



October 14, 2020

Mr. Jeffrey P. Reinbold  
Superintendent  
National Park Service  
National Mall and Memorial Parks  
900 Ohio Drive, SW  
Washington, DC 20024

RE: Completion of Section 106 Consultation for the National Desert Storm and Desert Shield Memorial

Dear Mr. Reinbold:

Thank you for continuing to consult with the District of Columbia State Historic Preservation Officer (SHPO) regarding the above-referenced undertaking. We have reviewed your most recent letter and are writing to provide additional comments in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

As you may recall, the Section 106 review of this undertaking was formally initiated in July of 2017. Since that time, we have participated in several agency meetings and at least one consulting parties' meeting to discuss the site selection process and the evolution of the design concept for the memorial.

The proposed site on the southwest corner of the intersection of 23<sup>rd</sup> Street and Constitution Avenue, NW falls within the boundaries of the National Mall Historic District and is surrounded by many other historic properties, including the Lincoln Memorial. As illustrated in the attached renderings, however, the relatively low profile of the proposed design, the sweeping berms that enclose the core elements, and the lack of any excessively tall elements minimize the visibility of the memorial, allow it to blend into its historic context, and avoid anything that, in our opinion, would meet the criteria of adverse effect found at 36 CFR 800.5(a)(1). We understand that the National Park Service notified the consulting parties of its proposed determination of "no adverse effect" via email on March 2, 2020 and that the NPS received no comments in response.

For the reasons outlined above, we concur that construction of the National Desert Storm and Desert Shield Memorial will have "no adverse effect" on historic properties provided that the NPS will keep us posted on any remaining refinements to the memorial design and consult further with us regarding any changes that may have potential to result in adverse effects on historic properties.

If you should have any questions or comments regarding these matters, please contact me at [andrew.lewis@dc.gov](mailto:andrew.lewis@dc.gov) or 202-442-8841. Otherwise, thank you for providing this opportunity to review and comment.

Sincerely,

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

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

17-0782

