

The Committee of 100 on the Federal City



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Founded 1923

June 26, 2017

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Ms. Gay E. Vietzke, Superintendent
National Park Service

National Mall and Park Memorials
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SUBJECT: Preliminary Comments, Lincoln Memorial Rehabilitation for
NEPA and Section 106 of the NPHA

Dear Superintendent Vietzke:

The Committee of 100 on the Federal City (C100) is the District of Columbia's oldest citizen planning organization. Founded in 1923, its mission is to sustain and safeguard the fundamental values of the L'Enfant and McMillan Plans and the Height of Buildings Act of 1910 that give the nation's capital much of its distinction, beauty, and rich community character. The C100 advocates for sound planning city-wide in the areas of land use planning, zoning, transportation, historic preservation, and parks and open space conservation. We are responding to your letter of June 7, 2017, inviting the public, citizen organizations, and government agencies to participate in the NEPA and Section 106 review processes for the rehabilitation of the Lincoln Memorial.

We understand and support the purpose of this renovation—to rehabilitate the Lincoln Memorial and its surrounding landscape for its centennial in 2022. We further believe that making use of a portion of the existing undercroft space, if that is possible, will in the end achieve your dual goal of retaining the historic integrity of the memorial and ensuring the solemnity of its space as stated in your June 7 letter.

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A C100 member recently visited the Lincoln Memorial site and experienced the following on a day with the temperature in the mid-80s:

- A very clean memorial structure and surrounding landscape;
- A crowded memorial with hundreds of people coming and going;
- In addition to the monumental stair, a single entry point (South side) to an un-air conditioned exhibition area right next to the entry to restrooms. Both area were hot, stuffy, and did not smell well;
- One small elevator (capacity 12) to get visitors who may have difficulty with the outside monumental stair, and families with small children and others with strollers, from the Plaza/Exhibition Level to the Chamber Level of the memorial, where Daniel Chester French's sculpture of Lincoln is located;
- A small air conditioned bookstore at the Chamber Level in a space not large enough to accommodate what must be hundreds of visitors daily during the annual 6-month peak visitor season;
- So many people in the Chamber Level area that the two signs requesting "Quiet Respect Please" on the plinth on which the Lincoln sculpture rests could not be seen, unless you were at the very front of the crowd. The signs had little effect on the people milling about, talking at a normal voice level, and taking pictures; and
- No ranger(s) visibly present (the time was mid-afternoon).

In a small way the experience outlined above supports much of the National Park Service's (NPS) rationale for the proposed work.

The C100 has the following preliminary thoughts on the NEPA and NHPA Section 106 processes for the memorial's rehabilitation:

- As discussed briefly above, in the end all work proposed, including the insertion of new features such as a second elevator and use of space in the undercroft, must ensure and maintain the historic integrity of the memorial;
- Insertion into the undercroft must be clearly spelled out. In particular, the NPS must define what it means by saying in some of its alternatives "...expanded into the airspace of the undercroft." Is this new space to be gained by cantilevering?
- The floor to ceiling height in the undercroft is substantial. Will visitors to the memorial actually be allowed to enter the space, as was allowed years ago when there were NPS-led tours, or will the size of today's crowds limit views from behind windows?

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- The coordination of your reviews under NEPA and Section 106 should take place in a manner that allows all alternatives to be equally considered under both processes thus permitting meaningful consultation about alternatives and potential effects; and
- Outside the memorial, the entire perimeter of the immediately adjacent landscaping appears to have bollards in place. The NEPA process and its assessment of the existing environment needs to include thoughts about how to protect the memorial and its crowds from any walk-in intruder with nefarious intent while at the same time balancing that concern and measures taken to address it so they do not detract from the spirit of freedom and peace embodied by the memorial itself.

The Lincoln Memorial is grand in its simple interpretation of Greek Revival architecture and the Sculpture Chamber is equally so in its simplicity. At this beginning point, the NPS's proposed alternatives look good on paper. The C100 looks forward to participating in this review.

Very truly yours,



Stephen A. Hansen
Chair

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