



National D-Day Memorial

Special Resource Study

Bedford, Virginia



April 2014

TABLE OF CONTENTS

| | |
|---|-----------|
| Executive Summary | iii |
| Chapter 1: Introduction and Study Process | 3 |
| Study Criteria | 3 |
| Brief Description of the Study Area | 5 |
| History of the Study Area | 6 |
| Chapter 2: Description of Study Area | 11 |
| Memorial Design | 13 |
| Visitor Experience | 20 |
| Visitor Facilities | 21 |
| Operations | 22 |
| Chapter 3: Special Resource Study Findings | 23 |
| Findings of Significance | 25 |
| Finding of Suitability | 27 |
| Finding of Feasibility | 31 |
| Finding of Need for Direct NPS Management | 35 |
| Summary of Findings | 35 |

| | |
|--|-----------|
| Chapter 4: Consultation and Public Outreach | 37 |
| Public Scoping..... | 39 |
| Agency Consultation | 39 |
| Environmental Compliance | 40 |
| Appendices | 41 |
| Pertinent Legislation | 43 |
| National Park Service Northeast Region Study Team Members and Advisors | 45 |
| Selected Bibliography..... | 47 |

EXECUTIVE SUMMARY

Public Law 111-84, the National Defense Authorization Act for Fiscal Year 2010, authorized the Secretary of the Interior to conduct a Special Resource Study regarding the national significance, suitability, and feasibility of the National D-Day Memorial located in Bedford, Virginia for potential designation as a unit of the national park system. This report constitutes the results of the study undertaken by the National Park Service (NPS).

This study, in accordance with previous legislation (Public Law 105-391) establishing the criteria to be used in such analyses and reflecting current NPS management policies, examines the national significance of the National D-Day Memorial, its suitability and feasibility for potential designation as a unit of the national park system, and the need for NPS management of the resource versus management by other public or private entities.

The National Defense Authorization Act for Fiscal Year 1997 (Public Law 104-201), designated a site in Bedford, Virginia as the location of the National D-Day Memorial in order “to honor the members of the Armed Forces of the United States who served in the invasion of Normandy, France, in June 1944.” Dedicated on June 6, 2001, with ceremonies attended by President George W. Bush, the National D-Day Memorial encourages viewers to reflect upon the sacrifices made by troops during the amphibious assault on the Normandy beaches. A series of plazas lead approximately 80,000 visitors per year through various phases of the D-Day, from the early stages of planning through the victory of the Allied Forces.

Chapter 1 of this report describes the purpose and background of the study, including the criteria used by the NPS to determine if a resource is eligible for potential designation as a unit of the national park system. The chapter concludes with a brief description of the study area. Chapter 2 provides a description of the design of the National D-Day Memorial, its associated resources, and current visitor experiences and opportunities. Chapter 3 provides the analysis to determine if the Memorial meets the various criteria for potential designation. Assessments of national significance, suitability, feasibility, and need for direct NPS management are presented. Chapter 4 describes the required consultation and coordination that occurred during the study, including a

summary of public meetings and written communications.

To be recommended as a new unit of the national park service, an area must be nationally significant, suitable, feasible, and have the need for direct NPS management.

National Significance Finding: The National D-Day Memorial does not possess a strong enough association with the events of the Normandy invasion to be considered nationally significant under the National Historic Landmark (NHL) criteria for its association with a nationally historic event. The lack of a strong association is primarily due to the Memorial's location, nearly 4,000 miles from the location of the actual event, and because the Memorial, constructed less than twenty years ago, did not exist during the time of the event. In addition, the Memorial does not possess extraordinary national significance on its own merit to meet NHL criteria. The NPS finds that the National D-Day Memorial would not qualify as a National Historic Landmark, and therefore does not meet the national significance criteria.

Suitability Finding: In addition to existing NPS memorials which mark the site of a particular World War II conflicts, the NPS currently administers a national memorial on the National Mall in Washington, D.C. that recognizes the valor, fidelity, and sacrifice of all who served and unselfishly gave their lives for their nation and the freedom of others during World War II. The overarching theme of honoring America's Armed Forces, as represented by the National D-Day Memorial, is already represented in other World War II Memorials throughout the country and the national park system and does not meet the criteria for suitability.

Feasibility Finding: The National D-Day Memorial Foundation, owners of the Memorial, have expressed their concerns of becoming a unit of the national park system due to current NPS budget constraints. Lack of landowner support, coupled with significant deferred maintenance and capital improvement needs of the site, resulted in a negative finding of feasibility.

Need for Direct NPS Management Finding: The NPS has determined that the Foundation is adequately protecting the Memorial's resources and providing for educational experiences and public enjoyment. The study team is unable to conclude that NPS management is clearly superior to existing management and, therefore, would not meet the need for direct NPS management.

Based on the analysis conducted during the study, the NPS concludes that the National D-Day Memorial does not meet the criteria for a new unit of the national park system. Recognizing these findings, this study will not investigate management alternatives and no additional environmental compliance will be performed. The study will be concluded by the Secretary of the Department of the Interior transmitting this report to Congress.



Chapter 1

Introduction & Study Process

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CHAPTER 1

INTRODUCTION & STUDY PROCESS

On October 28, 2009, President Obama signed H.R. 2647, the National Defense Authorization Act for Fiscal Year 2010, into Public Law 111-84. The Act instructed the National Park Service (NPS or the Service) to explore the possibility of adding the National D-Day Memorial as a new unit of the national park system. This report constitutes the results of the study undertaken by an interdisciplinary team of professionals within the Northeast Regional Office of the National Park Service.

STUDY CRITERIA

Areas comprising the present 401 unit national park system are cumulative expressions of a single national heritage. Potential additions to the system should, therefore, contribute in their own special way to a system that fully represents the broad spectrum of natural and cultural resources that characterize our nation. The NPS is responsible for conducting professional studies of potential additions to the national park system when specifically authorized by an Act of Congress, and for making findings regarding new areas to the Secretary of the Interior, the President, and Congress. Public Law 105-391 outlines criteria for potential units of the national park system. To receive a favorable finding from the NPS, a proposed addition to the national park system must:

1. possess nationally significant natural or cultural resources;
2. be a suitable addition to the system;
3. be a feasible addition to the system; and
4. require direct NPS management, instead of alternative protection by other public agencies, tribes, or the private sector.

These criteria are designed to ensure that the national park system includes only the most outstanding examples of the nation's natural and cultural resources. They also recognize that there are other alternatives, short of designation as a unit of the national park system, for preserving

the nation's outstanding resources.

An area or resource may be considered nationally significant if it is an outstanding example of a particular type of resource; possesses exceptional value or quality in illustrating or interpreting the natural or cultural themes of our nation's heritage; offers superlative opportunities for public enjoyment or for scientific study; and retains a high degree of integrity as a true, accurate, and relatively unspoiled example of a resource. National significance for cultural resources, such as the National D-Day Memorial, is evaluated by applying the National Historic Landmarks criteria contained in 36 Code of Federal Regulations Part 65.

An area may be considered suitable for potential addition to the national park system if it represents a natural or cultural resource type that is not already adequately represented in the system, or is not comparably represented and protected for public enjoyment by other federal agencies; tribal, state, or local governments; or the private sector. The suitability evaluation, therefore, is not limited solely to units of the national park system, but includes evaluation of all comparable resource types protected by others.

Suitability is determined on a case-by-case basis by comparing the resources being studied to other comparably managed areas representing the same resource type, while considering differences or similarities in the character, quality, quantity, or combination of resource values. The suitability analysis also addresses the rarity of the resources, interpretive and educational potential, and similar resources already protected in the national park system or in other public or private ownership. The comparison results in a determination of whether the potential new area would expand, enhance, or duplicate resource protection or visitor use opportunities found in other comparably managed areas.

To be feasible as a new unit of the national park system, an area must be of sufficient size and appropriate configuration to ensure sustainable resource protection and visitor enjoyment (taking into account current and potential impacts from sources beyond its boundaries), and be capable of efficient administration by the NPS at a reasonable cost. In evaluating feasibility, the Service considers a variety of factors, such as: size; boundary configurations; current and potential uses of the study area and surrounding lands; land ownership patterns; public enjoyment potential; costs associated with acquisition, development, restoration, and operation; access; current and potential threats to the resources; existing degradation of resources; staffing requirements; local planning and zoning for the study area; the level of local and general public support; and, the economic/socioeconomic impacts of designation as a unit of the national park system. The evaluation also considers the ability of the NPS to undertake new management responsibilities in light of current and projected constraints on funding and personnel.

There are many excellent examples of the successful management of important natural and cultural resources by other public agencies, private conservation organizations, and individuals. Most notably, state park systems provide for protection of natural and cultural resources throughout the nation and offer outstanding recreational experiences. The NPS applauds these accomplishments, and actively encourages the expansion of conservation activities by state, local, and private entities, and by other federal agencies. Unless direct NPS management of a studied area is identified as the clearly superior alternative, the Service will recommend that one or more of these other entities assume a lead management role, and that the area not be recommended as a potential unit of the national park system.

Studies evaluate an appropriate range of management alternatives and identify which alternative or combination of alternatives would be most effective and efficient in protecting significant resources and providing opportunities for appropriate public enjoyment. Alternatives to NPS management are not normally developed for study areas that fail to meet any one of the four criteria for inclusion listed above, particularly the “national significance” criterion. However, in cases where a study area’s resources meet the criteria for national significance, but do not meet other criteria for inclusion in the national park system, the Service may instead recommend an alternative status, such as “affiliated” area. To be eligible for “affiliated area” status, the area’s resources must:

1. meet the same standards for national significance that apply to units of the national park system;
5. require some special recognition or technical assistance beyond what is available through existing NPS programs;
6. be managed in accordance with the policies and standards that apply to units of the national park system; and
7. be assured of sustained resource protection, as documented in a formal agreement between the NPS and the non-federal management entity.

National Park Service policy requires that a special resource study be accompanied by an Environmental Assessment (EA), prepared in accordance with the requirements of the National Environmental Policy Act of 1969, as amended (NEPA) and its implementing regulations (36 CFR 1500-1508), and Director’s Order #12, *Conservation Planning, Environmental Impact Analysis, and Decision-Making* (2001), and accompanying Handbook. In cases where resources do not meet the required criteria for potential designation as units of the national park system, the EA portion of the study is not undertaken.

A special resource study (SRS) serves as a reference source for members of Congress, the NPS, and other persons interested in the potential designation of an area as a new unit of the national park system. The reader should be aware that the recommendations and analysis contained in an SRS do not guarantee future support or any subsequent action by Congress, the Department of the Interior, or the NPS.

This study has been conducted by the NPS Northeast Region’s Park Planning and Special Studies Division. The project team included planners, historians, interpretation specialists, architects, and landscape architects based in the Northeast Region’s Boston and Philadelphia offices. The study team has had primary responsibility for conducting the study process, producing this report, and coordinating the involvement of other public agencies and the public.

BRIEF DESCRIPTION OF THE STUDY AREA

The National D-Day Memorial (the Memorial) is situated on a hill overlooking the community of Bedford, Virginia. Southwest of Bedford’s commercial center, the Memorial is located at the interchange of Routes 460 and 122. Approximately 25 miles to the west, Route 460 connects with Interstate 81 through Roanoke and nearly the same distance to the east, connects with Route 29 through Lynchburg.

The Memorial is owned by the National D-Day Memorial Foundation (the Foundation), a 501(c)(3) non-profit educational organization. It is open 362 days a year from 10:00 a.m. to 5:00 p.m., closing on New Year's Day, Thanksgiving, and Christmas. It may also close during inclement weather during the winter months. Supporting facilities include a large canvas military tent for educational programs, a temporary modular unit housing a gift shop and some staff offices, a resource center containing collections in downtown Bedford, and the Foundation's headquarters, also located in downtown Bedford.

Nearby attractions include Holy Land USA which offers a walking or motorized tour on 200 acres following key events in the life of Jesus Christ; Poplar Forest, Thomas Jefferson's retreat house and a National Historic Landmark (1971); and two units of the national park system - Booker T. Washington National Monument and the Blue Ridge Parkway. The 40-mile long, 20,600 acre Smith Mountain Lake and its associated state park provide extensive recreational opportunities. In Bedford, a local museum and genealogical library is located across from the Foundation's headquarters which contains some displays on loan by the Foundation.

HISTORY OF THE STUDY AREA

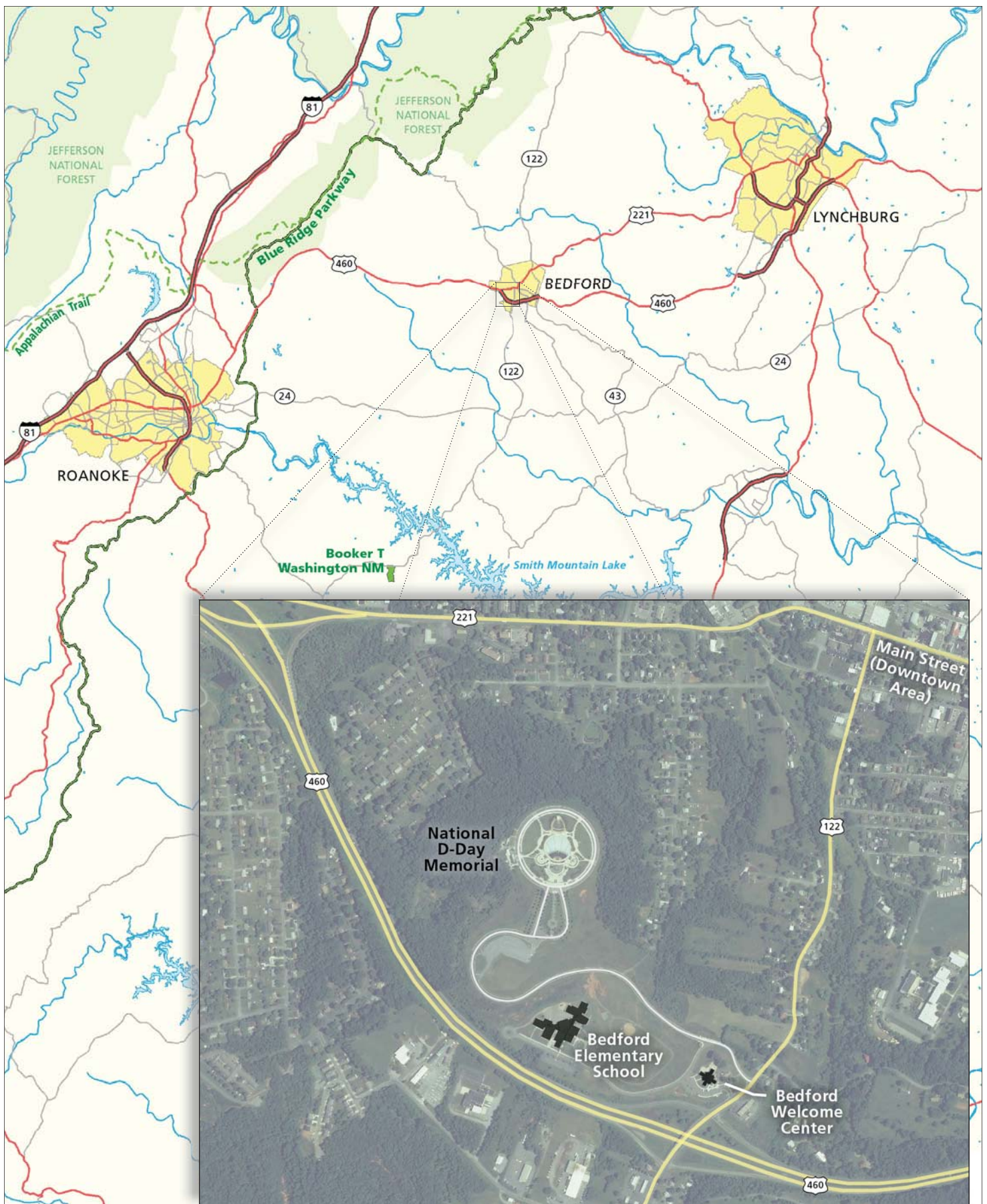
A national D-Day memorial was initially envisioned in 1987 by a small committee of veterans under the leadership of J. Robert Slaughter, a D-Day veteran and resident of Roanoke, Virginia. The group formed the National D-Day Memorial Foundation and set about locating potential sites for a memorial in or near Roanoke. When efforts to obtain a site in Roanoke proved to be unproductive, the City of Bedford, Virginia came forward offering the current site of the Memorial.

The Bedford location proved to a more appropriate location for the Memorial as Bedford is thought to have experienced the highest per capita American military losses on D-Day. The city lost 19 of its 34 young men, known as the "Bedford Boys," either approaching the Normandy beaches or in their first few minutes on French soil. The home town of the "Bedford Boys" was intended as a reminder of the price paid by small communities across the nation and the sacrifice of their young men in the cause of freedom.

During enactment of the National Defense Authorization Act for Fiscal Year 1997 (Public Law 104-201), Congress agreed to an amendment proposed on June 19, 1996 by former Virginia Senator John Warner and designated the Bedford location as the National D-Day Memorial. The Act specifies the purpose of the Memorial is "to honor the members of the Armed Forces of the United States who served in the invasion of Normandy, France, in June 1944." The Act further provides:

All expenses for maintenance and care of the memorial shall be paid for with non-Federal funds, including funds provided by the National D-Day Memorial Foundation. The United States shall not be liable for any expense incurred for the maintenance and care of the memorial.

The Foundation hired a chief executive officer in 1996. In that same year, the Foundation announced plans for a combined memorial and educational center with an estimated cost of \$12 million. A project design firm, contractor, and a chief sculptor were retained. Ground was broken for the Memorial on November 11, 1997. The project, however, escalated to near \$20 million by the time it was dedicated on June 6, 2001 with ceremonies attended by President George W. Bush.



National Park Service
U.S. Department of the Interior

National D-Day Memorial Special Resource Study

Figure 1
Study Location

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As a result of burgeoning costs, the Foundation was forced to file for bankruptcy soon after opening. The Foundation subsequently hired a new president and chief executive officer, Dr. William A. McIntosh, a career U.S. Army officer and former member of the West Point faculty. Under his stewardship, the Foundation retired its debt and proceeded with plans for ultimate completion of the Memorial. Dr. McIntosh retired in 2010 and was succeeded by Robin Reed who retired from the position in mid-2012. April Cheek-Messier was appointed Director of the Foundation in 2013. The Memorial currently operates on a yearly operational budget of approximately \$1.9 million and sees nearly 80,000 visitors per year.

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Chapter 2:

Description of Study Area

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CHAPTER 2

DESCRIPTION OF STUDY AREA

This chapter provides a description of the Memorial’s key elements, visitor experiences, and visitor and operational facilities. Information for this chapter was drawn from material provided by Memorial staff, previous NPS planning efforts, and observations made during a three-day NPS site visit conducted in early April of 2011. The April 2011 site visit team included persons with expertise in park planning, facilities management, and park operations. The team met with maintenance, operations, and education and interpretation staff from the Memorial to gather data on the Memorial’s resources and gain a better understanding of ongoing maintenance, education and interpretation, and other operational and visitor facility needs. The objective of this visit was to conduct a comprehensive condition assessment of the Memorial’s assets and infrastructure from which the study team was able to forecast the current deferred maintenance and costs required to bring the Memorial’s assets up to current NPS standards. An annual work plan was then created to determine yearly operations and maintenance costs needed to support the Memorial. The results of this site visit were used to determine the feasibility of including the National D-Day Memorial as a unit of the National Park System which is described in detail in Chapter 3: Special Resource Study Findings.

MEMORIAL DESIGN

The National D-Day Memorial serves as a tribute to the “Valor, Fidelity and Sacrifice” of all of the members of the Allied Forces who served and gave their lives during Operation Overlord, the invasion of France, on June 6, 1944. It is an ambitious landscape design that encourages viewers to reflect upon the sacrifices made by troops during the amphibious assault on the Normandy beaches. The Foundation desired a memorial that would permit visitors to experience an action scene, rather than the quiet, contemplative visitor experience of other war memorials. Rather than conducting a national design competition common to many other national memorials, the Foundation chose Dickson Architects, a Roanoke-based firm that supplies designs for a wide array of clients in the areas of housing, commerce, industry, healthcare and education. From information on the firm’s website, the National D-Day Memorial appears to be its only commemora-

tive design.

While the area of the Memorial is circular and surrounded by a single row parking lot, the designers intended visitors to move through the site in a linear progression through themed spaces that commemorate the planning, implementation, and aftermath of the invasion. The monument's linear orientation is more easily perceived in plan than in reality, as visitors are able to enter the Memorial from any of the main entry points that lead from the parking area.

Memorials to leaders of the Allied Nations were installed at several main entrances from the parking circle. Leaders represented included Franklin D. Roosevelt, Winston Churchill, Charles de Gaulle, Joseph Stalin, and Chiang Kai-shek. After much opposition to the inclusion of the Joseph Stalin bust, however, his bust and that of Chiang Kai-shek were removed.

Four major defined spaces, named for key donors, establish the linear and temporal progression. These are the Reynolds Garden, Gray Plaza, Estes Plaza and Stettinius Parade, which extends the axis beyond the circle and serves as the memorial's initial driving approach and exit.

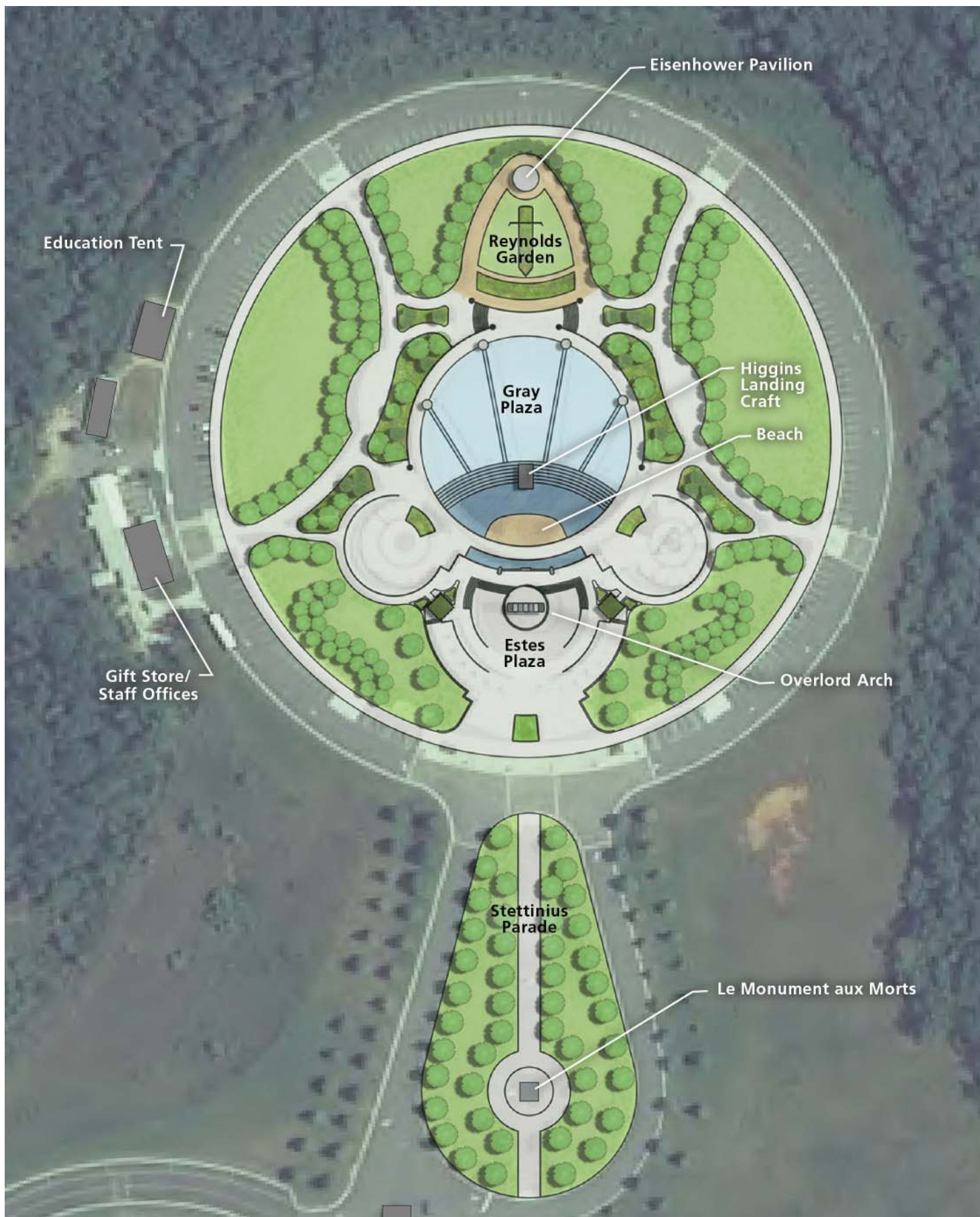
Reynolds Garden, at the northern end of the site, is laid out in a pattern that recalls the shoulder patch of the Supreme Headquarters Allied Expeditionary Force. It takes architectural cues from English landscape design sources with the classicized cement garden pavilion that anchors the northern end of the design and contains a standing bronze portrait of Allied Supreme Com-



Reynolds Garden



Gray Plaza



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National D-Day Memorial Special Resource Study

Figure 2
Memorial Site Plan

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Estes Plaza

mander, General Dwight D. Eisenhower. Six busts that line the garden's paths depict key American and British subordinates, among them, U.S. General Omar Bradley and British Air Chief Marshall Arthur Tedder, Deputy Supreme Commander.

A level higher, Gray Plaza, is accessed from the southern end of Reynolds Garden by two sets of stairs. The plaza is a broad expanse of hardscape divided into five sections, representing each D-Day landing site by a paving pattern that contrasts with the cement plaza. Cast bronze tablets ring the walls of the circular plaza and carry the names of more than 4,400 members of the Allied Expeditionary Forces killed on D-Day, including servicemen from the U.S., Australia, Belgium, Canada, France, New Zealand, Norway, and the United Kingdom. Each plaque carries between twenty and thirty names. In addition to the name panels, sixty-three other bronze informational plaques placed throughout the memorial grounds commemorate participants of the invasion or carry explanatory text. Most of these contain the names of their individual donors.

A granite construction designed to recall a Higgins built landing craft with its front gate open is the central link between the plaza and the shallow fountain that laps against the "beach" beyond that ascends from it. The plaza's water feature introduces a tableau of sculptural elements expressive of the beach landing. These include a soldier wading to shore, a dead soldier at the water's edge, and two crossing the beach. Water jets and an attendant sound effect create an impression of enemy fire directed at the invading troops. The fountain's figural representation culminates at the south end with a grouping of figures that represent soldiers who scaled the Atlantic Wall of casemates and



Stettinius Parade

bunkers. Figurative sculpture placed on the southern extremity of Gray Plaza supports the message of valor, fidelity and sacrifice, and thematic progression through time that the memorial's designers and patrons intended. Ancillary plazas to the east and west pay tribute to the role that air and naval forces played in the invasion.

Ascending to the next level is Estes Plaza, which celebrates the success of the invasion. The plaza is dominated by a massive triumphal arch constructed in a granite veneer over a concrete back-up. The contrasting stripes of the arch's stepped crown are drawn from markings used on American aircraft during the invasion. The invasion's code name, "Overlord," is inscribed on the arch's entablature. A bronze sculptural representation of a field memorial, an inverted rifle and bayonet topped by a helmet placed over the rifle stock is placed on axis with the arch. Estes Plaza also carries bronze plaques that pay tribute to the troops that came ashore after the main invasion.

Another bronze grouping of two soldiers links Estes Plaza to the Stettinius Parade that terminates the monument's progression. One figure moves forward and pulls along a wounded comrade. This grouping seems to have been originally placed on the "beach" but was replaced at that location by another group.

Stettinius Parade, the final portion of the Memorial, is designed to show the movement of the invasion beyond Normandy. Along the firmly established axis of the Parade is a copy of the bronze Great War memorial created by Edmond de Laheudrie for the town of Trevieres, France in 1921. The original bronze was damaged during the World War II and has retained the disfigurement that the war brought to it. The damage, limited largely to the face of the figure, serves as a key point of interest for viewers of the reproduction. Busts of the American and British leaders who succeeded Roosevelt and Churchill - President Harry S. Truman and Prime Minister Clement Atlee, are placed in the circle of the Parade.

Landscaped spaces beyond the monument's axial core are defined by elliptical paths framed by plantings of recent vintage which serve to somewhat soften the memorial's otherwise stark design.

Conservation and Long-Term Care

The National D-Day Memorial is a complex commemorative landscape that features a wide array of materials and systems that require a well-planned, long-term maintenance program. The Memorial has continued to acquire new components in the form of bronze statuary, plaques, plantings, and other landscape features since it was opened in 2001. According to the National D-Day Memorial Foundation Volunteer Handbook (revised 2/2008), more commemorative bronze figures and relief sculpture panels are planned. These include standing figures and relief panels with scenes depicting air and naval participation in the invasion and a full-size figure of former General of the Army, Secretary of State, and Secretary of Defense, George C. Marshall.

Masonry Components

Masonry elements of the memorial consist of a range of materials that include dimensional stone and stone veneer in granite and marble mostly centered in the area of the Overlord Arch and Estes Plaza, but the predominant masonry type used is precast concrete, seen throughout the



memorial as wall and paving elements. The domed structure that houses the Eisenhower portrait is an example of the overarching use of this material, a low-cost alternative to natural stone.

Throughout the memorial, masonry joints and paving panels have been closed with extruded caulk. Depending upon the type of caulk used and the application, these materials have a short functional life span when compared to mortar pointing systems. In many areas of the memorial, these caulked joints have failed and have been repaired by maintenance staff.

Statuary and Plaques

While the Memorial's literature notes four sculptors who have created works at the site, all of the major sculptural groups are works by Jim Brothers, a figurative sculptor based in Lawrence, Kansas. Matt Kirby, a sculptor from Kansas City, Missouri made the bronze rifle and helmet "Field Memorial" beneath the Overlord Arch. Several of the more recent bronze busts, and some of the projected works, are the work of Richard. G. Pumphrey, an art professor at Lynchburg College in Lynchburg, Virginia.

The bronzes exhibit a variety of foundry-applied patinas that range from browns through several greens that give the appearance of weathered surface. All seem to have been coated with a foundry-applied lacquer that Foundation staff maintains periodically with applications of a cold paste wax. It appears that bronzes still possess their original lacquer coatings. It is likely that the use of sacrificial wax coatings has prolonged the life of the foundry-applied lacquers, but most lacquer manufacturers recommend that coatings be removed and reapplied at five year intervals.



The many bronze plaques at the site form a different memorial type from the statuary, and are typical of much of the commercial plaque production of recent decades. These are also cast bronze, but instead of a chemical patina, these have color produced by a coating of brown paint; surfaces that have been burnished to a bright finish, and then sealed with a clear top-coat. As these coatings begin to fail, they will require complete removal and reapplication. If this is not accomplished in a timely way, the plaques will also require fairly extensive, and possibly harmful, surface cleaning to return them to the appearance they possess today. Plaques with sharp-edged raised lettering can be expected to fail first as lacquer coatings are thinnest along sharp divides. This condition is present in all of the text plaques that were viewed during the site visit to the Memorial. In addition, maintenance staff reported that some plaques exhibit a mottled appearance that may be the result of problems with the paint coatings applied at the foundry.

Fountain and Lighting Systems

The operation of the Memorial's fountain and lighting systems are a key element of the maintenance regime of the memorial and its staff. Documentation, particularly as-built drawings, are inadequate and do not accurately reflect constructed reality. The fountain system requires constant attention from the Memorial's maintenance staff due to leaks, cracks, and other system failures. In the face of system difficulties, the Memorial staff has done an exceptional job keeping the complicated and sometimes balky systems operating. This is particularly true with the systems designed to create "bullet" water jets and attendant sound effects.

Collections

The Foundation's collections are located in downtown Bedford in a resource center which also houses some employee space and a conference room. The resource center was not designed or built with collections storage as the intended use and does not meet NPS standards for collections storage facilities. While the study team did not view the entire collection, the Memorial provided a detailed list of the collection. The majority of the archives and artifacts were those associated with the D-Day invasion and World War II generally. The Foundation exhibits some artifacts in the Bedford Museum and develops traveling exhibits for the immediate region, but it does not currently have museum space at the Memorial to display any volume of archives and artifacts.

VISITOR EXPERIENCE

The current National D-Day Memorial visitor experience looks, feels, and operates with fundamental differences from memorial functions now under management by the NPS. The Memorial appears to be designed, built, and is interpreted with an assumption that visitors would arrive at the site well-grounded in the story of D-Day - the background and history of the event, its significance, its contextual role in World War II, and the effect of the D-Day victory on the outcome of the war.

The Foundation operates a website at <http://www.dday.org> which provides basic information about the site including entrance fees, location, school group offerings, upcoming events, and associated information and photos of the Memorial. The website, which is currently under construction, presents some information about the events of D-Day and its context in World War II,

but many of the web pages dedicated to the history of the battle are “under construction.” Once completed, the website could serve as a pre-visit informational and educational tool to enrich the visitor experience and provide prospective visitors with an understanding of the Memorial and an appreciation of the people and events of D-Day that merited its designation by Congress as a national memorial.

Visitors arrive at the site by automobile, tour buses, or school buses. An entrance gate house is driven by upon entering the Memorial where fees are collected during busy days. On less visited days, a sign directs visitors to the gift shop to pay fees. Adults are charged and entry fee of \$8.00 while children between the ages of 6 and 18 years are charged \$5.00. There is no charge for either entrance to, or tours of, the Memorial for children under the age of 6 years. Visitors may take either self guided tours, or pay an additional \$2.00 per person for a volunteer guided walking tour which leaves on the half hour between 10:30 a.m. and 3:30 p.m. A golf cart tour can be purchased for a \$5.00 per person additional charge. The entire site is wheelchair accessible and wheelchairs are provided at no charge. Charges for group tours vary depending upon the size of the group and subject matter covered during the tour. Additional fees are charged for before and after-hours use of the site.

The Memorial does an admirable job of serving students and providing character education - emphasizing the themes of “Valor, Fidelity, and Sacrifice.” It complies with the Virginia Standards of Learning, is one of the most popular destinations for field trips in the commonwealth, and has reached out to underserved audiences. School visits consist of a 2-hour program called, “Valor, Fidelity, Sacrifice,” which permits students to see uniforms and equipment, examine artifacts, learn about the “homefront,” and experience period music, as well as a guided tour of the Memorial. Creative programming has even taught history through science and nutrition. As a private organization, the Foundation can be flexible in its focus for educational programming.

VISITOR FACILITIES

Planning for the Memorial was focused on the immediacy of its construction, rather than the visitor experience or visitor services. While the Foundation plans for educational facilities, existing supporting facilities - the modular unit gift shop and tent for educational programs - were added as temporary structures on the site. Considerable investment would be necessary in the future for the Memorial’s plans to provide adequate facilities to support interpretation and education programs as well as on-site administration space.



Public restrooms are not large enough to accommodate a bus full of patrons or students. The Foundation recommends, for instance, that teachers have students use bathrooms before arriving at the Memorial due to the inadequacy of present facilities to handle groups and visitors. The restrooms are located inside the Memorial adjacent to the “beach” area.

OPERATIONS

The Memorial is a year-round operation, closing only for three major holidays: Thanksgiving, Christmas, and New Years Day. Normal operating hours are daily from 10:00 am to 5:00 pm. It receives approximately 80,000 visitors per year with the majority visiting during the summer months. The Memorial currently operates on an annual approximate budget of \$1.9 million and employs nine full-time employees and 6 part-time employees. Seasonal volunteers, many of whom are veterans, assist during busier times of the year. Approximately half of the Memorial’s revenue comes from donations with the other half resulting primarily from admissions, tours, and gift shop sales.



Chapter 3: Special Resource Study Findings

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CHAPTER 3

SPECIAL RESOURCE STUDY FINDINGS

Chapter 3 sets forth the analyses necessary to determine if the National D-Day Memorial should be recommended to be considered as a unit of the national park system. To receive a favorable recommendation from the NPS, an area must possess nationally significant natural or cultural resources, be a suitable and feasible addition to the national park system, and require direct NPS management instead of protection by some other governmental agency or by the private sector.

FINDINGS OF SIGNIFICANCE

Cultural resources being considered for possible inclusion in the national park system must satisfy the National Historic Landmark (NHL) criteria contained in 36 CFR Part 65. According to those criteria, national significance is ascribed to districts, sites, buildings, structures and objects that possess:

1. exceptional value or quality in illustrating or interpreting the heritage of the United States in history, architecture, archeology, engineering and culture; and
2. a high degree of integrity of location, design, setting, materials, workmanship, feeling and association.

In addition, nationally significant sites must meet at least one of the following:

- Criterion 1: Properties that are associated with events that have made a significant contribution to, and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained.
- Criterion 2: Properties that are associated importantly with the lives of persons nationally significant in the history of the United States.
- Criterion 3: Properties that represent some great idea or ideal of the American people.
- Criterion 4: Properties that embody the distinguishing characteristics of an architectural

type specimen exceptionally valuable for the study of a period, style or method of construction, or that represent a significant, distinctive and exceptional entity whose components may lack individual distinction.

- Criterion 5: Properties that are composed of integral parts of the environment not sufficiently significant by reason of historical association or artistic merit to warrant individual recognition but collectively compose an entity of exceptional historical or artistic significance, or outstandingly commemorate or illustrate a way of life or culture.
- Criterion 6: Properties that have yielded or may be likely to yield information of major scientific importance by revealing new cultures, or by shedding light upon periods of occupation over large areas of the United States. Such sites are those which have yielded, or which may reasonably be expected to yield, data affecting theories, concepts, and ideas to a major degree.

Application of the Criterion

The National D-Day Memorial most closely relates to NHL Criterion #1 – association with a nationally significant event. The Memorial serves as a tribute to the “Valor, Fidelity and Sacrifice” of all members of the Allied Forces who served and gave their lives during Operation Overlord, the invasion of France, on June 6, 1944. The events of World War II, including those of D-Day, are truly significant in terms of our nation’s history. In order to qualify as nationally significant under Criterion 1, the property being evaluated must have existed at the time of the event and have been strongly associated with the event. Indirect association with a historic event, by itself, is not enough to qualify a property under Criterion 1.

NHL criteria exception #7 states that a property primarily commemorative in intent is not eligible for NHL designation unless its design, age, tradition, or symbolic value has invested it with its own national historical significance. NHL guidelines for applying this criteria exception state:

A commemorative marker erected to memorialize a nationally significant person, event, or movement in the nation's history would not be eligible simply for its association with the person, event, or movement it memorialized. Neither is the case strengthened for the consideration of a commemorative property by the loss of other properties directly associated with a significant event or person.

Construction began for the Memorial in November of 1997; more than fifty-three years following the events of Operation Overlord. Not only did the Memorial not exist during the time of the event, but the site itself does not have a strong or direct association with its associated event. Constructed in Bedford, VA, the Memorial is nearly 4,000 miles from Normandy, France where the events of D-Day took place. While Bedford was chosen as the site of the Memorial because of its connection to the “Bedford Boys,” the Memorial is commemorative in nature and has little physical association with the events of Operation Overlord.

The absence of a strong and direct association with D-Day, and the fact that this commemorative memorial does not possess national significance for its design, age, tradition, or symbolic value, means that the National D-Day Memorial does not meet the requirements of NHL criteria exception #7.

Finally, the National D-Day Memorial does not meet the requirement of another NHL criteria

exception, #8, which states: “A property achieving national significance within the past fifty years may be eligible if it is of extraordinary national importance.” Although the memorial commemorates an important event that is more than fifty years old, the memorial itself is less than twenty years old, and does not meet the additional test of exceeding the threshold of national significance by possessing *extraordinary* national significance.

Conclusion: Finding/Determination of National Significance

The National D-Day Memorial does not meet the standard for national significance for cultural resources through the application of National Historic Landmark criteria. While the National D-Day Memorial is indirectly associated with a historic event, the Memorial did not exist during the time of the historic event and its association with the historic event is not a strong one. Two NHL criteria exceptions, #7 and #8, were also considered when evaluating the Memorial’s national significance. The Memorial does not meet the requirements of a commemorative site under NHL criteria exception #7 because of it does not possess a strong association with the events of D-Day, primarily due to its location nearly 4,000 miles from the location of the actual event. The Memorial also does not meet the requirements of NHL criteria exception #8 because it is less than 50 years old and the Memorial would not be considered to possess extraordinary national significance on its own. The NPS finds that the National D-Day Memorial would not qualify as a National Historic Landmark, and therefore does not meet the national significance criteria.

National significance is a threshold criterion. When a determination of national significance cannot be made, a special resource study may be concluded without determining if the remaining criteria can be met. During the course of the Special Resource Study process and through studies of the site, the NPS gathered information that would be necessary to analyze the remaining criteria. The following brief analysis of suitability, feasibility, and need for NPS management are offered simply to share that information and complete the analyses of the National D-Day Memorial under all designation criteria.

FINDING OF SUITABILITY

NPS Management Policies 2006 state that an area is considered suitable for addition to the National Park System if it represents a natural or cultural resource type that is not already adequately represented in the National Park System, or is not comparably represented and protected for public enjoyment by other federal agencies; tribal, state, or local governments; or the private sector. It is important to note that the suitability analysis is not limited to whether resources are represented in the system, but extends the analysis to similar resources protected by other public entities and the private sector. Adequacy of representation is determined on a case-by-case basis, by comparing the potential area to other comparably managed areas representing the same resource type, while considering differences or similarities in the character, quality, quantity, or combination of resource values. The comparative analysis also addresses the rarity of the resources and their interpretive and educational potential. The comparison yields a determination of whether the proposed new area would expand, enhance, or duplicate resource-protection or visitor-use opportunities found in other comparably managed areas.

Application of the Criterion

In evaluating the suitability of cultural resources within or outside the national park system, the Service uses its “Thematic Framework” (1994) for history and prehistory. The framework is an outline of major themes and concepts that help to conceptualize American history. It is used to assist in the identification of cultural resources that embody America’s past and to describe and analyze the multiple layers of history encapsulated within each resource. The thematic framework reflects an interdisciplinary, less compartmentalized approach to American history through eight concepts that encompass the multi-faceted and interrelated nature of human experience. The concepts are:

- Peopling Places,
- Creating Social Institutions,
- Expressing Cultural Values,
- Shaping the Political Landscape,
- Developing the American Economy,
- Expanding Science and Technology,
- Transforming the Environment, and
- Changing Role of the United States in the World Community.

The National D-Day Memorial, like other cultural resources associated with military actions, is most closely related to the fourth theme, Shaping the Political Landscape. This theme encompasses tribal, local, state, and federal political and governmental institutions that create public policy and those groups that seek to shape both policies and institutions. Sites associated with political leaders, theorists, organizations, movements, campaigns, and grassroots political activities all illustrate aspects of the political environment.

Places associated with this theme include battlefields and forts, as well as sites which commemorate watershed events in the life of the nation. The political landscape has been shaped by military events and decisions, by transitory movements and protests, as well as by political parties. Places associated with leaders in the development of the American constitutional system, embody key aspects of the political landscape.

Topics that help define this theme include: parties, protests, and movements; governmental institutions; military institutions and activities; and political ideas, cultures, and theories. The topic of military institutions and activities was deemed the most appropriate for the D-Day National Memorial focusing specifically on the recognition of the service and sacrifice of members of the United States Armed Forces during the World War II invasion of Normandy, France.

Adequacy of representation of sites in the national park system

There are currently 22 units of the national park system that relate to the theme of World War II. Most of those units are sites related to individuals who played a significant role of during the war (presidents, individuals on the home front, etc.) while other sites are memorials to battle sites that occurred on U.S. soil. The NPS unit most comparable to the National D-Day Memorial is the World War II Memorial in Washington, D.C.



National World War II Memorial

World War II Memorial, National Mall and Memorial Parks, Washington, DC – The World War II Memorial honors the service of sixteen million members of the U.S. Armed Forces, the support of countless millions on the home front, and the ultimate sacrifice of 405,399 Americans. The memorial honors all those who served during World War II, including those who served during the D-Day invasion in Normandy, France. Two 43-foot tall pavilions proclaim American victory on the Atlantic and Pacific fronts, while granite columns and a water feature symbolize the unprecedented wartime unity among the forty-eight states, seven federal territories, and the District of Columbia. Bronze bas-reliefs depicting specific battle scenes highlight the sacrifice and determination of the Armed Forces. An inscription, specifically commemorating D-Day, June 6, 1944, can be found carved into the memorial's stone wall along with a quotation from General Dwight D. Eisenhower. Visitors to the memorial can search a computerized database for the names of all those who fought in the war, on the home front or overseas. The memorial is open daily with the exception of December 25 and for annual events surrounding the National Independence Day Celebration. The NPS offers daily tours of the memorial.

Other units of the national park system which relate to specific World War II battles, include World War II Valor in the Pacific National Monument, American Memorial Park, and Aleutian World War II National Historic Area. World War II Valor in the Pacific National Monument preserves and interprets the stories of the Pacific War, including the events at Pearl Harbor, the internment of Japanese Americans, the battles in the Aleutians, and the occupation of Japan. American Memorial Park and Aleutian World War II National Historic Area, both affiliated areas of the national park system, tell the story of and honor those who lost their lives in the Marianas Campaign and the Aleutian Campaign, respectively. All three units mark the actual site of a World War II battle that occurred on U.S. territory.

Adequacy of representation of non-NPS sites

The suitability analysis also examines whether this theme is adequately represented at “protected areas” managed by private entities. There are many sites operated by non-profit entities commemorating events that occurred as part of the D-Day invasion.

The American Battle Monuments Commission, a U.S. federal agency tasked with overseeing American memorials and cemeteries for Armed Forces who served overseas, manages several sites commemorating events of World War II:

East Coast Memorial, Battery Park, New York City – The East Coast Memorial honors those soldiers, sailors, marines, coast guardsmen, merchant marines and airmen who met their deaths in the service of their country in the western waters of the Atlantic Ocean during World War II.

Pointe du Hoc Ranger Monument, France – The Pointe du Hoc Ranger Monument, located on a cliff overlooking Omaha Beach, honors soldiers of the American Second Ranger Battalion who helped defend against German counterattacks during the D-Day invasion.

Utah Beach American Memorial, France – The Utah Beach American Memorial commemorates American troops who fought along the Cotentin Peninsula from June 6 to July 1, 1944.

Normandy American Cemetery and Memorial, France – The cemetery site contains the graves of many of the U.S. soldiers who lost their lives during the D-Day operations. The memorial, overlooking Omaha Beach, commemorates those who lost their lives on, and in the days following, D-Day.

Additional suitability factors

The suitability of the National D-Day Memorial is constrained by its limited connection with the D-Day invasion. Located in Bedford, Virginia, the National D-Day Memorial is nearly 4,000 miles from where the event that it commemorates took place. The location of the World War II Memorial on the National Mall in Washington, D.C., within close proximity to similar national memorials, directly contributes to its interpretation. The landscape surrounding the National D-Day Memorial, does not help to explain the story of the events of D-Day or convey the setting of coastal France.

The Memorial was placed in Bedford, VA because Bedford is thought to have experienced the highest per capita American military losses on D-Day and the hometown of the “Bedford Boys” was intended as a reminder of the price paid by small communities across the nation and the sacrifice of their young men in the cause of freedom. The story is a compelling one; however, the connection between this story and the Memorial is not apparent in the symbolism or interpretation of the Memorial.

Conclusion: Findings of Suitability

The NPS currently administers a number of memorials commemorating the service of our military during international conflicts. Those memorials either mark the site of a particular conflict

or recognize all members of the Armed Forces who served in a particular war. The USS Arizona, located within the World War II Valor in the Pacific National Monument, marks the site of a specific battle fought during World War II, memorializing those who lost their lives in Pearl Harbor. The World War II Memorial, Korean War Veterans, and Vietnam Veterans Memorial are all NPS National Memorials that recognize all those who served during each of those conflicts.

During the course of World War II, there were many key engagements in both the European and Pacific Theaters of Operations. Recognizing this one memorial, as important as the event was to the war effort, may serve to create a perception of neglect of the equal contributions and sacrifices of those who fought in Africa, Italy, the Battle of the Bulge in Belgium and Luxembourg, at so many places in the Pacific, and elsewhere during World War II. The NPS currently administers a national memorial on the National Mall in Washington, D.C. that recognizes the valor, fidelity, and sacrifice of all who served and unselfishly gave their lives for their nation and the freedom of others in Africa, Asia, Europe, and the Pacific Islands during World War II. The NPS believes that the fundamental visitor experience found within the D-Day National Memorial duplicates those found in existing units managed by the national park system and others.

FINDING OF FEASIBILITY

NPS Management Policies 2006 states that in order to be feasible as a new unit of the national park system, an area must be:

1. of sufficient size and appropriate configuration to ensure sustainable resource protection and visitor enjoyment (taking into account current and potential impacts from sources beyond proposed park boundaries), and
2. capable of efficient administration by the NPS at a reasonable cost.

In evaluating feasibility, the Service considers a variety of factors, including: size; boundary configurations; current and potential uses of the study area and surrounding lands; land ownership patterns; public enjoyment potential; costs associated with acquisition, development, restoration, and operation; access; current and potential threats to the resources; existing degradation of resources; staffing requirements; local planning and zoning for the study area; the level of local and general public support; and the economic/socioeconomic impacts of designation as a unit of the national park system. The feasibility evaluation also considers the ability of the National Park Service to undertake new management responsibilities in light of current and projected constraints on funding and personnel.

Application of the Criterion

The NPS study team drew upon documentation provided by the Memorial, information obtained through town and county public records, and discussions with Memorial staff to examine the feasibility of the Memorial as a potential unit of the national park system. As discussed in the introduction to Chapter 2, members from the Facility and Maintenance Division of the National Park Service's Northeast Regional Office visited the Memorial in April 2011 to assist the study team in assessing the existing condition of the Memorial's resources and determining future needs and costs associated with bringing those resources up to current NPS standards. The fol-

lowing is an evaluation of the National D-Day Memorial in accordance with the NPS *Management Policies 2006* feasibility criteria.

Land Ownership and Level of Local Public Support

The Memorial is owned and operated by the National D-Day Memorial Foundation, a nonprofit educational foundation overseen by a Board of Directors. The Foundation does not receive federal funding and relies primarily on private donations and fee collections for operational support. The Foundation was in full support of the Memorial's inclusion into the national park system at the initiation of this study. Since that time, however, the Foundation has moved in the direction of other opportunities of support. The Foundation has concerns regarding the future operation of the Memorial in light of current federal government budgetary constraints and is not convinced that becoming a unit of the national park system is in the Memorial's best interest.

In general, there has been an expressed public interest in designating the Memorial as a unit of the national park system in order to bring national attention to the site. Local support for the Memorial is primarily aimed at ensuring that the Memorial is preserved and protected for future generations to learn from and enjoy.

Conclusion

In spite of support from the local community, lack of current support from the landowner would not support the feasibility of a proposed new unit.

Boundary Configurations, Size, Surrounding Lands

The Foundation owns approximately 51 acres of land on which the Memorial sits. The Memorial is constructed on the highest point of the property, overlooking the City of Bedford and surrounding countryside. The Foundation's parcel is predominately surrounded by parcels owned by the City of Bedford, two of which are zoned "Planned Memorial Park District" which limits allowable uses to memorials and related activities. A third city-owned parcel is the location of the city's elementary school and a fourth parcel, owned jointly by the city and Bedford County, serves as the location for the Bedford Welcome Center. The remaining adjacent parcels are privately-owned and zoned for planned residential development. While the city-owned parcels adjacent to the Memorial provide an immediate buffer from the surrounding land uses, the location of the Memorial on one of the highest elevations in Bedford allows direct views to nearby residential and manufacturing land uses as well as view to the main highway, Route 460. These views threaten the serene, contemplative value of the surrounding landscape.

The existing modular unit used for the visitor center, gift shop, and administrative offices is too small to accommodate the needs of the Memorial or an NPS unit. Undersized restrooms cause lines to form within view of the centerpiece of the Memorial, creating a distraction for other visitors and creating additional visual intrusions on the contemplative value of the Memorial. The Memorial's headquarters are located in a separate location in downtown Bedford along with the Memorial's collection items. The space would not meet current NPS standards for museum collections. Improvements would be needed in order to fulfill the NPS Mission to include a visitor/education center, adequate public restroom facilities, and curatorial and maintenance facilities.

Conclusion

An acceptable boundary for an envisioned unit of the national park system should provide for the inclusion and protection of its primary resources, sufficient surrounding area to provide a proper setting for the resources, and sufficient land for appropriate use and development. The size of the Foundation's property, in addition to the similarly-zoned surrounding parcels owned by the City of Bedford, are sufficient in protecting the resources from encroaching development, but the visual intrusion of the surrounding views would continue to diminish the contemplative setting of the Memorial and could impede the visitor experience. The Memorial's parcel is of sufficient size to allow for the improvements needed to fulfill the NPS Mission.

Costs and Staffing Requirements

A new unit of the national park system would have start-up and ongoing operational and maintenance costs. For the purposes of this study, the study team developed cost estimates that are based on very broad needs typically associated with the operational requirements of a new park unit (all estimates are provided in 2010 dollars). At a minimum, start-up costs would include acquisition of the property owned by the National D-Day Foundation, whether through donation, exchange, or purchase from willing sellers.

Immediate work needed to repair ongoing maintenance issues and prevent further deterioration of the site includes: concrete joint and cracking repairs throughout the site, sidewalk and roadway repairs, electrical repair and/or replacement, lighting repair/replacement, pool filtration/circulation system repairs, valve replacements for pool special effects, water pipe replacements for drinking fountains and hose bibs, and irrigation system repairs. In addition to structural repairs, several cosmetic issues need to be addressed including: replacement of cracked Necrology benches, repainting Gray's Plaza, awning and canopy replacements, replacement of the army tent which is currently used for education space, and removal of hazardous trees. The total cost for these known deferred maintenance items is estimated to be \$1.1 million.

In addition to the deferred maintenance listed above, an additional \$60,000 would be needed to complete engineering studies for structural repair of the pool system, Folly, and "bunker" room which houses the Memorial's operational control systems. The results of those studies would determine additional unknown deferred maintenance costs for those structures which could be substantial. These unknown costs, along with the \$1.1 million in known deferred maintenance, make it unlikely that the NPS could meet the existing maintenance needs of the Memorial in light of current and anticipated NPS budget constraints.

As mentioned above, several capital improvement projects were proposed for consideration in the fulfillment of the NPS Mission. To address some of these visitor facility needs, the existing modular unit used for the visitor center and administrative offices would need to be replaced, the restrooms expanded, and more adequate maintenance facility developed. If the NPS determines that collections currently held by the Memorial are suitable for a new national memorial, then additional curatorial facilities would need to be constructed. The Foundation's parcel provides adequate space for the addition of the above-mentioned needed facilities, but the cost of construction, in light of current and anticipated NPS budget constraints, would likely be infeasible.

Current operational costs for the National D-Day Memorial total approximately \$1.879 million.

The additional structures proposed above could easily raise that cost by another \$200,000. Staffing is typically the principal element in cost of operations and the study team estimates that an NPS unit would most likely consist of between 7 and 10 full-time and part-time staff, while employing seasonal workers and utilizing volunteers during higher visitation periods. The NPS may potentially consider the Memorial as a seasonal park, such as Saugus Iron Works National Historic Site, to operate more economically and reduce staff. For a variety of reasons, such as shutting off the fountain (a primary feature of the memorial) for winterization from mid-December to March and low visitation during winter months, the Memorial could be closed during the winter months, or remained open only on weekends during those months.

Following is a list of NPS units similar in size and visitation to the National D-Day Memorial. While all sites differ in programming and maintenance needs, this list provides a rough estimate of operational needs and costs for potentially incorporating the Memorial into the national park system.

| NPS Unit | NPS Owned Acreage | 2010 Visitation | 2010 Operating Budget (\$M) | Staff |
|---|-------------------|-----------------|-----------------------------|-------|
| Carl Sandburg Home NHS | 263.52 | 86,740 | 1.280 | 20 |
| Fort Smith NHS | 31.75 | 68,678 | 1.112 | 14 |
| Hubbell Trading Post NHS | 160.09 | 80,578 | 0.907 | 13 |
| Jimmy Carter NHS | 36.81 | 64,849 | 1.698 | 20 |
| Moore's Creek NB | 85.35 | 51,326 | 0.701 | 7 |
| Perry's Victory & International Peace Mem. | 23.12 | 92,944 | 1.136 | 15 |
| Sagamore Hill NHS | 83.02 | 55,149 | 1.581 | 19 |

Other sites like the World War II Memorial, Korean War Veterans Memorial, and Vietnam Veterans Memorial which are more closely related in purpose and theme to the National D-Day Memorial, are all part of a larger park unit and share maintenance, administrative, curatorial, professional, and law enforcement services. Many smaller units of the national park system receive similar shared support from a partner/parent park in order to lower the cost of operations. Those sorts of shared services would probably not be available for the National D-Day Memorial. The closest national park unit, Booker T Washington NM in Hardy, VA, is a smaller park unit and would probably not have the resources available to assist the Memorial. Appomattox Court House NHP in Appomattox, VA is too far away to allow practical or cost-effective pooling of maintenance or administrative services.

Conclusion

The scale and nature of the capital improvement projects needed for the Memorial to fulfill the NPS mission would require considerable expenditures of funds. Known deferred maintenance needs of the site alone are estimated to be a minimum of \$1.1 million with another \$200,000 needed for capital improvements. The long-term management and maintenance of the Memorial would require ongoing funding that is difficult to estimate at this time. These resource and property management obligations, given other system-wide cost and maintenance pressures, would not be considered feasible.

Conclusion: Finding/Determination of Feasibility

Many projects that are technically possible to accomplish may not be feasible in light of current budgetary constraints and other NPS priorities. The study team made extensive efforts to understand the condition of the Memorial's structures and monuments in order to determine associated costs of bringing the Memorial up to current NPS standards. Preliminary cost estimates for necessary capital improvements and deferred maintenance alone would be a minimum of \$1.3 million. In light of current and anticipated NPS budget, funding needs for deferred maintenance could result in additional strain on the Memorial's resources. Funding needs of the site in conjunction with a lack of landowner support for the Memorial's designation as a unit of the national park system, lead the study team to conclude that the National D-Day Memorial would not meet the criteria for feasibility.

FINDING OF NEED FOR DIRECT NPS MANAGEMENT

The need for NPS management is the final criterion for the potential establishment of a unit of the National Park System. This criterion requires a finding NPS management is clearly superior to any other available form of management by other entities, public or private. It may find that the resource is immediately threatened and preservation by the NPS is the only alternative available. The NPS does not normally find that it is needed to manage resources already adequately protected by state, local or private, entities.

Application of the Criterion

The National D-Day Memorial Foundation has managed the site since its creation. Although budgets have been an ongoing concern, the Memorial has remained open for public enjoyment on a year-round basis, offers a variety of educational programming, and hosts several special events throughout the year. Overall, the Memorial site is in fair condition. When considering the limited resources available to the maintenance division, the staff have done a good job in keeping the site open and operational. NPS management would not necessarily provide better resource protection, visitor enjoyment, or educational and interpretive experiences. Therefore, there is no demonstrated need for NPS management for the National D-Day Memorial.

Conclusion: Finding/Determination of Need for Direct NPS Management

During the course of the study, NPS has determined that the Foundation is adequately protecting the Memorial's resources and providing for educational experiences and public enjoyment. The study team is unable to conclude that NPS management is clearly superior to existing management and, therefore, would not meet the need for direct NPS management.

SUMMARY OF FINDINGS

This congressionally authorized National D-Day Memorial Special Resource Study concludes that the resources contained within the Memorial do not meet the criteria for national signifi-

cance, suitability, feasibility, or the need for NPS management. Since this study concludes that the resources associated with the Memorial do not fully meet the criteria for potential designation as a unit of the national park system, no federal action is anticipated.



Chapter 4:

Consultation & Public Outreach

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CHAPTER 4

CONSULTATION & PUBLIC OUTREACH

This chapter describes the required consultation procedures, public meetings, and comments related to the preparation of the National D-Day Memorial Special Resource Study.

PUBLIC SCOPING

In accordance with the National Environmental Policy Act (NEPA), a public scoping meeting for the National D-Day Memorial Special Resource Study took place on January 18, 2011. Newsletters were handed out during the meeting which described the special resource study process, outlined the criteria for new parklands, and provided contact information for the study team. The meeting provided an opportunity for members of the public to ask questions and express concerns or comments about the study. Those who spoke at the public scoping meeting expressed support for the establishment of the National D-Day Memorial as a unit of the national park system.

In addition to the meeting, the planning team created a project webpage for the National D-Day Memorial Special Resource Study on the NPS Planning, Environment and Public Comment (PEPC) website. Copies of the newsletter were uploaded to the website and the public was asked to submit thoughts, comments, and concerns about the study. Five pieces of correspondence were received; all of which were in favor of the Memorial becoming part of the national park system.

AGENCY CONSULTATION

Consultation was undertaken with the U.S. Fish and Wildlife Service (FWS) and the Virginia State Historic Preservation Officer (SHPO). A letter was sent to the Virginia SHPO on October 24, 2011, initiating formal consultation and providing a brief description of the project. The SHPO responded in a letter requesting continued consultation throughout the study pro-

cess. The study team initiated consultation with the U.S. FWS's Virginia Field Office through their online project review process. Through this process, it was determined that no threatened, endangered, or species of concern or critical habitats were present in the study area and a "no effect" determination was made. No further consultation with U.S. FWS was required.

ENVIRONMENTAL COMPLIANCE

Since this study concludes that the National D-Day Memorial does not fully meet the criteria for potential designation as a unit of the national park system, no federal action is anticipated. Therefore, an environmental assessment will not be prepared.



Appendices

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APPENDIX A

PERTINENT LEGISLATION

110 STAT. 2670

PUBLIC LAW 104–201—SEPT. 23, 1996

Virginia.
16 USC 431 note.

**SEC. 1080. DESIGNATION OF MEMORIAL AS NATIONAL D-DAY
MEMORIAL.**

(a) DESIGNATION.—The memorial to be constructed by the National D–Day Memorial Foundation in Bedford, Virginia, is hereby designated as a national memorial to be known as the “National D–Day Memorial”. The memorial shall serve to honor the members of the Armed Forces of the United States who served in the liberation of Normandy, France, in June 1944.

PUBLIC LAW 104–201—SEPT. 23, 1996

110 STAT. 2671

(b) PUBLIC PROCLAMATION.—The President is requested and urged to issue a public proclamation acknowledging the designation of the memorial to be constructed by the National D–Day Memorial Foundation in Bedford, Virginia, as the National D–Day Memorial.

(c) MAINTENANCE OF MEMORIAL.—All expenses for maintenance and care of the memorial shall be paid for with non-Federal funds, including funds provided by the National D–Day Memorial Foundation. The United States shall not be liable for any expense incurred for the maintenance and care of the memorial.

Subtitle F—Other Matters

SEC. 2872. NATIONAL D-DAY MEMORIAL STUDY.

(a) DEFINITIONS.—In this section:

(1) AREA.—The term “Area” means in the National D-Day Memorial in Bedford, Virginia.

(2) SECRETARY.—The term “Secretary” means the Secretary of the Interior, acting through the Director of the National Park Service.

(b) STUDY.—

(1) IN GENERAL.—The Secretary may conduct a study of the Area to evaluate the national significance of the Area

PUBLIC LAW 111-84—OCT. 28, 2009

123 STAT. 2697

and suitability and feasibility of designating the Area as a unit of the National Park System.

(2) CRITERIA.—In conducting the study authorized under paragraph (1), the Secretary shall use the criteria for the study of areas for potential inclusion in the National Park System in section 8(c) of Public Law 91-383 (16 U.S.C. 1a-5(c)).

(3) CONTENTS.—The study authorized under paragraph (1) shall—

(A) determine the suitability and feasibility of designating the Area as a unit of the National Park System;

(B) include cost estimates for any necessary acquisition, development, operation, and maintenance of the Area; and

(C) identify alternatives for the management, administration, and protection of the Area.

(c) REPORT.—Section 8(c) of Public Law 91-383 (16 U.S.C. 1a-5(c)) shall apply to the conduct of the study authorized under this section, except that the study shall be submitted to the Committee on Natural Resources of the House of Representatives and the Committee on Energy and Natural Resources of the Senate not later than 3 years after the date on which funds are first made available for the study.

Applicability.

APPENDIX B

STUDY TEAM AND CONTRIBUTORS

NPS NORTHEAST REGION STUDY TEAM MEMBERS AND ADVISORS

Dennis R. Reidenbach, Regional Director

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John Piltzecker, Associate Regional Director for Planning, Facilities, and Conservation Assistance

Terrence D. Moore, Chief, Planning and Compliance NER (former)

Allen Cooper, Chief, Park Planning and Special Resource Studies Branch

Amanda Jones, Community Planner, Project Manager

Lisa Kolakowsky Smith, Community Planner

Brian Strack, Division Chief, Facility Management

William Tagye, Supervisory FMSS Program Coordinator (former)

Robert Boyer, Facility Management Systems Specialist

Richard Cox, Facility Management Systems Specialist (former)

Joanne C. Blacoe, Interpretive Planner

Dennis Montagna, Historian and Specialist in Monuments

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APPENDIX C

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SELECTED BIBLIOGRAPHY

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- 2008 *National D-Day Memorial Volunteer Handbook*.

National Park Service, U.S. Department of the Interior

- 2011 *National D-Day Memorial, Bedford, Virginia: Technical Assistance Report*.

WEBSITES CONSULTED

The National D-Day Memorial, www.dday.org

Town of Bedford, Virginia, www.bedfordva.gov

Bedford County, Virginia, www.co.bedford.va.us

National Register of Historic Places, www.nps.gov/nr

National Historic Landmarks Program, www.nps.gov/nhl

American Battle Monuments Commission, www.abmc.gov



As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical 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 by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

United States Department of the Interior – National Park Service