

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



July 25, 2017

Ms. Catherine Dewey, Chief of Resource Management
National Park Service
National Mall and Memorial Parks
900 Ohio Drive, SW
Washington, DC 20024

RE: Initiation of Section 106 Consultation: Site Selection for the Desert Storm War Memorial

Dear Ms. Dewey:

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 Desert Storm War Memorial (NDSWM) Association, in cooperation with the National Park Service (NPS), proposes to establish a memorial to those who served in Operation Desert Storm/Desert Shield at one of the two sites identified in the image to the right: 1.) Memorial Circle on Columbia Island and 2.) the Constitution Avenue Terminus Area near 23rd Street, NW. Since both sites are located within historic districts and near properties that are listed in the National Register of Historic Places, effects on historic properties are almost certain to occur regardless of which site is selected.



The NPS proposes to delay the formal determination of Area(s) of Potential Effect (APE) “because multiple locations are under consideration,” but we believe documenting the APE for each site is an important step that should be carried out as part of the site selection process. Doing so will help to determine how many properties may be affected by the selection of each site, what the specific historic properties may be, and possibly even the degree to which those historic properties may be affected via consideration of proximity, site conditions and related circumstances. The selected site’s APE may require refinement as more is learned about the design of the memorial design, but identifying APE(s) at site selection will help to ensure a thorough and equitable evaluation of each site and may ultimately even aid in the avoidance, minimization and/or mitigation of adverse effects. We look forward to actively participating in the comprehensive evaluation of both sites.

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

Sincerely,

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