COMMISSION ACTION

NCPC File No. 6265

LINCOLN MEMORIAL
TWO CONCESSION BUILDINGS
Washington, DC

Submitted by the National Park Service

January 6, 2005

Commission Action Requested

Approval of final site and building plans for the concession buildings pursuant to 40 U.S.C. §8722(d) and Section 5 of the National Capital Planning Act (40 U.S.C. §8722(b)(1))).

Commission Action

The Commission:

Approves final site and building plans for two concession buildings on Bacon and French Drives, as shown on NCPC Map File No. 1.44(38.00) 41519.

Deborah B. Young
Secretary to the National Capital Planning Commission

STAFF RECOMMENDATION

N. Witherell

NCPC File No. 6265

LINCOLN MEMORIAL
TWO CONCESSION BUILDINGS
Washington, DC

Submitted by the National Park Service

December 22, 2004

Abstract

The National Park Service has final site and building plans for two concession buildings to be constructed to the north and south of the Lincoln Memorial on Bacon and French Drives. The buildings are part of the overall traffic, security, and visitor service improvements at the memorial. At its December 2003 meeting, the Commission approved the "location, function, and number of concession buildings" and requested that NPS "develop an alternative building design." After modification of the roof form and height, the Commission approved preliminary site and building plans at its February 2004 meeting. The current submission is identical in location, form, dimension, and material to the preliminary plans approved last February.

Commission Action Requested by Applicant

Approval of final site and building plans for the concession buildings pursuant to 40 U.S.C. §8722(d) and Section 5 of the National Capital Planning Act (40 U.S.C. §8722(b)(1))).

Executive Director's Recommendation

The Commission:

Approves final site and building plans for two concession buildings on Bacon and French Drives, as shown on NCPC Map File No. 1.44(38.00) 41519.

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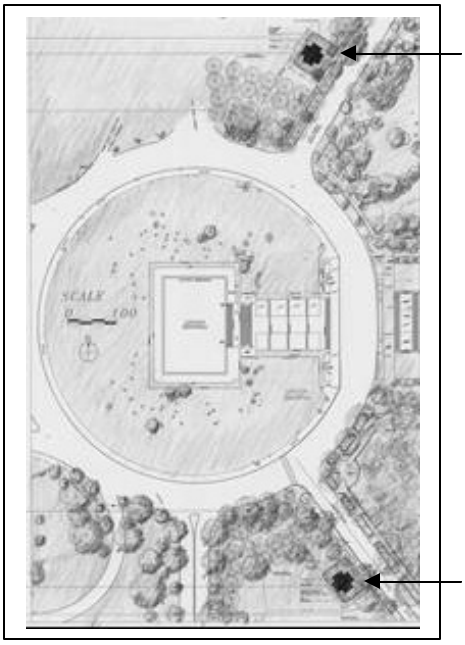
PROJECT SUMMARY

Site Description

The two concession buildings are proposed for the west side of Henry Bacon Drive, to the north of the memorial, and Daniel French Drive, to the south of the memorial. The north concession

building would be a new location for visitor services; the south building would replace the food and concession trailers in that location. The Lincoln Memorial was sited by the McMillan Commission and designed by one of Charles McKim's protégés, architect Henry Bacon. Built between 1914 and 1922, the national memorial to President Lincoln is the western terminus of the extended Mall and the focal point of West Potomac Park.



Rendered site plan showing Lincoln Memorial Circle, the north concession building on the west side of Henry Bacon Drive, and the south concession building on the west side of Daniel French Drive.

Project Submission

- The current proposal for final site and building plans is identical in location, form, dimension, and material to the preliminary site and building plans approved by the Commission at its February 2004 meeting.

- The proposed buildings measure 34 feet by 34 feet (with a larger roof overhang) and are approximately 18 feet in height. All of the mechanical equipment to support the buildings is contained within the roofs.

- The new buildings are close in design to the existing four concession kiosks on the Mall, so that visitors will readily identify them as providing concession services. (The existing kiosks measure 22 feet by 22 feet and are also 18 feet in height.)

- The south building would provide walk-up food service. The north kiosk would provide walk-in service and include retail as well as food service.

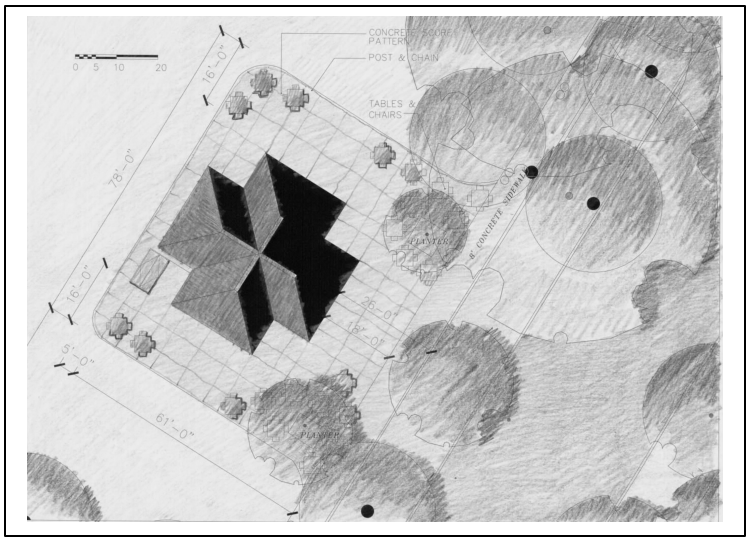
- All of the buildings, existing and proposed, are clad in stucco wall panels with wood trim, and have wood double-hung sash windows and wood doors, with standing seam copper roofs and copper ridge vents.

- NPS proposes painting all of the buildings a dark sand or grey-green color, with dark green trim.

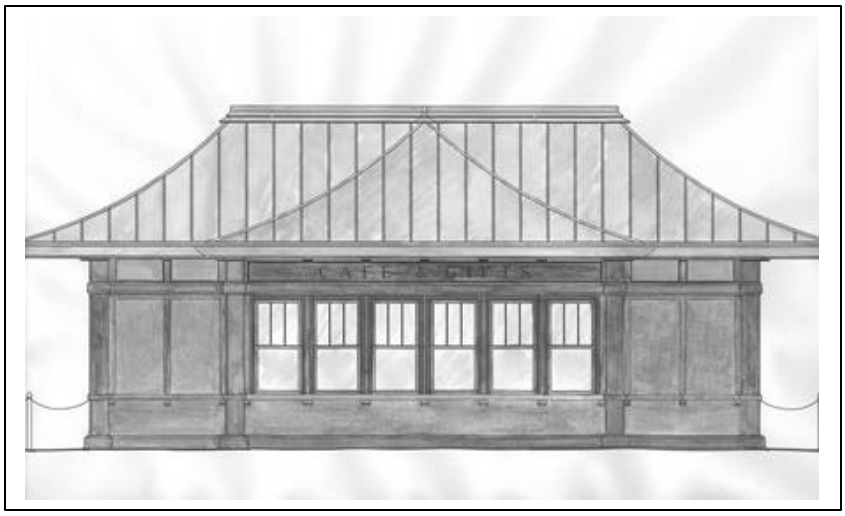
- The proposed paved seating areas around the new buildings would measure 78 feet by 79 feet (at the north site) and 78 feet by 61 feet (at the south site). Each paved area contains 23 tables with four chairs. The pavement would be the National Park Service's scored, exposed aggregate surface that is used throughout the Mall. Each area would be surrounded by 36-inch post-and-chain.

- The proposed buildings would have basements to provide interior storage; an at-grade lift in the paved area on the west side of each building would be used to transfer materials to the basements.

- No trees would be removed during the construction, other than those planted to screen the south concession trailers, which would also be removed. Nearby trees would be marked and protected.



Enlarged site plan of north concession building



Elevation

NPS photo simulation of north concession building on Henry Bacon Drive

Background

At its February 2004 meeting, the Commission approved preliminary site and building plans for the proposal currently before the Commission for final review. The final site and building plans are identical in location, form, dimension, and material to the plans approved at the February 2004 meeting.

At its December 2003 meeting, the Commission approved the "location, function, and number of concession buildings" and requested that NPS "develop an alternative building design." That was subsequently accomplished when the roof form was slightly modified and was lowered two feet and approved at the February 2004 meeting.

The Commission also approved final site and building plans for the retaining wall around the north, west, and south sides of Lincoln Memorial Circle at the February 2004 meeting. A security barrier design for the east (Mall) side of the memorial was presented at the December 2003 meeting and not approved. At that meeting the Commission did approve final site and building plans for traffic improvements in and near the circle.

Staff Recommendation

Staff recommends final site and building plan approval for the construction of the two 34-foot by 34-foot concession buildings. The proposal remains the same as that approved by the Commission in February 2004. The buildings are well-designed of high-quality materials and well-sited for use by individual visitors to the Lincoln Memorial and adjacent memorials, as well as by tour bus groups that will unload passengers on both Bacon and French Drives in front of

the concession buildings. The south building will replace the "temporary" concession trailers and improve the appearance of that area. The north building constitutes new construction and new provision of services on the north side of the Lincoln Memorial. The Commission has previously concurred (at the December 2003 meeting) with the provision of additional visitor concession services on the north side of the Lincoln Memorial at this location.

In previous meetings, the stylistic relationship of the two larger concession buildings to the four existing kiosks on the Mall was raised. By its February 2004 action, the Commission concurred with NPS's preference for continuing the recognized form of the food kiosks on the Mall at the Lincoln Memorial so that visitors could more readily identify the purpose of the buildings. NPS proposes repainting the existing Mall kiosks in somewhat darker colors, at the suggestion of the Commission of Fine Arts (CFA). The two new concession buildings would be painted the same colors, as well. CFA's review of the proposed color scheme will take place at its January 2005 meeting. Staff recommends that the proposed scheme be approved. (The existing concession kiosks on the Mall are located near the Air and Space Museum, the Museum of American History, the Natural History Museum, and the Arts and Industries Building.)

Two locations for two future concession buildings proposed for the Washington Monument Grounds at 15th Street, NW north of Madison Drive and south of Jefferson Drive are shown in NPS's Development Concept Plan for the Washington Monument Grounds (approved by the Commission in 1993 and reaffirmed in 2002). This planning and design issue will come before the Commission at a future date. In the meantime, the Commission approved the temporary construction of a concession facility consisting of two trailers and tables and chairs, covered by a tent, at its April 2004 meeting, for a period not to exceed two years.

The National Coalition to Save Our Mall expressed in writing on October 25, 2004 its concern that the proposed Lincoln Memorial concession buildings are "in apparent violation of the Congressional moratorium on any new visitor centers on the Mall (Title II of Public Law 108-126)", the law that established the Reserve. Section 202(c) reads: "After the date of enactment of the Commemorative Works Clarification and Revision Act of 2003, no commemorative work or visitor center shall be located within the Reserve."

On November 1, 2004, NPS responded in writing to the Coalition, stating that, "The [new concession buildings] will serve the same functions and operate in the same manner as the Mall kiosks and the existing Lincoln Memorial kiosk. No new type of service will be offered. The kiosks are being built by park concessionaire Guest Services, Inc. (GSI). GSI is responsible for the cost of the construction of the kiosks. . . . "The kiosks in question are being built and operated by the park concessionaire. Gifts (sic) and food will be sold at these kiosks. There will be no NPS personnel at these kiosks and no NPS programs will be run from these kiosks. Thus the NPS believes that these concession kiosks are not a visitor center and Public Law 108-126 does not apply."

Staff accepts NPS's definition of its concession kiosks, and the distinction it makes between facilities built and operated by its concessionaire and those built by NPS for NPS programs. Therefore, staff does not believe that the proposed concession buildings are in violation of the Public Law.

COORDINATION

Coordinating Committee

The Coordinating Committee reviewed this item at its meeting on November 12, 2003, and forwarded the proposal to the Commission with the statement that the project had been coordinated with all agencies participating, including NCPC; the District of Columbia Office of Planning; the Department of Housing and Community Development; the District Department of Transportation; the General Services Administration; and the Washington Metropolitan Area Transit Authority.

CONFORMANCE

Comprehensive Plan

The following are some applicable policies in the Preservation and Historic Features Element of the Comprehensive Plan:

- Express the dignity befitting the image of the federal government in the national capital. Federal development should adhere to the high aesthetic standards already established by the planning and design legacy of the national's capital.

- Plan carefully for appropriate uses and compatible design in and near the monumental core to reinforce and enhance its special role in the image of the nation's capital.

- Protect the settings of historic properties, including views to and from the sties where significant, as integral parts of the historic character of the property.

Commission of Fine Arts

CFA reviewed the Lincoln Memorial concession buildings in November 20, 2003, approving the buildings but asking that NPS paint the buildings darker colors. In a recent letter, CFA commented on four color schemes presented by NPS at CFA's November 2004 meeting. CFA preferred a body color of dark sand, with dark green trim for the window sashes and trim. The soffit of the roof would be a glossy white. CFA has scheduled action on the color scheme at its January 2005 meeting.

National Environmental Policy Act

The Executive Director issued NCPC's FONSI (Finding of No Significant Impact) on November 17, 2003, concluding that the analysis was sufficient and demonstrated no significant environmental impacts from the planned action.

The Commission's review of NPS's site and buildings plans for the Lincoln Memorial Circle Rehabilitation is governed by NCPC's Environmental Policy and Procedures, in coordination with the National Environmental Policy Act (NEPA). NCPC staff analyzed, in conformance with the requirements of NEPA, the Environmental Assessment (EA) completed by NPS in June 2003. Except for the No Action Alternative, two other alternatives proposed the enhancement of visitor services at the Lincoln Memorial. In any of the assessed alternatives there would be no change to the Lincoln Memorial itself. Under Alternative B, the Preferred Alternative of the Park Service, NPS proposed to rehabilitate Lincoln Memorial Circle, construct a vehicular barrier system, and enhance visitor services areas.

The Commission staff reviewed the EA analysis and concluded that the environmental effects for Alternative B would have minimal impacts on environmental attributes of the immediate memorial site. Important visual effects are essential in comparing the various alternatives and staff determined the proposed project review and approval did not require an environmental impact statement, pursuant to NEPA, because no resources were significantly impacted by either the intensity of the action or its context.

Mitigation of any potential viewshed impacts involving Alternative B would be mitigated through the use of compatible appropriate sympathetic context design and materials in keeping with the cultural landscape and historic setting of the Lincoln Memorial. These would include:

- Design techniques and construction materials that would preserve the aesthetic qualities of the original roadway design at its historic location, including curb line
- Restoration of the east side of the Memorial to its historic layout
- Rehabilitation of the sidewalks to their historic appearance
- Restoration of the historic tree landscape plan
- Construction measures that would minimize any disturbance to roots, limbs, and branches that are character defining features of the Lincoln Memorial Grounds
- Massing, scale, and materials reflective of or consistent with the surrounding park resources and historic designed landscape

To comply with Section 106 of the National Historic Preservation Act, the National Park Service subsequently entered into a Memorandum of Agreement (MOA) with the DC State Historic Preservation Office and the Advisory Council on Historic Preservation to provide consultation in order to avoid major adverse effects associated with the views and vistas of the Lincoln Memorial. Consultation and coordination would continue with the Commission of Fine Arts and the National Capital Planning Commission. Alternative B would be mitigated through the use of compatible appropriate sympathetic context design and materials in keeping with the cultural landscape and historical setting of the Lincoln Memorial. These would include:

- Design techniques and construction materials that would preserve the aesthetic qualities of the original roadway design at its historic location, including curb line
- Restoration of the east side of the Memorial to its historic layout
- Rehabilitation of the sidewalks to their historic appearance
- Restoration of the historic tree landscape plan

- Construction measures that would minimize any disturbance to roots, limbs, and branches that are character defining features of the Lincoln Memorial Grounds
- Massing, scale, and materials would be reflective of or consistent with the surrounding park resources and historic designed landscape.

Consultation and coordination of all physical planned improvements would continue to be coordinated with the Commission of Fine Arts and NCPC.

To mitigate impacts to visitors during the construction of the visitor services areas, the north service area would be constructed first and would allow the existing gift shop and concession stand to remain open. The gift shop, concession stand, and information kiosks on the south side would then be transferred to the north side so that construction could begin on the south visitor services area, thereby eliminating disruption to visitor use and experience.

National Historic Preservation Act

NPS has satisfactorily complied with the requirements of Section 106 of the National Historic Preservation Act.

Pursuant to the October 31, 2003 Memorandum of Agreement (MOA) among NPS, the D.C. State Historic Preservation Officer (DC SHPO), and the Advisory Council on Historic Preservation (ACHP), NPS circulated the proposed designs for the concession buildings for comment by the DC SHPO, ACHP, and the consulting parties for a period of thirty days. NPS complied with this stipulation prior to previous reviews by the Commission of the concession building design and again for thirty days in October-November 2004. NPS was required to take these comments into account and make modifications it deemed appropriate. During this time period, the correspondence described earlier in the report between the Coalition to Save Our Mall and NPS occurred. Further, NPS held two consultation meetings with the parties during this period in which questions about the kiosks could be raised.

NPS initiated consultation with the DC SHPO and with the ACHP on July 1, 2002, determining that the proposed security alterations and the loss of the roadway in the eastern portion of the traffic circle would have an adverse effect on the National Register qualities of the Lincoln Memorial. The consultation included both of the above agencies, as well as NCPC staff and public groups and individuals such as the National Trust for Historic Preservation, the Committee of 100, the National Coalition to Save Our Mall, and the ANC representative.

The elements of the memorial and site are of high historic significance and designed to be seen and experienced as a whole, creating a symbolic and commemorative landscape setting for the Lincoln Memorial within the spacious precinct of West Potomac Park and the Mall itself, and extending westward across the Memorial Bridge to Arlington National Cemetery.

With reference to the concession buildings, the Memorandum of Agreement stipulates:

- To the extent possible, the undertaking shall be compatible with the historic and architectural qualities of the Memorial and grounds in terms of scale, massing, color, and

materials and shall be consistent with the recommended approaches to rehabilitation and new construction set forth in *the Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (U.S. Department of the Interior, National Park Service, 1995).

- Future concession kiosk structures will be placed outside the memorial area and the existing food service trailers will be removed from the south grounds between the Memorial and Independence Avenue, as shown in concept plans dated August 1, 2003. The design of the kiosk will be submitted to the DC SHPO, ACHP, and any interested consulting parties for comment in accordance with Stipulation 6.

- NPS will submit the relevant sheets from the final design plans for the Undertaking to the DC SHPO, ACHP, and Consulting Parties for review and comment. NPS will take into account any comments filed within a 30-day period and will make modifications to the final design plans as it deems appropriate. Any changes requiring additional review by NCPC will be submitted to NCPC for approval.