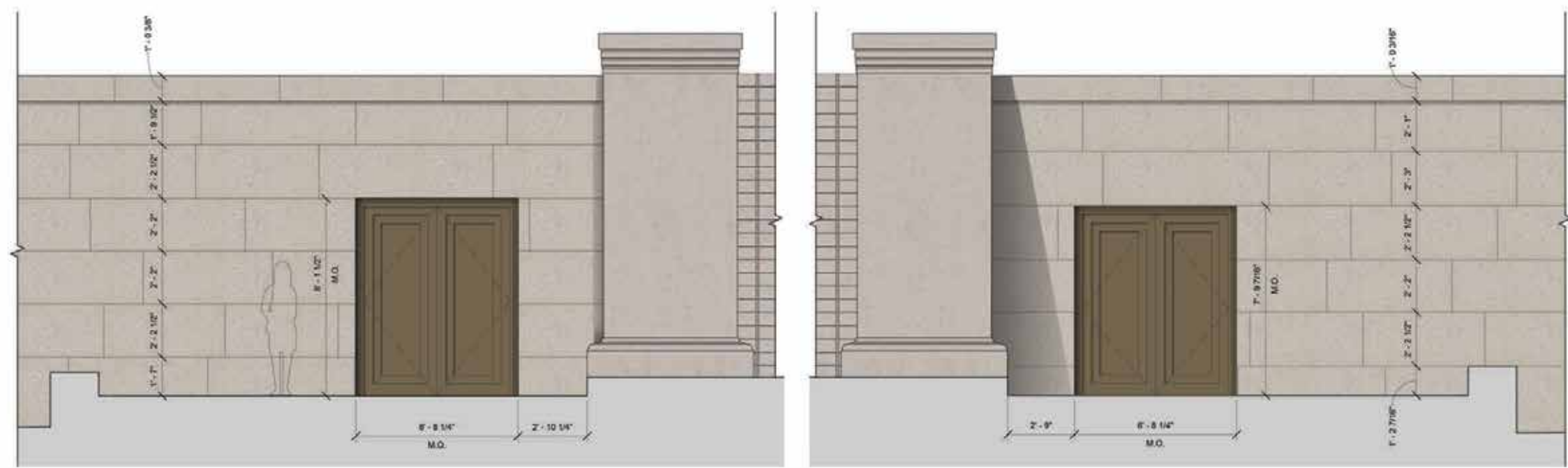








Plan View



East Elevation

The interpretive space would be approximately 4,020 square feet, and at its southern and northern extents would transition into the lobby areas for an integrated visitor experience. A glass curtain wall would be installed along the western edges of the interpretive area allowing an expansive view of the undercroft level. This glass curtain wall would extend from the exhibit level floor up to the underside of the chamber floor structure above. It would be constructed of laminated glass panels on the interior face of the walls, which is designed to remain in place in the event of a breakage to limit injury due to broken glass or the loss of a protective barrier at the edge of the exhibit level. The glass curtain wall would be supported at the top by a top track or shoe and would be secured to the exhibit level slab at the bottom. A center mullion consisting of a horizontal beam and tracks attached to the columns may be required if a full height glass wall cannot be delivered into the space. A viewing platform with tiered seating would be created at the front and center of the interpretive space. The concrete columns would be incorporated into the architecture of the space, and some areas between the columns would create niches where interpretive media would be installed. Structural modifications required for the installation of the exhibit level spaces are described later in this section.

Different types of interpretive exhibits would be installed throughout the interpretive space. The types of interpretive exhibits could range from large-scale exhibits for immersive viewing of the undercroft to small-scale individual or small group experiences. Specific design, location, and content of the interpretive exhibits would be determined during a later phase of this project. Increased visitor interpretation and services may be provided through a WiFi network on the east, north, and south side of the Memorial grounds. This network would require access point transmitters be mounted on existing light poles on the outside of Lincoln Memorial Circle road and plaza. Other incidental small equipment may be necessary.

The retail space would be relocated from the chamber level to the central, eastern side of the exhibit level, as shown on figure 9. The retail space would be approximately 1,820 square feet and would have a dedicated office and a storage room located at the eastern corners of the space. The retail space would be closed off from the interpretive space with solid walls. Doors would be located on both the north and south sides for visitor circulation. Structural modifications required for installation of the exhibit level spaces are described later in this section. Eastern National would design the specific layout of the retail space to meet their needs.

Space for NPS operations would be constructed in the exhibit level, including an NPS break room which would be approximately 300 square feet and would be located off of the south lobby. Other operations spaces provided would be an exhibit support room, storage areas, [REDACTED], [REDACTED] room.

The undercroft level that would not be visible to the public would be used for mechanical equipment and is shown on figure 10. A new heating, cooling, and ventilation system would be installed in the undercroft level and would be designed to accommodate the larger public spaces. The bulk of the ductwork required for the new system would be routed to the exhibit level from the undercroft level below. To provide redundancy in systems, the exhibit level would be divided in half along the east-west axis with each side served by individual split systems with interconnected ductwork. The electrical system would be upgraded as required for new lighting, elevators, power receptacles, audio/visual systems, and emergency systems throughout the exhibit level and visible portions of the unrenovated undercroft. Plumbing would be upgraded as needed to support the increase in number of restroom fixtures in the exhibit level. New piping would be routed outside of the visible area of the undercroft. Existing piping in the undercroft that would be visible from the viewing area would be relocated as needed.

Some structural modifications would be required for the proposed improvements under alternative B. On the chamber level, the new elevator on the northeast side would require a new opening in the floor and new steel beams to support the adjacent floor slabs. New openings for small vertical air ducts within the existing chases in the corner rooms of the chamber level may be required for air circulation and to properly condition the rooms on the chamber level. These openings would be as small as practicable, would be visually screened to the extent practicable, and would be located in areas of lesser significance, namely outside of the statuary chamber. On the exhibit level, some of the original concrete slab of the raised terrace area under the north plaza area would be removed and restructured in order to create the required ceiling height for the exhibit level. Additionally, the existing beams of the raised terrace area would be removed and replaced with beams of a shallower profile. Many of the beams to be removed would be non-original steel beams that were installed during previous projects to reinforce the original concrete in 1921 and again in 1993 (QEA 2017a). The proposed floors, walls, and ceilings for the new exhibit level spaces would be supported by new steel beams connected to wall plates or channels secured to the existing concrete columns with epoxy or expansion anchors. This would require permanent attachments of modern materials to the original concrete structure.

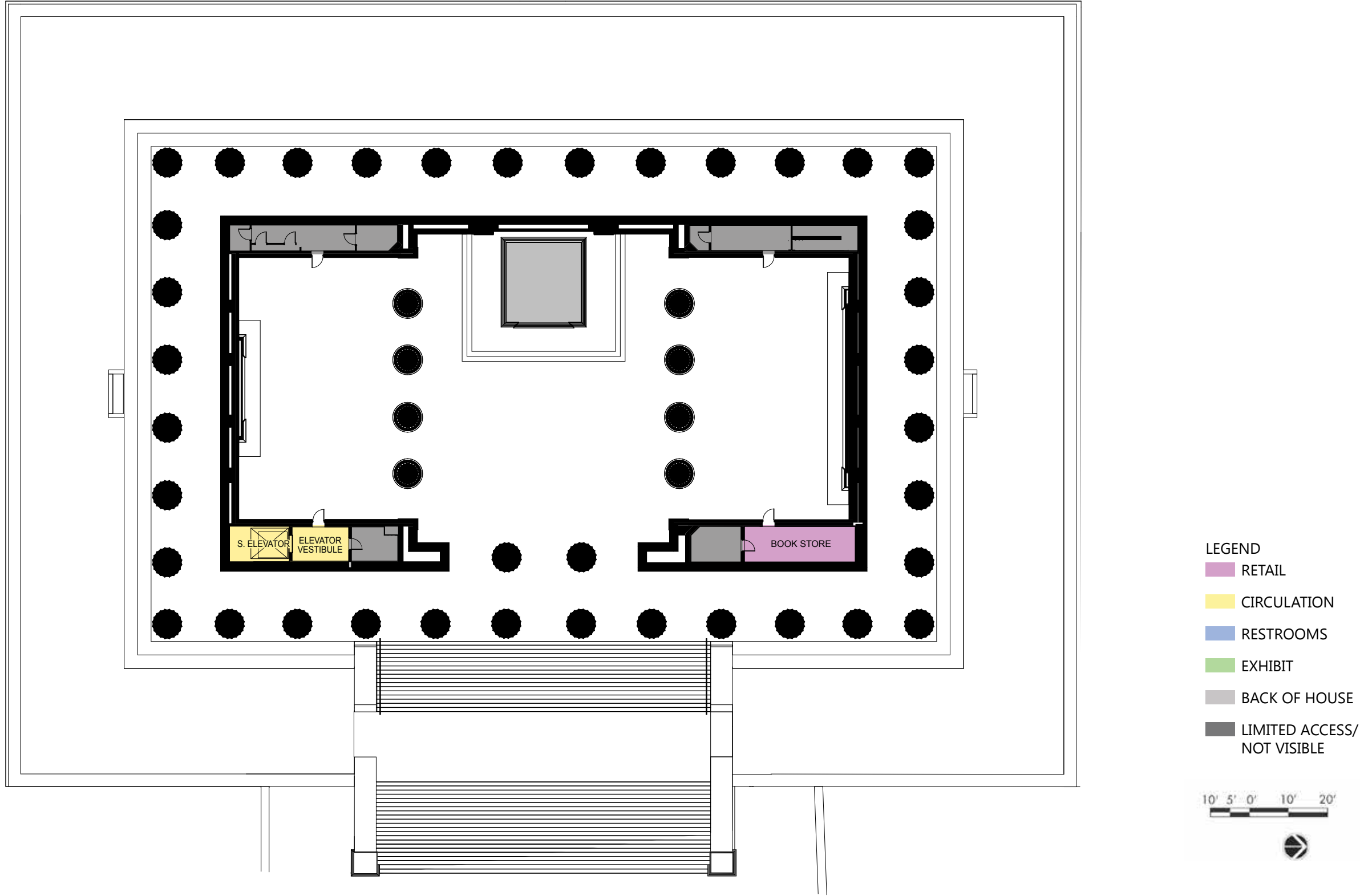
Access into the undercroft for construction activities and equipment would be from Lincoln Memorial Circle on the west side of the Memorial, via existing removable granite-block gates. The grounds west of the Memorial would be used for construction staging. Access from the grounds to the undercroft would require some earthwork excavation to create a graded ramp down to an existing underground door on the west side of the Memorial. Some temporary drainage structures or diversions may be required to collect and/or divert stormwater runoff and prevent water from entering the undercroft. Utility work would include replacement or rehabilitation of existing utilities such as water, sanitary sewer, electric, and telephone. Construction is expected to last approximately 24 months.

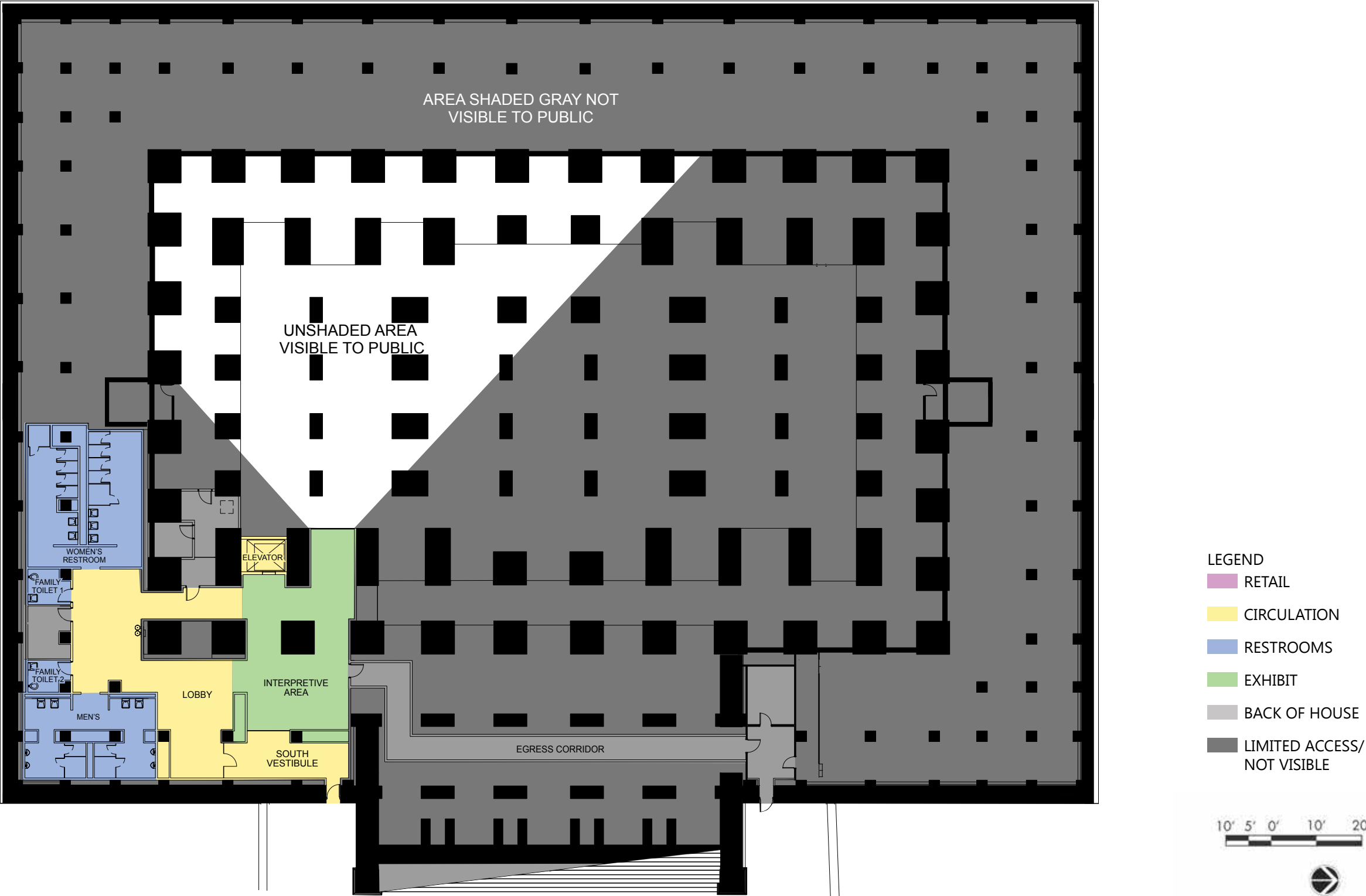
ALTERNATIVE C: IMPROVE EXISTING

Under alternative C, the National Park Service would rehabilitate the existing exhibit level at the south end in its current location to improve visitor services while minimizing physical changes to the Memorial. Figures 12–15 illustrate the proposed configuration under alternative C.

The south door would remain at its current width, while the north door would be enlarged to match the width of the south door at 36 inches. The south door would be increased in height to 84 inches to match the height of the north door (see figure 15). An egress hallway would be constructed that would connect the south interpretive area with the north door, which would create two means of egress from the exhibit level. Penetrations through the original, non-character-defining support walls along the approachway section of the undercroft would be required for the proposed egress hallway connecting the north and south doors. The north door would be used as an emergency egress. A new door that is compatible with the existing doors in terms of color, materials, scale, and design would be installed. The specific design of the new doors would be determined at a later design stage and would be determined in consultation with the DC Historic Preservation Officer, the US Commission of Fine Arts, and the National Capital Planning Commission.

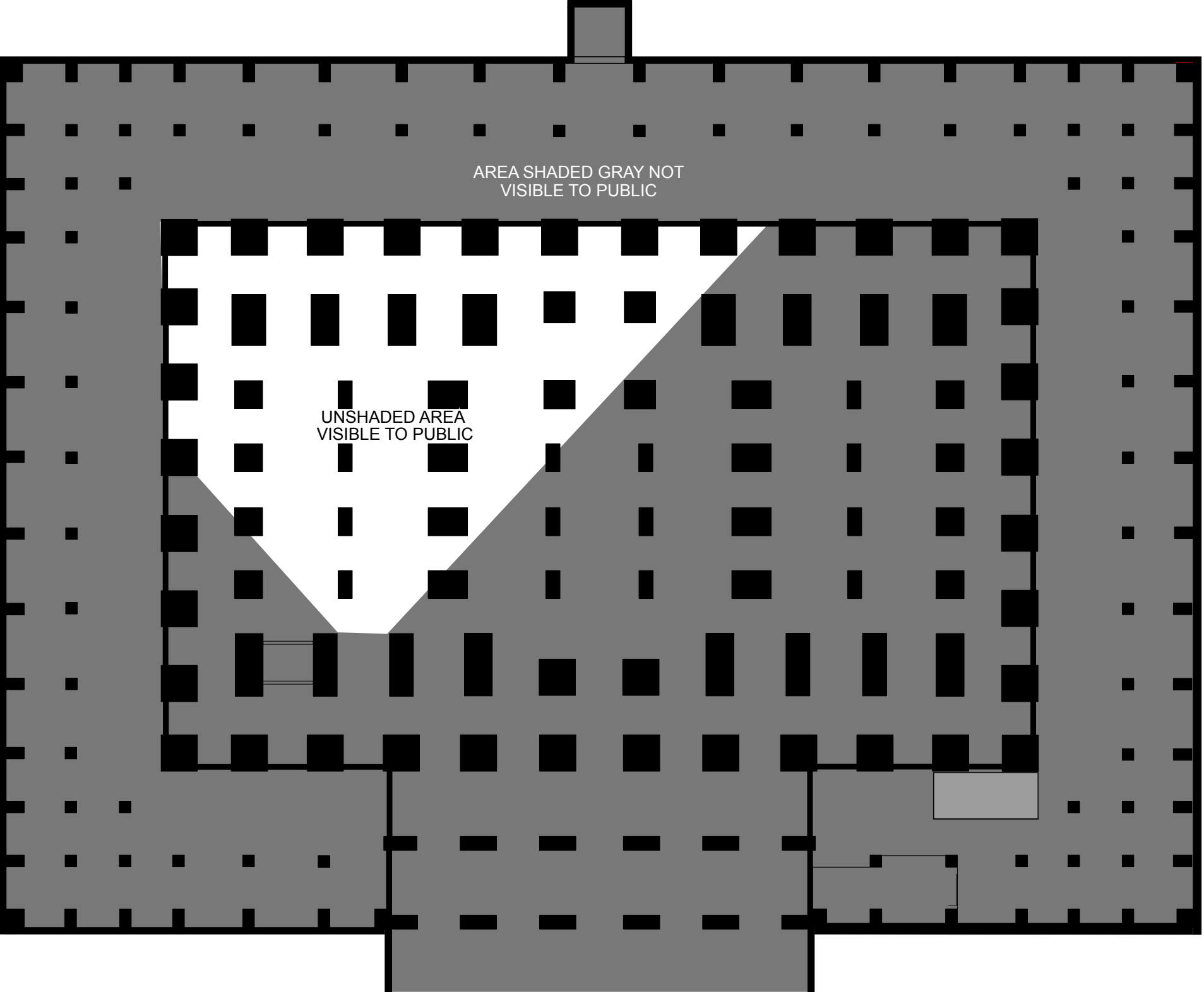
The chamber level (figure 12), including universal access via one elevator and the existing retail space, would remain the same as described under Alternative A: No Action.



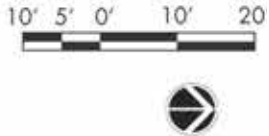


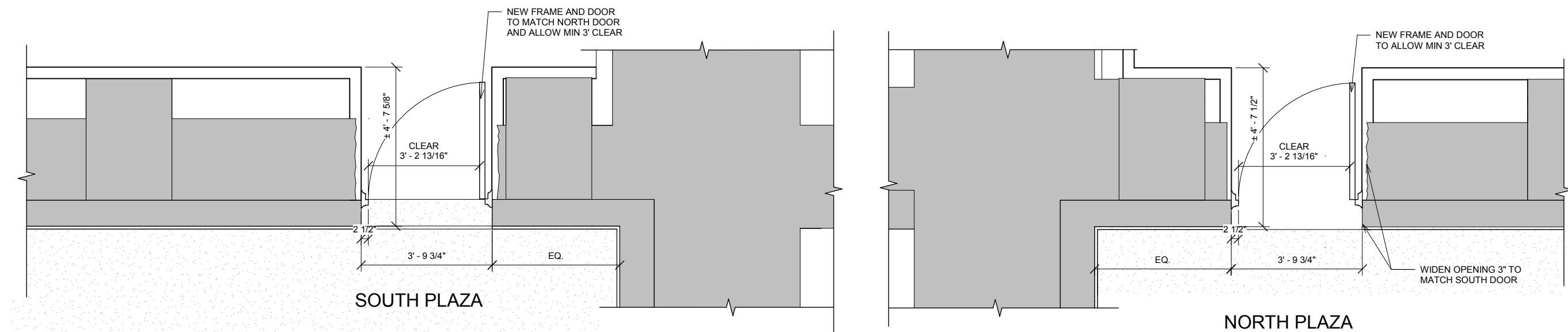
Lincoln Memorial Rehabilitation
Environmental Assessment

FIGURE 13
Alternative C: Improve Existing, Exhibit Level Plan

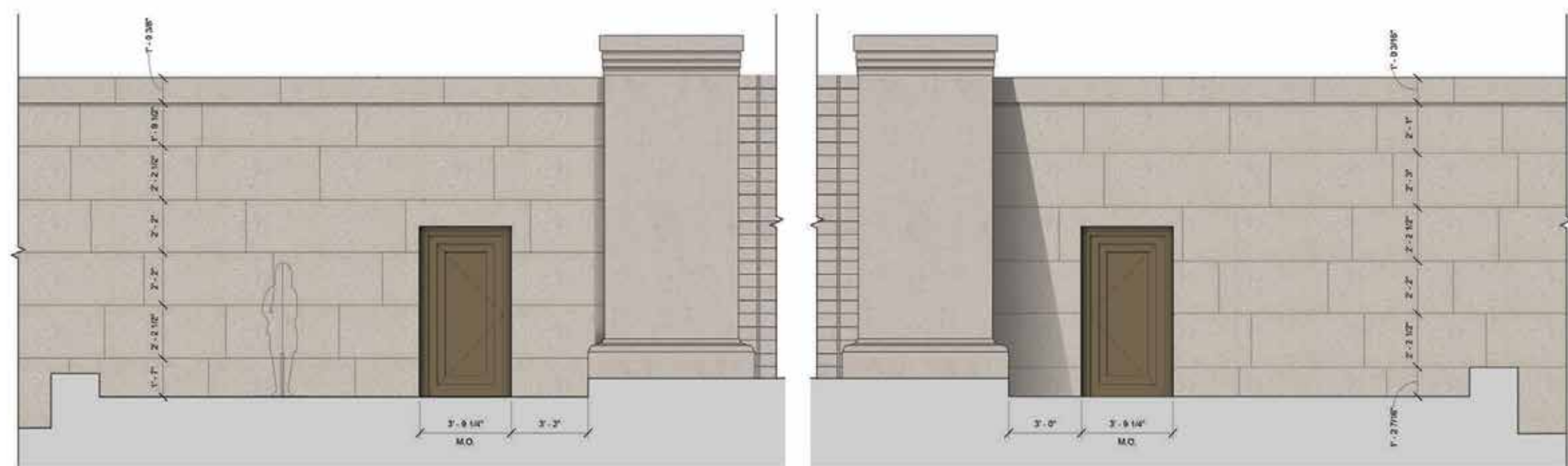


- LEGEND
- RETAIL
 - CIRCULATION
 - RESTROOMS
 - EXHIBIT
 - BACK OF HOUSE
 - LIMITED ACCESS/
NOT VISIBLE





Plan View



East Elevation

In the exhibit level (figure 13), the interpretive space would remain at approximately 950 square feet and in the same general configuration as the existing space. A picture window would be opened up through the west wall of the interpretive space to allow a partial view into the undercroft level. The picture window would be constructed of laminated glass panels on the interior face, which is designed to remain in place in the event of a breakage to limit injury due to broken glass or the loss of a protective barrier.

Increased visitor interpretation and services may be provided through a WiFi network on the east, north, and south side of the Memorial grounds, as under alternative B. This network would require access point transmitters be mounted on existing light poles on the outside of Lincoln Memorial Circle road and plaza. Other incidental small equipment may be necessary.

The restrooms would be rehabilitated, reconfigured, and expanded, as shown on figure 13. The women's room would have ten toilets and five sinks. The men's room would have eight toilets/urinals and four sinks. Additionally, there would be two separate family restrooms, each with one toilet and one sink. The lobby area would be larger than under alternative A to provide additional space for queueing as needed for the restrooms. A restroom attendant space and additional operations space would be created in the exhibit level. Structural modifications required for the expansion of the exhibit level spaces would be similar to those described under alternative B, but would be generally limited to the south and east sides of the undercroft.

The undercroft level that would not be visible to the public would be used for mechanical equipment and other storage, as shown on figure 14. The existing catwalk, mezzanine walkway, and storage spaces would remain, and mechanical systems would continue to be housed in the undercroft level. The mechanical systems would be upgraded to supply proper heating, cooling, and ventilation to the exhibit level. The electrical system would be upgraded as required for new lighting, elevators, power receptacles, audio/visual systems, and emergency systems throughout the exhibit level and visible portions of the unrenovated undercroft. The plumbing system would be upgraded as needed to support the increase in restroom fixtures. New piping would be routed outside of the visible area of the undercroft. Existing piping in the undercroft that would be visible from the viewing area would be relocated as needed.

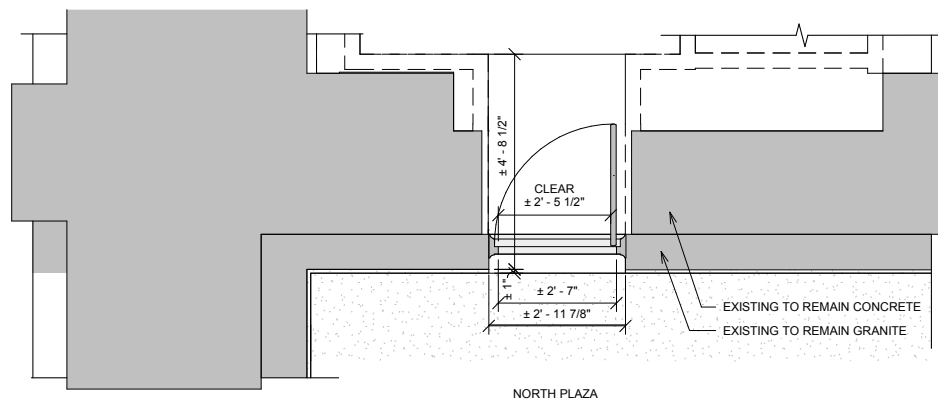
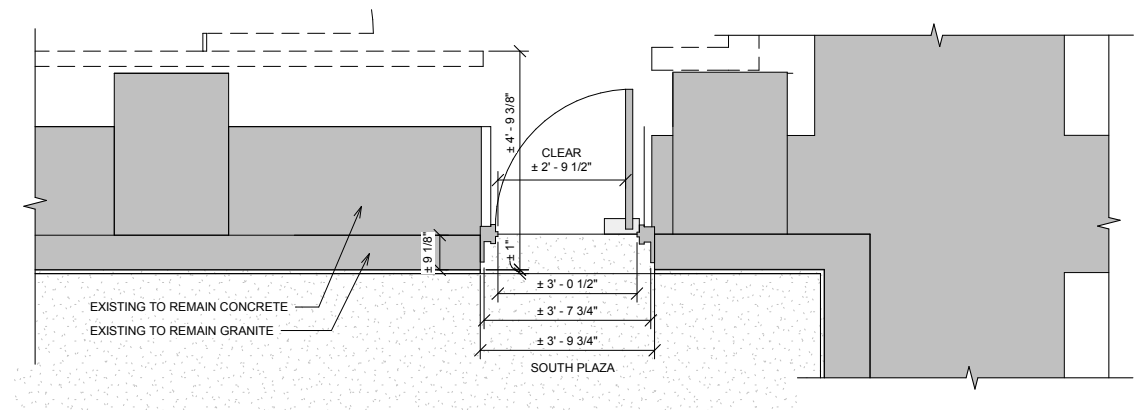
Construction activities and access would be the same as described under alternative B, but would be expected to last a shorter duration of approximately 14 months.

COMPARISON OF THE ALTERNATIVES

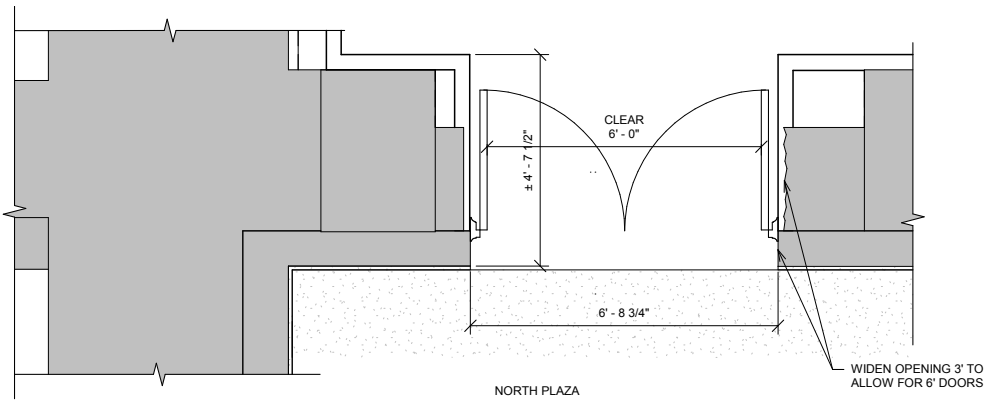
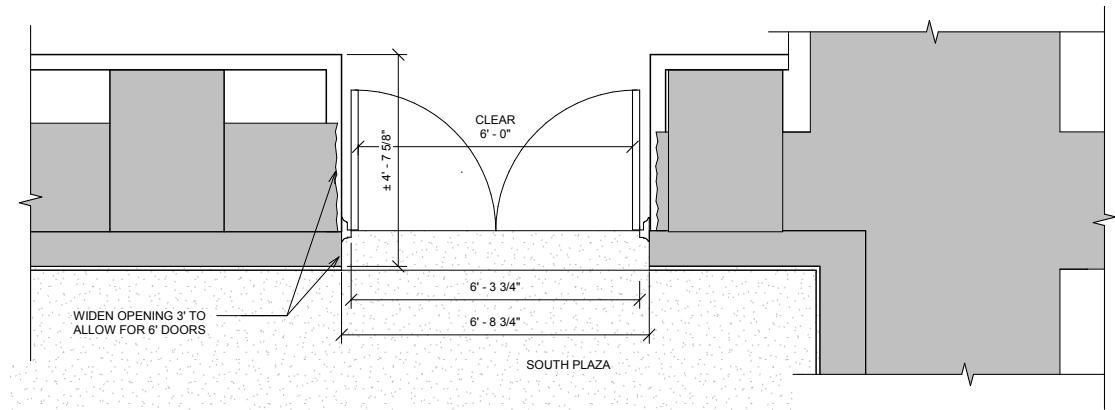
Table 1 below provides a brief summary and comparison of the key components of the three alternatives described above. Figures 16 and 17 following the table show the comparison of the exterior doors in both plan view and east elevation view. Impacts associated with the actions summarized below are fully described in the following chapter.

TABLE 1. COMPARISON OF THE ALTERNATIVES

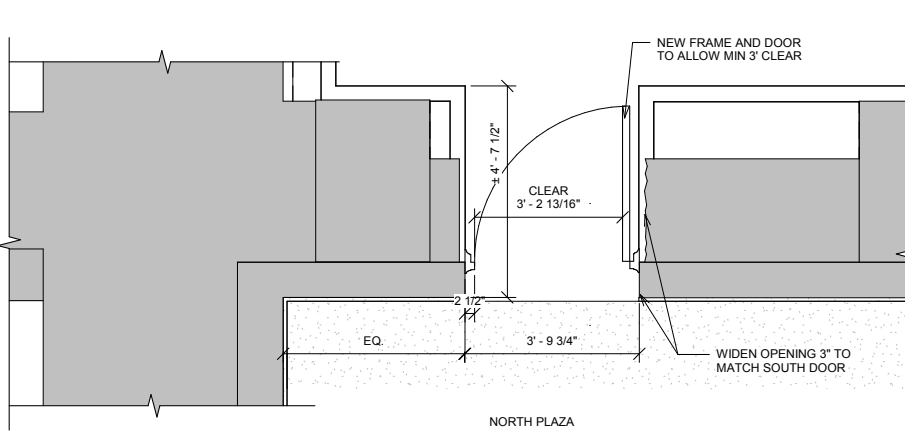
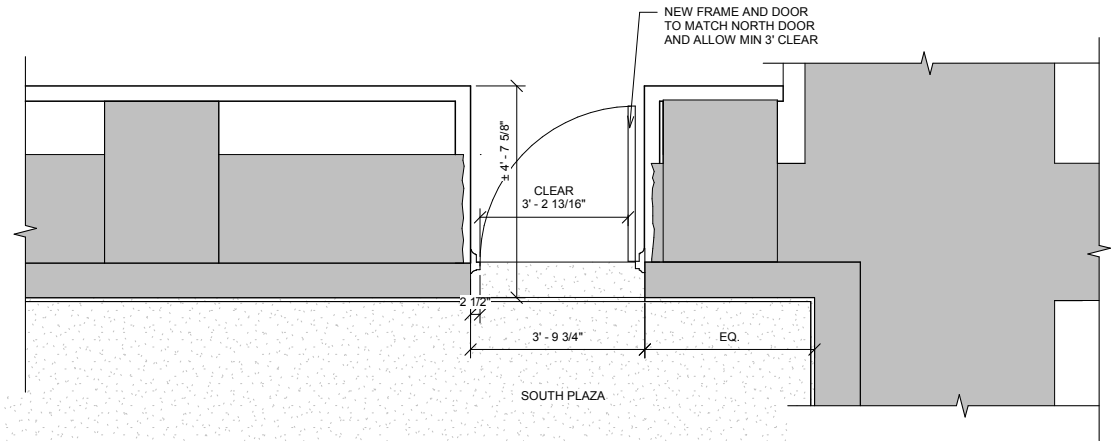
| Key Element | Alternative A: No Action | Alternative B: Proposed Action and NPS Preferred | Alternative C: Improve Existing |
|---------------------------|---|---|---|
| Egress | <ul style="list-style-type: none"> § South door remains 36" wide § North door remains 31" wide, with no connection to public space in exhibit level § One means of egress from exhibit level | <ul style="list-style-type: none"> § South and north doors enlarged to 72" each with a set of double doors § Two means of egress from exhibit level | <ul style="list-style-type: none"> § South door remains 36" wide § North door widened to 36" and connected to public space in exhibit level § Two means of egress from exhibit level |
| Accessibility | <ul style="list-style-type: none"> § One outdated elevator remains in the interpretive space, connecting to the chamber level | <ul style="list-style-type: none"> § South elevator renovated and updated § North elevator added in place of existing retail space | <ul style="list-style-type: none"> § Same as Alternative A: No Action |
| Restrooms | <ul style="list-style-type: none"> § Restrooms are wearing out and in their current location and layout § One women's room with a total of 8 toilets § One men's room with a total of 7 toilets § No family restrooms available | <ul style="list-style-type: none"> § New restrooms created on both the south and north sides of the exhibit level § Two women's rooms with a total of 20 toilets § Two men's rooms with a total of 14 toilets § Four family restrooms with a total of 4 toilets | <ul style="list-style-type: none"> § Restrooms reconfigured and renovated on the south end of the exhibit space § One women's room with a total of 10 toilets § One men's room with a total of 8 toilets § Two family restrooms with a total of 2 toilets |
| Retail Space | <ul style="list-style-type: none"> § Retail space remains in chamber level at approx. 200 sf | <ul style="list-style-type: none"> § Retail space relocated to exhibit level and increased to approx. 1,820 sf | <ul style="list-style-type: none"> § Same as Alternative A: No Action |
| Interpretive Space | <ul style="list-style-type: none"> § No views into the undercroft § Remains at approx. 950 sf in current layout | <ul style="list-style-type: none"> § Curtain wall provides expansive views into the undercroft level § Increased to approx. 4,020 sf. with opportunities for different types of exhibits | <ul style="list-style-type: none"> § Picture window provides partial views into undercroft level § Remains at approx. 950 sf in current layout |
| Operations | <ul style="list-style-type: none"> § All NPS operations spaces remain in current locations and configurations § NPS staff break room remains on chamber level and approx. 200 sf in size | <ul style="list-style-type: none"> § NPS operations spaces reconfigured on chamber and exhibit levels § NPS staff breakroom relocated off south lobby and increased to 300 sf | <ul style="list-style-type: none"> § NPS operations on the chamber level remain in the current locations § NPS operations on the exhibit level would be reconfigured and some enlarged § NPS staff break room remains on chamber level and approx. 200 sf in size |
| Stewardship | <ul style="list-style-type: none"> § No removal of original building material | <ul style="list-style-type: none"> § Removal of building material for enlargement of both doors and for north elevator § Replacement of historic structural features under the north plaza area | <ul style="list-style-type: none"> § Removal of original masonry for enlargement of north door § Removal of some original concrete for egress hallway connecting north and south doors |



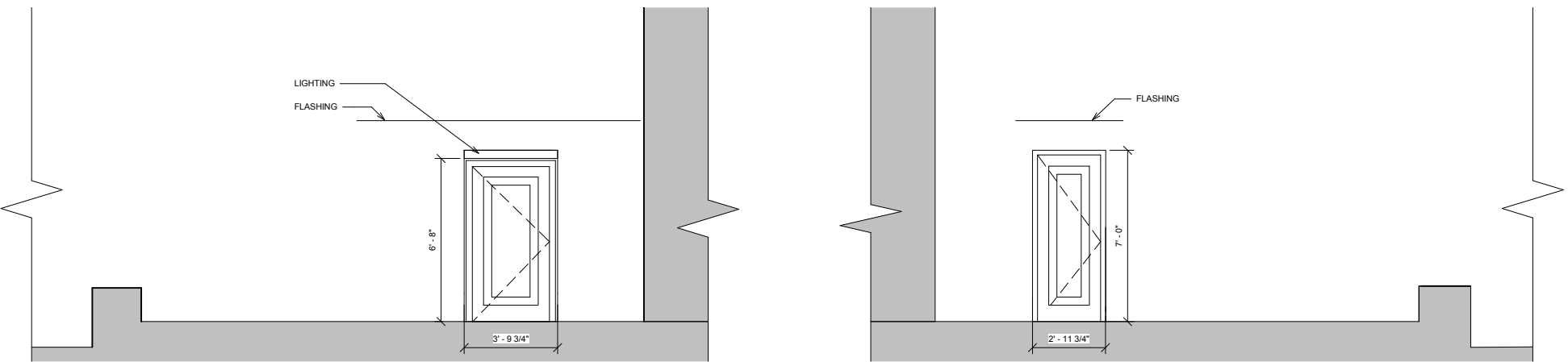
Alternative A: No Action



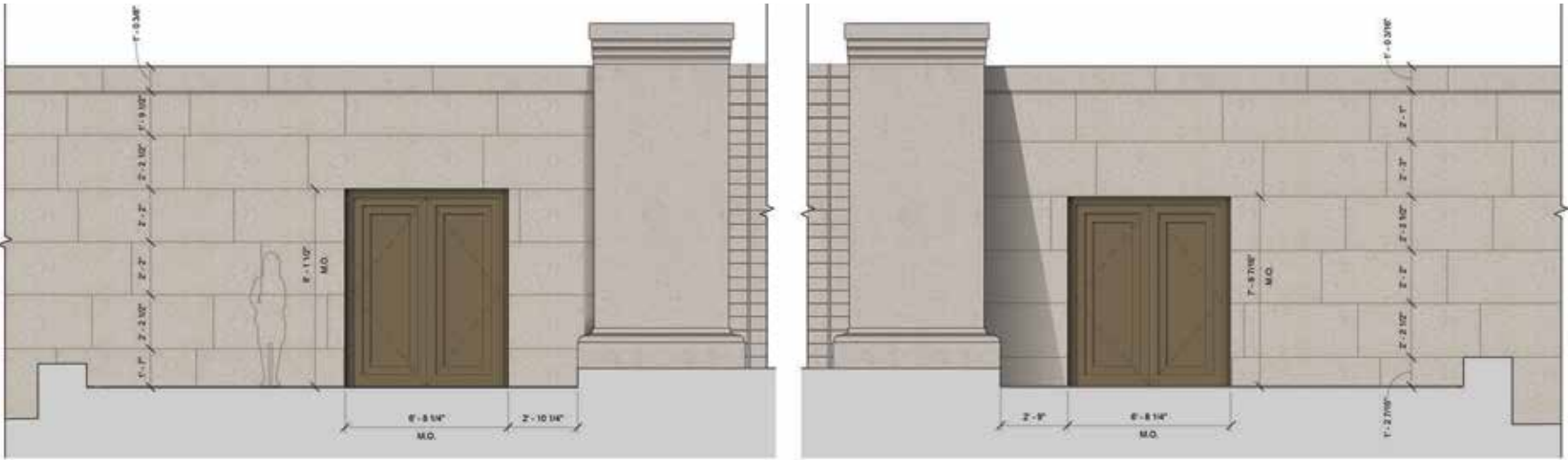
Alternative B: NPS Preferred - 72" Door Expansion



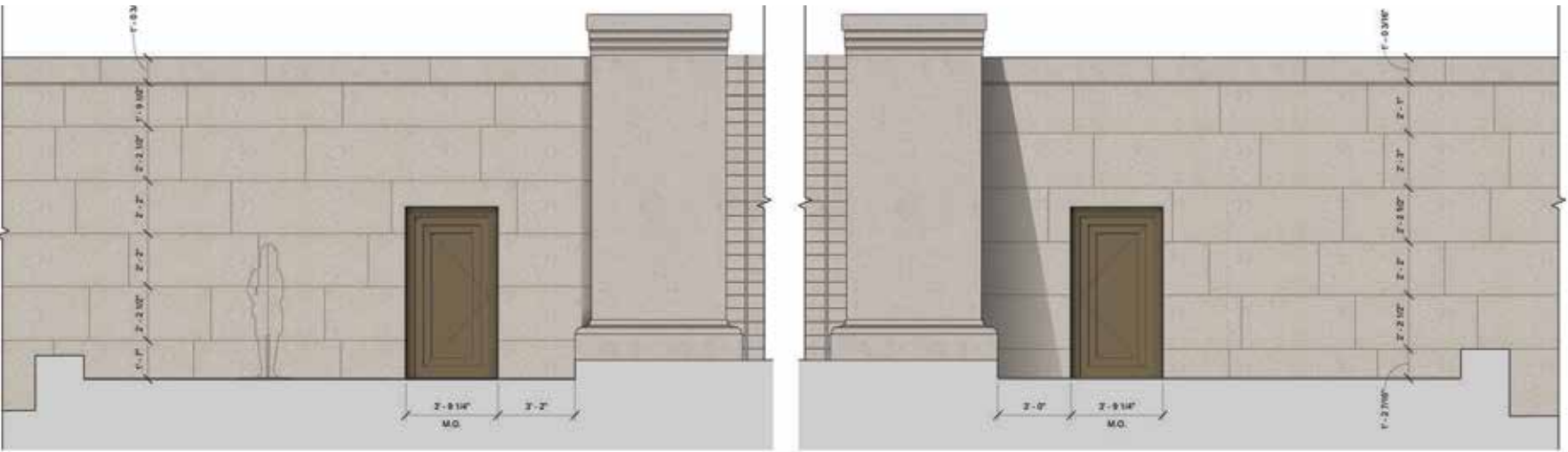
Alternative C: Improve Existing - 36" Door Expansion



Alternative A: No Action



Alternative B: NPS Preferred
- 72" Door Expansion



Alternative C: Improve Existing
- 36" Door Expansion

MITIGATION MEASURES OF THE ACTION ALTERNATIVES

To minimize environmental impacts related to the action alternatives, the National Park Service would implement mitigation measures whenever feasible. Although the exact mitigation measures to be implemented would depend upon the final design and approval of plans by relevant agencies, the National Park Service (and their contractors) would take the following measures:

- § Instruct contractor employees on the sensitivity of the general environment and monitor their activities. Staging of construction equipment would be restricted to identified previously disturbed areas to avoid impacts on natural and cultural resources.
- § Use the minimum size equipment needed to complete the actions laid out in the alternatives. Minimally intrusive methods may be specified to minimize damage to cultural or natural resources.
- § Implement standard noise abatement measures during construction. Standard noise abatement measures could include the following elements: a schedule that minimizes impacts on adjacent noise-sensitive uses, the use of the best available noise control techniques wherever feasible, the use of hydraulically or electrically powered impact tools when feasible, and location of temporary noise sources as far from sensitive uses as possible.
- § Minimize soil erosion by limiting the time that soil is left exposed and by applying other erosion control measures such as construction matting, as appropriate.
- § Any vegetation damaged by construction activities would be replaced in-kind, consistent with the cultural landscape report.
- § Follow the *Secretary of the Interior's Standards for the Treatment of Historic Properties* for all preservation and rehabilitation efforts to historic structures, to the extent practicable for the majority of project elements.
- § Develop an Unanticipated Discovery Plan to mitigate potential adverse impacts in the event that archeological resources are encountered during the actions proposed in the alternatives. If during construction previously unknown archeological resources were discovered, all work in the immediate vicinity of the discovery would be halted until the resources could be identified and documented and, if significant resources could not be preserved in situ, an appropriate mitigation strategy (e.g. the excavation, recordation, and mapping of cultural remains prior to disturbance, to ensure that important archeological data that otherwise would be lost is recovered and documented) would be developed in consultation with the state historic preservation office and, as appropriate, associated American Indian tribes.

ALTERNATIVES/ELEMENTS CONSIDERED BUT DISMISSED FROM FURTHER ANALYSIS

Several alternative elements were identified during the planning process, internal scoping, and public scoping. Some of these were determined to be unreasonable, or much less desirable than similar options included in the analysis, and were therefore not carried forward for analysis in this environmental assessment. The descriptions below summarize the alternatives and elements that were considered but dismissed from further analysis and the rationale behind the dismissal.

EXTERIOR BUILDINGS

Early in the planning process, an exterior building located to the southeast of the Memorial, along Daniel French Drive SW, was considered to house restrooms and retail space. These buildings would allow those visitor services to be removed from the Memorial to restore the intended solemnity from which they detract. A separate building would also provide the opportunity to create an optimal size and layout for the restrooms and retail space because they would not be confined by the existing architecture of the Memorial. However, this would require a new, modern structure to be introduced into the cultural landscape, which would detract from the historic character and integrity of the Memorial and its grounds. These adverse impacts on the cultural landscape were determined to be unacceptable by the National Park Service and, therefore, a separate building was dismissed from further analysis.

ADDITIONAL EGRESS DOORS

Additional egress doors on the north and south elevations were considered during the alternatives development process. These additional egress doors would allow for an increased occupancy in the exhibit level. These additional egress doors would also allow the National Park Service the flexibility to develop visitor spaces farther into the undercroft space while still meeting life safety code. However, creating new openings on the north and south elevations would require removal of historic masonry and a substantial change in visitor circulation because of the need to create walkways to these doors from the main approachway. These changes to the historic fabric and character of the Memorial was determined to be unacceptable adverse impacts for the National Park Service, and the element was dismissed from further analysis.

50-INCH EGRESS DOORS

Egress doors 50-inches wide for each the south and north doors were considered during the alternatives development process. These doors would meet life safety code and would increase occupancy above the existing occupancy based on the size of the current door. However, to achieve this width, either a single 50-inch wide door or two 25-inch wide doors would be required. The proportions of either option were not compatible with the historic character of the Memorial and were not visually appealing. Additionally, though the doors would be fully accessible, the width would limit the number of people who can simultaneously enter/exit, particularly those using wheelchairs, walkers, or pushing strollers. This would continue to result in a congestion point that exists with the current 36-inch door. The 50-inch wide doors would require the removal of historic masonry and would not improve visitor circulation to a great enough extent to balance the adverse impacts on the historic structure. When compared to the substantial improvement in circulation provided by the 72-inch wide doors proposed under alternative B, the 50-inch wide doors were dismissed from further analysis as a redundant design element that does not do enough to meet the purpose and need.

REFRESH EXISTING

During the design process, the NPS considered an alternative that did not reconfigure any interior space and instead only rehabilitated the existing spaces. The restrooms would be updated in their existing locations, and a picture window would be opened in the interpretive space to provide a view

into the undercroft space. The south door would be widened to 36 inches to meet current life safety code, but no second egress would be opened. This alternative was considered but ultimately dismissed from consideration because the existing layout of the exhibit level does not accommodate the high visitation to the Memorial. Issues associated with congestion and accessibility would persist. As such, refreshing the existing layout and facilities does not meet the purpose and need of the plan. Therefore, this alternative was dismissed from further analysis.

OTHER EXHIBIT LEVEL CONFIGURATIONS

Other configurations of layout in the exhibit level were considered during the design process, and some were presented to the public during the public scoping process. These configurations included various numbers of restroom fixtures, retail space on the north side of the exhibit level, restrooms in the central area of the exhibit level, and varying sizes of interpretive space. Some options included an enclosed exhibit space that provided clear definitions of space, while other options focused on more free-flowing circulation between spaces. These configurations were refined throughout the alternatives development process, and the National Park Service took into account comments from the public, agencies, consulting parties, and partners. This process resulted in Alternative B: Proposed Action and NPS Preferred Alternative as described and analyzed in the environmental assessment. Because the other exhibit level layouts considered during this process represent an evolution of the alternative rather than distinct alternatives, they were dismissed from further analysis.

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3

AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This chapter describes the current environmental conditions in and surrounding the project as they relate to each impact topic retained for analysis, as outlined in chapter 1. These conditions serve as a baseline for understanding the resources that could be impacted by implementing the project. This chapter then analyzes the beneficial and adverse impacts that would result from implementing any of the alternatives considered in this environmental assessment. This chapter also includes direct, indirect, and cumulative impacts, as well as the methods used in these analyses. A summary of the environmental consequences for each alternative is provided in table 2, which can be found at the end of this chapter.

GENERAL METHODOLOGY FOR ANALYZING IMPACTS

In accordance with the CEQ regulations for implementation of the National Environmental Policy Act, direct, indirect, and cumulative impacts are described under each impact topic (40 CFR 1502.16), and the impacts are assessed in terms of context and intensity (40 CFR 1508.27). Where appropriate, mitigating measures for adverse impacts are also described and incorporated into the evaluation of impacts. The specific methods used to assess impacts for each resource may vary; therefore, these methodologies are described under each impact topic.

TYPE OF IMPACT

Impacts are discussed by type, as follows:

- Direct:** Impacts that would occur as a result of the proposed action at the same time and place of implementation (40 CFR 1508.8).
- Indirect:** Impacts that would occur as a result of the proposed action but later in time or farther in distance from the action (40 CFR 1508.8).

Adverse: Impacts that would cause an unfavorable result to the resource when compared to the existing conditions.

Beneficial: Impacts that would result in a positive change to the resource when compared to the existing conditions.

CUMULATIVE IMPACTS ANALYSIS METHODOLOGY

Cumulative impacts are defined as “the impact on the environment which results from the incremental impact of the action when added to other past, present, or reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions” (40 CFR 1508.7). As stated in the CEQ handbook, *Considering Cumulative Effects under the National Environmental Policy Act* (CEQ 1997), cumulative impacts need to be analyzed in terms of the specific resource, ecosystem, and human community being affected and should focus on impacts that are truly meaningful. Cumulative impacts are considered for all alternatives, including the no-action alternative.

Cumulative impacts were determined for each impact topic by combining the impacts of the alternative being analyzed and other past, present, and reasonably foreseeable actions that would also result in beneficial or adverse impacts. Because some of these actions are in the early planning stages, the evaluation of the cumulative impact is based on a general description of the projects. These actions were identified through the internal and external project scoping processes and are summarized below.

Past, Present, and Reasonably Foreseeable Actions

Washington, DC and Vicinity Flood Risk Management Project Improvements. The National Park Service proposes to improve the reliability of flood risk management facilities and eliminate the need to deploy temporary barriers such as sandbags in the vicinity of Potomac Park. The current Potomac Park levee system consists of an earthen berm maintained as lawn that extends from the vicinity of 23rd Street NW in Constitution Gardens running parallel to the Reflecting Pool, and ends on the Washington Monument Grounds east of 17th Street NW. Mature trees line the levee on its northern and southern sides. In 2014, the US Army Corps of Engineers and the National Park Service erected a post and panel closure structure at 17th Street NW, which no longer requires temporary earthen/sandbag closure during flood events. The proposed project would include increasing the elevation of the Potomac Park levee system and constructing an earthen berm (closure structure) at 23rd Street NW. The Potomac Park levee crest would be increased in height by 2 to 3 feet along approximately 2,450 feet of its length. After construction of the levee is complete, a new asphalt walkway would be constructed, and the area would be landscaped. Trees would be planted in disturbed areas off the levee. For the 23rd Street NW closure, an earthen berm approximately 490 feet long would be constructed on the southwest side of the intersection of Constitution Avenue NW and 23rd Street NW, and an earthen berm approximately 75 feet long would be constructed between the east and west bound lanes of Constitution Avenue NW on the west side of the intersection. Berm crest elevation would be up to several feet higher than the existing ground. Several trees, an asphalt walkway, and some fencing would be removed. Ballfields southwest of the intersection would be shifted to accommodate the earthen berm.

Thomas Jefferson Memorial Targeted Accessibility Improvement Program. The National Park Service is undertaking a project at the Thomas Jefferson Memorial as part of the Targeted Accessibility Improvement Program, which encourages holistic principles of Universal Design during the visitor experiences and at the Memorial facilities. The purpose of this project is to make the experiences and facilities of the Thomas Jefferson Memorial accessible to visitors with mobility, sensory, and cognitive disabilities through the application of principles of Universal Design. The visitor experience at the Memorial includes arrival at and use of the facilities in and around the Memorial (parking spaces, sidewalks, restrooms, information desk, food kiosk, wayfinding, and orientation) and utilization of accessible routes to the Memorial. The project will improve, modify, and/or create new routes to more efficiently get visitors of all abilities to the chamber level. The project will include new exterior routes and/or walks from the tidal basin plaza (north of the Memorial) and the former car parking location (south of the Memorial). Design of a route from the Memorial to the existing concessions kiosk near the bus drop-off is included in this project.

Washington Monument Security Screening Building Project. The National Park Service plans to construct a new security screening facility on the plaza of the Washington Monument in the same location as the existing temporary facility. This facility will be constructed on the east side of the Washington Monument as a separate structure and only minimally connected to the monument itself. The screening facility will be approximately 30 feet wide by 27 feet deep by 17.5 feet tall. The exterior walls will be constructed of ballistic rated laminated glass or polycarbonate that allow full visibility from the interior outward while preventing visibility from the exterior inward. The roof will be a tinted glass that mitigates heat gain while allowing visibility of the Washington Monument from the interior.

HISTORIC STRUCTURE AND CULTURAL LANDSCAPES

AFFECTED ENVIRONMENT



Lincoln Memorial Exterior

The Lincoln Memorial, designed by architect Henry Bacon, is listed on the National Register as both an individual property and as a contributing structure to the East and West Potomac Parks Historic District (NPS 1981 and 1973). It is a rectangular, open air structure constructed with Colorado-Yule marble on the exterior and Indiana limestone on the interior. The Memorial is in the style of a Greek temple surrounded by 38 fluted Doric columns rising 44 feet high with a base diameter of 7.5 feet each.

The main steps leading to the statuary chamber level are located on the east side of the Memorial. Flanking the steps as they approach the entrance are 11-foot tall buttresses each crowned with a tripod carved from pink Tennessee marble. Single bronze doors are located on

either side of the buttresses leading into the exhibit level of the Memorial. The opening of the south door is approximately 36 inches wide and 80 inches high. The opening of the north door is approximately 31 inches wide and 84 inches high. As originally built, the Memorial had no doors into the undercroft. The north and south openings were not created until 1927–28 when two comfort stations were installed and bronze doors were added on either side of the main stairs. Modifications were made for accessibility in 1974 when the south door was widened, shortened and replaced. Accessible ramps to the doors were constructed on either side of the approachway stairs, which were later widened again in 1995 to meet Americans with Disabilities Act (ADA) requirements. Vegetation used to screen the doors from view in the 1920s was removed for these accessibility modifications, and the doors are subtly visible from the plaza area today. The existing south door remains unchanged since 1974, and the north door remains unchanged since 1927.

The interior of the chamber level is divided into three chambers by two rows of Ionic columns. The central chamber contains the solitary figure of Lincoln sitting in contemplation, carved from Georgia white marble by sculptor Daniel Chester French. The statue is 19 feet high and sits on a 10-foot-high oblong pedestal of Tennessee marble. The north and south side chambers feature inscriptions of Lincoln's Second Inaugural Address and his Gettysburg Address, respectively. The ceiling of the chamber is 60 feet above the floor and composed of bronze girders and panels of Alabama marble. In the south chamber, a single elevator, vestibule, and janitor's closet are located on the east side, and an NPS staff breakroom is located on the west side. In the north side chamber, the retail space is located along the east wall, [REDACTED].

The Memorial is anchored in a concrete foundation and is supported by the undercroft. The undercroft is a mostly unfinished space consisting of dirt floors and rows of 40-foot-tall concrete columns topped with concrete arches at the floor slab of the chamber level above. A concrete walkway is located approximately 22 feet above the floor, adjacent to the perimeter wall. The undercroft remains largely in its original, unfinished condition with the exception of a few visitor services and NPS operations areas in what is known as the exhibit level. The exhibit level sits approximately 18 feet above the undercroft floor in the southeast corner. Restrooms, a restroom attendant closet, an interpretive area, and a single elevator to the chamber level are located within the exhibit level and are accessed through the south exterior door. [REDACTED].

The undercroft area extends outward under the raised terrace and towards the east under the approachway stairs. These areas do not have the characteristic soaring ceilings and archways that exist under the statuary chamber.

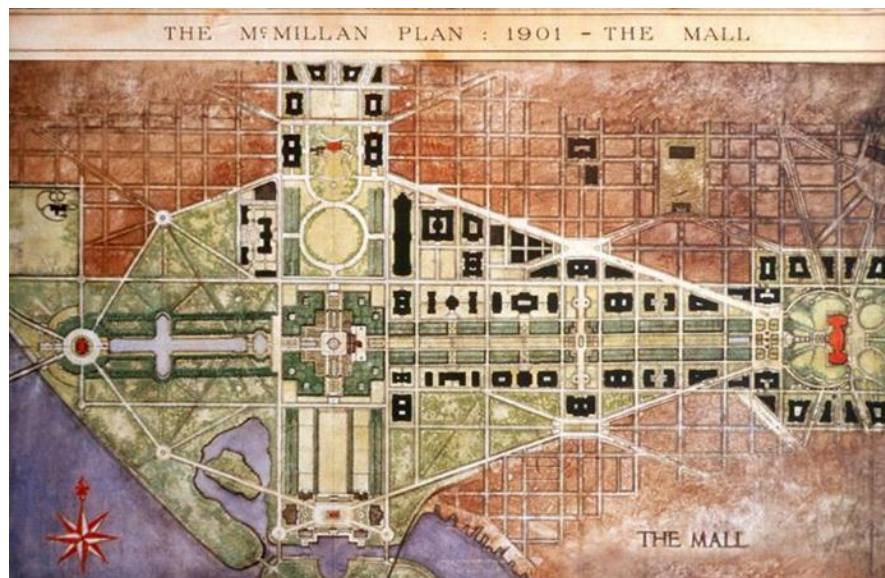


View of the Undercroft

The Lincoln Memorial cultural landscape is considered eligible for listing in the National Register for its association with early design planning for the National Capital such as the 1901 McMillan Plan and the City Beautiful Movement, for its role as a backdrop for the civil rights movement, for its association with Abraham Lincoln and Martin Luther King, Jr., for its embodiment of the classicism of the Beaux Arts architectural style, and because it

represents the work of several masters including Frederick Law Olmsted, Jr., Charles McKim, Henry Bacon, and James Greenleaf. Although some modifications to the landscape have taken place, its important features of vegetation, circulation patterns, structural features, views, and continued use for commemoration and passive recreation retain enough integrity to maintain the historic character of the landscape (NPS 1999).

The Lincoln Memorial and its grounds are part of the larger designed landscapes within West Potomac Park and, more broadly, the National Mall. As discussed in chapter 1, the location of the Memorial was chosen as a formal terminus of the National Mall in the 1901 McMillan Plan. This plan was a continuation of L'Enfant's vision for a grand promenade between the Capitol and the Washington Monument. The Memorial and its grounds also serve as successful examples of the ideals of the City Beautiful Movement of the early 1900s that inspired well-conceived and beautifully designed urban spaces (NPS 1999). The Memorial sits at the western end of an axis formed by the Capitol and the Washington Monument.



1901 McMillan Plan. Image Source: National Capital Planning Commission

The Lincoln Memorial landscape is organized geometrically, characterized by its linear and symmetrical features. This is emphasized by the long Reflecting Pool, with rows of elm trees on either side and flanked by parallel pedestrian paths. The area immediately surrounding the Memorial is also designed with this geometric and symmetrical character through the arrangement of drives, walks, panels of lawn, and tree-lined streets radiating out from Lincoln Memorial Circle. According to the cultural landscape report, much of the spatial organization has been retained, but development in other areas of the National Mall, particularly north and south of the Reflecting Pool, have somewhat diminished these qualities (NPS 1999).

Pedestrian circulation through the Memorial grounds has remained relatively unchanged around the Reflecting Pool since the 1920s, with the exception of resurfacing many of the walkways from concrete to asphalt. Pedestrian circulation from the approachway into the Memorial itself has been modified since its creation. In the 1970s, Lincoln Memorial Circle was partially closed to vehicles and converted into a pedestrian area east of the Memorial. Accessible ramps on either side of the Memorial approachway were constructed for the Bicentennial events in the 1970s and have been

improved to meet accessibility requirements in the decades since. These ramps are considered noncontributing features to the cultural landscape (NPS 1999). According to the cultural landscape report, through changes in materials and widths have occurred, the pedestrian circulation still follows the same pattern from the 1930s (NPS 1999).

METHODOLOGY

Potential impacts on historic structures and cultural landscapes are evaluated based on changes to character-defining features of the resources, which are the characteristics of a historic property that qualify the property for inclusion in the National Register. This approach is derived from the *Secretary of the Interior's Standards for Treatment of Historic Properties*, Director's Order 28: *Cultural Resource Management Guidelines*, as well as the regulations of the Advisory Council on Historic Preservation implementing the provisions of the National Historic Preservation Act. Character-defining features contribute to a property's integrity, which is composed of location, design, setting, materials, workmanship, feeling, and/or association. The current conditions of the historic structure and cultural landscapes, as presented under the "Affected Environment" section above, were compared with the alternatives described in chapter 2 to determine the impacts on the historic structure and cultural landscapes. It should be noted that this document assesses impacts under the National Environmental Policy Act. An NHPA Section 106 assessment of effect is being completed concurrently with, but separately from, this document.

The geographic area of analysis is identified as the project area as described in chapter 1 plus all locations from where the exterior doors on the east façade would be visible. This area generally extends east from the Memorial, narrowing due to topography and vegetation, to approximately the halfway point of the length of the Reflecting Pool.

The resource-specific context for the evaluation of impacts on historic structure and cultural landscapes includes the following:

- § The Lincoln Memorial is listed in the National Register and is eligible for inclusion based on criterion A for its association with the McMillon Plan, the City Beautiful Movement, and the civil rights movement; on criterion B for its association with Abraham Lincoln and Martin Luther King, Jr.; and on criterion C for its embodiment of the classicism of the Beaux Arts style and for representing the works of several masters.
- § The historic character and integrity of historic structures and small-scale features in the project area could be diminished by relocation, destruction, major design changes, introduction of new structures or circulation, and the use of historically-incompatible materials and methods in repair and maintenance.
- § Preserving the commemorative works within the National Mall, including the Lincoln Memorial, is part of the purpose of the Park (NPS 2010).
- § The existing doors on the east façade, while not original to the structure, have been identified as character-defining features of the Memorial because they have become an integral part of the façade (QEA 2017b).
- § The undercroft, including its soaring character and arched ceilings is identified as a character-defining feature of the structure (QEA 2017b).

IMPACTS OF ALTERNATIVE A: NO-ACTION

Impact Analysis

Under alternative A, there would be no changes to the historic structure or the cultural landscapes in which it sits. Therefore, there would be no impacts under alternative A.

Cumulative Impacts

Although other past, present, and reasonably foreseeable future actions may affect historic structures and/or cultural landscapes in the area, the no-action alternative would have no impacts on historic structures and cultural landscapes and, therefore, would not contribute to the effects of other actions. Consequently, there would be no cumulative impacts to historic structures and cultural landscapes under the no action alternative.

Conclusion

There would be no changes to the historic structure or to the setting of the Memorial under alternative A. There would be no cumulative impacts associated with alternative A. Therefore, there would be no impacts on historic structure and cultural landscapes under alternative A.

IMPACTS OF ALTERNATIVE B

Impact Analysis

Under alternative B, there would be a loss of historic fabric for the expansion of the north and south doors on the east façade, as shown on figure 18. The doors would be approximately doubled in size, expanding by approximately 34 inches in width and 17 inches in height at the south door and approximately 44 inches in width and 10 inches in height at the north door. This expansion would result in approximately 28 square feet of the original masonry removed at the south door and approximately 31 square feet removed at the north door, which would result in a direct adverse impact on the historic fabric. However, this loss of material would be very small when considered with the amount of original masonry remaining in the Memorial. In addition to the loss of material, these openings would also result in a change to the appearance of the east façade of the structure. Because the doors would be taller and wider than the existing, they would be more visible to visitors not only on the approachway, but from adjacent portions of Lincoln Memorial Circle and the Reflecting Pool as well. However, this change in appearance would be relatively small when compared to the overall appearance of the Memorial itself, which dominates the view from adjacent areas. Additionally, the proposed doors would only be visible from about halfway down the Reflecting Pool to the east and would, therefore, have only a small impact on the overall cultural landscapes of the Lincoln Memorial Grounds, West Potomac Park, and the National Mall as a whole. Due to the limited extent of the proportion of historic fabric that would be removed, the expansion of the north and south doors would not introduce visual elements that are incompatible, out of scale, in great contrast, or out of character with the aesthetics or character of the structure.

Because alternative B proposes an additional entrance/exit to the exhibit area than currently exists, there would be a slight change in pedestrian circulation, which would be a slight adverse impact on the cultural landscape. Although the existing door on the north side is used by NPS staff, there would be an increase in use of that door by the public to reach the proposed exhibit level. During times of

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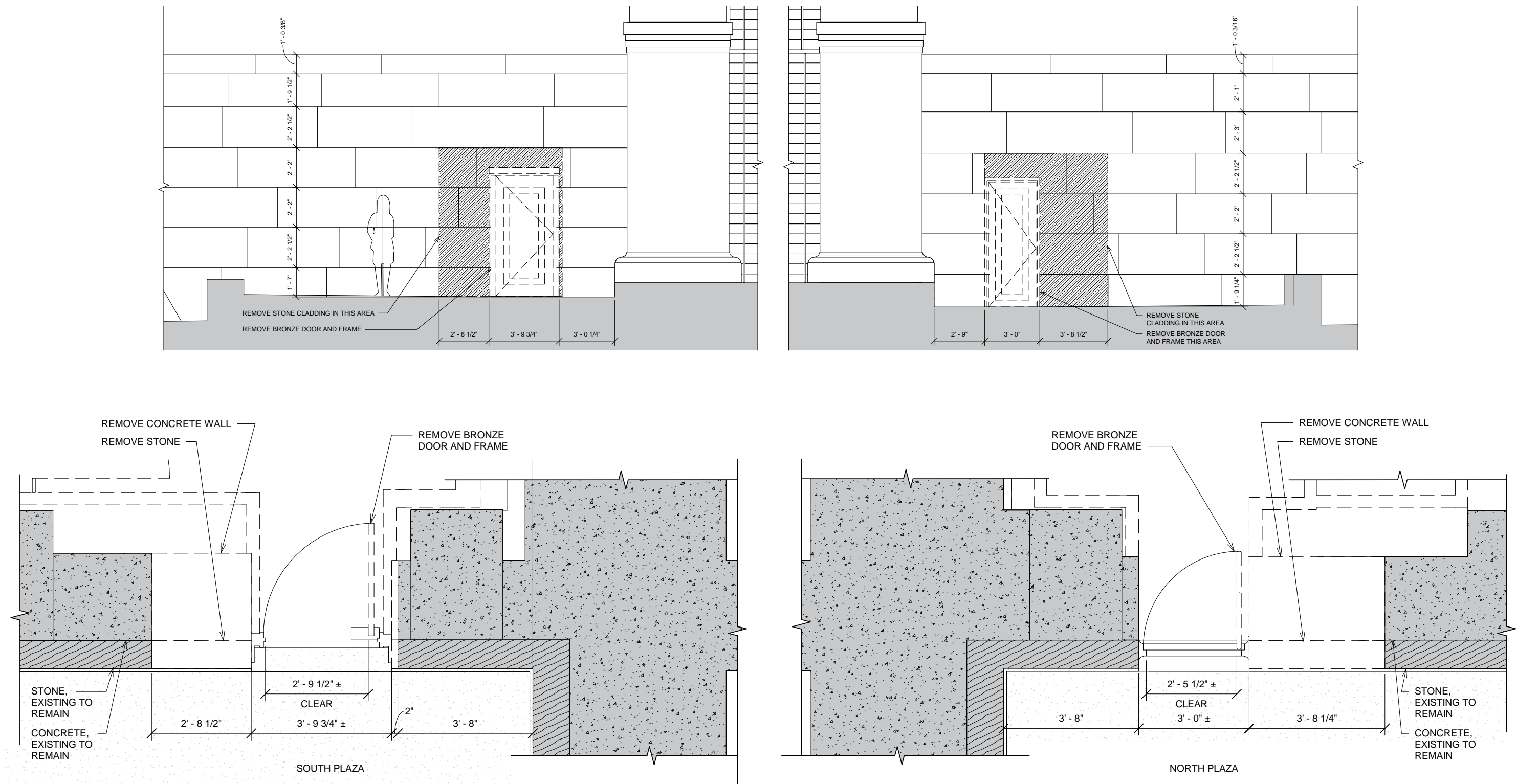


FIGURE 18
Demolition Impacts for 72-Inch Exterior Doors

high visitation, this could result in visitors congregating around the plaza area near the north door as currently happens in the plaza area near the south door. However, this change in pedestrian circulation would not be visually incompatible with the landscape nor would it detract from the historic circulation patterns. The Memorial was intended as a place to be visited by the public and visitors have historically, and continue to, congregate on the terrace level to experience the Memorial and the views of the National Mall.

On the interior, notable changes would be made to the historic structure. At the chamber level (figure 8), the retail space would be removed, which would restore some of the intended solemnity that is lost with the bookstore's operation and would result in a direct beneficial impact on the structure. The installation of a second elevator on the north when the retail space is removed would result in a change in pedestrian circulation because visitors were not historically arriving at the chamber level from that side of the chamber. This elevator would require a new opening in the chamber level floor, which would be a loss of historic material. New steel beams would be installed to support the adjacent floor slabs, which would result in the introduction of modern materials into the mostly concrete and masonry historic structure. However, this loss of historic material and introduction of modern materials would not be visible to the public and would not detract from the overall appearance or character of the chamber.

On the exhibit level (figure 9), the removal and replacement of some of the existing raised terrace slab would result in a loss of historic fabric and the introduction of modern materials. Supports for the exhibit level floors would require some penetrations to the original concrete columns for expansion anchors to secure the new steel beams. The expansion of the exhibit level would result in changes to the character of the undercroft and the introduction of modern materials and new structures. At approximately 15,540 total square feet, the total amount of public and NPS spaces proposed under alternative B would be approximately 12,500 square feet larger than the existing spaces. However, because the majority of the exhibit level features would be located in the raised terrace portion of the undercroft, the cathedral-like character of the undercroft, as well as the arched ceiling would be mostly preserved.

Temporary impacts to the structure and its setting would be required for construction. The presence of construction equipment and materials in the staging area as well as the required excavation for construction access to the west of the Memorial would detract from the overall feeling and appearance of the historic setting, which would be a short-term, direct adverse impact on the cultural landscapes. However, the construction staging area would not be visible from the main façade of the structure to the east, nor from most of the nearby monuments and memorials in the Park. The staging area would be in view of the Arlington Memorial Bridge and areas west of the Memorial, resulting in a short-term, indirect adverse impact on those resources. Those impacts would be limited to the duration of construction, which is estimated to be approximately 24 months. Because construction access into the Memorial would be achieved through an existing access point on the west elevation of the Memorial, no removal of historic material would be required for access. No permanent impacts on the historic structure exterior or cultural landscapes would occur as a result of the construction activities for the proposed improvements.

Cumulative Impacts

Other past, present, and reasonably foreseeable actions that would have impacts on historic structures include the Flood Risk Management Project Improvements, the Thomas Jefferson Memorial Targeted Accessibility Improvement Program, and the Washington Monument Security

Screening Building Project. These projects would result in modifications to the existing setting of the National Mall and the introduction of modern materials into the cultural landscapes. The Flood Risk Management Project Improvements would somewhat change the topography within the historic setting and cultural landscapes of the Memorial and the National Mall. The Jefferson Memorial Targeted Accessibility Improvement Program and the Washington Monument Security Screening Building Project would introduce modern structures and materials into the setting and cultural landscape of the National Mall in the forms of accessible ramps and other accessible media at the Jefferson Memorial and a glass building at the Washington Monument. These changes in topography and introductions of modern materials would detract slightly from the historic character of the cultural landscapes. When combined, these changes would result in a somewhat adverse impact on the historic setting of the Lincoln Memorial and the cultural landscape of the National Mall. Under alternative B, the expansion of the doors on the east façade would contribute to changes in the appearance of the historic setting of the Memorial and the cultural landscape of the National Mall. When considered with the actions identified above, the adverse impact of the expanded doors would slightly contribute to the overall adverse impact of the other actions. However, these changes in the overall landscape would be relatively small when compared with the overall character of the landscape that would remain. Therefore, the overall cumulative impact on the historic structure and cultural landscapes would be slightly adverse.

Conclusion

Under alternative B, exterior changes to the doors at the east façade would result in adverse impacts on the historic structure and cultural landscapes. These impacts would be due to the removal of historic material and the change to character-defining features of the façade. However, this loss of historic material and changes to the façade would be relatively minor when compared with the overall historic material and the historic appearance that would be retained. Additionally, the change would only be visible from a short distance when compared to the distance from which the Memorial itself is visible in West Potomac Park, the National Mall, and surrounding areas. The removal of the existing doors and replacement with new, larger doors would result in an adverse impact due to the loss of those character-defining features. However, the proposed doors would be designed to be similar to the existing doors and sympathetic to the overall historic structure and landscape in terms of materials, color, and design. The design of the doors would be developed in consultation with the DC Historic Preservation Officer, the National Capital Planning Commission, and the US Commission of Fine Arts. The proposed changes to the exterior doors, though an adverse impact, would not detract from the overall character of the Memorial or the cultural landscapes with which it is associated.

Substantial changes to the undercroft, including the removal of some historic material and the introduction of modern material, would result in an adverse impact on the historic structure. However, the overall structure would retain its character and integrity because these changes would be located in areas of lesser significance, namely outside of the statuary chamber. Changes to the chamber level would be limited to existing spaces on the outskirts of the chamber and would not detract from the character-defining features of the statuary chamber. In the undercroft, the expansion of the exhibit level would be mostly focused in the undercroft raised terrace area, which is not considered a character-defining feature due to previous alterations (QEA 2017b). This would allow much of the character-defining features of the undercroft statuary chamber to be retained, including the soaring arched ceiling and unfinished appearance.

Although changes would occur, the Memorial and cultural landscapes would retain their historic integrity and would continue to be eligible for listing in the National Register. Under alternative B, the National Park Service would be able to continue its preservation of the Lincoln Memorial, which would remain a prominent feature of West Potomac Park and the National Mall.

IMPACTS OF ALTERNATIVE C

Impact Analysis

Under alternative C, the direct adverse impacts related to widening the north door would be similar to those described under alternative B but would be of a lesser intensity because, at 36 inches, the width would be approximately half that of alternative B and more similar to the existing conditions. The widened door would require the removal of approximately 1 square foot of historic masonry at the south door and approximately 6 square feet at the north door, but this would be a very small loss when compared to the overall amount of historic masonry that would remain in the Memorial. As under alternative B, the larger doors would result in a change to the appearance of the east façade of the structure, and it would be more visible not only from the approachway, but from adjacent portions of Lincoln Memorial Circle and the Reflecting Pool when compared to the existing conditions. However, this change in appearance would be relatively small when compared to the overall appearance of the Memorial itself, which dominates the view from adjacent areas. Additionally, the proposed door would only be visible from about halfway down the Reflecting Pool to the east and would, therefore, have only a small, direct adverse impact on the broader cultural landscapes. This visual impact would be of a lesser intensity than under alternative B.

On the interior, the expansion of the exhibit level (figure 13) would require some loss of original material for the hallway connection between the north and south doors, resulting in a direct adverse impact. However, this loss of materials would be relatively very small when compared with the overall historic material that would remain. It would also be limited to the raised terrace area of the undercroft, and the main statuary chamber area of the undercroft would remain intact. The expansion of the exhibit level would also result in changes to the character of the undercroft through the introduction of new materials into currently unfinished spaces. At approximately 4,400 total square feet, the total amount of public and NPS spaces proposed under alternative C would be approximately 1,360 square feet larger than the existing spaces. However, the expansion of the exhibit level would be concentrated adjacent to the existing exhibit level spaces and would expand outward further into the raised terrace portion of the undercroft, rather than towards the center. Therefore, the cathedral-like character of the undercroft and the arched ceiling would be preserved.

Temporary impacts, both direct and indirect, related to construction under alternative C would be the same as under alternative B, but would be expected to last a shorter duration of approximately 14 months.

Cumulative Impacts

Other past, present, and reasonably foreseeable actions that would have impacts on historic structures include the Flood Risk Management Project Improvements, the Thomas Jefferson Memorial Targeted Accessibility Improvement Program, and the Washington Monument Security Screening Building Project. These projects would result in modifications to the existing setting of the National Mall and the introduction of modern materials into the cultural landscapes. These impacts are described under alternative B.

Under alternative C, the expansion of the doors on the east façade would contribute to changes to the appearance of the historic setting of the Memorial and the cultural landscape of the National Mall. When considered with the actions identified above, the adverse impact of the expanded doors would slightly contribute to the overall adverse impact of the other actions. However, these changes to the overall landscape would be relatively small when compared with the overall character of the landscape that would remain. Therefore, the overall cumulative impact on the historic structure and cultural landscapes would be slightly adverse.

Conclusion

Under alternative C, exterior changes to the doors at the east façade would result in adverse impacts on the historic structure and cultural landscapes. These impacts would be due to the removal of historic material and the change to character-defining features of the façade. However, this loss of historic material and changes to the façade would be smaller than under alternative B because the proposed doors would be smaller. The impacts related to the door changes would be similar to those described under alternative B but would be of a lesser intensity. As under alternative B, the loss of the existing doors would result in the loss of character-defining features; however, the proposed doors would be designed to be sympathetic to the existing doors and overall historic structure and landscape in terms of materials, color, and design. The proposed changes to the exterior doors, though an adverse impact, would not detract from the overall character of the Memorial or the cultural landscapes with which it is associated.

Changes to the undercroft, including the removal of some historic material and the introduction of modern material, would result in an adverse impact on the historic structure. However, these adverse impacts would be of a lesser intensity than those under alternative B because the expansion of the exhibit level would be substantially smaller. The overall structure would retain much of its character and integrity because the changes would be located in areas of lesser significance outside of the statuary chamber. In the undercroft, the expansion of the exhibit level would be mostly focused in the undercroft under the raised terrace and approachway and would not expand out into the airspace of the character-defining portion of the undercroft. The undercroft would retain its character-defining soaring arched ceiling and unfinished appearance.

Although changes would occur, the Memorial and cultural landscapes would retain their historic integrity and would continue to be eligible for listing in the National Register. Under alternative C, the National Park Service would be able to continue its preservation of the Lincoln Memorial, which would remain a prominent feature of West Potomac Park and the National Mall.

VISITOR USE AND EXPERIENCE

AFFECTED ENVIRONMENT

At almost eight million visitors a year, the Lincoln Memorial is one of the most visited sites in the Park (NPS 2017). Because the Memorial is open 24 hours per day, there are visitors to the Memorial at all times. Visitation does fluctuate throughout the day and year, however. Visitation is generally the lowest in January and February, before school groups visit the Memorial from March through the beginning of June. The Cherry Blossom Festival increases visitation in March and April. May through October sees high visitation by professional tour groups, foreign visitors, and families on vacation. Visitation slows in the fall, but increases again around the Christmas and New Year's

holidays. On a day-to-day basis, visitation is generally highest in the afternoon, between 3pm and 6pm. In the spring, summer, and fall months visitation tends to stay high until between 9pm and midnight. In the winter, visitation slows earlier in the day. The overnight and morning hours see the lowest visitation levels (QEA 2017a).

Annual visitation has been increasing over the past decade (NPS 2017), and the National Park Service expects this trend to continue. Because of this high visitation, visitors often experience crowds and congestion in the chamber level and the exhibit level. The chamber level is open to the public via the main stairway 24 hours a day year-round. Visitor services such as the bookstore, elevator, and restrooms are closed overnight.

Most visitors to the Memorial arrive from the National Mall to the east or from the vehicular parking and drop-off area to the south. Visitors approach the Memorial on its east side and first experience its overall Classical appearance and landscape including the Reflecting Pool, the main stair way, and the symmetrical temple-like structure. Visitors using the stairs to reach the chamber level experience the grandeur of the entrance to the chamber level that was intended by the original design.

Access to the chamber level is also available through a single elevator located through the south door near the restrooms and interpretive space. Visitors using this accessible route travel up a ramp on either the south or north side of the approachway stairs, separated by a row of low shrubs. The ramps lead to the north and south doors, though the north door is not open to the public. Visitors are directed to enter at the south door where a single elevator is located in the exhibit level. The existing elevator is unreliable and requires frequent repairs. When the elevator is out of service for repairs, there is no accessible route to the chamber level.

Current visitor services within the exhibit level include the single elevator discussed above, restrooms, and an interpretive space. Visitors access these services through the above-mentioned south door, traversing through a vestibule. The restrooms are then located down a corridor to the left and the exhibit area and elevator are located straight ahead. Visitor circulation in the exhibit is linear and directed due to the size and layout of the space. The visitor services available are currently inadequate for the high visitation and demand on the facilities. The corridor leading to the restrooms provides some area for queuing but is not sufficient for free-flowing visitor circulation during periods of high visitation. Long queues form for the restrooms because the number of fixtures (eight toilets for women and seven toilets/urinals for men) is insufficient for the high numbers of visitors to the Memorial and the next closest restroom is approximately 0.3 mile away. In addition to crowding and over use, the restrooms and associated mechanical systems, particularly the ventilation system, are outdated and therefore require frequent repairs and maintenance. Regular cleaning and maintenance occurs daily but is challenging when restrooms are crowded.



Corridor to Existing Restrooms

An interpretive space is located in the exhibit level where visitors are able to learn additional information about the history and construction of the Memorial. This space is often crowded during periods of high visitation. Additionally, the

elevator is located off of this space, and when a queue forms, it adds to the congestion. Due to the proximity to the exhibit space, the sounds and smells from the restrooms carry through to the exhibit space, particularly during periods of high visitation.

Visitors entering the chamber level from the main stairway enter into the central statuary chamber and are presented with the statute of Lincoln in front of them. Visitors entering the chamber from the elevator enter in the south chamber, seeing a partial view of the statue first. Once in the chamber level, visitors are able to move freely and organically between the three chambers.

The bookstore in the northeast corner of the chamber is run by Eastern National and is generally open from 10am to 8pm. This retail has the highest sales volume per square foot for all of Eastern National. The store, at approximately 200 square feet, is insufficient to serve the high numbers of visitors to the Memorial. Because of its small size, it is frequently congested and the single door serving as an entrance and exit creates a circulation choke point. Staff have difficulty restocking shelves or adequately assisting customers during congested periods.



Existing Bookstore

METHODOLOGY

Potential impacts on visitor use and experience are assessed based on changes to the way people use the Park, as well as how the alternatives would alter visitors' experiences. NPS *Management Policies 2006* states that the enjoyment of park resources and values by the public is part of the fundamental purpose of all parks and that the National Park Service is committed to providing appropriate, high-quality opportunities for visitors to enjoy the parks (NPS 2006). The current conditions of visitor use and experience, as presented under the "Affected Environment" section above, were compared with the alternatives described in chapter 2 to determine the impacts on visitor use and experience.

The geographic area of analysis is the project area as described in chapter 1.

The resource-specific context for the evaluation of impacts on visitor use and experience includes the following:

- § The Lincoln Memorial has the highest level of visitation of all sites on the National Mall and sees almost 8 million visitors per year.
- § The National Park Service strives to provide universal accessibility where possible in the Park as an important part of the visitor experience. One of the objectives in the 2010 management plan for the National Mall is that the National Mall be a role model of inclusiveness and universal design for all citizens (NPS 2010).
- § One of the objectives of the 2010 management plan for the National Mall is to provide high quality visitor facilities that are sized and configured to meet visitor needs during periods of high visitation. (NPS 2010).

- § Educational opportunities are considered some of the Park's fundamental values in the 2010 National Mall management plan. Visitor education and enjoyment through learning opportunities are the focus of several objectives in that plan (NPS 2010).

IMPACTS OF ALTERNATIVE A: NO-ACTION

Impact Analysis

Because there would be no changes to the current management of the Memorial under alternative A, there would be no new impacts; however, the current trends would continue. Visitors to the Memorial would continue to experience the grand, temple-like structure from the exterior. This grand experience would continue as visitors approach the chamber level from the approachway or the adjacent ramps on the east facade. Visitors able to climb the stairs into the chamber would continue to experience the Memorial's exterior as it transitions to the chamber interior with the statue of Lincoln appearing in the center. Visitors who are unable to navigate the stairway may lose the sense of grandeur when they enter the small exhibit space to reach the elevator. The elevator would continue to be outdated, and visitors with limited mobility would continue to lose access to the chamber level when the elevator is out of service for repairs.

The intended solemn atmosphere of the chamber would continue to be diminished by the retail space located at the northeast corner of the chamber. Additionally, its location would continue to have limited visibility, and some visitors may continue to be unaware that a retail space exists at the Memorial. The small size of the retail space would continue to create congestion and would continue to limit visitors' ability to circulate freely throughout the space during times of high visitation. The single door serving as both an entrance and exit would continue to create a congestion point that may be difficult for visitors to navigate during period of high visitation. Because a continued trend of increasing annual visitation is expected, the experience of congestion related to the existing retail space would likely increase as well.

Restrooms available at the Memorial would continue to be worn out with poor ventilation. There would continue to be an insufficient number of fixtures (eight toilets for women and seven toilets/urinals for men) to meet the needs of the large number visitors to the Memorial. The restrooms may appear poorly maintained during times of high visitation because the crowds make it difficult for NPS staff to clean the restrooms. During periods of heavy congestion and use, visitors would continue to experience queueing for the restrooms in the hallway connecting to the interpretive area. Additionally, the noises from the hand dryers and toilets in the restrooms would continue to be audible from within the chamber level above. The restrooms may become more insufficient as the trend of increasing visitation continues and more visitors use the restrooms. This could result in longer queues, more congestion, and more difficulty for NPS staff to clean the restrooms during periods of high visitation.

In the interpretive area, visitors would continue to have the opportunity to learn more about the Memorial's history through the interpretive exhibits. During periods of peak visitation, however, visitors in the interpretive area would continue to experience crowding due to its relatively small size for the level of visitation. In addition, the crowded interpretive area may be exacerbated by visitors queueing for the single elevator. Visitors in the interpretive area may continue to experience the sounds and smells from the restroom that would continue to drift into the area. Overall, crowding in the small interpretive space would continue to result in a diminished visitor experience during

periods of high visitation. The visitor experience may continue to diminish as the trend of increased visitation to the Memorial continues, which could lead to an increase in congestion during periods of heavy visitation.

Under alternative A, there would continue to be no opportunities for visitors to the Memorial to experience the expansive undercroft on which the Memorial sits. Although this would not be an adverse impact, it would continue to be a missed opportunity for an expanded visitor experience of the Memorial.

Cumulative Impacts

Although other past, present, and reasonably foreseeable future actions may affect visitor use and experience in the area, the no action alternative would have no new impacts on visitor use and experience and therefore would not contribute to the effects of other actions. Consequently, there would be no cumulative impacts to visitor use and experience under the no action alternative.

Conclusion

Under alternative A, visitors would continue to experience the Memorial's architecture, appearance, and setting within the National Mall. Opportunities for visitor enjoyment and passive recreation would continue to be provided at the Memorial in the existing condition. The National Park Service would continue to provide an accessible route to the chamber level when the elevator is in service. However, when the elevator is out of service for repairs, accessibility to the chamber level would be limited. Under alternative A, the National Park Service would continue to provide restrooms for visitors to the Memorial, although they would continue to be inadequate in terms of size and configuration for the heavy use during periods of high visitation. Although these services would continue to be available for visitors, these limitations would continue to result in difficulty for the National Park Service to fully meet the objectives in the 2010 National Mall management plan related to universal design and high-quality visitor facilities.

Educational and interpretive opportunities would continue to be available to the public through the Memorial itself, the interpretive space on the exhibit level, and through the availability of rangers at the Memorial during certain periods. Due to the size of the interpretive space, the National Park Service is limited in the types of educational and interpretive exhibits that can be made available for the public. Additionally, the small size would continue to result in a crowded experience of the exhibit level, particularly during periods of heavy visitation. Under alternative A, the National Park Service would continue to provide opportunities for visitor education and enjoyment throughout the Memorial through the existing exhibits and facilities. However, the existing facilities would continue to result in missed opportunities to expand these visitor experiences and provide a more accessible experience for visitors.

IMPACTS OF ALTERNATIVE B

Impact Analysis

Under alternative B, the visitor experience of the Lincoln Memorial would be greatly improved when compared to the no-action alternative and the existing conditions.

Visitors approaching the chamber level via the main stairway would have the same grand experience as they would under the no-action alternative. However, visitors requiring the elevator to reach the chamber level would have an improved experience. These visitors would enter the exhibit level through double doors opening into a vestibule, which would be more easily navigated during periods of high visitation because two visitors can pass through the doors simultaneously. Once inside, visitors in either the north or south lobby areas would experience nearly three times more space to freely circulate than the space currently provided (see figure 9 above). The route to the elevator would be very clear because it would be directly ahead of the door entering into the lobby space. Because there would be two elevators, wait times for the elevator would likely be less than the existing, even during periods of high visitation. Additionally, if an elevator is out of service for repairs, accessibility to the chamber level would be available due to the redundancy of elevators. Visitors travelling to the elevator from the north or south vestibule would be able to see glimpses of the undercroft between the columns and, if desired, would be able to experience the cathedral-like space of the undercroft before travelling up to the chamber. This would provide an experience of entering an important, grand space even before reaching the chamber level. Even without stopping at any exhibits, visitors requiring the elevator would be able to begin their experience of the Memorial through the exposed concrete columns and glimpses of the undercroft within view, which would be a direct beneficial impact on their experience, particularly when compared with the no-action alternative.

The visitor experience of the chamber level would be mostly the same as the no-action alternative, but the removal of the retail space from the chamber level would return some of the solemn atmosphere that has been lost with the existing retail space location. Visitor circulation would also change somewhat with the addition of the north elevator. This would allow visitors requiring the elevator more circulation options when arriving at or exiting from the chamber to the exhibit level.

The proposed restrooms would result in a direct beneficial impact on the visitor use and experience because there would be more than double the number of restroom fixtures available to serve visitors, resulting in less wait time and shorter queues during periods of high visitation. Updated and improved ventilation systems for the restrooms would result in a more comfortable experience than in the existing restrooms. The proposed family restrooms would also be beneficial for visitors not comfortable using the regular restrooms or for those who need more space for wheelchairs or assisting others. Because the restrooms would be duplicated on both the north and the south, visitors would experience restrooms that are properly maintained and cleaned because NPS staff would be able to close a restroom for cleaning as needed throughout the day. The location of the restrooms and the larger lobby area would provide an increased area for queuing if needed, and would have adequate space for free-flowing visitor circulation to and from the restrooms (see figure 9 above).

The relocated bookstore in the exhibit level would result in an improved visitor experience over the existing bookstore. At more than nine times the size of the existing bookstore, the larger space would allow better visitor circulation and flow into, out of, and throughout the store. Because there are two doors on opposite sides of the retail space, it is less likely that a congestion point would form at the doors. The larger space and dedicated storage room would also allow the bookstore staff to stock a wider variety of items, which may be desirable to visitors wanting to purchase souvenirs. The proposed bookstore would allow employees to better assist customers and restock shelves as needed because there would be space to navigate around customers and displays.

The proposed interpretive space with the glass curtain wall exposing the undercroft would provide a new visitor experience at the Memorial. The glass curtain wall and associated viewing platform and tiered seating would allow visitors to view a large portion of the undercroft and understand its

expansive space. The seating and viewing platform would allow visitors to view the undercroft comfortably and from different levels. Because the interpretive space under alternative B facilitates different types of exhibits, it would allow visitors to explore different themes in a number of different ways. This could be beneficial because it may allow visitors to experience a deeper dive into the content, or it may allow a visitor to experience the content in a manner in which they find most engaging. Because the areas outside of the designated interpretive area would be thematically connected to the space through small-scale media, visitors would be able to experience a part of the Memorial story anywhere they are in the exhibit level. The openness of the interpretive area into the connecting lobby areas would allow for free-flowing visitor circulation and would limit the amount of congestion points formed during periods of high visitation.

The reconfigured NPS operations spaces (back of house spaces) would improve the visitor experience overall because NPS staff would be able to respond to visitor needs and maintenance issues in an efficient and timely manner.

Temporary closures for construction would result in a direct, adverse impact on visitors because they would not be able to access the restrooms, interpretive space, retail space, or elevators during that time. When the elevators are closed, visitors who cannot climb the stairs would be unable to visit the chamber level, which is the prominent experience of the Memorial. Therefore, being excluded from the chamber level would be an adverse impact on the experience for visitors requiring an elevator. Temporary restrooms and/or retail space may be made available nearby during the closure to mitigate some adverse impacts. Additionally, during construction, visitors would experience the sounds of construction equipment throughout the Memorial and its grounds, which would detract from the character and intended solemnity. Construction equipment would also be a visual distraction on the west side of the Memorial; however, the visual impacts would be limited to the rear of the Memorial and would not detract visually from the prominent east façade or chamber level of the Memorial. Construction and related closures would be expected to last about 24 months.

Cumulative Impacts

Other past, present, and reasonably foreseeable actions that would have impacts on visitor use and experience include the Thomas Jefferson Memorial Targeted Accessibility Improvement Program and the Washington Monument Security Screening Building Project. These projects would result in adverse impacts on visitor use and experience due to construction activities and closures, which are expected to overlap somewhat. During construction closures, these prominent landmarks at the Park and in the monumental core of Washington, DC would be inaccessible to visitors. The Washington Monument would be completely closed and visitors would be unable to experience the vast views of Washington, DC and surrounding areas that are available at the top of the monument. The Jefferson Memorial would be closed on the interior. Although the Jefferson Memorial chamber level (where the statue of Thomas Jefferson is located) would be open, there would be no elevator access to that level, prohibiting some visitors from experiencing it. The presence of construction equipment and materials for these projects in the Park would also result in visual detractions on the appearance and feeling of the landscape experienced by visitors.

When complete, these projects would result in beneficial impacts on visitor use and experience for visitors to the Park. The Jefferson Memorial accessibility project would provide an accessible experience for all visitors. Improvements would include improved accessible routes to the interior and chamber level from both the designated accessible parking area and the Tidal Basin as well as accessible interpretive elements such as videos, audio descriptions, and tactile exhibits. At the

Washington Monument, the new security screening building would provide permanent security screening building that replaces the existing temporary building. The new building would improve visitor security and visitor flow through the screening process over the existing facility. The design of the building would also preserve the aesthetic and feeling of the memorial as the visitor experiences it to the extent practicable and would be an aesthetic improvement over the existing structure.

Under alternative B, the construction activities and closure at the Lincoln Memorial would contribute to the adverse impacts of the other actions related to construction activities and closures. Because the construction timeframes for all three landmarks are expected to overlap, visitors to the Park during this time would be unable to experience portions of three of the park's most prominent landmarks. Once complete, however, the beneficial impacts of improved accessibility and interpretive experiences at the Lincoln Memorial would greatly contribute to the beneficial impacts of the other actions related to visitor experience in the Park. When considered with the actions identified above, the beneficial impact of improved visitor services and accessibility at these three prominent landmarks would outweigh the adverse impacts of construction activity and closures because these projects would allow for visitors of all abilities to have improved experiences for the foreseeable future. Therefore, the overall cumulative impact on the visitor use and experience would be greatly beneficial.

Conclusion

Under alternative B, the visitor experience of the Memorial would be substantially improved over the existing conditions and when compared to the no-action alternative. The installation of a second elevator to the chamber level would improve the reliability of universal accessibility, would meet the NPS goal of providing universal accessibility, and would provide a more inclusive and accessible experience for all visitors. The increase in restrooms, including duplicating facilities, increasing the number of fixtures, and providing family restrooms would provide improved visitor comfort when compared to the existing conditions. These restrooms, including their layout and the NPS ability to clean and maintain them throughout the day, would meet the objective to provide high-quality visitors facilities that are sized and configured to meet visitor needs during periods of high visitation. While queues would likely still form for the restrooms during periods of the heaviest visitation, ample space would be available for visitor circulation and queueing.

Educational and interpretive opportunities would be expanded under alternative B through the larger interpretive area and creation of the undercroft viewing area. These expanded opportunities would greatly improve the overall experience of the Memorial because visitors would have the opportunity to learn not only about Lincoln but about the importance of the Memorial itself, such as the construction methods and the site's relationship to other landmarks in Washington, DC. This would provide a more holistic understanding of the Memorial and would allow visitors new opportunities to have a meaningful experience. Visitors would be able to have new experiences at the Memorial and would have more opportunities for education and enjoyment through varying types of exhibits. This would maintain and improve the Park's fundamental value of educational opportunities throughout the National Mall. The removal of the retail space from the chamber level would also improve the visitor experience of the chamber level because it would reduce conflicts with the intended solemnity and visitors would better be able to focus on the statuary chamber and reflect on its solemn atmosphere.

Although crowding and congestion would continue to occur at the Memorial during periods of high visitation, alternative B would allow the National Park Service to better accommodate the high

number of visitors, which would substantially improve the overall visitor use and experience of the Memorial. Visitors would experience more space to circulate and queue at the restrooms, retail space, and exhibit space, which would reduce conflicts among visitors trying to use the space. This would improve the overall comfort of visitors and allow visitors to have a meaningful experience of the exhibits with reduced distractions related to navigating throughout the space.

IMPACTS OF ALTERNATIVE C

Impact Analysis

Alternative C would result in direct, beneficial impacts on the visitor experience because of the improvements proposed.

The experience of the chamber level, including the retail space, would be the same as described under the no-action alternative. The impacts of retaining only a single elevator would also be the same as under the no-action alternative. However, visitors requiring the elevator to reach the chamber level would have an improved experience over the no-action because visitors entering through the south door would experience a larger lobby area with approximately one and a half times more space to circulate than compared to the existing. Visitors travelling to the elevator would be able to see glimpses of the undercroft in the picture window between the columns, although the picture window would provide less of an opportunity to glimpse the undercroft than the full glass curtain wall proposed under alternative B. If desired, visitors requiring the elevator would be able to experience the cathedral-like space of the undercroft by viewing it through the picture window before travelling up to the chamber. This would provide an experience of entering an important, grand space even before reaching the chamber level. Even without stopping at the exhibits, visitors requiring the elevator would be able to begin their experience of the Memorial through the exposed concrete columns and glimpses of the undercroft space within view, which would be a direct, beneficial impact on their experience, particularly when compared with the no-action alternative. However, because the interpretive space would be about the same size as the existing, visitors would continue to experience congestion during periods of high visitation. This would be most likely to occur at the picture window, which may create a congestion point during crowded periods.

The larger and renovated restrooms would provide an improved visitor experience because there would be more fixtures to serve the high number of visitors. Queues for the restrooms would likely continue to form during periods of high visitation, but the proposed layout for the lobby and restrooms would allow for better visitor circulation than the no-action alternative. The proposed family restrooms would also be beneficial for visitors not comfortable using the regular restrooms or for those who need more space for wheelchairs or assisting others.

Temporary closures for construction would result in a direct, adverse impact on visitors because they would not be able to access the restrooms, interpretive space, retail space, or elevators during that time. However, as under alternative B, temporary restrooms and/or retail space may be made available nearby during the closure. This closure would be expected to last the duration of construction, about 14 months.

Cumulative Impacts

Other past, present, and reasonably foreseeable actions that would have impacts on visitor use and experience include the Thomas Jefferson Memorial Targeted Accessibility Improvement Program

and the Washington Monument Security Screening Building Project. These projects would result in adverse impacts on visitor use and experience due to construction activities and closures, which are expected to occur in part at the same time. However, when complete, these projects would result in beneficial impacts on visitor use and experience for visitors to the Park for the foreseeable future. These impacts are described under alternative B.

Under alternative C, the construction activities and closure at the Lincoln Memorial would contribute to the adverse impacts of the other actions related to construction activities and closures, although for a shorter timeframe than alternative B. Because the construction timeframes for all three landmarks are expected to overlap, visitors to the Park during this time would be unable to experience all or portions of three of the park's most prominent landmarks. Once complete, however, the beneficial impacts of improved accessibility and interpretive experiences at the Lincoln Memorial would contribute to the beneficial impacts of the other actions related to visitor experience in the Park, although to a lesser extent than under alternative B. When considered with the actions identified above, the beneficial impact of improved visitor services and accessibility at these three prominent landmarks would outweigh the adverse impacts of construction activity and closures because these projects would allow for visitors of all abilities to have improved experiences for the foreseeable future. Therefore, the overall cumulative impact on the visitor use and experience would be primarily beneficial.

Conclusion

Under alternative C, the visitor experience at the Memorial would be improved over the existing conditions and when compared to the no-action alternative. However, the visitor experience would not be improved as greatly as it would under alternative B. Because there would continue to only be one elevator, alternative C would continue to limit the ability of National Park Service to provide reliable universal accessibility to the chamber level. If the elevator is down for repairs, some visitors would be unable to have the prominent experience of visiting the chamber level, resulting in adverse impacts on those individuals. Therefore, alternative C would not meet the NPS goal to provide universal accessibility wherever possible in the Park or of being a model of inclusiveness and universal design for all citizens. The creation of more restroom fixtures in an improved layout, including the addition of family restrooms, would allow for improved visitor comfort and circulation at the restrooms. These restrooms would be up-to-date and would accommodate more visitors than the current configuration, but the increase in number of fixtures would be relatively small when compared to the high demand during periods of high visitation. Additionally, because there would continue to be a single set of restrooms, NPS staff would continue to have difficulty cleaning and maintaining them throughout the day because they cannot be closed for a thorough cleaning. Though these restrooms would provide improved visitor facilities, they would not fully meet the goal of providing facilities that are sized to meet visitor needs during periods of high visitation.

Educational and interpretive opportunities would be expanded through the addition of the picture window into the undercroft. This would provide a new experience for visitors to the Memorial and would be compatible with the fundamental value of the Park related to providing educational opportunities. The expanded opportunities would improve the overall experience of the Memorial because visitors would have the opportunity to learn not only about Lincoln but about the importance of the Memorial itself, including the methods of construction. This would provide a more holistic understanding of the Memorial and would allow visitors new opportunities to have a meaningful experience. However, as under the no-action alternative, the size of the interpretive space would limit the types of educational and interpretive exhibits that can be made available for

the public. The small size would continue to result in a crowded experience of the exhibit level, particularly during periods of heavy visitation. This would continue to result in adverse impacts on the visitor experience because the difficulty some visitors may have navigating the small space would be a distraction to a meaningful experience at the Memorial.

Although crowding and congestion would continue to occur at the Memorial during periods of high visitation, alternative C would allow the National Park Service to better accommodate the high number of visitors and provide new educational opportunities over the existing conditions. This would benefit the overall visitor use and experience of the Memorial, although this benefit would be of a lesser intensity than under alternative B.

SUMMARY OF ENVIRONMENTAL CONSEQUENCES

Table 2 below summarizes the impacts of each alternative on the impact topics analyzed in this environmental assessment. These impacts are described in greater detail under their respective headings in the “Affected Environment and Environmental Consequences” chapter. Figure 19 below shows a comparison of the visual impacts of the proposed changes to the egress doors across all alternatives.

TABLE 2. SUMMARY OF ENVIRONMENTAL CONSEQUENCES

| Impact Topic | Alternative A: No Action | Alternative B: Proposed Action and NPS Preferred | Alternative C: Improve Existing |
|--|---|--|---|
| Historic Structures and Cultural Landscapes | There would be no changes to the structure or the landscape; therefore, there would be no impacts. | Larger doors would change appearance of historic structure and cultural landscapes. New doors would require removal of character-defining existing doors. Visitor circulation would change slightly as the public would use both the north and south doors to enter and exit exhibit level. Retail space would be removed from chamber, which would remove existing detractor from character. Expanded exhibit space would require removal of historic material and addition of modern material. Much of the overall character and appearance of undercroft would remain. Construction would last approximately 24 months. | Larger doors would change appearance of historic structure and cultural landscapes, though less than alternative B. New doors would require removal of character-defining existing doors. Retail space in chamber would continue to detract from historic character. Expanded exhibit space would require removal of historic material and addition of modern material, though less than alternative B. Majority of the overall character and appearance of undercroft would remain. Construction would last approximately 14 months. |
| Visitor Use and Experience | Accessibility to chamber would be unreliable and limited to one elevator. Experience of the chamber level would be unchanged. Retail space would continue to be crowded and inadequate in size to properly serve customers. Restrooms would continue to be crowded and require frequent maintenance. Visitors may experience restrooms that appear poorly maintained due to limited opportunity for NPS staff to clean them throughout the day during periods of high visitation. Interpretive space would continue to be crowded and limited in types of exhibits and experiences. | Redundant elevators and larger exterior doors would improve accessibility and would be reliable. Without bookstore, solemn atmosphere of chamber level would be restored. Retail space would be in central location and large enough for easy circulation and restocking of shelves. Restrooms would serve substantially more visitors and redundant facilities allow NPS to properly maintain them throughout the day. Expansive view of undercroft would provide new experience to visitors. Large interpretive space would allow for varying types of exhibits and experiences. | Same as Alternative A with the following differences: <ul style="list-style-type: none"> § Additional restroom fixtures and family restrooms would serve more visitors. § Reconfigured lobby and restrooms would provide space for improved visitor circulation. § Portion of the undercroft would be visible in the interpretive space, which would create a new experience for visitors. |

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Alternative A: Existing Doors



Alternative B: 72-Inch Doors



Alternative C: 36-Inch Doors

4

CONSULTATION AND COORDINATION

Director's Order 12: *Conservation Planning, Environmental Impact Analysis, and Decision-making* requires the National Park Service to make "diligent" efforts to involve the interested and affected public in the National Environmental Policy Act process. This process, known as scoping, helps to determine the important issues and eliminate those that are not; allocate assignments among the interdisciplinary team members and/or other participating agencies; identify related projects and associated documents; identify other permits, surveys, consultations, etc. required by other agencies; and create a schedule that allows adequate time to prepare and distribute the environmental document for public review and comment before a final decision is made. This chapter documents the agencies and tribes consulted, summarizes the public scoping process, and includes a list of preparers for the document.

AGENCY AND TRIBAL CONSULTATION

During the scoping period, the National Park Service contacted the following agencies and tribes for consultation: the Advisory Council on Historic Preservation, the US Commission of Fine Arts, the National Capital Planning Commission, the DC State Historic Preservation Officer, and the Delaware Nation. The National Park Service also notified these agencies and tribe of the intent to initiate consultation under NHPA Section 106 and that Section 106 compliance would be conducted separately but concurrently to the NEPA process. The National Park Service notified these agencies that Section 106 compliance would be completed concurrently with but separately from this environmental assessment.

The National Park Service continued consultation with these agencies and other interested parties throughout the alternatives development process. A consulting parties meeting was held on July 24, 2017, to present information about the proposed improvements and gather feedback from the consulting parties. Of particular consideration by these parties was the proposed widening of the doors on the east façade. Consulting parties understood that the changes to the historic façade required for the proposed widening of the door was necessary to improve accessibility and provide appropriate visitor services at the Memorial. Materials presented at this meeting as well as relevant correspondence to and from consulting parties are available on the Park's Planning, Environment and Public Comment (PEPC) website at <https://parkplanning.nps.gov/LincolnMemorialRehab>. The National Park Service will provide a copy of this environmental assessment to these parties and others as appropriate. The National Park Service will continue to coordinate with these agencies,

commissions, and tribe as needed throughout the project. See appendix A for copies of relevant pieces of correspondence between the National Park Service and these parties.

PUBLIC SCOPING

Public scoping was initiated to provide information to and gather feedback from the public regarding the proposed Lincoln Memorial rehabilitation project. The National Park Service held an open public comment period from June 7, 2017, to July 10, 2017, and a public open house was held on June 27, 2017. Seven people attended the meeting. The project information presented at the meeting was also posted to the Park's PEPC website at <https://parkplanning.nps.gov/LincolnMemorialRehab>. During the open comment period, a total of 11 pieces of correspondence were received.

LIST OF PREPARERS

PREPARERS

| VHB | | |
|--------------------|------------------------------|---|
| Tracy Littell | Project Manager | Guidance of the NEPA process, document review, and project management |
| Erin Leatherbee | Preservation Planner | Document preparation |
| Jennifer Morrissey | Senior Environmental Planner | Document review |
| Margaret Beavers | Environmental Scientist | Graphics and GIS analysis |

| Quinn Evans Architects | | |
|------------------------|-------------------|--------------------------|
| Beth Barrett | Project Architect | Alternatives Development |
| Thalia Chrousos | Project Architect | Alternatives Development |

CONTRIBUTORS AND REVIEWERS

| National Mall and Memorial Parks | |
|----------------------------------|--------------------------------|
| Cassius Cash | Acting Superintendent |
| Sean Kennealy | Chief of Professional Services |
| Catherine Dewey | Chief of Resource Management |
| Audrey Tepper | Historical Architect |

| National Capital Region | |
|-------------------------|---|
| Joel Gorder | Regional Environmental Coordinator |
| Tammy Stidham | Chief of Planning and Compliance |
| Kathryn Smith | National Historic Landmarks and National Register Coordinator |

| Denver Service Center | |
|-----------------------|------------------------------|
| Mike Giller | Project Manager |
| Elaine Rideout | Natural Resource Specialist |
| Greg Cody | Cultural Resource Specialist |

PUBLIC REVIEW

The environmental assessment will be on formal public and agency review for 30 days and has been distributed to a variety of interested individuals, agencies, and organizations. It also is available on the internet at <https://parkplanning.nps.gov/LincolnMemorialRehab>, and hard copies are available at the Park's headquarters.

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REFERENCES

Federal Emergency Management Agency

- 2010 Flood Insurance Rate Map, District of Columbia, Washington, DC. Map Number 1100010018C. Revised September 27, 2010.

National Park Service (NPS)

- 1973 National Register of Historic Places Inventory Nomination Form for East and West Potomac Park Historic District.
- 1981 National Register of Historic Places Inventory Nomination Form for Lincoln Memorial.
- 1995 *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes*. Available at <http://www.nps.gov/tps/standards/four-treatments/landscape-guidelines/index.htm>. Accessed December 28, 2015.
- 1999 *Cultural Landscape Report, West Potomac Park, Lincoln Memorial Grounds, National Capital Parks Central, Part I: Site History, Analysis and Evaluation and Design Guidelines*. Washington, DC. August 1999.
- 2002 Director's Order 28: *Cultural Resource Management Guideline*. NPS Office of Policy.
- 2006 *NPS Management Policies 2006*.
- 2010 *Final National Mall Plan/Environmental Impact Statement, Volume I*.
- 2011 Director's Order 12: *Conservation Planning, Environmental Impact Analysis, and Decision-making*. NPS Office of Policy.
- 2015 *NEPA Handbook*. September 2015.
- 2017 Annual Park Recreation Visitation for Lincoln Memorial. Available at <https://irma.nps.gov/Stats/Reports/Park/LINC>. Accessed August 31, 2017.

Quinn Evans Architects (QEA)

- 2017a Lincoln Memorial Rehabilitation – Undercroft Schematic Design Report.
- 2017b Historic Structure Assessment Report, Lincoln Memorial, Final Review Draft.

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APPENDIX A: RELEVANT CORRESPONDENCE

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United States Department of the Interior



NATIONAL PARK SERVICE

National Mall and Memorial Parks
900 Ohio Drive, S.W.
Washington, D.C. 20024-2000

March 17, 2017

Mr. David Maloney
State Historic Preservation Officer
District of Columbia, Office of Planning
1100 4th Street SW, Suite E650
Washington D.C. 20024

Subject: State Historic Preservation Office Consultation for the Lincoln Memorial Rehabilitation,
National Mall and Memorial Parks, Washington, DC

Dear Mr. Maloney:

The National Park Service (NPS), National Mall and Memorial Parks (NAMA) wishes to initiate consultation with the District of Columbia (DC SHPO) under Section 106 of the National Historic Preservation Act regarding the rehabilitation of the Lincoln Memorial, in accordance with 36 CFR 800.3 of the regulations of the Advisory Council on Historic Preservation.

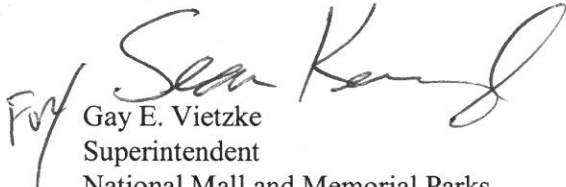
The Lincoln Memorial is a legislated unit of the NPS that is part of the National Mall and Memorial Parks (NAMA). It commemorates one of the most venerated presidents in American history. Designed by architect Henry Bacon (1866-1924) and constructed between 1914 and 1922, the memorial takes the form of a Greek temple and features a portrait sculpture of the Great Emancipator by Daniel Chester French. Located on a site identified by the McMillan Commission in its 1901-02 plan for Washington, the memorial occupies a primary position at the west end of the monumental core on axis with and in visual relation to the U.S. Capitol, the Grant Memorial, the Washington Monument, and the Arlington Memorial Bridge. The purpose of this project is to rehabilitate the Lincoln Memorial for its centennial in 2022. This project will include the rehabilitation of the undercroft portion of the Lincoln Memorial and improvements to the existing visitor services on the mezzanine level, which will include accessibility enhancements and expanded visitor interpretation and NPS service-related spaces. Exterior work will also be completed and include repairs to the brick masonry and marble joints and improvements to the landscaping adjacent to the memorial.

In accordance with the National Environmental Policy Act of 1969 (NEPA), the NPS will prepare an Environmental Assessment (EA) to identify alternatives and analyze impacts potentially resulting from the rehabilitation of the Lincoln Memorial. Concurrent to the NEPA process, the NPS will conduct consultation under Section 106 of the National Historic Preservation Act of 1966 (NHPA). The NPS plans to consult with the public per 36 CFR 800.3(e) by holding public informational meetings and through its Planning, Environment, and Public Comment website (<https://parkplanning.nps.gov/projectHome.cfm?projectId=66405>). The NPS anticipates that these outreach efforts will accommodate the requirements of both NEPA and the Section 106 process.

The draft Area of Potential Effect (APE) is bounded by Lincoln Memorial Circle, NW, Daniel French Drive, Independence Avenue, and 23rd Street. The draft APE encompasses the Lincoln Memorial and is situated within the National Mall (1981, revised 2016) and East and West Potomac Parks (1973, revised 2001) National Register Historic Districts. We are also aware that this project may affect other National Register eligible or listed properties.

Enclosed find the relevant plans and supporting documentation that identifies the location of the APE and additional details of the project. If you have any questions, please do not hesitate to contact Catherine Dewey, Chief of Resource Management, at catherine_dewey@nps.gov.

Sincerely,


Gay E. Vietzke
Superintendent
National Mall and Memorial Parks
Attachment



United States Department of the Interior

NATIONAL PARK SERVICE

National Mall and Memorial Parks
900 Ohio Drive, S.W.
Washington, D.C. 20024-2000



March 17, 2017

Ms. Nekole Alligood
Cultural Preservation Director
Delaware Nation
P.O. Box 825
Anadarko, OK 73005

Subject: Tribal consultation for the Lincoln Memorial Rehabilitation, National Mall and Memorial Parks, Washington, DC

Dear Ms. Alligood:

The National Park Service (NPS), National Mall and Memorial Parks (NAMA) wishes to initiate consultation with the Delaware Nation under Section 106 of the National Historic Preservation Act regarding the rehabilitation of the Lincoln Memorial, in accordance with 36 CFR 800.3 of the regulations of the Advisory Council on Historic Preservation.


The Lincoln Memorial is a legislated unit of the NPS that is part of the National Mall and Memorial Parks (NAMA). It commemorates one of the most venerated presidents in American history. Designed by architect Henry Bacon (1866-1924) and constructed between 1914 and 1922, the memorial takes the form of a Greek temple and features a portrait sculpture of the Great Emancipator by Daniel Chester French. Located on a site identified by the McMillan Commission in its 1901-02 plan for Washington, the memorial occupies a primary position at the west end of the monumental core on axis with and in visual relation to the U.S. Capitol, the Grant Memorial, the Washington Monument, and the Arlington Memorial Bridge. The purpose of this project is to rehabilitate the Lincoln Memorial for its centennial in 2022. This project will include the rehabilitation of the undercroft portion of the Lincoln Memorial and improvements to the existing visitor services on the mezzanine level, which will include accessibility enhancements and expanded visitor interpretation and NPS service-related spaces. Exterior work will also be completed and include repairs to the brick masonry and marble joints and improvements to the landscaping adjacent to the memorial.

In accordance with the National Environmental Policy Act of 1969 (NEPA), the NPS will prepare an Environmental Assessment (EA) to identify alternatives and analyze impacts potentially resulting from the rehabilitation of the Lincoln Memorial. Concurrent to the NEPA process, the NPS will conduct consultation under Section 106 of the National Historic Preservation Act of 1966 (NHPA). The NPS plans to consult with the public per 36 CFR 800.3(e) by holding public informational meetings and through its Planning, Environment, and Public Comment website (<https://parkplanning.nps.gov/projectHome.cfm?projectId=66405>). The NPS anticipates that these outreach efforts will accommodate the requirements of both NEPA and the Section 106 process.

The draft Area of Potential Effect (APE) is bounded by Lincoln Memorial Circle, NW, Daniel French Drive, Independence Avenue, and 23rd Street. The draft APE encompasses the Lincoln Memorial and is situated within the National Mall (1981, revised 2016) and East and West Potomac Parks (1973, revised 2001) National Register Historic Districts. The NPS understands that the Delaware Nation has an interest in the preservation of Native American cultural resources of significance in this region of the country. While no pre-contact or contact period archeological sites with Native American components have been identified at the Lincoln Memorial, given its location, the potential for sites exists. Your input will allow us to comprehensively address all potential impacts as the planning process moves forward.

Enclosed find the relevant plans and supporting documentation that identifies the location of the APE and additional details of the project. If you have any questions, please do not hesitate to contact Catherine Dewey, Chief of Resource Management, at catherine_dewey@nps.gov.

Sincerely,

For 

Gay E. Vietzke
Superintendent
National Mall and Memorial Parks
Attachment

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



April 13, 2017

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

RE: Initiation of Section 106 Consultation for the Rehabilitation of the Lincoln Memorial

Dear Ms. Gay:

Thank you for initiating consultation with the District of Columbia State Historic Preservation Officer (SHPO) regarding the above-referenced undertaking. We have reviewed the project submittal and are writing to provide our initial comments in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

We understand that the National Park Service (NPS) proposes to rehabilitate the Lincoln Memorial in time to celebrate the historic property's centennial in 2022. Exterior work appears to be limited to the repair of brick masonry and marble joints and to landscape improvements while interior work relating to accessibility, visitor interpretation and NPS service-related spaces will extend to the undercroft and existing visitor services on the mezzanine. We look forward to receiving more detailed project information as soon as it becomes available.

Once we receive a more specific scope of work, we will be better able to comment on the draft Area of Potential Effect (APE) that the NPS has prepared for the project. At this time, it appears that the draft *may* be too narrowly focused – especially in terms of indirect effects (e.g. visual effects) that may occur within the historic districts that surround the Memorial on all sides – but final decisions will depend upon the type of work that is carried out.

If you should have any questions or comments regarding any of this matter, please contact me at andrew.lewis@dc.gov or 202-442-8841. Otherwise, we look forward to consulting further with NPS and all other parties regarding the effects of this undertaking on historic properties.

Sincerely,

A handwritten signature in blue ink that reads 'Andrew Lewis'.

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

17-0518



Executive Director's Recommendation

Commission Meeting: July 13, 2017

| | |
|--|--|
| PROJECT Lincoln Memorial Restoration Lincoln Memorial 2 Lincoln Memorial Circle, NW Washington, DC | NCPC FILE NUMBER 7866 NCPC MAP FILE NUMBER 1.43(73.10)44522 |
| SUBMITTED BY United States Department of the Interior National Park Service | APPLICANT'S REQUEST Approval of comments on concept design |
| REVIEW AUTHORITY Federal Projects in the District per 40 U.S.C. § 8722(b)(1) and (d) | PROPOSED ACTION Approve with comments on concept design |
| | ACTION ITEM TYPE Staff Presentation |

PROJECT SUMMARY

The National Park Service (NPS) is seeking comments on a concept design for the widening of existing door widths at the Lincoln Memorial, as part of a larger rehabilitation project in the memorial undercroft and the memorial chamber. The Lincoln Memorial is located in West Potomac Park on the western end of the National Mall. The two existing doors are on the east façade of the Lincoln Memorial, at the ground terrace level, flanking the center stairs of the approach way leading to the memorial chamber. The south door provides public access to the current visitor services space in the undercroft, including restrooms, an exhibit space, and the only elevator to the memorial chamber. The north door does not have public access.

The concept design proposes to improve the visitor's experience at the Lincoln Memorial by providing enhanced functional and Architectural Barriers Act Accessibility Standards (ABAAS) compliant entrances to the visitor services space located in the memorial undercroft by widening the two existing doors at the ground terrace level. NPS has submitted three design options of varying door widths for Commission comment.

KEY INFORMATION

- Designed to honor the 16th president of the United States of America, Abraham Lincoln, the Lincoln Memorial was constructed starting in 1914, and completed and dedicated in 1922. Architect Henry Bacon designed the memorial to resemble a classical Greek temple, with 36 fluted Doric columns encircling the exterior, and a main chamber for the sculpture of President Lincoln. The Lincoln Memorial was listed in the National Register of Historic Places in 1966.
 - The Lincoln Memorial receives eight million visitors a year, with each year surpassing the previous in number of visitors.
-

- The current restroom facilities and exhibit space located within the undercroft are insufficient to meet the needs of visitors. Only one elevator currently provides access to the chamber from the undercroft visitor services area.
 - In 2016, NPS received an \$18.5 million donation from a local philanthropist to assist in the rehabilitation efforts at the Lincoln Memorial, focusing on improving the interpretive experience for the memorial's visitors.
 - Much of the rehabilitation work will occur in the memorial undercroft, consisting of increasing the restroom capacity and a secondary elevator to the chamber, expanded exhibition space, and providing visual access to the undercroft, and relocating the bookstore and retail space from the chamber to the undercroft.
 - NPS has submitted three design options for consideration by the Commission for increasing the two door widths to improve compliance with ABAAS to the memorial undercroft visitor services space. The first option increases the width to 36 inches clearance, with a single door. The second option increases the width to 50 inches, with two paired doors. A third option increases the width to 72 inches with two paired doors.
-

RECOMMENDATION

The Commission:

Supports the applicant's proposal to increase the existing door widths at the ground terrace level of the Lincoln Memorial's east elevation, to allow increased accessibility and functionality to the rehabilitated and expanded visitor services areas located in the memorial undercroft.

Notes the existing doors were not original to the design and added in 1927, with the south door altered in 1977 to its current width of three feet nine inches, with a clearance of two feet nine and half inches. The north door has a width of three feet, with a clearance of two feet five and a half inches.

Notes the south door currently provides the single source of public entry to the visitor services area located in the memorial undercroft and does not meet accessibility requirements.

Finds the 50 inch concept option achieves the desired accessibility and functional program requirements of the NPS, while minimizing loss of historic fabric and visual impacts.

Finds the 50 inch concept option would allow two visitors to simultaneously use the expanded doors to the visitor service area in the memorial undercroft.

Recommends the applicant continue to explore the benefits and challenges of widening the two doors to 50 inches while minimizing loss of the surrounding historic fabric, and minimal changes to the visual impact to the Lincoln Memorial.

PROJECT REVIEW TIMELINE

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| | |
| Remaining actions (anticipated) | Review of preliminary and final site development plans for the door alterations. |

PROJECT ANALYSIS

Executive Summary

Staff has evaluated the concept proposal for the widening of the two existing doors to the Lincoln Memorial undercroft by determining its consistency with the relevant policies within the *Comprehensive Plan for the National Capital* and the *National Mall Plan*. Staff has found the proposed improvements are consistent with the Plans and the Act and will improve the visitor experience at the memorial. Therefore, staff recommends the **Commission supports the applicant's proposal to increase the existing door widths at the ground level of the Lincoln Memorial, to allow increased accessibility and functionality to the rehabilitated and expanded visitor services areas located in the memorial undercroft.** Further staff suggests the **Commission recommend the applicant continue to explore the benefits and challenges of widening the two doors to 50 inches in a manner resulting in the minimal loss of the surrounding historic fabric, and minimal changes to the visual impact to the Lincoln Memorial.**

Analysis

As indicated previously, NPS seeks to increase the widths of the two existing ground level door entrances to the Lincoln Memorial undercroft, in order to meet accessibility requirements and improve the function of the rehabilitated visitor services area housed in the memorial undercroft. The rehabilitated memorial undercroft will include expanded restroom facilities, and an expanded exhibit space consisting of a viewing area into the undercroft, a secondary elevator to the memorial chamber, and the relocated bookstore, moved from the chamber. The expanded visitor services area in the undercroft is envisioned to have an occupancy of up to five hundred people. In order to accommodate the expected occupancy numbers, wider doors are needed to meet egress requirements. As such, staff recommends the Commission note the existing single entrance into the current visitor services area does not meet accessibility requirements and is functionally challenging.

The current door openings at the ground level were added in 1927 at the base of the Lincoln Memorial in the terrace wall, flanking the approach way to the memorial chamber, when restroom facilities were added in the undercroft. Bronze doors were installed in the openings, which were shielded by vegetation. In 1974, the south door was altered to become wider, and shorter than the north door. Today, the south door has a clearance width of 2 feet 9 inches, while the north door retains its 1927 width of 2 feet 5 inches. Only the south door provides access to the visitor services area. The north door provides access to a vestibule area then to a mezzanine level encircling the upper part of the undercroft. This is not accessible to the public.

NPS has submitted three design options for consideration to increase the width of the door openings. All three concepts include installing bronze doors in the increased openings, similar to the existing bronze doors. The first option increases the width to 36 inches clearance, with a single door. The second option increases the width to 50 inches, with two paired doors. A third option increases the width to 72 inches with two paired doors. All three approaches expand the width away from the approach way and require the removal of original historic stone material. Under all three approaches, the new openings will be treated more like “gates” into a vestibule area, adjacent to the rehabilitated undercroft space, and will remain opened during the visitor services area operational hours.

Balancing the programmatic needs of NPS, particularly for the rehabilitated undercroft area, with the need to minimize any loss of historic fabric and character, including visual impacts, the three concept options result in varying degrees of appropriateness. As part of the submittal package, NPS provided renderings showing the visual impact of the increased opening width as visitors approach the memorial and the stairs to the chamber. While all three options will necessitate the removal of original historic stone cladding in the terrace wall in order to expand the width, the visual impact of the expanded door widths may result in a greater alteration of the visual character of the memorial, especially as the doors will remain open during operating hours for visitors, creating a different relationship of solids to voids. In terms of the three options, the third option of a 72 inch width more than doubles the current approximately 32 inch widths of the doors. This change has the potential to make the openings much more visually intrusive due to the size and the creation of a large void in the terrace wall, and alters the visual character of the approach way. While the 36 inch width option results in less removal of historic fabric and visual impact, it does not successfully address the issues of accessibility and functionality desired by NPS.

Based upon staff’s analysis, the applicant’s proposal of increasing the door widths to 50 inches addresses the desire for accessibility and functionality improvements for the visitor experience to the Lincoln Memorial undercroft. Therefore, staff recommends the **Commission supports the applicant’s proposal to increase the existing door widths at the ground level of the Lincoln Memorial, to allow increased accessibility and functionality to the rehabilitated and expanded visitor services areas located in the memorial undercroft.** Further staff suggests the **Commission recommend the applicant continue to explore the benefits and challenges of widening the two doors to 50 inches in a manner resulting in the minimal loss of the surrounding historic fabric, and minimal changes to the visual impact to the Lincoln Memorial.**

CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

Comprehensive Plan for the National Capital

Staff finds that the proposed concept design is consistent with policies in the Federal Elements of the Comprehensive Plan for the National Capital (2016) and in particular, those policies contained in the Historic Preservation and the Visitors and Commemoration Element. These policies encourage the federal government to preserve and protect historic properties while also accommodating visitors and balancing the needs of security and accessibility.

Among the policies in the Historic Preservation and Visitors and Commemoration Elements that the proposed concept is consistent include the following:

- Sustain exemplary standards of historic property stewardship.
- Ensure the continued preservation of federal historic properties through ongoing maintenance.
- Ensure that sites and settings for federally owned historic assets in the region are preserved and maintained as integral parts of the National Capital Region's historic character.
- Develop and maintain a safe, comfortable and pleasant environment that offers a range and distribution of amenities, services, and access throughout the area (e.g. lighting, accessible restrooms, concessions, and information).
- Ensure that any supporting facilities such as restrooms or concession stands do not detract from the aesthetics or accessibility of the commemorative element and its grounds.

National Mall Plan

The National Mall Plan seeks to rehabilitate and refurbish the National Mall so that very high levels of use can be accommodated and the needs of all visitors and users can be met in an attractive, high-quality, energy-efficient, and sustainable manner. The National Mall Plan establishes a framework to protect memorials and landscapes while maintaining large areas of unprogrammed open space. The plan seeks to balance contemporary uses while respecting the planned historic landscapes of the L'Enfant and McMillan plans. The proposed concept design appears to be in keeping with the National Mall Plan.

National Historic Preservation Act

The Commission does not require the conclusion of Section 106 process at the concept review phase.

National Environmental Policy Act

The Commission does not require National Environmental Policy Act (NEPA) review to be complete at the concept review phase.

CONSULTATION

Coordinating Committee

The Coordinating Committee reviewed the proposal at its June 21, 2017 meeting. The Committee forwarded the proposed concept review to the Commission with the statement that the proposal has been coordinated with all participating agencies. The participating agencies were: NCPC; the District of Columbia Office of Planning; the District of Columbia State Historic Preservation Officer the District Department of Transportation; the District of Columbia State Historic Preservation Officer; the National Park Service; the General Services Administration and the Washington Metropolitan Area Transit Authority. The DCSHPO noted that all Section 106 review process requirements would need to be completed.

U.S. Commission of Fine Arts

The U.S. Commission of Fine Arts (CFA) will review the project at its July 20, 2017 meeting.

ONLINE REFERENCE

The following supporting documents for this project are available online:

- Submission Package
- Project Summary

Prepared by Lee Webb
06/26/2017

POWERPOINT (ATTACHED)



Commission Action

July 13, 2017

| | |
|--|--|
| PROJECT Lincoln Memorial Restoration Lincoln Memorial 2 Lincoln Memorial Circle, NW Washington, DC | NCPC FILE NUMBER 7866 |
| | NCPC MAP FILE NUMBER 1.43(73.10)44522 |
| SUBMITTED BY United States Department of the Interior National Park Service | APPLICANT'S REQUEST Approval of comments on concept design |
| REVIEW AUTHORITY 40 U.S.C. § 8722(b)(1) and (d) | ACTION TAKEN Approved comments on concept design |

The Commission:

Supports the applicant's proposal to increase the existing door widths at the ground terrace level of the Lincoln Memorial's east elevation, to allow increased accessibility and functionality to the rehabilitated and expanded visitor services areas located in the memorial undercroft.

Notes the existing doors were not original to the design and added in 1927, with the south door altered in 1977 to its current width of three feet nine inches, with a clearance of two feet nine and half inches. The north door has a width of three feet, with a clearance of two feet five and a half inches.

Notes the south door currently provides the single source of public entry to the visitor services area located in the memorial undercroft and does not meet accessibility requirements.

Finds the 36 inch concept option does not achieve the desired accessibility and functional program requirements of the NPS.

Recommends the applicant continue to explore the benefits and challenges of widening the two doors up to 72 inches for accessibility and egress purposes while minimizing loss of the surrounding historic fabric, and minimal changes to the visual impact to the Lincoln Memorial.

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|---|---------------|
| //Original Signed// | 07/14/2017 |
| _____ Julia A. Koster Secretary to the National Capital Planning Commission | _____ Date |

U.S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

401 F STREET NW SUITE 312 WASHINGTON DC 20001-2728 202-504-2200 FAX 202-504-2195 WWW.CFA.GOV

27 July 2017

Dear Mr. Vogel:

In its meeting of 20 July, the Commission of Fine Arts reviewed a concept proposal for modifications to improve access to the Lincoln Memorial and to expand the visitor support facility in its undercroft. The Commission approved the submission with the following comments.

The Commission members observed the importance of the memorial's intended entrance sequence—ascending the steep stairway to the statuary chamber—and emphasized that this should remain the primary visitor experience for this most iconic of national memorials. However, recognizing the need to improve accessibility to the memorial, they expressed support for the proposal to increase the width and height of the two existing entrances into the undercroft on the east-facing walls of the memorial's base. They recommended that the detailing of these enlarged entrances within the walls of large granite blocks convey a tectonic logic, perhaps by including a visible lintel as part of the bronze doorway enframements; they also suggested studying the finish of the new doors in relation to the memorial's historic design. For visitors who enter the memorial through the undercroft, they advised the careful design of this entry sequence—from the bright daylight outside, through the entrance portals, past the dim and mysterious undercroft space, and upward into the main chamber of the memorial—to reinforce a dignified experience.

The Commission looks forward to further review of this project. As always, the staff is available to assist you with the next submission.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Luebke', with a large, sweeping initial 'T'.

Thomas E. Luebke, FAIA
Secretary

Robert Vogel, Regional Director
National Park Service, National Capital Region
1100 Ohio Drive, SW
Washington, DC 20242

cc: Carl Elefante, Quinn Evans Architects



As the nation's principal conservation agency, the Department of the Interior has responsibilities for most of our nationally owned public lands and natural resources. This includes fostering wise use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historic places, and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people. The department also promotes the goals of the Take Pride in America campaign by encouraging stewardship and citizen responsibility for American Indian reservation communities and for people who live in island territories under US administration.