MEMORANDUM OF AGREEMENT
AMONG
THE SMITHSONIAN INSTUTITION
THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICER
THE NATIONAL CAPITAL PLANNING COMMISSION
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING
THE CONSTRUCT INTEGRATED BEZOS LEARNING CENTER PROJECT

This Memorandum of Agreement (MOA) is made as of this 4 day of June, 2025, by and among the Smithsonian Institution (SI), the District of Columbia State Historic Preservation Officer (DC SHPO), the National Capital Planning Commission (NCPC), and the Advisory Council on Historic Preservation (ACHP) (referred to collectively herein as the "Signatories" or individually as a "Signatory"), pursuant to Section 106 of the National Historic Preservation Act (NHPA), 54 U.S.C. § 306108, and its implementing regulations, 36 CFR Part 800 (Section 106), and § 800.6(b) to resolve adverse effects from the Construct Integrated Bezos Learning Center Project; and

WHEREAS, the National Air and Space Museum (NASM) is a Modernist style building designed by Gyo Obata of Hellmuth, Obata & Kassabaum, that opened to the public in 1976. The NASM building is rectangular in plan with alternating bays of blocks of curtain wall construction clad with stone and glazing. The NASM previously included a restaurant addition constructed in 1988 (1988 Addition), which was recently demolished as described below; and

WHEREAS, the NASM is a contributing element of the National Mall Historic District, which was listed in the National Register of Historic Places (NRHP) in 1981, with the District expanded in 2016. The NASM may be eligible for individual listing in the NRHP; and

WHEREAS, on July 14, 2021, the second largest philanthropic gift ever given to the SI enabled the design and construction of a "world class center for education" known as the Bezos Learning Center (BLC) which will focus on both NASM-specific and pan-institutional programs; and

WHEREAS, on March 30, 2022, the SI, DC SHPO, and NCPC entered into the *Programmatic Agreement regarding the NASM East End Project* (NASM East End PA), which governed the demolition of the 1988 Addition and provided stipulations to guide the design and Section 106 review of the BLC, including Stipulation 2.C.iv which requires a separate Memorandum of Agreement to be executed to resolve any adverse effects that would result from the BLC; and

WHEREAS, the Construct Integrated Bezos Learning Center Project (Undertaking or Project) includes: 1.) the design and construction of a three-story addition on the east elevation of the NASM that contains a connecting vestibule and restaurant on the first level, and BLC programming and staff spaces on the upper floors (BLC Addition); 2.) permanent replacement and relocation of the Phoebe Waterman Haas Public Observatory (Haas Observatory) on the southeast side of the site; 3.) creation of outdoor educational programming spaces, including the Phoebe Waterman Haas Astronomy Park on the east terrace and the Learning Courtyard on the north side of the site; 4.) new accessible walkways to the north and south sides of the BLC; and 5.) newly designed landscapes at the east end of the site (Exhibit A – Bezos Learning Center Design); and

WHEREAS, a separate and ongoing project known as the NASM Revitalization Project is currently nearing completion. The NASM Revitalization Project is the subject of a 2017 Memorandum of Agreement and involves replacement of the NASM building's exterior cladding and glazing, and the construction of a security vestibule on the north side. The BLC Addition will require removal or modification of stone cladding and the east curtain wall glazing replaced under the NASM Revitalization Project; and

WHEREAS, the SI initiated Section 106 consultation with the DC SHPO for the Project on June 30, 2023, and in accordance with Stipulation 2.C of the NASM East End PA; and

WHEREAS, NCPC, a Signatory to this MOA pursuant to 36 CFR § 800.3(f)(1), has approval authority over federal projects located within the District of Columbia pursuant to the National Capital Planning Act (40 U.S.C. § 8722(b)(1) and (d); and

WHEREAS, pursuant to Public. Law No. 108-72, 117 Stat. 888 (August 15, 2003), the SI is "deemed to be an agency for purposes of compliance with regulations promulgated by the ACHP pursuant to Section 106 of the National Historic Preservation Act" for projects in the District of Columbia requiring NCPC review and approval; and

WHEREAS, the SI and NCPC have agreed that SI will be the lead Federal agency pursuant to 36 CFR § 800.2(a)(2) for the Undertaking to fulfill their collective Section 106 responsibilities. NCPC has elected to fulfill its Section 106 responsibilities by participating in consultation and by signing this MOA pursuant to 36 CFR § 800.6(c)(2); and

WHEREAS, in addition to the Signatories, the SI has consulted with a wide group of interested parties and the public and has invited them to participate as Consulting Parties pursuant to 36 CFR § 800.3(f) (Exhibit B – List of Consulting Parties); and

WHEREAS, the U.S. Commission of Fine Arts (CFA) has participated in the consultation as a Consulting Party and has reviewed the project under their legal authorities; and

WHEREAS, the SI has provided opportunities for the Signatories, Consulting Parties and the public to participate in the Section 106 consultation and National Environmental Policy Act (NEPA) review processes through public meetings, site visits, and a public project webpage (https://airandspace.si.edu/about-transformation/bezos-learning-center/106), also in compliance with Stipulation 2.C of the NASM East End PA (Exhibit C – Summary of Consulting Parties and Public Meetings); and

WHEREAS, on November 12, 2024, the SI and NCPC released the Draft Environmental Assessment (EA) pursuant to the NEPA for a public comment period. The EA was prepared in accordance with the MOA between the SI and NCPC which directs how NEPA compliance is addressed for SI projects. Analysis determined that the Project will not have a significant impact on the human environment; and

WHEREAS, the Area of Potential Effects (APE) was defined in consultation for this Undertaking and through the NASM East End PA, and is the same as the APE for the NASM Revitalization Project, including the portions of the National Mall Historic District from which the NASM is visible, and extending south of the NASM; and

WHEREAS, the Project was designed in accordance with the Bezos Learning Center Design Framework outlined in Stipulation 2.B of the NASM East End PA so that when the Signatories and the Consulting Parties applied the criteria of adverse effect pursuant to 36 CFR § 800.5(a), they determined adverse effects were avoided by maintaining the NASM's siting relationship to the National Gallery of Art West Building; and by shaping the BLC Addition's height, form, and setbacks to respect contributing vistas of the Plan of the City of Washington and the National Mall Historic District, including the 4th Street north-south vista, the east-west viewshed of the central greensward, and the building line established by the Plan of the City of Washington; and

WHEREAS, the Signatories and the Consulting Parties also determined that the undertaking will result in adverse effects on the NASM and the National Mall Historic District as outlined below and described in the *Assessment of Effects on Historic Resources* (Exhibit D – Assessment of Effects Report Summary); and

WHEREAS, the Signatories and Consulting Parties agree that the design and construction of the BLC Addition, the permanent replacement and relocation of the Phoebe Waterman Haas Public Observatory, and the other changes proposed for the east terrace are substantial alterations and additions that will diminish the integrity of the NASM's design, setting, materials, workmanship, feeling, and association, and will result in adverse effects on the NASM. The Signatories and Consulting Parties further agree that the cumulative effects of the Undertaking, including the BLC Addition's integral façade lighting, will diminish the integrity of the National Mall context and result in adverse effects on the National Mall Historic District (Exhibit E – Assessment of Effects Report); and

WHEREAS, the SI notified the ACHP on November 18, 2024, of the adverse effects associated with the Undertaking in accordance with 36 CFR § 800.6(a)(1) and invited the ACHP to participate in consultation to resolve adverse effects. On February 10, 2025, the ACHP notified the SI of its intent to participate in consultation to develop this MOA; and

NOW, THEREFORE, the Signatories agree that the Undertaking shall be implemented in accordance with the following stipulations in order to take into account the effects of this Undertaking on historic properties.

STIPULATIONS

The SI shall ensure the following measures are carried out:

1. MINIMIZATION MEASURES

A. BLC Addition Form: Design of the BLC Addition's form minimize adverse effects on the NASM and the National Mall Historic District as follows:

i. BLC Addition Form and Height: The maximum height of the BLC Addition will be 52'6", which is less than the NASM's overall height of 82'9" and the National Museum of the American Indian's (NMAI) overall height of 97'. Limiting the BLC's height establishes a hierarchy that identifies the NASM as the primary feature on the site, and the BLC Addition to read as secondary. This configuration recalls the hierarchy and siting of the 1988 Addition.

ii. BLC Addition Setbacks: Critical setbacks reinforce the site hierarchy and the NASM's prominence. The BLC Addition aligns with the NASM's north and south facades to minimize

adverse visual effects in the Independence Avenue and Jefferson Drive viewsheds. The BLC Addition will be setback 30' from the 4th Street SW right-of-way to mirror the NMAI's site arrangement and maintain the 4th Street vista within the National Mall Historic District.

iii. Solid to Void Pattern: The NASM has distinctive seven bay solid (stone) to void (glazing) patterns on its north and south elevations. The BLC Addition will extend and reinterpret the NASM's solid to void pattern on the north by utilizing a courtyard and glazing as a void and a building elevation as a solid. These features relate to the NASM's original design and create compatibility between the historic building and the Addition.

B: BLC Addition Materials: Cladding materials and finishes will be selected to minimize adverse effect through matching or complementing the NASM's materials palette as follows.

i. Metal Cladding Panels and Reveal Details: The size of the BLC Addition's metal panels will follow a 1'3" module based upon proportional fractions of NASM's 2'6" stone panel sizes. Six different panel sizes derived from the 1'3" module will be randomized across the BLC Addition elevations. The size of the reveal between the metal panels was reduced to 3/4 inch to correspond to the NASM's stone cladding joints and relate better to its monolithic aesthetic.

ii. Metal Panel Finish: The BLC Addition's metal panels will be finished as a light cool gray color and feature a custom metallic finish (PPG Titanium) to correspond with and complement the NASM's Colonial Rose granite cladding. The metal finish will also complement adjacent materials in the immediate setting including the differing yellow limestones of the NMAI and the Eisenhower Memorial.

iii. Glazing System Finishes: The glazing system at the BLC Addition's first floor, glazed connection to the NASM, and on all facades except the north facing concourse section, will feature a dark brown metal finish and tinted glazing to relate to the NASM's curtain wall glazing finishes. The glazing system at the north facing concourse section will feature a light gray metal finish to match the NASM's atrium space frames.

C: Fenestration Size and Scale: The size and scale of the fenestration pattern on the BLC Addition's south and east sides were developed to reflect the proportions of the NASM's rectangular fenestration setback at the balconies of the NASM's solid bays. These features relate to the NASM's original design and strengthen compatibility between the historic building and the Addition.

D: BLC Addition Connection to NASM: The NASM's east elevation three-bay solid to void pattern will be partially obscured by the BLC Addition. To minimize the resulting adverse effect, the BLC Addition will connect lightly with a glazed hyphen, requiring minimal removal of NASM building fabric at the first floor only. Use of glazing will maintain full visibility of the east elevation when inside the hyphen to recall the configuration of the NASM's atriums.

E: Haas Observatory Design: The Haas Observatory design will be integrated with the BLC Addition's form and materials. The Haas Observatory will also be integrated with the NASM and BLC site walls and planting beds to create a comprehensive design for the east terrace and landscape.

F. Site Walls: Perimeter site walls will be maintained at existing heights per the NASM Revitalization and will be clad in Colonial Rose granite, to maintain visual and material continuity with the NASM building and site features, in keeping with the original design intent.

G: Site Visit to Review Façade Lighting: Within three (3) months of the completion of the BLC Addition's façade, the SI will invite the Signatories to convene at the NASM site to review and comment on the calibration of the dimmable façade lighting level, color temperature (soft white 3,000K) and other lighting-related details of the BLC. Lighting levels and related details will be adjusted and refined as necessary to reflect Signatory comments. The SI shall use the comments from this visit to establish and verify the appropriate lighting treatments and level for the BLC Addition, and the NASM site within the National Mall context, for conformance with the NCPC's *Monumental Core Lighting Policy and Framework* and to avoid the intensification of adverse effects. Within thirty (30) days of the site visit, the SI shall provide the Signatories with a formal memo to document how the lighting levels and related details were finalized.

2. MITIGATION MEASURES

A. Interpretive Signage: Within three (3) months of the day the BLC is formally opened to the public, the SI shall install one (1) interpretive signage panel within the Learning Courtyard, southwest of the BLC entrance, which fronts the National Mall. This signage panel will comply with Stipulation 1.C of the NASM East End PA. The design and exact location will be developed in consultation with the DC SHPO and the NCPC, but the signage will be installed at a location on the east terrace of the NASM to provide the public with information and images relating to the history of the NASM, the 1988 Addition and related topics. The signage may include links to supplemental web-based resource material (Exhibit A, page 18).

B. Exhibit Regarding the BLC Addition Design: Per the NASM Revitalization MOA, an exhibit was developed and is on display inside the NASM regarding building history, construction, and design of the Revitalization Project. Within one (1) year of the execution of this MOA, one (1) additional panel will be added to the exhibit to describe the BLC Project design and its Section 106 consultation. At a minimum, the physical exhibit will remain in the NASM for two (2) years after the day the BLC is formally opened to the public. After this period expires, the SI will consider permanently displaying the exhibit or will adapt the exhibit to a web-based resource accessible through the SI AHHP webpage or otherwise made available to the public.

C. Section 106 Project Archive: The Construct Integrated BLC Project Section 106 public webpage will be archived to create a complete record of consultation on the Project. The webpage will be archived by the Smithsonian Institution Archives and will become part of the *Smithsonian Institution Websites* collection. The archived Section 106 project webpage will be accessible through the Architectural History and Historic Preservation (SI AHHP) webpage or otherwise be made permanently available to the public through SI Archives. Archiving will be complete within one (1) year of the execution of this MOA.

D. Cultural Landscape Report: In coordination with the National Park Service and the DC SHPO, the SI will prepare a Cultural Landscape Report (CLR) for the National Mall Historic District east of 15th Street NW. The CLR will be a comprehensive document that describes the history and significance of the SI museums and the National Mall landscape settings and identifies recommended treatment plans for these features. The CLR will provide guidance on how to manage the landscapes while considering their cultural and historical value and ensure preservation of significant viewsheds and vistas. The CLR will

recommend boundary definitions between the SI sites and the National Mall landscape. The CLR deliverable will be formatted to permit the future completion of the western half of the National Mall Historic District. The CLR will be completed within four (4) years of the execution of this MOA, and will be accessible through the SI AHHP webpage or otherwise made available to the public.

E. Preservation Periodical: The SI AHHP publishes a biannual newsletter to connect with individuals that have an interest in providing input on current and future SI projects with potential to affect historic properties; learning more about historic properties under the SI's jurisdiction; and engaging in a dialogue on related topics. Each future issue of the newsletter will incorporate a BLC construction progress update for the complete duration of the Project which summarizes all developments that relate to historic preservation topics.

3. DESIGN CONSULTATION

The SI will consult with the Signatories regarding any design changes to the Project's scope as shown in the Exhibits, and any modifications recommended by NCPC and/or the CFA after final approval. Consultation will be carried out as follows:

A. The SI will review any proposed changes and propose a determination as to whether the revised design may result in new adverse effects that have not already been resolved and/or the intensification of known adverse effects to historic properties.

B. The Project site has been previously disturbed and construction will occur within the NASM's footprint. Should cultural resources or unanticipated historic fabric be identified during the implementation of the Project, or any actions taken pursuant to this MOA, the SI shall ensure that reasonable efforts are made to avoid, minimize or mitigate adverse effects to such resources, and shall consult the DC SHPO to resolve any unavoidable adverse effects pursuant to 36 CFR § 800.6.

C. The SI shall contact each Signatory via telephone to provide advanced notice of proposed changes and forthcoming effect determinations prior to forwarding, via electronic format, its determination in Stipulation 3.A. and the revised design to the Signatories for a fourteen (14) calendar day review and comment period.

D. If the SI determines that no new adverse effects may result or no known adverse effects on historic properties will be intensified and a Signatory objects in writing within the fourteen (14) calendar day review period, the SI will notify the Signatories and consult with the objecting party and the other Signatories who elect to participate in the consultation to seek ways to resolve the objection. If SI determines that the objection cannot be resolved after a thirty (30) day consultation period, or another time period agreed upon by all Signatories, the SI will follow the procedures in the Dispute Resolution stipulation of this MOA.

E. If the SI determines that a new adverse effect may result or a known adverse effect will be intensified, the SI shall immediately advise the Signatories and consult to avoid, minimize, or mitigate the new or intensified adverse effect. If the SI determines that unavoidable adverse effects on historic properties will result or be intensified after a thirty (30) day consultation period, or another time period agreed upon by all Signatories, the Signatories shall determine

whether an Amendment to this MOA is warranted to identify additional measures that will be carried out to avoid, minimize, or mitigate any new or intensified adverse effects.

4. MONITORING AND REPORTING

Each year, by the anniversary date of the last signature on this MOA until it expires or is terminated, the SI will provide the Signatories a summary report detailing work undertaken pursuant to the terms of the MOA. Such report will include any proposed scheduling changes, any encountered or anticipated problems, and a summary of any disputes or objections received in the SI's efforts to carry out the terms of this MOA pursuant to its Dispute Resolution clause. A Signatory may request the SI will convene a meeting with the Signatories to discuss the annual report. Failure to provide such summary report may be considered non-compliance with the terms of the MOA pursuant to the Amendments and Non-Compliance stipulation of this MOA.

5. QUALIFICATIONS

SI will ensure that all historic preservation work performed on its behalf pursuant to this MOA will be accomplished by, or under the direct supervision of a person or persons who meet(s) or exceed(s) the pertinent qualifications cited in the Secretary of the Interior's Professional Qualifications Standards.

6. ANTI-DEFICIENCY ACT

The SI's obligations under this MOA are subject to the availability of appropriated funds, and the stipulations of this MOA are subject to the provisions of the Anti-Deficiency Act. The SI will make reasonable and good faith efforts to secure the necessary funds to implement its obligations under this MOA. If lack of appropriated funds or compliance with the Anti-Deficiency Act alters or impairs the SI's ability to implement its obligations under this MOA, the SI will consult in accordance with the Amendments and Non-Compliance stipulation, and if necessary, the Termination stipulation.

7. AMENDMENTS AND NON-COMPLIANCE

This MOA may be amended when such an amendment is agreed to in writing by all Signatories. The amendment will be effective on the date a copy signed by all the Signatories is filed with the ACHP. If the Signatories cannot agree to appropriate terms to amend the MOA, any Signatory may terminate the MOA in accordance with the Termination stipulation of this MOA.

8. DISPUTE RESOLUTION

Should any Signatory or Consulting Party object at any time to any action proposed or the manner in which the terms of this MOA are implemented, SI shall consult with the Signatories to resolve the objection. If a resolution cannot be reached after a thirty (30) day consultation period, or other time period agreed upon by all Signatories, and the SI determines the objections cannot be resolved, the SI will:

A. Forward all documentation relevant to the dispute, including the SI's proposed resolution, to the ACHP. The ACHP will provide the SI with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, the SI will prepare a written response that takes into account any timely advice or

comments regarding the dispute from the ACHP and Signatories and provide them with a copy of this written response. The SI will then proceed according to its final decision.

B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day period, the SI may make a final decision on the dispute and proceed accordingly. Prior to reaching a final decision, the SI shall prepare a written response that takes into account any timely comments regarding the dispute from the Signatories to the MOA and provide them and the ACHP with a copy of such written response.

C. The SI's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

9. TERMINATION

If any Signatory to this MOA determines that its terms cannot or are not being properly implemented, that Signatory shall immediately consult with the other Signatories to identify actions that would remedy the situation, potentially including an amendment per the Amendments and Non-Compliance stipulation of this MOA. If the Signatories cannot reach agreement on an amendment within thirty (30) days (or another time period agreed to by all Signatories), any Signatory may terminate the MOA upon written notification to the other Signatories. Once the MOA is terminated, and prior to work continuing on the undertaking, the SI must either (a) execute a new MOA pursuant to 36 CFR § 800.6, or (b) reinitiate consultation on the unfinished components of the undertaking pursuant to 36 CFR § 800 and applicable sections of the terminated MOA. The SI will notify the Signatories as to the course of action it will pursue.

10. ELECTRONIC COPIES

Within one week of the last signature on this MOA, the SI will provide the Signatories with one legible, color, electronic copy of the fully executed MOA and all attachments fully integrated into one, single document. Internet links will not be used to provide copies of attachments. If the electronic copy is too large to send by e-mail, the SI will provide the Signatories with a copy of this MOA on a compact disc or other electronic format.

11. DURATION

This MOA will be in effect for nine (9) years from the date of its execution. Prior to such time, the SI may consult with the Signatories to reconsider the terms of the MOA and amend it in accordance with the Amendments and Non-Compliance stipulation of this MOA.

Execution of this MOA by the Signatories and the implementation of its terms evidences that the SI has taken into account the effects of the Construct Integrated Bezos Learning Center Project on historic properties, and afforded the ACHP a reasonable opportunity to comment.

SIGNATURES FOLLOW ON SEPARATE PAGES

EXHIBITS

Exhibit A – Bezos Learning Center Design
Exhibit B – List of Consulting Parties
Exhibit C – Summary of Consulting Parties and Public Meetings
Exhibit D – Assessment of Effects Report Summary
Exhibit E – Assessment of Effects on Historic Resources Report

SIGNATURE PAGE
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FOR THE SMITHSONIAN INSTITUTION

DocuSigned by:
Ron Cortez
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5/19/2025 | 10:29 AM EDT

Ronald S. Cortez, JD, MA — Date
Under Secretary for Finance and Administration/Chief Financial Officer

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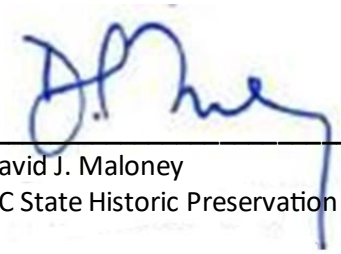
FOR THE DC STATE HISTORIC PRESERVATION OFFICER



May 20, 2025

David J. Maloney — Date
DC State Historic Preservation Officer

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FOR THE NATIONAL CAPITAL PLANNING COMMISSION

May 20, 2025

Marcel C. Acosta
Executive Director

Date

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FOR THE ADVISORY COUNCIL ON HISTORIC PRESERVATION

06/04/2025

Reid Nelson
Executive Director

Date

Exhibit A – Bezos Learning Center Design

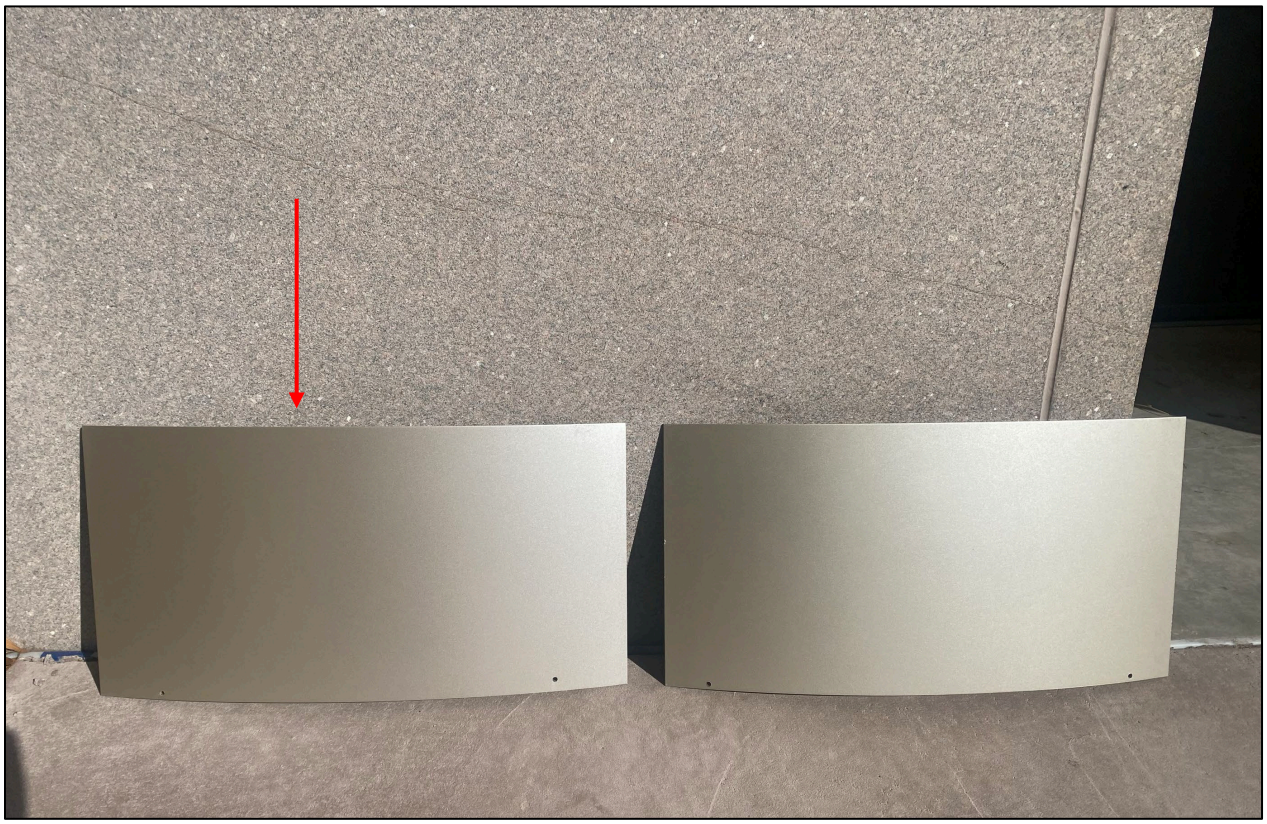
NASM site plan, with BLC Addition and east terrace landscape at right.

BLC Addition and exterior Learning Courtyard, north aerial rendered view. NASM visible at right.

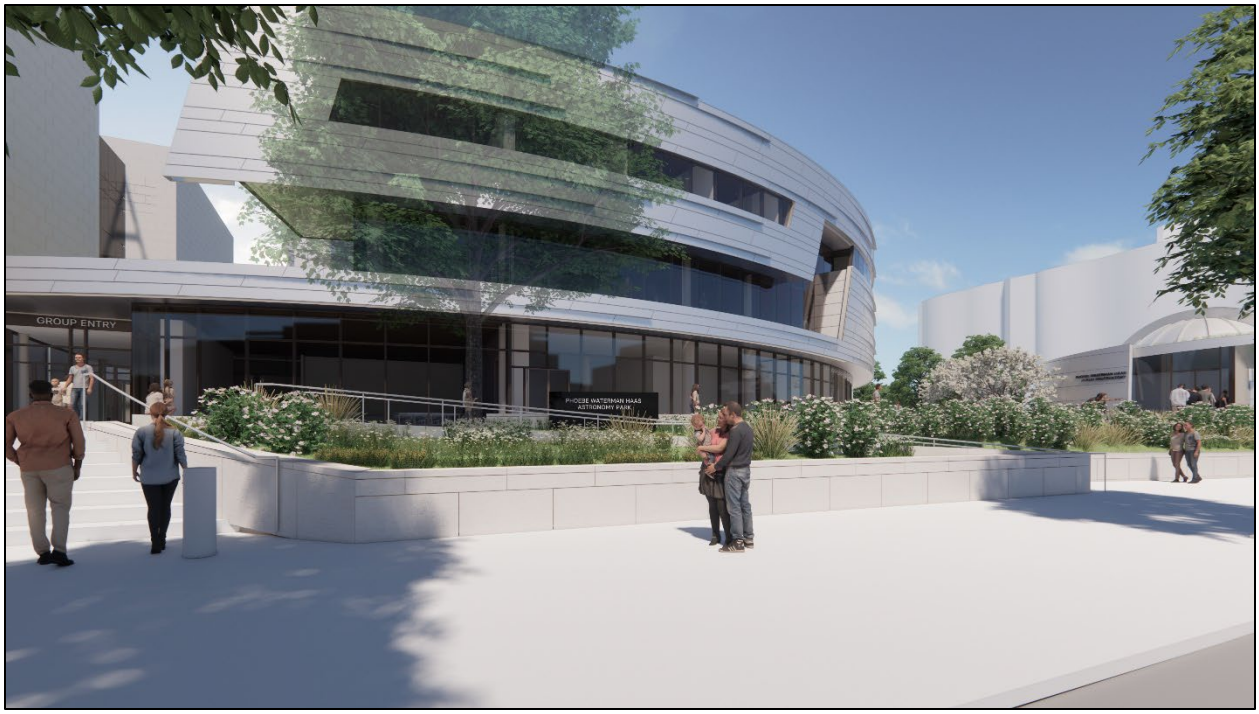
BLC Addition and Phoebe Waterman Haas Public Observatory, south rendered view.

BLC Addition and Phoebe Waterman Haas Public Observatory, rendered view near the NASM site's southeast corner.

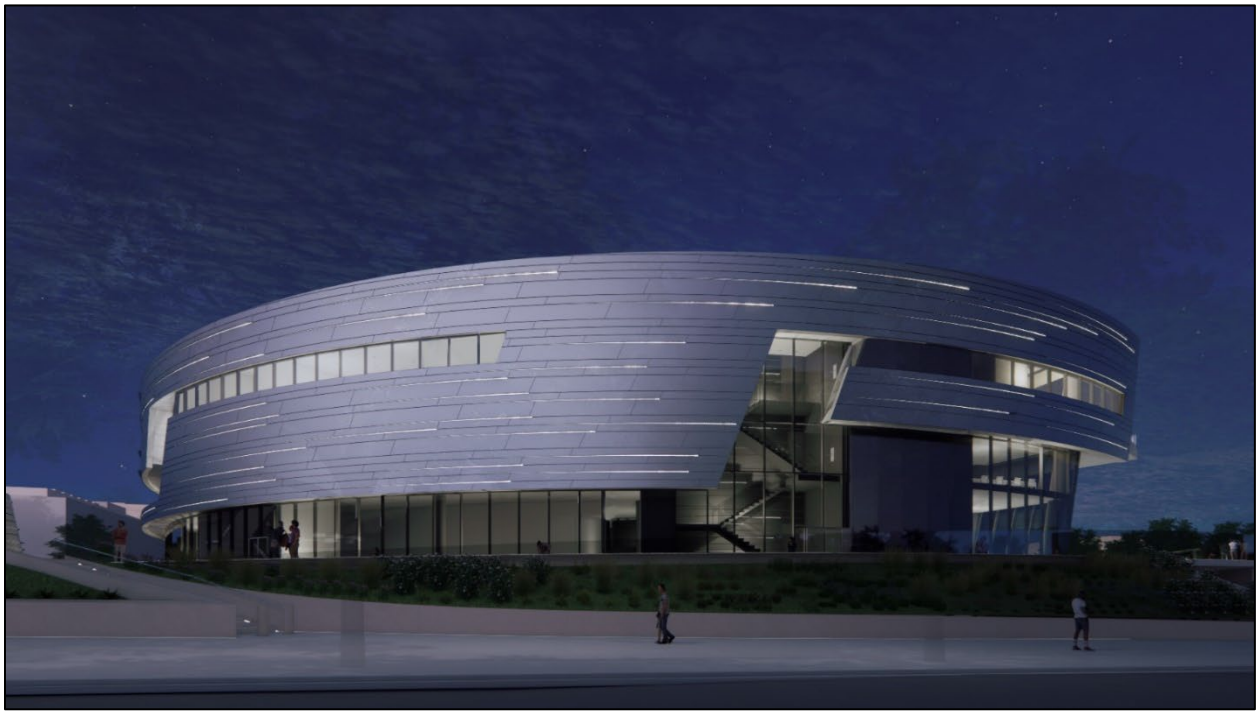
BLC Addition, Phoebe Waterman Haas Public Observatory, and Astronomy Park, northeast aerial rendered view.



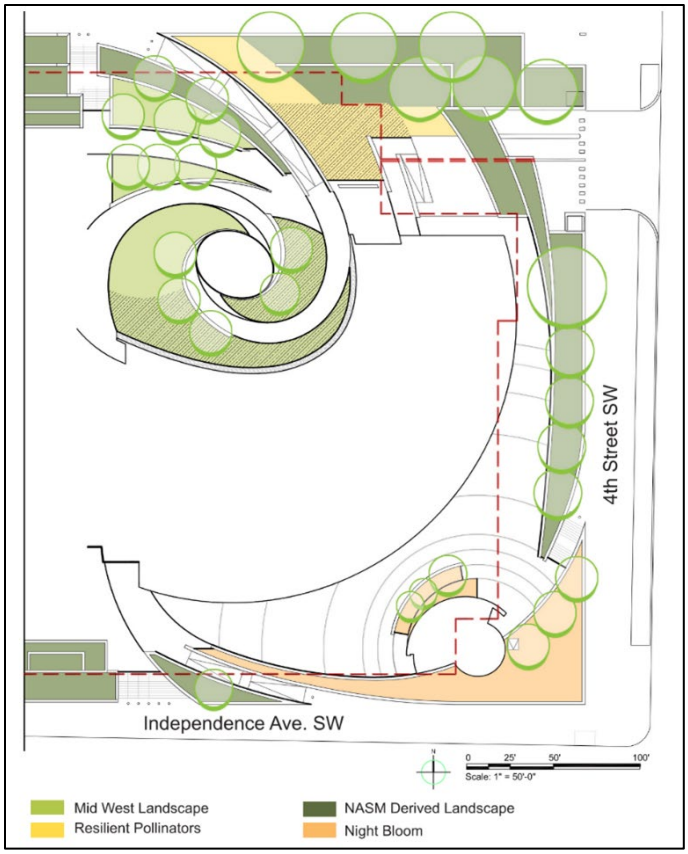
BLC Addition metal cladding finish samples, placed against Colonial Rose granite on the NASM building, February 2025. Selected finish (Titanium) at left, noted with a red arrow.



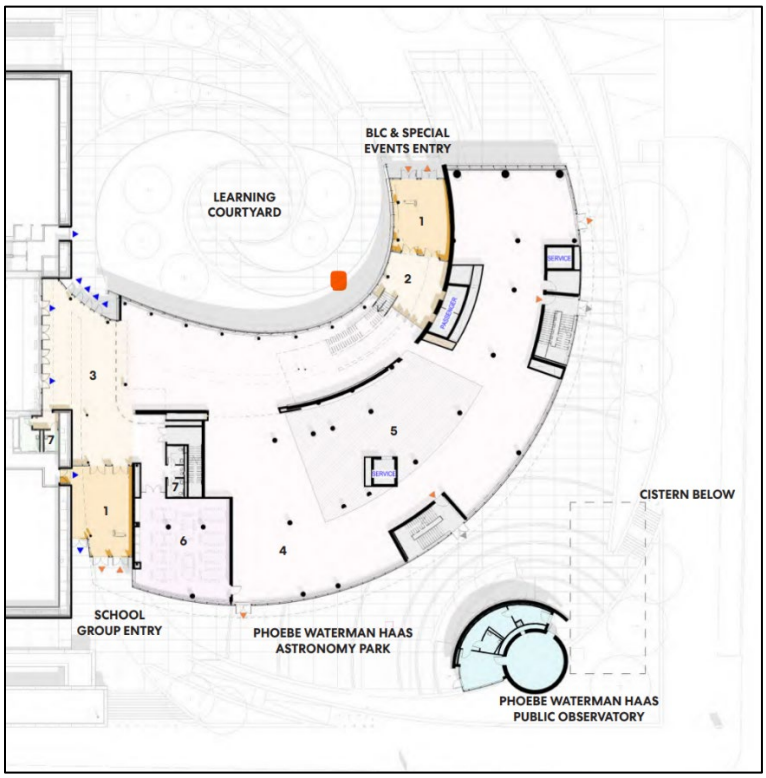
Signage program, noting signage over the NASM Group Entry, adjacent to the Haas Observatory entrance, and in the landscape. Rendered view from Independence Avenue.



BLC Addition east elevation with integrated façade lighting within the BLC Addition's metal panels, rendered at night.



BLC Addition and east terrace landscape plan.



BLC Addition and east terrace site plan. Location for the exterior interpretive signage panel noted in red.

Exhibit B – List of Consulting Parties *

Review Agencies
National Capital Planning Commission
U.S. Commission of Fine Arts

State Historic Preservation Office
DC State Historic Preservation Office

Public Agencies
Advisory Council on Historic Preservation
Architect of the Capitol
DC Office of Planning
District Department of Energy and the Environment
District Department of Transportation
Environmental Protection Agency
General Services Administration
National Gallery of Art
National Park Service
Washington Metropolitan Area Transit Authority

Interested Parties
Committee of 100 on the Federal City
Docomomo US
DowntownDC
Eisenhower Memorial Commission
National Trust for Historic Preservation
Southwest Business Improvement District
Southwest Neighborhood Assembly
Trust for the National Mall

Local Elected Representatives
Advisory Neighborhood Commission 2C
Advisory Neighborhood Commission 6D

* Names of private individuals that participated in Section 106 consultation are not included for privacy concerns.

Exhibit C – Summary of Consulting Parties and Public Meetings

Public Meeting Date	Meeting Summary
1. August 9, 2023	First public consultation meeting, which introduced the BLC Project scope and coordination with the ongoing NASM Revitalization construction project. To initiate Section 106, the SI proposed a draft APE and provided an overview of the NASM's Determination of Eligibility for the NRHP. The meeting reviewed the NASM's character defining features and how the NASM contributes to the National Mall Historic District. The design team reviewed the Project's contextual framework including adjacent greenspaces, buildings, and how the Project site is visible within contributing and significant viewsheds and vistas.
2. November 1, 2023	Second public consultation meeting paired with a NEPA public scoping meeting. The Project purpose and need were reviewed, and the resources identified and dismissed for analysis in the Environmental Assessment. At this meeting, the BLC Addition's overall height was reduced 10' and the second floor connection to the NASM was eliminated. The design team presented the spiral galaxy concept behind the BLC Addition's form and landscape. Two alternatives were reviewed for the landscape concept, a spiral organization that works with the BLC form, or an orthogonal concept to relate to the NASM's tiered site planters and walls.
2.a. November 6, 2023	Public site tour of the Project. Attendees toured the NASM site and significant National Mall and other viewsheds to consider the visibility and impacts of the addition.
3. February 26, 2024	Third public consultation meeting, focused on design development. The BLC Addition form previously sloped up toward the NASM, this was revised to slope towards the museum. The south and east elevations previously were solid; this was revised to include bands of fenestration. Two alternatives were reviewed for the BLC Addition's connection to the NASM, referred to as infill and gap spacing. Spiral landscape alternative was identified as preferred. Three alternatives for the metal cladding metal fin shape and placement were presented, with the tapered fin identified as preferred.
4. July 24, 2024	Fourth public consultation meeting introduced the preliminary Assessment of Effects (AOE) on Historic Resources report. The report was reviewed and made available for consulting parties' comments through August 21, 2024. Meeting covered design developments including the metal panel module and simplification of the tapered fin detailing. Two alternatives for the southwest termination of the BLC Addition's façade cladding were reviewed.
4.a. September 20, 2024	Public site meeting to review materials samples, including metal cladding panels finish colors, storefront system finish colors, and stone for the Learning Courtyard benches. Consulting Parties preferred a "Titanium" finish color for the cladding panels but recommended reducing its yellow tone. Consulting Parties supported the preferred mullion finish colors and "Rainbow" granite for the benches.
5. October 30, 2024	Fifth public consultation meeting reviewed updates made to the AOE report in response to comments. The integral façade lighting required further evaluation before finalizing the effect determination. Landscape design progress was reviewed on plant species and hardscape details. Three alternatives were

	reviewed for the southwest termination of the BLC Addition's façade cladding; the Option 2 Angle Back was selected as preferred. Design of the glazed spiral concourse section of the addition was simplified. A summary of the September 20th site visit was provided for Consulting Parties that could not attend. Joints between the metal cladding panels were adjusted to match the NASM's stone pattern. The Observatory design was reviewed, with suggestions to remove an adjoining curved retaining wall.
6. December 12, 2024	This public meeting was held during the comment period for the Draft EA. The EA comment period was held November 12-December 20, 2024. This meeting reviewed the No Action and Action Alternatives and associated NEPA analysis.
7. March 11, 2025	Sixth public consultation meeting reviewed the final design progress for the BLC Addition exterior, including cladding panel finish color refinement and roofscape simplification. Cladding for the guardhouses, Learning Courtyard design updates, landscape, and Astronomy Park programming were also reviewed. Initial minimization and mitigation measures were introduced to assist the SI in preparation of a Section 106 MOA. Consulting Parties were briefed on the review timeline for the MOA.
8. April 29, 2025	Seventh public consultation held during the public comment period to review the draft MOA.

Exhibit D – Assessment of Effects Report Summary

	Resource	Adverse Effect	Item/Feature	Resolution
National Air and Space Museum	Design and Form	Adverse Effect	Spiral design and form, dynamic integrated façade lighting	
	Solid/Void Pattern	No Adverse Effect	N/A	N/A
	Recessed Glazed Openings/Marble Wall Panels	Adverse Effect	Partially obscures the east elevation	Minimized by glazed hyphen and skylight, with east elevation to visible.
	Signage	No Adverse Effect	N/A	N/A
	Terraces/Planting Beds/Retaining Walls	Adverse Effect	Further loss of terraces, planting beds, and retaining walls flanking garage and along Fourth Street, SW	Minimized by only impacting the very east end of the NASM site.
	Garage Openings	Adverse Effect	Alters original feel of the ramps by diminishing their size	
	Interior	No Adverse Effect	N/A	N/A
	Landscape	No Adverse Effect	N/A	N/A
	Cumulative Impacts	Adverse Effect		Minimized by enhancing NASM's ability to display their collections and further education.
National Mall Historic District	New Construction	Adverse Effect	Alteration to the setting and addition of dynamic façade lighting	Minimized by the distinctive and carefully conceived design.
	Viewsheds and Vistas	No Adverse Effect	N/A	N/A
	Cumulative Impacts	Adverse Effect	Continued changes to the setting and light pollution impacts at night	
L'Enfant Plan	New Construction	No Adverse Effect	N/A	N/A
LBJ Building	Adjacent New Construction	No Adverse Effect	N/A	N/A
Social Security Building	Adjacent New Construction	No Adverse Effect	N/A	N/A
US Capitol and Grounds and Grant Memorial	Adjacent New Construction	No Adverse Effect	N/A	N/A
National Gallery of Art East and West Wings	Adjacent New Construction	No Adverse Effect	N/A	N/A
Remaining Resources within the APE	Adjacent New Construction	No Adverse Effect	N/A	N/A

Introduction

The Smithsonian Institution (SI), with the National Capital Planning Commission (NCPC), is undertaking a project known as the Construct the Integrated Bezos Learning Center (BLC/Undertaking) which includes the construction of an addition that connects to the National Air and Space Museum (NASM) at the east elevation and the integration of the existing Phoebe Waterman Haas Observatory and Astronomy Park (Haas Observatory and Astronomy Park) within the East Terrace. This Assessment of Effects Report (AOE Report) describes the project and analyzes potential adverse effects on historic properties, including archeological resources, within the project area in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations (36 Code of Federal Regulations [CFR] Part 800 "Protection of Historic Properties"). It has been prepared as part of the consultation process among the SI, NCPC, and the District of Columbia State Historic Preservation Office (DC SHPO) and the consulting parties.

The Section 106 implementing regulations define adverse effect as: "An adverse effect is found when an undertaking may directly or indirectly alter any of the characteristics of a historic property that qualify it for inclusion in the National Register in a manner that would diminish the property's integrity of location, design, setting, materials, workmanship, feeling, or association."[1]

Project Description

The project to Construct the Integrated BLC includes the construction of an above-grade 57,045 square-foot addition and the renovation of an existing 38,064 Basement Level/Loading dock. The addition will be connected to the east elevation of NASM and includes the integration of the Phoebe Waterman Haas Observatory and Astronomy Park within the East Terrace. The Undertaking and subsequent Section 106 process follows the parameters outlined in the NASM East End Project Programmatic Agreement (PA), executed on March 30, 2022, among SI, DC SHPO, and NCPC. Also outlined in the PA are the design framework for the BLC, which include:

1. Design concepts must respect the formal setting of the National Mall and neighboring museums, including the Hirshhorn Museum, National Gallery of Art, and the National Museum of the American Indian. The NASM is sited on center with the Sixth Street axis, designed in a symmetric relationship with the National Gallery of Art west building.
2. Design concepts must respect the NASM building and respond to its architecture and massing with an addition design that maintains the essential form and integrity of the NASM and its environment. Design concepts shall meet the *Secretary of the Interior's Standards for the Treatment of Historic Properties for Rehabilitation*.
3. Design concepts must carefully consider the BLC addition's physical connection to the NASM and materials. Design concepts may consider transparent walls to inspire learning through connection to the National Mall, BLC learner projects, and to the NASM's artifacts.
4. Design concepts must consider and respect contributing vistas of the National Mall Historic District, including the Fourth Street north-south vista, the east-west viewshed of the central greensward, the building line established by the Plan of the City of Washington and views to the flanking elm trees and buildings along the Mall from pedestrian paths and the central greensward.

The complete project scope includes: a three-story addition that holds a restaurant on its ground floor, BLC programming, and building support spaces on the upper floors; a new east vestibule directly connected to NASM on its level one; an upper terrace for BLC related programming at the addition's northeast corner; a new permanent location for the Haas Observatory and Astronomy Park at the East Terrace; outdoor educational programming space; new accessible walkways to the north and south sides of the addition; and new landscape design at the east end of the site.

Bezos Learning Center

[1] 36 CFR 800.5(a)(1).

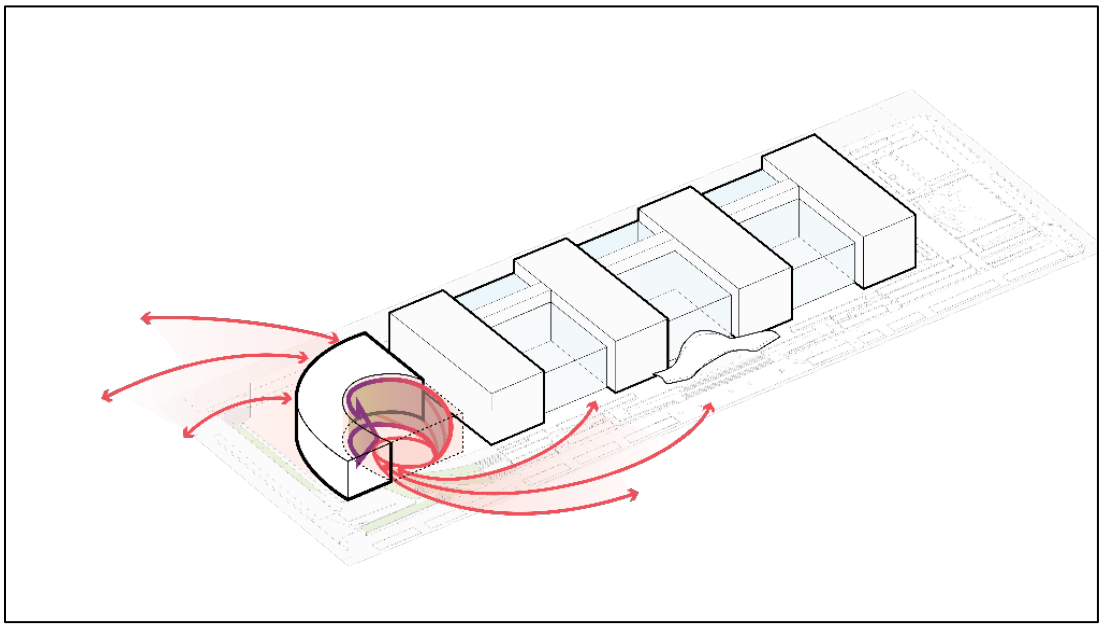


Figure 1: Inspired by spiral galaxies, the spiral force draws people in and diffuses knowledge out. (Perkins&Will, 2023)

The inspiration for the form of the BLC is a spiral galaxy, a form that reflects two-thirds of the known galaxies, including the Milky Way (Figure 1). The building's architecture metaphorically places the individual student, educator, and visitor at the core of the galaxy, surrounded by educational experiences and paths of discovery that lead to infinite possibilities for their future in science, innovation, and leadership.

Figure 2: NASM and BLC proposed site. (Perkins&Will, 2024)

The central circulation spine of NASM, which takes visitors through the legacy of aviation and spaceflight, evolves into an energizing, spiral geometry within the BLC, and creates a symbolic destination for the study of the universe. The spiral trajectory extends out into the landscape to create the Learning Courtyard and Astronomy Park (Figure 2). From the National Mall, visitors will see the Learning Courtyard framed by the addition rising skyward, recalling the form of the galaxy. The design of the exterior enclosure uses texture to create dramatic shadow patterns by day that reinforce the energy and movement within the BLC. At night, these openings transform into streaks of subtle light, recalling shooting stars in the night sky.

The addition will connect to the east elevation of NASM with a one-story glazed hyphen to allow maximum views of the east elevation of NASM from inside the new addition and recalling the stone and glass composition of the NASM's

atriums. The main mass of the addition will be pulled back from NASM, sloping to the east, spiraling up to the north, exercising motion and allowing further separation from NASM (Figures 3 and 4). The height of the west end of the addition is sixty-seven feet, while the highest point at the northeast corner reaches seventy-two feet. The proposed addition will be set back 445 feet from the National Mall, following the McMillan Plan, thirty feet from Fourth Street, SW, to conform to the adjacent National Museum of the American Indian's setback, and aligns with the southern elevation of NASM on Independence Avenue, SW (Figure 5).

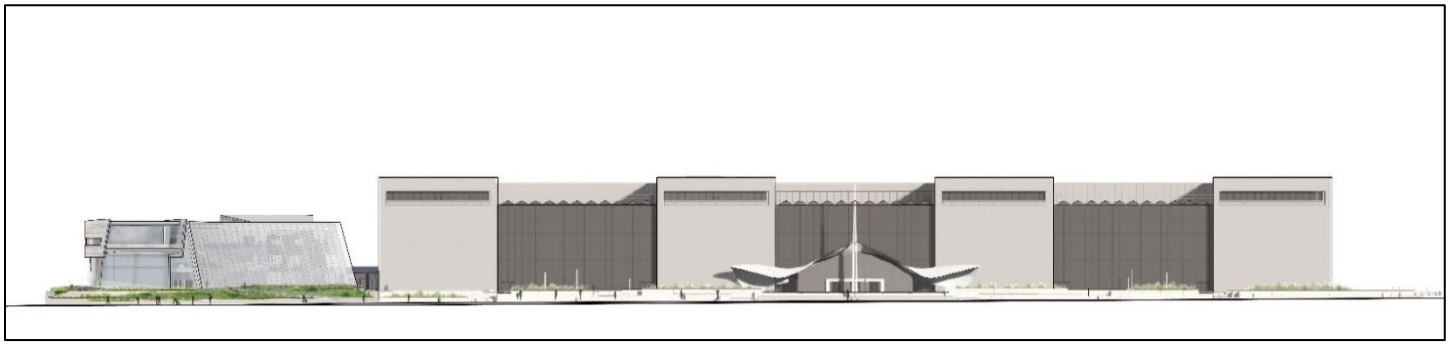


Figure 3: Proposed north section of the building. (Perkins&Will, 2024)

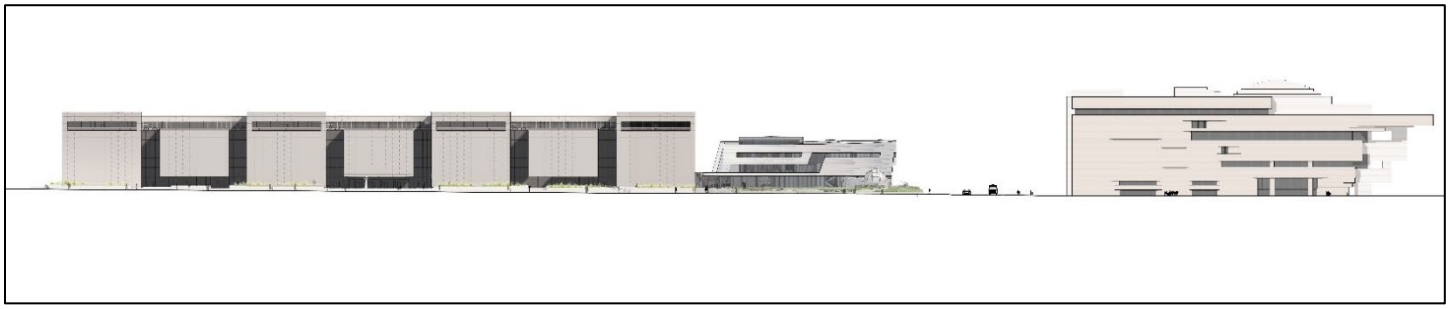


Figure 4: Proposed south elevation of the addition. Note the main mass of the new construction set back, and leaning away from the NASM, to allow the east elevation to remain visible and create a visual separation between the museum and the BLC. (Perkins&Will, 2024)

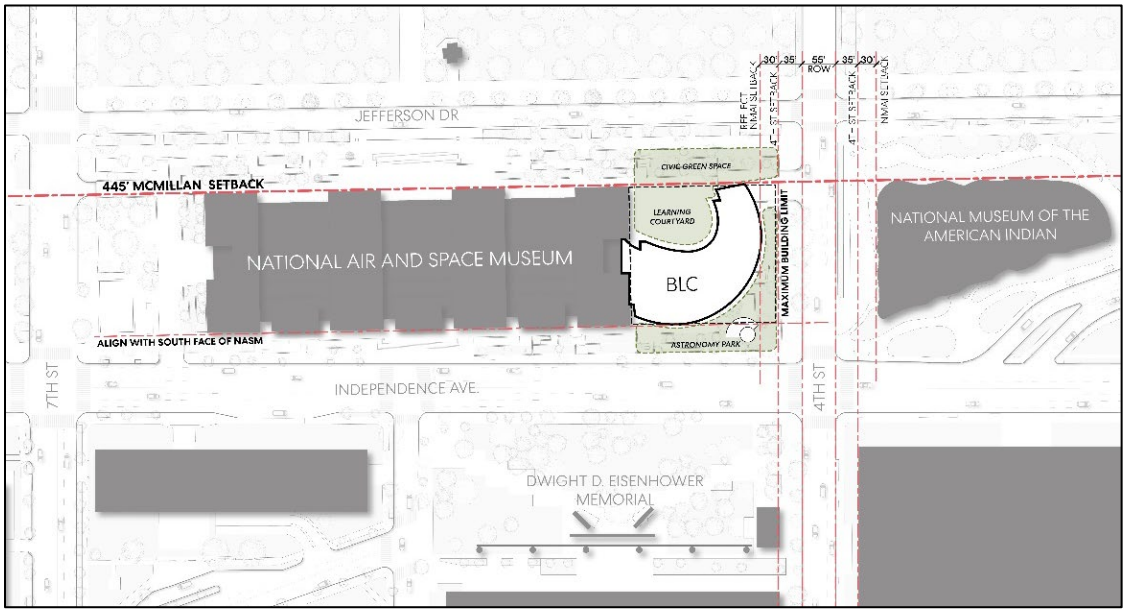


Figure 5: BLC setbacks from L'Enfant Plan streets, protecting viewsheds. (Perkins&Will, 2023)

The main mass of the addition will be concentrated at the southeast end of the site, opening the northwest landscape to the National Mall. The interior curve of the spiral will be a three-story glazed curtain wall to maximize views to and from

the National Mall, and in keeping with the NASM's rhythm of facade composition. At the east and south elevations, the addition is clad in aluminum panels with tapered eight-inch deep, aluminum fins. The fins have continuous one-inch tall reveals which incorporate lighting, to accentuate the spiral motion of the addition's form.

Phoebe Waterman Haas Observatory

Figure 6: Phoebe Waterman Haas Observatory and Astronomy Park. (Perkins&Will, 2024)

The permanent Phoebe Waterman Haas Observatory will be located at the southeast corner of the site (Figure 6), the best location on the site for astronomical events and viewing. The proposed building to house the Observatory is a twenty-six-foot-wide dome containing the telescope, with a curved, ten-foot-fourteen-inch-tall entrance, office, and storage space wrapping around the northwest end of the Observatory. The Observatory will be clad in the same aluminum panels and tapered fins as the new addition. The southwest corner and entrance to the Observatory will be glazed to maximize light into the public space and topped by a green roof.

Landscape Design and Phoebe Waterman Haas Astronomy Park

The galactic spiral that informs the BLC architectural form introduces an organic, outwardly expanding landscape scheme with two program areas: the north-facing Learning Courtyard fronting Jefferson Drive, SW, and the south-facing Astronomy Park, which provides the Observatory and telescope array the best views of the night sky. The design promotes visual and spatial continuity between the addition's interior and exterior spaces on the main floor and at Level Two to planted roofs and canopy vegetation, including canopies of trees on the National Mall.

The new landscape will be a spiral form at the Learning Courtyard with low flowering trees at the center to allow for temporary projections on the east elevation of NASM (Figure 7). The landscape spirals out towards the National Mall with a new accessible ramp connecting to Jefferson Drive, SW. The extant terraced stair to Jefferson Drive, SW, will be reconfigured to better align with the new curved ramp and landscape. A new pollinator garden will be inserted in the top tier of the extant NASM terraced walls, with a grove of Scarlet and Shumard oak trees on the middle and bottom tiers, anchoring the northeast corner of the site and increasing the tree canopy around the National Mall. The east end of the landscape will be altered with a new curved stair extending from the Haas Observatory to Fourth Street, SW, with

moon trees along the east end. The south end will contain the Astronomy Park, with the extant stairs to remain and a new curved accessible ramp to Independence Avenue, SW. A radiating pattern in the terrace paving is centered from the Observatory with low flowering trees and night blooming plantings along the northwest curve of the Observatory.

For more images and information on each element of the Undertaking, please refer to the presentation materials from past Section 106 Consulting Parties meetings available on the project webpage (https://airandspace.si.edu/about/major-projects/bezos-learning-center).

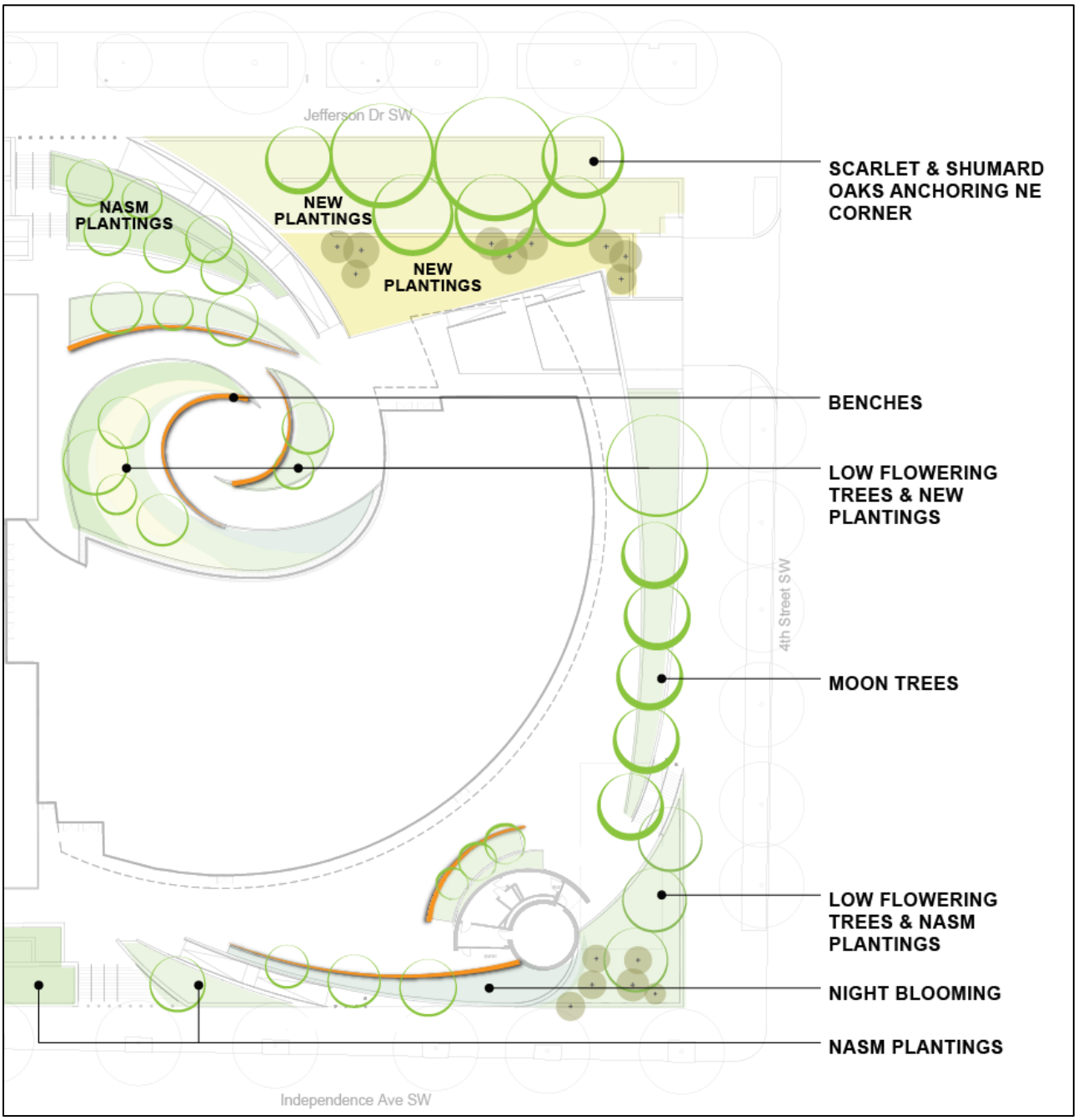
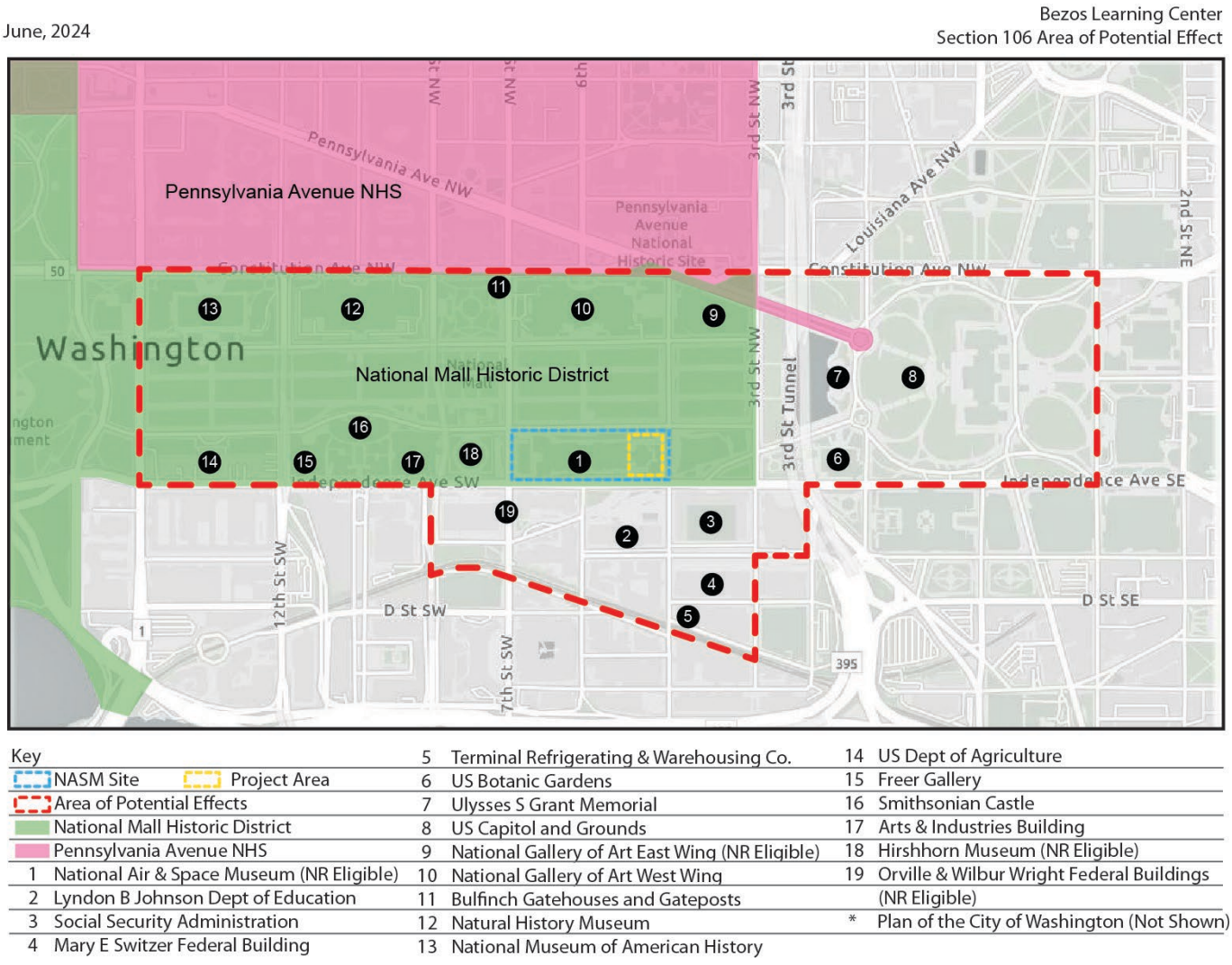


Figure 7: Proposed landscape plan that emphasizes the spiral design concept of the new addition. (Elizabeth Kennedy Landscape Architects, 2024)

Area of Potential Effects

The APE (Figure 8) is defined as the geographic area within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties under the implementing regulations Section 106 (36 CFR § 800.16[d]). This AOE Report on Historic Resources considers the effects of the Undertaking within the APE outlined in the below mapped area. This APE was presented and finalized during the Section 106 consultation process. More information on the APE and descriptions of the identified historic resources can be found in **Attachment A**.



Key					
NASM Site	Project Area	5	Terminal Refrigerating & Warehousing Co.	14	US Dept of Agriculture
Area of Potential Effects		6	US Botanic Gardens	15	Freer Gallery
National Mall Historic District		7	Ulysses S Grant Memorial	16	Smithsonian Castle
Pennsylvania Avenue NHS		8	US Capitol and Grounds	17	Arts & Industries Building
1	National Air & Space Museum (NR Eligible)	9	National Gallery of Art East Wing (NR Eligible)	18	Hirshhorn Museum (NR Eligible)
2	Lyndon B Johnson Dept of Education	10	National Gallery of Art West Wing	19	Orville & Wilbur Wright Federal Buildings (NR Eligible)
3	Social Security Administration	11	Bulfinch Gatehouses and Gateposts	*	Plan of the City of Washington (Not Shown)
4	Mary E Switzer Federal Building	12	Natural History Museum		
		13	National Museum of American History		

Figure 8: Area of Potential Effects and Identified Historic Resources. (EHT Traceries, 2024)

National Air and Space Museum – Character Defining Features

The NASM is the largest museum building on the National Mall and showcases a nationally significant collection of artifacts documenting the history of flight and space travel. The Modernist style building was designed by Gyo Obata of Hellmuth, Obata & Kassabaum and opened to the public in 1976. NASM is a contributing element to the National Mall Historic District under Criterion A. The building itself has been evaluated and may be eligible for individual listing in the National Register of Historic Places under Criteria A, C, and Criteria Consideration G with a period of significance of 1976. Later additions and changes made to the building and site after 1976 are not considered contributing features. Below is a list of character-defining features that are contributing to NASM's historic significance.

Character Defining Feature*	Notes

Seven-bay building form with alternating solid-void pattern	-The solid and void pattern of NASM is a critical design element. -Visible on all elevations. -At the north façade, four solid sections are divided by three void sections, with the void sections continuing to the roof, with large skylights that continue to the building's central spine. -The south elevation has four solid sections, mimicking the north façade, with three smaller solid cantilevered bays held within void glazing.
Recessed, glazed openings in the east and west elevations	-The east and west elevations have solid north/south wings framing a central void section, which continues the solid-void pattern of the building form. -The physical glass and frame are not original and do not retain integrity of material
Recessed third-story, linear openings and balconies	-Eight recessed, third-floor balconies are located within the solid sections of the design. -Their horizontality, emphasized with their railings and deep recesses, help articulate the monumental solid bays.
Marble curtain wall panels	-The Tennessee Pink Marble exterior panels were replaced with Colonial Rose Granite panels; a substitute material selected as part of the Section 106 process during the NASM Revitalization project. -Installation of new Colonial Rose Granite panels resulted in a loss of integrity of material.
Carved inscriptions on north and south elevations	-Located at the north and south elevations. Incorporated into accessible walkway stone walls under the NASM Revitalization project.
Exterior terrace on southeast cantilevered block	-Located on top of the southeast cantilever block, the exterior terrace was part of Obata's original design.
Tiered terraces and planting beds	-Surrounding the site, the historic landscape plan had tiered terraces and planting beds. -Almost all the tiered terraces and planting beds located at the east end of the site were altered c. 1988 with the restaurant addition; these reconfigured terraces and beds are not considered character defining. -Vegetation within the planters is not considered character defining. -Non-historic stairs, ADA-ramps, and perimeter security features have been inserted into the historic tiered terraces over time and are not considered character defining.
Marble-clad retaining walls throughout the site	-Located throughout the site, the retaining walls remain but the Tennessee Pink Marble panels have been replaced with Colonial Rose Granite. -Marble retaining walls at the east terrace are in poor condition.
Garage openings and ramps	-Located at the east elevation, the garage opening and ramps flow under the east terrace to the museum basement and loading dock. -Historically clad in Tennessee Pink Marble, the material was removed and replaced with Colonial Rose Granite. -There is a non-contributing guardrail atop the garage opening, and non-contributing perimeter security features throughout.
Ad Astra sculpture	-Sculpture has always been displayed at the north façade, main entrance. -Designed by Richard Lippold.
Continuum sculpture	-Sculpture has always been displayed at the building's south elevation. -Designed by Charles O. Perry.

**Please note that there are a number of contributing elements to NASM on the interior of the building, but as work is limited to the exterior of NASM they have not been included within this AOE Report.*

Assessment of Effects on Historic Resources

The following provides an assessment of effects for each of NASM's character-defining features, as well as an assessment of effect for each action of the Undertaking on the identified historic resource within the APE (Attachment

A). The effects determination is based on the criteria of adverse effect. For more images and detailed information on each action and assessment, please refer to the presentation materials from past Section 106 Consulting Parties meetings available on the project webpage.

A number of character-defining features of NASM have no potential to be adversely affected by the BLC project, including: the recessed third-story, linear openings and balconies; the exterior terrace on southeast cantilevered block; carved inscriptions on the north and south elevations, and the *Ad Astra* and *Continuum* sculptures. As such they are not addressed below.

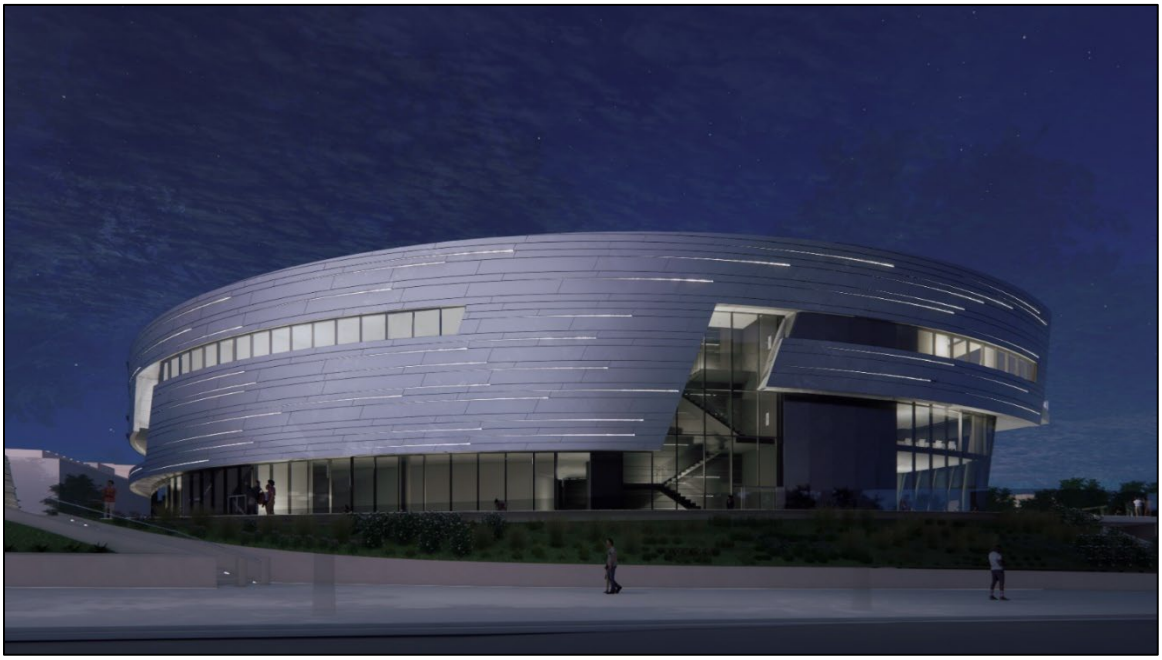
National Air and Space Museum

National Air and Space Museum	
Feature/Action	**Design Details**
BLC and Haas Observatory Design and Form / Mechanical Systems / Materials and Integrated Façade Lighting	-The spiral form and massing of both the BLC and Haas Observatory are substantial additions to the NASM and its site, distinctive from the geometric imposing massing and rigid form of Obata's NASM design, resulting in an adverse effect. -To minimize the adverse effect, the light and airy design, showcasing movement, is differentiated as new additions to Obata's original monumental building form, designed with setbacks and lower height to allow the NASM's massing and form to remain the primary feature of the Museum and site. -The BLC's entry points at the SW and NE portions of the addition call visual attention and may signify that the addition is the primary entrance to the Museum, especially at night, resulting in adverse effect. -All mechanical systems will be integrated within the building designs and forms of the spirals and will not be interrupted by mechanical equipment, maintaining the distinctive form on all elevations, minimizing adverse effect. -The BLC's façade cladding with PPG Titanium finished metal panels and fins with integrated cove lighting creates a dynamic texture of light and shadow that wrap the spiral building forms evoking the linear energy and dotted landscape within the Spiral Galaxy. The aluminum Titanium cladding color will complement the NASM's Colonial Rose Granite to minimize adverse effects. -The size of the panels follows a 1'3" module, derived from NASM's 2'6" stone panel joints. There will be six panel sizes, three thick, three thin, that will be randomized across the elevation and will correspond to the tapered fins and integrated lighting. The size of the reveal between panels was reduced to one inch, bringing the metal panels closer to the monolithic aesthetic of NASM, minimizing adverse effect. -As day transitions to night, integrated cove lighting will illuminate the metal fins. There is no current comparable lighting or design feature on NASM's static, solid, monumental architecture. The lighting will comply with the dark skies initiative and will be fully dimmable to controlled and specific levels. Dynamic lighting at night directly adjacent to NASM detracts from the NASM's formal setting, and though the lighting will be fully dimmable, will result in an adverse effect. -The Spiral Concourse of the BLC faces the Mall and is clad with clear Viracon GL-01 Make-up glass (with bird frit pattern) to maximize views and connection between interior and exterior in keeping with the NASM's configuration. The Spiral Concourse system will be a custom steel column, steel horizontal connector beam, custom steel mullion, and stainless-steel outrigger, with aluminum fins, all to be executed in the Sherwin Williams On the Rocks 7671 in keeping with the NASM's interior space frame structure. The incorporation of transparent walls is in accordance with the PA design framework.

	-All non-concourse elevations will receive a darker, grey-tinted Interpane GL-02 Make-up #2 glass (with bird frit pattern). This tint is not as dark as NASM's extant glass, for differentiation, and follows the PA design framework of the incorporation of transparent walls.

Images

The form and massing are distinctive and complimentary to Obata's original design intention. (Perkins&Will, 2025)

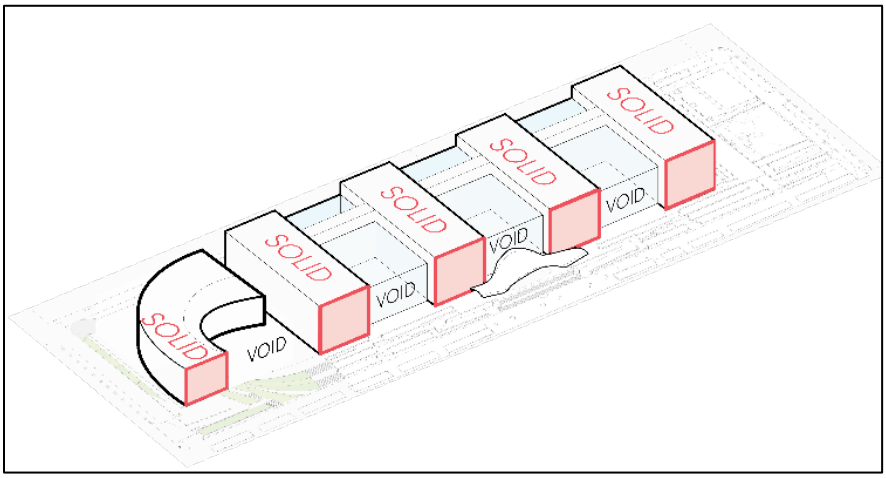


East elevation rendering at night of BLC and Hass Observatory with the integrated façade lighting within the metal panels. (Perkins&Will, 2024)

South elevation rendering of BLC and Haas Observatory . (Perkins&Will, 2025)

Proposed Effect Determination – Adverse Effect

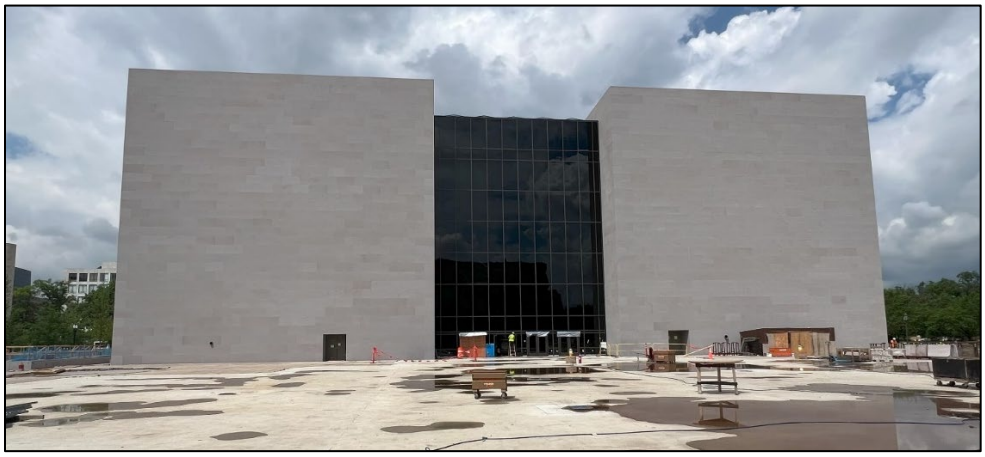
National Air and Space Museum	
Feature/Action	**Design Details**
Seven-bay building form with alternating solid-void pattern / New addition	-The new addition will not alter the seven-bay solid-void pattern of NASM's north and south elevations. Both the north and south elevations, and their solid/void pattern, will continue to be fully legible. -The new addition will extend and reinterpret the solid-void pattern, on both the north and south elevations, relating to Obata's original design intent. -The limited height of the addition and extending the solid-void pattern improves the compatibility of the BLC addition to the NASM's form and this character defining feature of the original design and will not result in an adverse effect. -The addition form respects the NASM building and responds to its architecture and massing in accordance with the PA design framework. -See "Connection to the east elevation of NASM" for related analysis.
Images	



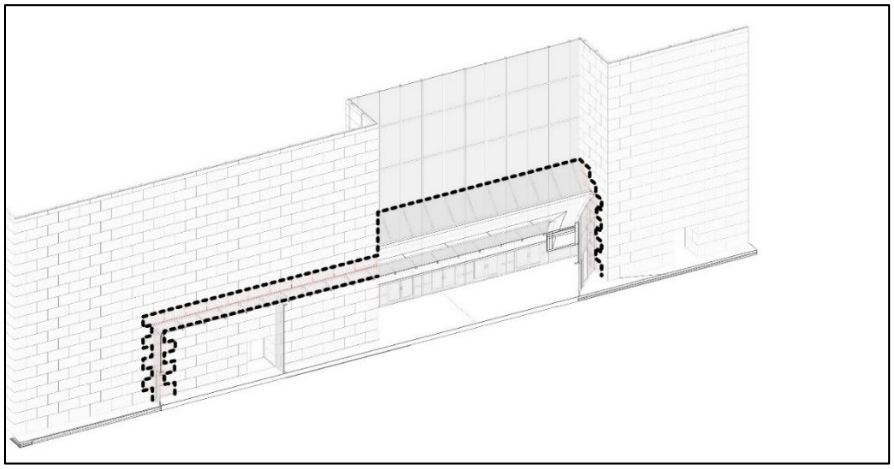
North elevation of NASM with the seven-bay solid-void pattern, continued to the new addition. (Perkins&Will, 2023)

Proposed Effect Determination – No Adverse Effect

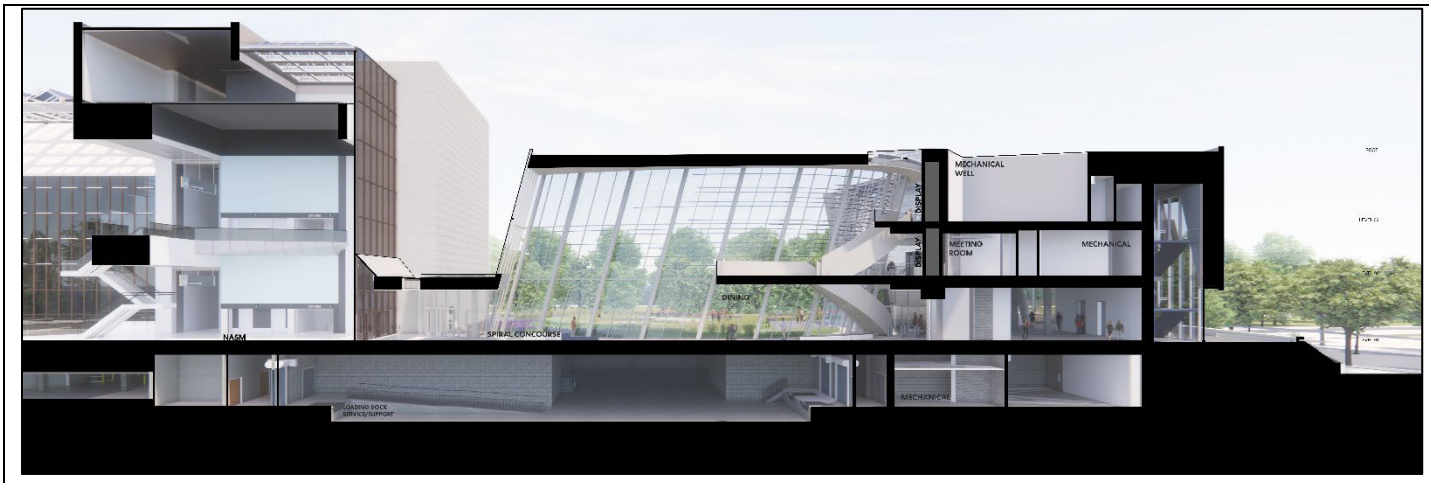
National Air and Space Museum	
Feature/Action	**Design Details**
Recessed, glazed openings in the east and west elevations / Marble curtain wall panels (no longer extant) / Connection to the east elevation of NASM	-The west elevation of NASM will not be impacted by the Undertaking. -Though the Undertaking involves the limited removal of Colonial Rose Granite panels and portions of the east elevation glazing, both materials lack integrity as they were previously replaced, resulting in no adverse effect. -The three-bay solid/void pattern of the east elevation will be partially obscured by the addition resulting in an adverse effect. The pattern will still be communicated, as the main mass of the addition is set back, leaning away from the face of the building, only connected at the first story, with a glazed hyphen, minimizing adverse effect. -The new addition is also reversible as it lightly connects to the east elevation and permits NASM to remain the primary feature on the site, minimizing adverse effect. -The hyphen incorporates a skylight at the connection, exposing the east elevation from inside the new addition, further minimizing adverse effects, and recalls the configuration of the NASM's atriums. -The addition's physical connection to NASM was carefully considered and incorporates a light touch and glazed hyphen in accordance with the PA design framework.
Images	



Extant view of NASM's east elevation, looking west, with the solid-void pattern, new glazing, and Colonial Rose Granite panels. (EHT Traceries, 2024)



Axonometric view of the limits of connection at the east elevation of NASM. (Perkins&Will, 2024)



Interior section of the new addition and hyphen connection to NASM. Note the main mass of the BLC angled away from NASM allowing for separation and maintaining views to the museum's east elevation. (Perkins&Will, 2024)

Interior rendering of the connection to NASM with the skylight allowing for views of the east elevation from inside the new BLC hyphen. (Perkins&Will, 2024)

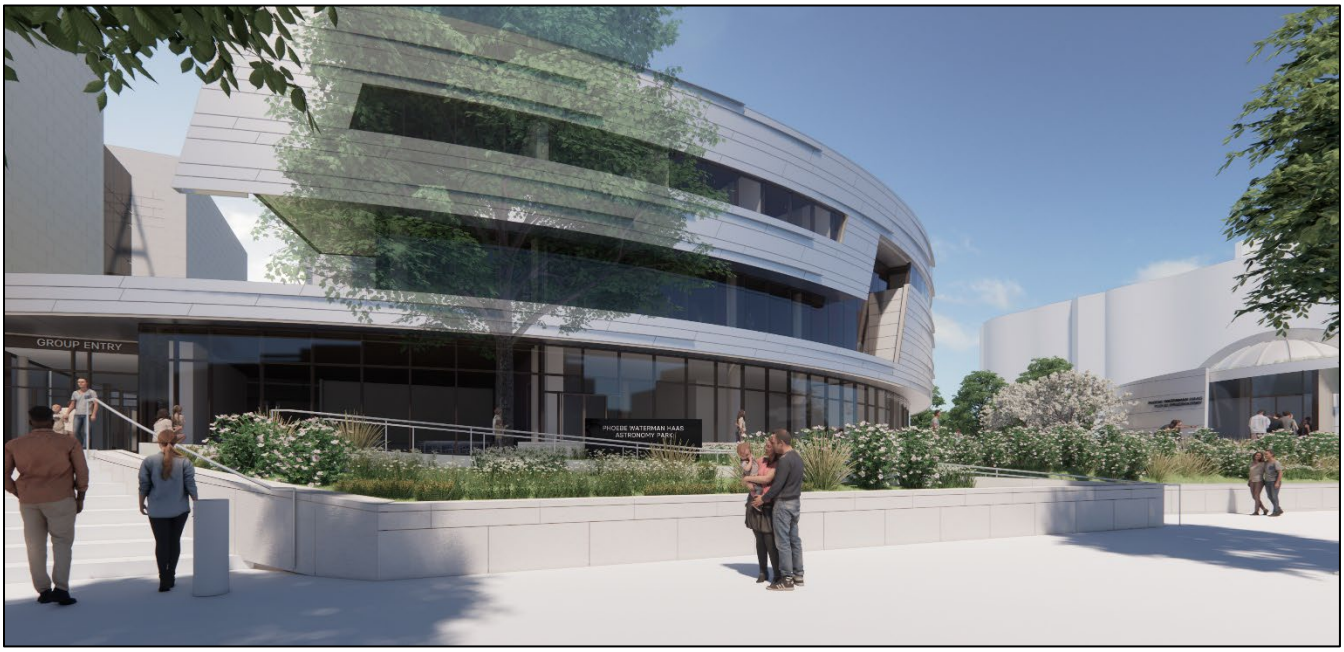
Proposed Effect Determination – Adverse Effect

National Air and Space Museum	
Feature/Action	**Design Details**

New Signage	-Signage program consists of two types. Metal letters are attached to the BLC addition over the northeast and southwest entrances and at the Observatory. -Stone walls with engraved letters are proposed in planting beds setback from the sidewalk extents of the site. -Proposed signage program is secondary to the monumental NASM engraved signage at the north and south museum building entrances.

Images

Proposed signage at the northeast entrance (left) and planter sign facing Jefferson Drive. (Perkins&Will, 2054)



Proposed signage at the south elevation with building mounted and planter signage. (Perkins&Will, 2025)

Proposed Effect Determination – No Adverse Effect

National Air and Space Museum	
Feature/Action	**Design Details**

Tiered terraces and planting beds / Retaining walls / New addition and insertion of new site access, including stairs and ADA ramps	-New site access and accessible ramps will require the demolition of tiered terraces, planting beds, and retaining walls, resulting in an adverse effect. However, most of the original tiered terraces, planting beds, and retaining walls at the east end of the site were demolished and reconfigured in 1988. Only portions of the planting beds and retaining wall along Fourth Street, SW, and flanking the garage entrance retain their historic design. -The stair to Jefferson Drive, SW, currently steps down to the east; the newly configured stair will step down to the west altering the planting beds at the north elevation. However, these planting beds fall outside of the period of significance and these alterations will not result in adverse effects. -The new accessible ramp from the Learning Courtyard to Jefferson Drive, will impact the tiered planting beds at this location; however, these planting beds fall outside of the period of significance. The retaining wall in this location is not original. This will not result in an adverse effect. -The tiered planting beds flanking the garage will be demolished to the south and reconfigured to the north, resulting in an adverse effect. -The planting bed and retaining wall along Fourth Street, SW, south of the garage, was previously reduced in size with the construction of the restaurant addition in 1981. Due to the new location of the addition and expanded Astronomy Park, the planting bed along Fourth Street, SW, will be further diminished in size, resulting in an adverse effect. The location of the opening for the new ramp will result in further loss of the retaining wall, resulting in an adverse effect. -The extant stair to the south, leading to Independence Avenue, SW, will be retained, minimizing adverse effect. -The ADA ramp to the south will be reconfigured to conform with the new spiral design; however, the ramp falls outside of the period of significance. This will not intensify adverse effects. -Alterations to the tiered terraces, planting beds, and retaining walls will have a cumulative impact on these features, resulting in an adverse effect. However, all the alterations will be limited to the east end of the NASM site, minimizing those adverse effects.

Images

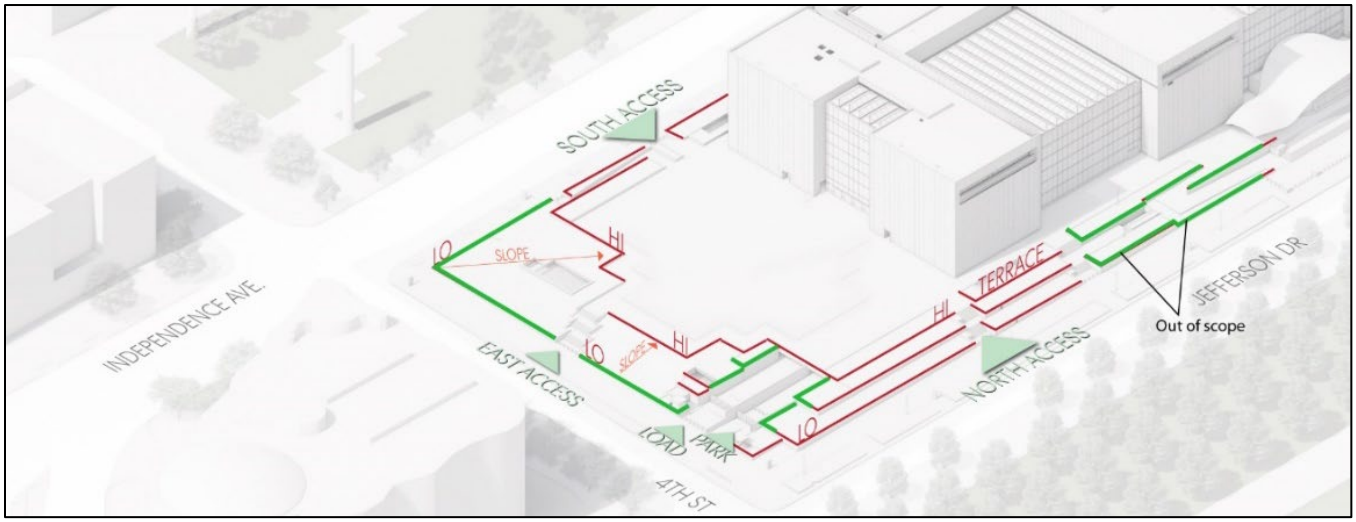
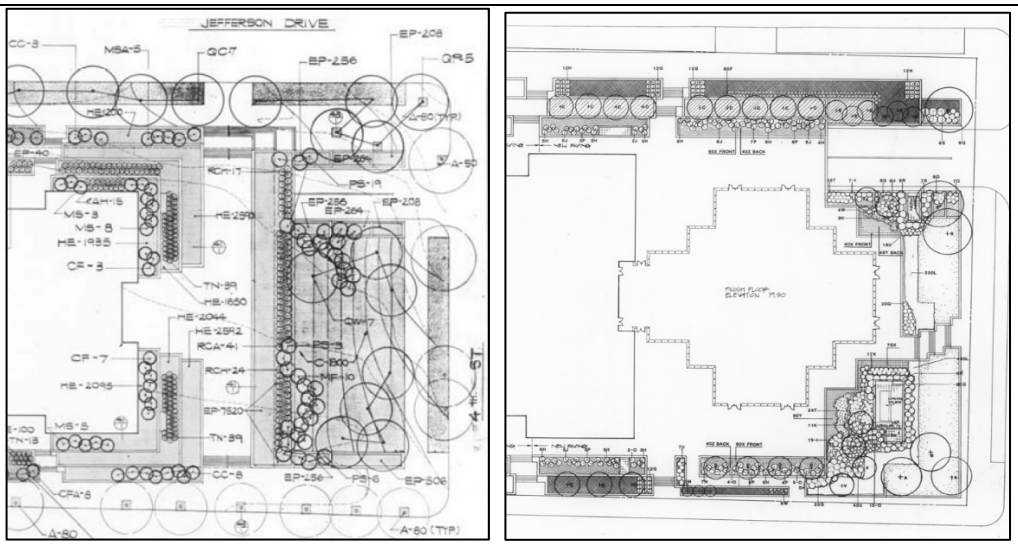


Diagram of the current retaining walls, tiered terraces, and planting beds at the east end of NASM. Walls highlighted in green are part of the original design and are character-defining features; walls highlighted in red were altered in 1988 and are not considered character-defining features. (Perkins&Will, 2023, annotated by EHT Traceries, 2024)



Left: Original 1972 landscape and planting plan (Smithsonian Institution, 1972)
Right: 1988 restaurant addition and landscape plan showing the alteration of character-defining features. (Smithsonian Institution, 1988)

Proposed landscape and planting plan as part of the Undertaking. (Elizabeth Kennedy Landscape Architects, 2025)

Proposed Effect Determination – Adverse Effect

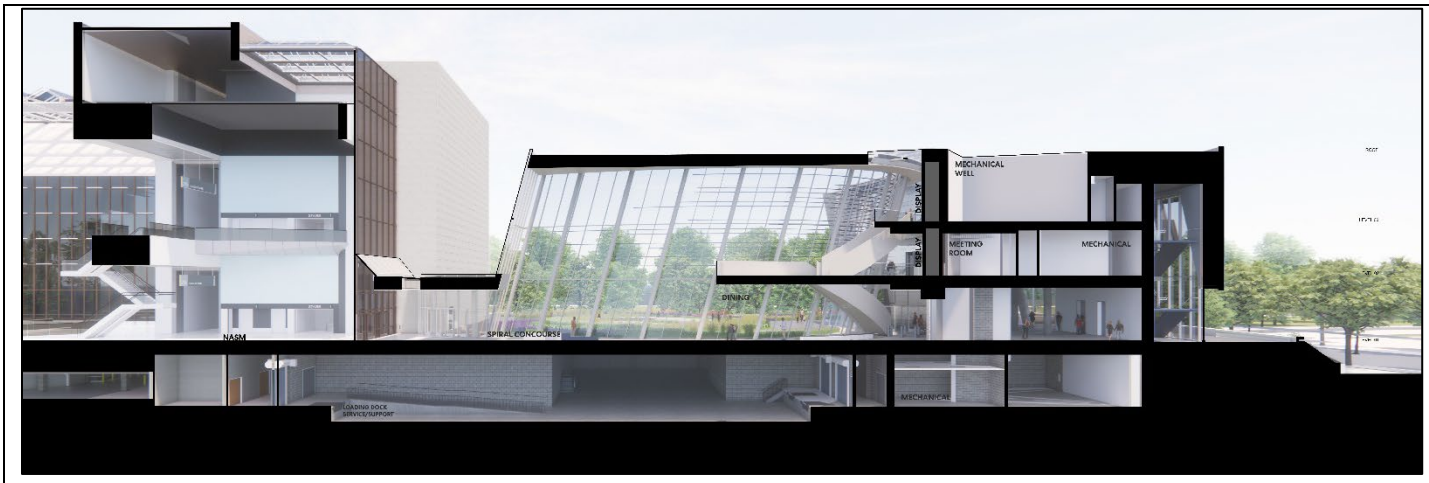
National Air and Space Museum

Feature/Action	Design Details
Garage openings and ramps / New addition extending over the garage	-Vehicular ramps down to the garage will remain, though the marble-clad walls were previously replaced with Colonial Rose Granite. - Two existing security guard booths flanking the ramps will remain. -The new addition, which is pulled further away from NASM towards Fourth Street, SW, will result in decking over both ramps and garage openings. This decking will cause a tunnel effect when entering the garage/loading dock area, an aspect that was not part of Obata's original design intention. The change in the feel of the original ramps and their relationship with the east elevation of NASM will result in an adverse effect.
Images	

Proposed extent of the decking over the existing garage openings and ramps. (Perkins&Will, 2025)

Proposed Effect Determination – Adverse Effect

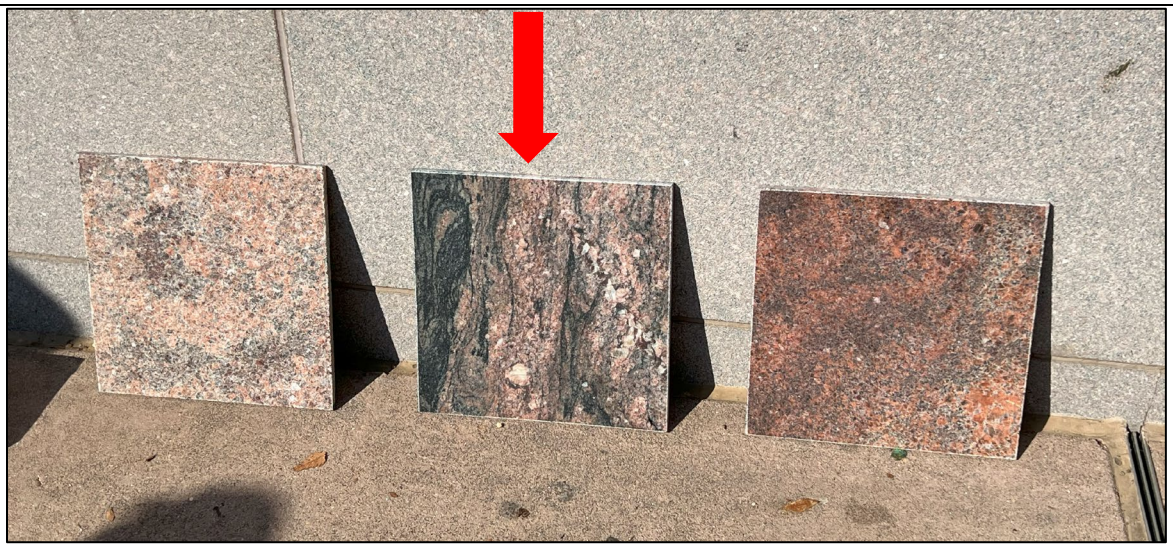
National Air and Space Museum	
Feature/Action	**Design Details**
Interior of NASM	-There will be no alterations to the historic interior configuration of NASM. All systems will be independent of the main NASM building and the existing doors at the east elevation will be retained. There will be no adverse effect to the interior of NASM.
Images	



This undertaking does not include any work on the interior of NASM. (Perkins&Will, 2024)

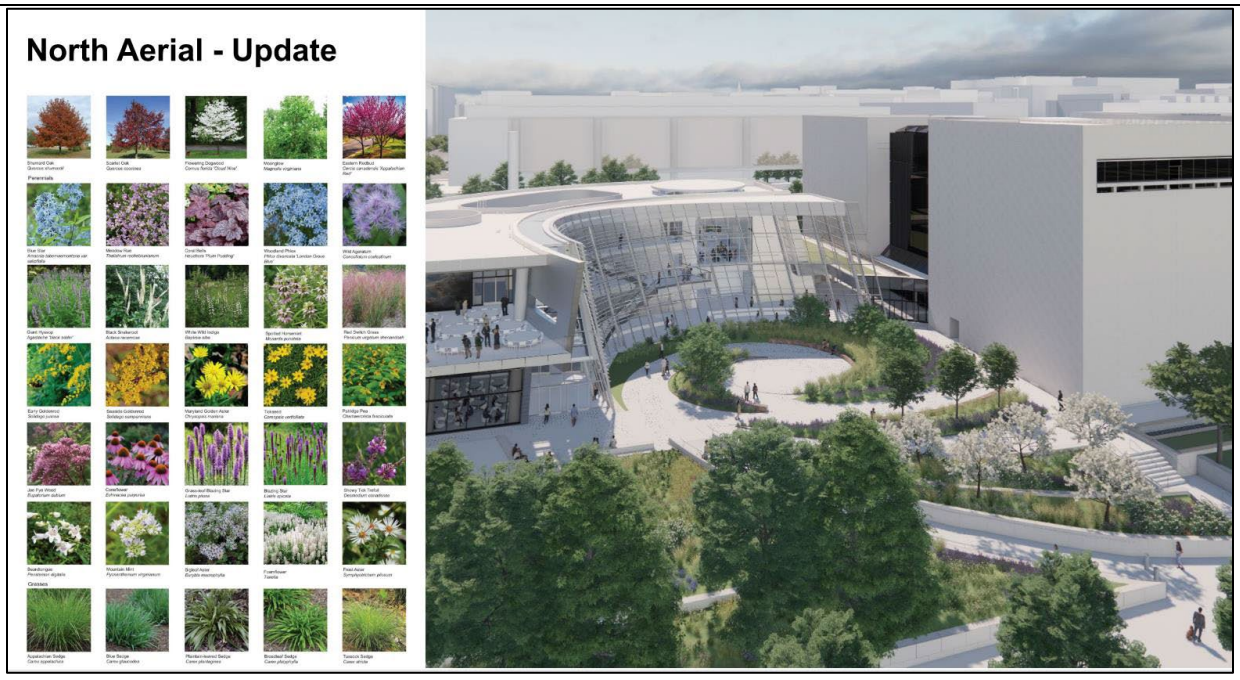
Proposed Effect Determination – No Adverse Effect

National Air and Space Museum	
Feature/Action	**Design Details**
Landscape and Astronomy Park features including: New paving design and pattern / Integrated site lighting / New vegetation	-The terrace level paving will be cast-in-place single color concrete with exposed aggregate, in keeping with the extant paving throughout NASM installed in the Revitalization Project. Paving joints will be scored or formed by non-corrosive metal divider strips. -In the Learning Courtyard, the use of Rainbow granite, for planters and knee walls, is a compatible material to the Colonial Rose granite used throughout the rest of the site. The diminutive height of the Learning Courtyard seating walls is compatible with the larger NASM landscape design and will not result in an adverse effect. Paving joints will be scored or formed by non-corrosive metal divider strips. -The extant pavers are not character-defining features, and the new design and material will be compatible with the concrete paving used through the NASM site. -The Undertaking will include the use of integrated site lighting features which will not result in an adverse effect as the design will follow site lighting established throughout Smithsonian sites and the National Mall. -New vegetation includes a planting concept of native trees, shrubs, and an understory of perennial and prairie plants, that foster biodiversity and support a diverse array of pollinators. The planting plan establishes a visual and ecological connection with the broader national prairie landscape of the National Mall. -The Undertaking restores the tree canopy to the east end of the NASM site, with native trees spaced appropriately to provide sufficient sunlight for the planting understory. The tree canopy will not be high enough to obscure views to the east end of NASM, nor will they rise above the height of the elm trees on the National Mall. The new vegetation and planting plan will not have an adverse effect.
Images	



Left: Coldspring Agate Granite with diamond 10 finish; Center: Coldspring Rainbow granite with diamond 8 finish; Right: Coldspring Agate Granite with diamond 8 finish. Samples are laid against an existing Colonial Rose granite NASM site wall. (EHT Traceries, 2024)

Proposed hardscape paving and landscape at the southeast end of the site. (Elizabeth Kennedy Landscape Architects, 2025)



Final planting plan. (Perkins&Will, 2024)

Proposed Effect Determination – No Adverse Effect

National Air and Space Museum	
Feature/Action	**Design Details**
Cumulative Impacts	-This undertaking, along with the previous Revitalization project, will result in a cumulative impact and adverse effect on NASM. Continued changes and alterations, such as materials, additions, access, and landscape have a cumulative adverse effect on the potential for the resource to be individually listed in the National Register of Historic Places. However, all the Undertakings have been executed with compatible and sensitive designs that have enhanced the ability of NASM to display their significant collections and increase education to a broader public, minimizing those adverse effects.
Images	

Rendering of the proposed BLC in context with the new entrance canopy on the façade. (Perkins&Will, 2024)

Proposed Effect Determination – Adverse Effect

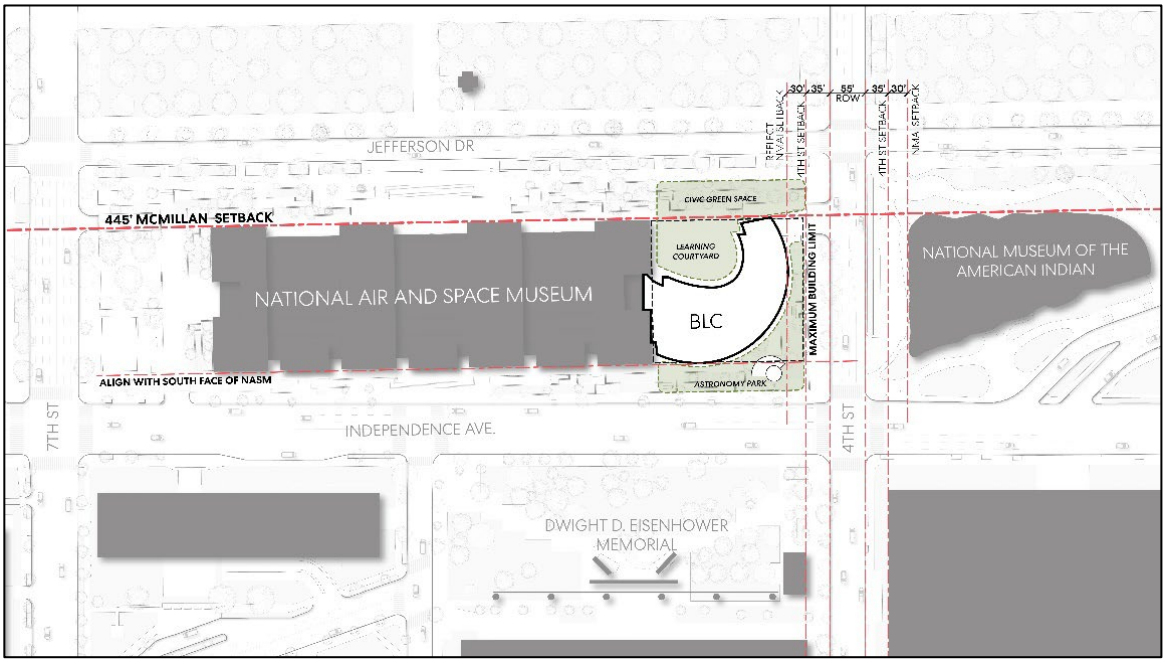
Other Historic Resources within the APE

National Mall Historic District	
Resource/Action	**Design Details**
New construction within the National Mall Historic District	-The National Mall consists of a wide, east-west oriented lawn flanked by paired rows of American elm trees, most of which are sixty to eighty feet in height. This creates a visual screen between the central lawn and the buildings along Jefferson and Madison Drives. The building rooflines and monumental massing form the backdrop setting for the Mall's association with Criterion A. While the elm trees will largely obscure the addition's visibility from the National Mall, the new construction will alter the setting and will result in an adverse effect. -Both the BLC and Haas Observatory will be directly adjacent to the character-defining Fourth Street, SW, vista within the National Mall Historic District; however, the Haas Observatory, located further east than the BLC, respects the setback from Fourth Street, SW. Its setting will only be altered nominally with slight changes to the retaining walls, tiered terraces, and planting beds along Fourth Street, SW, and none of the changes intrude into the Fourth Street right-of-way. In accordance with the PA design framework the design respects the Fourth Street, SW, vista and therefore will minimize adverse effect. -There is no precedent on the National Mall for the proposed integrated façade lighting, especially at night. The integral facade lighting at night will result in an adverse effect to the National Mall Historic District. -These adverse effects will be minimized with the carefully conceived design of the new addition, as well adherence and respect for all setbacks and viewsheds. The spiral form, massing, and complementary landscaping will be compatible with the monumental and significant museums and other federal buildings that line the Mall. The design is contemporary and distinctive from the neo-classical buildings, the modern era museums, and even the contemporary buildings in keeping with the Smithsonian's building collection, in which the design of each facility reflects prevailing architectural styles of the period. -The proposed metal cladding panels are a complementary color to the yellow and beige tones of adjacent buildings including the National Museum of the American Indian, LBJ Building, and the Eisenhower Memorial, minimizing adverse effect. -Cumulative impacts from this Undertaking, along with the previous Revitalization project, will result in a cumulative adverse effect on the National Mall.
Images	

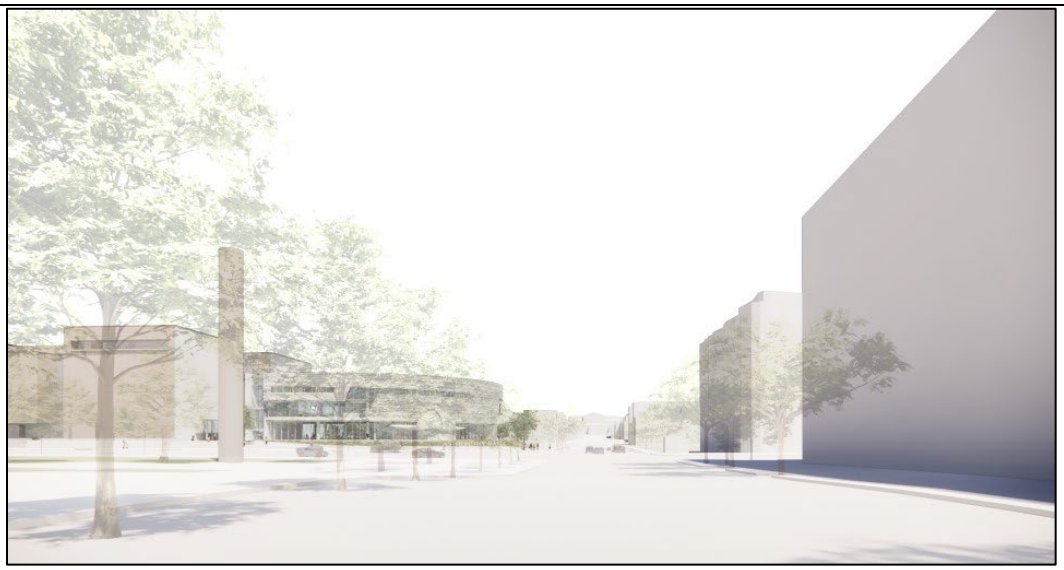
Night-time rendering of the addition's façade, looking south. (Perkins&Will, 2024)

Proposed Effect Determination – Adverse Effect

L'Enfant's Plan for the City of Washington

Feature/Action	Design Details
New construction within L'Enfant's Plan for the City of Washington	-The Undertaking follows the McMillan set back 445 feet to the north, as well as the setbacks along Fourth Street, SW; however, the Haas Observatory does fall below NASM's south elevation along Independence Avenue, SW. -Despite the location of the Haas observatory, there will be no interruption of the historic street grid, and no interruption of the views along the Plan of the City of Washington. There will be no adverse effect to L'Enfant's Plan for the City of Washington. -The Undertaking respects the street grid of L'Enfant's Plan in accordance with the PA design framework.
Images	
 *Diagram showing the addition following all setbacks. (Perkins&Will, 2023)*	
Proposed Effect Determination – No Adverse Effect	

Lyndon B Johnson Department of Education	
Feature/Action	**Design Details**
New construction near to the LBJ Building	-The historic setting of the LBJ Building was previously altered with the demolition of its historic landscape and the insertion of the Eisenhower Memorial. The Undertaking will not further erode the setting. The building retains its association with adjacent federal buildings to the east and west.
Images	



Proposed view of the new addition from Fourth Street, SW, directly adjacent to the LBJ Building. (Perkins&Will, 2024)

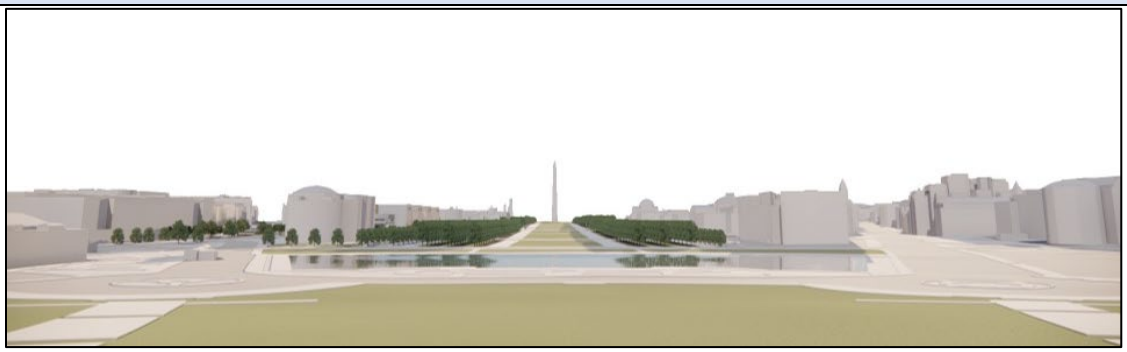
Proposed Effect Determination – No Adverse Effect

Social Security Administration	
Feature/Action	**Design Details**
New construction near the Social Security Administration	-The building will retain its setting, feeling, and association on Independence Avenue, SW, among neighboring federal, museum, and institutional buildings.
Images	

Proposed view of the new addition from Independence Avenue, SW, looking west. (Perkins&Will, 2024)

Proposed Effect Determination – No Adverse Effect

US Capitol and Grounds and Grant Memorial

Feature/Action	Design Details
New construction within View of US Capitol and Grounds, Ulysses S. Grant Memorial, and US Botanic Gardens	-The Undertaking will be minimally visible from the US Capitol steps, Grant Memorial, and Botanic Gardens. -Visibility of the BLC is minimized through its setbacks and by respecting the canopy of the American elm trees on the National Mall. -The character defining views and visual relationships of the Capitol and the National Mall will be maintained. Although the Undertaking will be minimally visible, all historic resources will retain their settings, feelings, and association with the US Capitol Grounds and National Mall.
Images	
 *Proposed view of the new addition the US Capitol steps, the addition will be visible. (Perkins&Will, 2024)*	
Proposed Effect Determination – No Adverse Effect	

National Gallery of Art East and West Wings	
Feature/Action	**Design Details**
New construction Near the National Gallery of Art East and West Wings	-The buildings will retain their setting, feeling, and association within the National Mall and the visual connection of the West Wing to NASM will not be altered. -The new addition will not impact the Sixth Street vista between the main NASM building and the National Gallery of Art West Wing, resulting in no adverse effect. -The axial and architectural relationship of NASM and the National Gallery of Art will be maintained as the new addition is located to the east of NASM, opposite the open plaza between the East and West Galleries. -The Undertaking respects NASM's balanced, architectural relationship with the National Gallery of Art and the Sixth Street axis in accordance with the PA design framework.
Proposed Effect Determination – No Adverse Effect	

Remaining Resources within the APE	
Feature/Action	**Design Details**
Mary E. Switzer Federal Building, Terminal Refrigerating & Warehousing Co, U.S. Botanic Gardens, Bulfinch Gatehouses and Gateposts, Natural History Museum, National Museum of American History, US Department of Agriculture, Freer Gallery, Smithsonian Castle, Arts and Industries Building, Hirshhorn Museum, and Orville and Wilber Wright Federal Buildings.	The Undertaking will not have an adverse effect on any of the remaining historic resources within the APE. There will be no impact on the location, design, setting, materials, workmanship, feeling, or association of any of the remaining historic resources.
Proposed Effect Determination – No Adverse Effect	

Summary Determination of Effect

	Resource	Adverse Effect	Item/Feature	Resolution
National Air and Space Museum	Design and Form	Adverse Effect	Spiral design and form, dynamic integrated façade lighting	
	Solid/Void Pattern	No Adverse Effect	N/A	N/A
	Recessed Glazed Openings/Marble Wall Panels	Adverse Effect	Partially obscures the east elevation	Minimized by glazed hyphen and skylight, allowing the east elevation to remain visible.
	Signage	No Adverse Effect	N/A	N/A
	Terraces/Planting Beds/Retaining Walls	Adverse Effect	Further loss of terraces, planting beds, and retaining walls flanking garage and along Fourth Street, SW	Minimized by only impacting the very east end of the NASM site.
	Garage Openings	Adverse Effect	Alters original feel of the ramps by diminishing their size	
	Interior	No Adverse Effect	N/A	N/A
	Landscape	No Adverse Effect	N/A	N/A
	Cumulative Impacts	Adverse Effect		Minimized by enhancing NASM's ability to display their collections and further education.
National Mall Historic District	New Construction	Adverse Effect	Alteration to the setting and addition of dynamic façade lighting	Minimized by the distinctive and carefully conceived design.
	Viewsheds and Vistas	No Adverse Effect	N/A	N/A
	Cumulative Impacts	Adverse Effect	Continued changes to the setting and impacts from light pollution at night	
L'Enfant's Plan	New Construction	No Adverse Effect	N/A	N/A
Lyndon B. Johnson Building	Adjacent New Construction	No Adverse Effect	N/A	N/A
Social Security Building	Adjacent New Construction	No Adverse Effect	N/A	N/A
US Capitol and Grounds and Grant Memorial	Adjacent New Construction	No Adverse Effect	N/A	N/A
National Gallery of Art East and West Wings	Adjacent New Construction	No Adverse Effect	N/A	N/A
Remaining Resources within the APE	Adjacent New Construction	No Adverse Effect	N/A	N/A