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Correspondence Text

Having started this campaign with the last World War One Veteran I am intimately involved in this project from its very creation when I escorted Frank Buckles wheelchair to the DC WWI Memorial on March 6, 2008.

Years after the effort for a National WWI Memorial was started by Frank Buckles, the last WWI veteran, the Foundation he started now opposes the creation of a new war memorial at Pershing Park in Washington, DC.

Following a design competition last fall, the WWI Centennial Commission revealed its winner. The chosen memorial design would result in the total destruction of Pershing Park, a Washington landmark soon to be included in the National Register of Historic Places.

The WWI Memorial Foundation opposes this destruction and suggests alternatives, such as a scaled-down memorial, an addition of a small stage at the existing park, and a search for a new site. The Foundation has proposed several designs, which would both restore Pershing Park and honor veterans.

It would be incredible for the Commission to demonstrate the need for preservation and honor by restoring Pershing Park, preserving its purpose and honoring WWI veterans at the same time. To bulldoze the park sends a distinctly dangerous message to those trying to save other parks and memorials both in Washington DC and America.

America is watching. Specifically the people, developers and preservation groups. I fully endorse the TCLF's position on protecting the park.

To claim that because the fountain and pond have not functioned for years is a reason to obliterate it is so shortsighted and insulting to historical significance that I am shocked. A commission spearheaded by members of

the ABMC would drive this project.

The normal process of a site search was completely bypassed for this memorial. In that process, the Pershing Park site would have been properly vetted to see if it was even eligible to host the National WWI Memorial, and alternates would also have been considered.

I have had my disagreements in the past with the agencies involved but this can not- can not move forward. As sad as it is this is a major demonstration of groups not doing their due diligence in site selection. I have been very challenged to understand the agencies that review these projects but now fully understand why they comb through every proposal. This is a vivid illustration of why they exist.

Sadly, our five million WWI heroes have met a stumbling block which could and should have been avoided.

When the WWICC announced this and said that Frank Buckles wanted a memorial in DC we immediately contacted them to let them know in no uncertain terms that he would never advocate for grinding Pershing Park into dust and this was not his mission. The family felt so strongly about this that they demanded that they never associate his name with the project ever again.

After 100 years we challenge Congress, the NPS, NCPC, CCFA, GSA and the Centennial Commission to do the right thing and have a site search and offer complete renovation and preservation of Pershing Park.

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Correspondence Text

I attended last week's Section 106 meeting on plans for Pershing Park and its enhancement as a national World War I Memorial, as cited below.

"Congress has authorized the World War I Centennial Commission to enhance the existing Pershing memorial by constructing on Pershing Park "appropriate sculptural and other commemorative elements, including landscaping."" - Memorial Design Competition from WWI Centennial Commission web site.

The revised plan, based upon the design competition winning entry, "The Weight of Sacrifice," does not come close to adhering to that charge. The plan, as presented, all but destroys the M. Paul Friedberg-designed park and Oehme van Sweden's landscape design, rather than enhancing it by adding commemorative elements and landscaping.

We have pointed out during Congressional hearings, National Capital Memorial Advisory Commission hearings, in public talks and programs, and in the media that the American Battle Monuments Commission's memorial to General Pershing already serves as a 'national' memorial to World War I. Instead of attempting to build a new memorial, modest funds should be expended to rehabilitate Pershing Park and to enhance the Pershing Memorial by adding new interpretive signage and memorial elements, such as sculptural ones, to recognize other participating branches of the services and make the Pershing Memorial a comprehensive World War I memorial. Such rehabilitation and adaptive reuse would have a minimum impact on the existing park's design and retain its character-defining elements that make it eligible for the National Register of Historic Places as an individual site.

We believe that an adaptation of the "memorial wall" portion of the revised plan could be successfully incorporated into the existing park without destroying the water features (fountain and pool), terraced seating and landscape elements that are an integral part of the Friedberg design, but are absent in the revised design. As it now stands, the revised proposed plan for Pershing Park renders it virtually unrecognizable as the product of

Friedberg's and Oehme van Sweden's designs and should be rejected.

We urge the parties who will review this project to compel the WWI Commission to have their plan redesigned to incorporate only those modifications that would have the least impact on the existing park's design, by sensitively adding elements that would make it a national WWI Memorial, while preserving the essential character-defining elements of the original National Register-eligible design. The fact that Pershing Park has not been adequately maintained over the years is no excuse for demolishing it or severely modifying its water features. Rehabilitating Pershing Park to incorporate additional design elements could make it a truly national WWI Memorial, while still retaining the integrity of its original design. In fact, this approach would be most in keeping with the authorization quoted in our second paragraph above: "...to enhance the existing Pershing memorial by constructing on Pershing Park appropriate sculptural and other commemorative elements, including landscaping...'".

If you would like to discuss this further or invite interested members of the AOI of DC to comment or participate, please let me know.

Sincerely,

William N. Brown, President The Association of the Oldest Inhabitants of the District of Columbia

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Correspondence Text

I attended the WWI Memorial Section 106 Consultation meeting on September 21, 2016. The following are my comments on the proposed WWI Memorial design that was presented there.

The announcement of that meeting included the final determination of eligibility (DOE) of Pershing Park for the National Register of Historic Places. That DOE "concluded that Pershing Park is nationally significant under Criterion A in the area of community planning and development as the site of the General John J. Pershing Memorial. It is also nationally and locally significant and under Criterion C in the area of landscape architecture as a signature designed landscape by M. Paul Friedberg, one of modern American landscape architecture's most accomplished urban designers. The park is an exceptional example of a landscape design of the modern period and of an approach to the design of public space as an integral part of the revitalization of an urban neighborhood in decline. Pershing Park is also significant at the national and state levels under Criterion C as the first modernist commemorative park on one of the important elements of the nationally significant Washington city plan.

Pershing Park meets Criterion Consideration F for a commemorative property and Criterion Consideration G for a property having achieved significance within the last fifty years for its exceptional significance as a highly intact example of M. Paul Friedberg's concept of the urban park plaza. Finally, the "Pennsylvania Avenue, NW, Cultural Landscape Inventory - White House to the Capitol" determined that several aspects of Pershing Park (spatial organization, views and vistas, Pershing Memorial, Bex Eagle sculpture, and PADC street furnishings and vegetation) contribute to the significance of the Pennsylvania Avenue, NW, cultural landscape."

Because of that DOE, I had expected that the newly-proposed design for the WWI Memorial on that site would have reflected both the WWI Memorial Competition Design Objective, which stated that "Congress has authorized the World War I Centennial Commission to enhance the existing Pershing memorial by constructing ...appropriate sculptural and other commemorative elements, including landscaping", and the DOE.

The proposed design was to have been an adaptation of the competition finalist, "The Weight of Sacrifice" that should have reflected this DOE conclusion. In fact, in commenting earlier on the five competition finalists, I had written that this was "the most straightforward and effective design of all, and it appears to be most similar to the existing design, although it eliminates and fills in the pool, fountain and amphitheater area. Thus if a preservation alternative were to be desired and achieved, it would be possible to adapt it to be so."

Unfortunately, however, this did not happen. Although text that accompanied the presentation of the proposed design stated that "it integrates new commemorative elements while maintaining character-defining features of the existing park", that was clearly not the case! It was not even true that the Pershing Memorial was retained in its original location, although that looked to be possible.

According to the DC State Historic Preservation Office DOE Form, "Pershing Park demonstrates a high degree of integrity in location, design, and setting...Paul Friedberg's design of the park's hardscape and his structural plantings and English ivy remain in place. ..and the materials and workmanship possess a moderate to high degree of integrity." Also, "the majority of the original built elements of the designs of Friedberg and Harrison's design remain in place. The polished, honed, or rough-cut granite, Belgian block pavers, and diagonally set brick tiles still express their original workmanship." And "Original plant materials, including trees, lawn, grasses, and flowers, are also present."

The fact that both the design and integrity of Pershing Park as designed by M. Paul Friedberg and Oehme van Sweden have not only been adversely affected, but also essentially obliterated, is readily apparent in looking at both the "Topographic Enhancement" and "Planting Design" Plans that were presented at the meeting, and comparing them with the "Existing Park Defining Features" Plan.

Although the presenter talked about "softening" the berms and grades, the reality is that, as shown on the socalled "Topographic Enhancement" Plan, all of the grades within the park would be changed - from adding as much as 4.56' in the north central part of the park to cutting as much as 5.3' at the SE corner of the Pershing Memorial plaza area. Likewise, the continuity of features of the Pennsylvania Avenue Plans would be disrupted. Thus the proposed design would obliterate Friedberg's design, including the signature pool and waterfall with its stepped seating, plaza and planting that created a much-used oasis from the bustle of the avenue.

Proof that the Oehme van Sweden planting design would be destroyed is not only the proposed changes in grades, but also the "Planting Design" Plan, which shows both a significant change in the plant palette, including a significant color change by adding red maples along the central grassed area and spring-flowering white-flowered fringe trees, instead of summer-flowering pink crape-myrtles, and a decrease in the number of trees.

The so-called reason for all of these changes is that plantings have become overgrown and built and mechanical elements have not been properly replaced or maintained, thus discouraging use by the public. However, since the basic well-designed framework of the park still remains, this is no excuse for abandoning the original design, which is a significant work of landscape architecture by master landscape architects. Rather, it should be rehabilitated. "Demolition by neglect" should not be tolerated.

In summary, although it is purported that the proposed design "integrates new commemorative elements while maintaining character-defining features of the existing park", that is blatantly NOT True. In fact, it adversely affects or destroys all of these character-defining features! For this reason, the proposed design should be rejected and the WWI Commission should be directed to develop a new proposed design that would preserve the integrity of this nationally historic cultural landscape.

In previous comments, I have never questioned the selection of this site or its enhancement as a WW I Memorial, but I have urged that careful consideration be given to limiting the scope of that enhancement, so that it would not adversely affect the integrity of the existing design. I have also stated that "An imaginative and sensitive designer

should be able to develop a solution that would both commemorate WW I and preserve and enhance the significant components of the existing park's design." This could still be done by sensitively incorporating "Walls of Remembrance", and maybe even "The Wheels of Fury", within the existing design.

This creative "pairing" would also show that the success of WW I enabled the continuance of a democracy that celebrates public vitality and enjoyment of a vibrant public space that anchors the west end of the grand ceremonial Pennsylvania Avenue between the Capitol and the White House within the larger urban context of our Nation's Capital. I would hope that such a solution would not be rejected by the WWI Commission as not being "grand" enough!

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Correspondence Text

Cultural Landscape Foundation's comments on the proposed WWI Memorial design presented at the Section 106 Consulting Parties Meeting held on September 21, 2016 (see letter attached).



www.tclf.org

October 19, 2016

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

Dear Ms. Dewey:

Thank you for the opportunity to comment on the proposed WWI Memorial that was presented at the Section 106 Consultation meeting on September 21, 2016. The proposed memorial would be built on the site of Pershing Park, a Modernist design by landscape architect M. Paul Friedberg that is located on Pennsylvania Avenue, NW, and physically part of the Pennsylvania Avenue National Historic Site.

This meeting was significant because it occurred after Pershing Park had been determined eligible for listing in the National Register of Historic Places as noted in a 43-page "Determination of Eligibility" (DOE), by the Washington, D.C. State Historic Preservation Office. Up to this point, proponents of the WWI Memorial had denigrated the design, its historic and cultural significance, and its condition. The DOE countered those assertions emphatically. Specifically, the document notes:

- "Pershing Park is significant at the national and state levels and under Criterion C in the area of landscape architecture as a signature designed landscape by M. Paul Friedberg, one of modern American landscape architecture's most accomplished urban designers."
- "The park is an exceptional example of a landscape design of the modern period and of an approach to the design of public space as an integral part of the revitalization of an urban neighborhood in decline."
- "Pershing Park is also significant at the national and state levels and under Criterion C as the first modernist commemorative park on one of the important elements of the nationally significant Washington city plan."
- Even though the park is less than 50 years of age, it is "an exceptional and highly intact example of M. Paul Friedberg's concept of the urban park plaza."
- "The park also retains a greater degree of integrity to its period of significance than Friedberg's Peavey Plaza, which has been listed on the National Register of Historic Places."

The DOE also states: "Pershing Park is an exceptionally important example of this urban form of public space and of Friedberg's work."

The purpose of the Section 106 process is to "seek ways to avoid, minimize or mitigate any adverse effects on historic properties." The sole revised plan presented on September 21, 2016, utterly fails to honor that purpose and would instead result in the demolition of Pershing Park. Moreover, the consulting parties to the Section 106 review process were provided with no alternatives during that September 21, 2016 meeting – only a recitation of rejected designs considered during the competition process – that would "avoid, minimize or mitigate any adverse effects on" Pershing Park. The sole revised plan also fails to support the WWI Memorial proponents' claims that it "integrates new commemorative elements while maintaining character-defining features of the existing park." In the revised plan significant built elements including the waterfall, pool and stepped seating have been eliminated; the pool footprint was substantially reduced and replaced by a "scrim" of water. Site grading has been radically altered (referred to in the presentation as "softening"), and it's clear from the "Planting Design" and "Topographic Enhancements" narrative that accompanies the revised plan that the Friedberg design and the subsequent planting plan by James van Sweden and Wolfgang Oehme (of Oehme, van Sweden & Associates), would, essentially be eliminated.

As a result of these severe modifications, which results in the demolition of a National Registereligible work of landscape architecture, we cannot support the proposed redesign presented on September 21, 2016, and urge that it be rejected and that the WWI Memorial Commission be instructed to develop a plan the is consistent with the historic significance of Pershing Park and one that "seeks ways to avoid, minimize or mitigate any adverse effects on" the park.

Moreover, now that Pershing Park has been determined eligible for listing in the National Register of Historic Places, we believe the National Historic Site designation for Pennsylvania Avenue, last updated in 2004 – 12 years ago – should be updated to include Pershing Park. We also would like to raise the question that with Pershing Park's potential eligibility for inclusion in the Pennsylvania Avenue National Historic Site, should the Advisory Council on Historic Preservation should be consulted going forward?

Thank you for this opportunity to comment on these proposed efforts.

Sincerely,

Charles A. Birnbaum, FASLA, FAAR President + CEO, TCLF

cc: Claire Sale, AECOM; David Maloney, State Historic Preservation Officer for the District of Columbia; Thomas Luebke, Secretary, U.S. Commission of Fine Arts; Elizabeth Miller, National Capital Planning Commission; Peter May, Associate Regional Director, National Capital Region, National Park Service; Darwina Neal; Rebecca Miller, DC Preservation League, The Committee of 100; M. Paul Friedberg, FASLA; Lisa Delplace, OvS; Bill Brown, AOI

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Correspondence Text

Letter from the Committee of 100 on the Federal City (Committee of 100) providing comments on the design of the World War I Memorial as presented at the Consulting Parties meeting on Wednesday, September 21, 2016 (see letter attached).

Founded 1923

October 24, 2016

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945 G Street, N.W. Washington, D.C. 20001 202.681.0225 info@committeeof100.net Gay Vietzke, Superintendent National Mall and Memorial Parks National Capital Region 1100 Ohio Drive, SW Washington, D.C. 20014

SUBJECT: Pershing Park/World War I Memorial Design

Dear Superintendent Vietzke,

The Committee of 100 on the Federal City (Committee of 100), founded in 1923, is the District of Columbia's oldest citizen planning organization. We are pleased to provide these comments on the design of the World War I Memorial which is proposed to be located in Pershing Park at 14th Street and Pennsylvania Avenue, NW. These comments are based on the design presentation at the Consulting Parties meeting on Wednesday, September 21, 2016, other materials that are now posted on the National Park Service PEPC website, and site visits by Committee of 100 members to evaluate the revised design.

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www.committeeof100.ne

The Committee of 100 on the Federal City has long been concerned with protecting and enhancing, in our time, the various elements of the L'Enfant Plan (1791-92) and the planning and design work of the McMillan Commission (1901-02). Both of these plans have been important in shaping the "Monumental Core" of Washington, D.C. Pershing Park has an important location in the Monumental Core in the western portion of the Pennsylvania Avenue area, just east of the White House complex and President's Park South.

The Committee of 100 has a strong interest in the continuing revitalization of Pennsylvania Avenue and adjacent areas between the Capitol and the White House. As you know, the National Capital Planning Commission, the National Park Service, and the General Services Administration, along with other federal and District agencies and local and national organizations, are now in the first phases of the Pennsylvania Avenue Initiative program. The "Cultural Landscape

Inventory: Pennsylvania Avenue, NW-White House to the Capitol" (May 10, 2016), prepared by the National Park Service, provides background information for that work.

Background

The site called Pershing Park was designed and constructed by the Pennsylvania Avenue Development Corporation in the late 1970s, with the General John J. Pershing Memorial in the southeast corner of the park. Most of the park has continued to serve an "urban park" function, though affected by the problems which caused terminating the skating rink/outdoor plaza and the concession stand. Unfortunately, over approximately the past decade, there has been significant deterioration of some parts of the Pershing Park landscape, apparently due to lack of funding.

Members of the Committee of 100 have participated in the discussions of a proposed World War I Memorial in Pershing Park for the past several years, beginning with the EA Scoping Meeting on May 20, 2015, convened by the National Park Service and the World War I Centennial Commission. The Committee of 100 outlined preliminary concerns in a May 27, 2015 letter to the National Park Service. We noted our concerns that the important "urban park" functions of Pershing Park not be overwhelmed by the design of the World War I Memorial.

The Committee of 100 continued to track the design competition process through the summer and fall of 2015 and the selection of five potential final designs from the hundreds of designs that had been submitted. The Committee of 100 was relieved to see the selection of the "Weight of Sacrifice" as the winning design in early 2016. Of the five final designs, the "Weight of Sacrifice" seemed to have the least negative impact on the "urban park" functions of Pershing Park. Although that design had issues, it seemed to have the most potential for refinement to reduce adverse impacts. We note that the design refinement process continued for some eight months (January-September 2016) with no public information or participation.

The Framework for Design of the World War I Memorial

The Congressional legislation for the World War I Memorial (Public Law 113-291, December 19, 2014) states "The Commission may *enhance* the General Pershing Commemorative Work by constructing on the land designated by paragraph (1) as a World War I Memorial appropriate sculptural and other commemorative elements, including landscaping, to further honor the service of members of the United States Armed Forces in World War I" (emphasis added). It is also useful to note that in your (Superintendent Gay Vietzke) January 4, 2016 letter to the Competition Jury, you said that "In advance of selecting a designer for the World War I Memorial, the National Park Service (NPS) would like to reiterate our desire to enhance the existing park to accommodate a new memorial, while retaining the signature elements of the park." Subsequently, the National Park Service issued a formal Final

Determination of Eligibility finding Pershing Park eligible for the National Register of Historic Places, citing a number of elements that meet various criteria.

The revised proposed design for the World War I Memorial in Pershing Park that was presented at the Section 106 Consulting Parties Meeting on September 21, 2016 is encouraging in some respects, but also has many problems. The design has been modified and simplified and some new features have been added, such as the water feature (a water scrim) in front of the Memorial Wall. These are changes since the Jury selected this general design in January 2016.

Committee of 100 members have reviewed the presentation that was shown at the September 21 meeting (presentation now on line) and have revisited Pershing Park with the presentation materials in order to try to fully understand the impact of the design.

Achieving a Simple Memorial

I want to let you know that there is strong sentiment in the Committee of 100, as in other reviewing organizations, to retain the historic design of Pershing Park, restore most features of the original design, and to commemorate World War I by improvements/revisions/additions to the Pershing statue area at the southeast corner of the park. That would be a simple and appropriate memorial.

Comments on the Proposed Design

However, we also want to address the revised design. In terms of the refined proposal presented at the September 21, 2016 Consulting Parties Meeting, we were encouraged in some respects but still have a number of concerns, questions and suggestions. We also note that the presentation materials could have been, and should have been, much clearer about the changes being proposed and how the proposed changes would affect the existing park design. For example, the "Topographic Enhancement" illustration in the presentation says "earthen berms softened to increase visibility into park on the south, west and east sides". The word 'softened" seems somewhat misleading when the site plan shows changes of one to more than four feet reductions. Such significant changes would have a very adverse effect on the original design of the park, now in place, and add significant costs to creating the World War I Memorial in Pershing Park.

In general, we believe that many of the important elements of the original M. Paul Friedberg and Oehme, van Sweden & Associates design work should be maintained, and restored where deterioration has occurred. With this overall concept in mind, we suggest a modified design, which would remove the Pavilion and somewhat raise the level of the ground where the existing lowered area (where the previous water feature was located) to provide a new central grass area and water feature (a scrim water feature) in front of the new Memorial Wall at the west end of the park. Such an approach would retain many of

the features of the proposed revised design, while not destroying so much of the features of the original park design.

The location of the Memorial Wall as now proposed would require the removal of the original fountain structure and removal of the long row of "steps" at the west end of the park. The design of the Memorial Wall in the presentation is in very conceptual terms, with refined designs to come in the future. We suggest a modification of the revised design that has been proposed, in order to retain more of the landscape features of the original park design. It may be possible to retain the existing fountain as part of the Memorial Wall.

We also suggest that there should be an improved visual connection between the Memorial Wall area on the west side of the park and the existing General John J. Pershing statue and walls at the southeast corner of Pershing Park. The revised design proposes that the visual and symbolic connection be made by a walkway leading west from the Pershing statue to the south side of the Memorial Wall. However, this connection seems somewhat limited and requires major revision of the original Pershing Park design (removing or lowering berms and steps, etc). We suggest that it would be more appropriate to open up a broader visual connection, perhaps with some modification to the design of the central grass panel. The visual and symbolic connection between the Pershing statue area at the southeast corner of the park and the central grass area and Memorial Wall could be a very important feature in telling the story of American involvement in World War I.

Improving the Pershing Statue Area

We have some concerns with the existing Pershing statue area which consists of the Pershing statue and two walls at right angles. However, it is not clear what is to be done, if anything, with the two walls. This should be an important area for introducing park visitors to key reasons and events in the American involvement in World War I. However, the maps and description (etched in stone on the south wall) are very difficult to read and understand. As indicated in the presentation, "inscriptions on walls lack legibility". We suggest that the World War I Centennial Commission, and the design team for the new design, need to give more attention to how this important entry point to the park, and the message which is to be conveyed, can be improved. Perhaps additional walls or sculpture could be added in this area.

Importance of the Western Portion of Pershing Park

We note that the design work does not seem to give much attention to the western portion of Pershing Park. This is the raised area west of the Memorial Wall, bordered by 15th Street on the west. Visitors in this area would be able to stand next to the top of the wall and look east over Pershing Park. We believe they should be able to look east and see the Pershing statue area at the southeast corner of the park. This area west of the Memorial Wall has a view of the Washington Monument and visual connections to the

White House grounds, the Treasury Building, President's Park South, and the Willard Hotel and W Hotel on the north side of Pennsylvania Avenue. There is an at grade entrance into Pershing Park at the northeast corner. We suggest study of a ramp from this location down to the lower level of the Park.

We have several concerns about proposed changes in landscaping. Lowering the berms will alter the Park's design and destroy mature trees. It would be useful to see the public safety data that is supposedly a reason for this proposed change. Concerning trees in boxes, the crape myrtles appear to be healthy. It would also be useful to clarify the proposal to add additional street trees on the north side of the Park.

In summary, we suggest further revisions that would retain as much of the original park design as possible, while incorporating new features such as the central grass panel, the water feature, and the Memorial Wall. We believe a better visual connection between the west side of the park and the Pershing statue area is needed. Finally, we believe improvements of some kind to the Pershing statue area (the walls adjacent to the statue) are needed. Further work on the Memorial Wall design is needed.

This stage of design review includes comments by the U.S. Commission of Fine Arts, the National Capital Planning Commission, the District Government and comments by many civic and design organizations. Clearly, some further revisions are needed. We strongly request that the next stage of the design be clearer on what is being proposed, especially any modifications to the original park design.

The Committee of 100 on the Federal City appreciates the opportunity to make these comments. We hope further design refinements can be made in the next stages of review of the Pershing Park/World War I Memorial that will make the World War I Memorial more compatible with the urban park character of Pershing Park and, at the same time will provide an appropriate statement about American involvement in World War I.

Respectfully submitted,

Nancy MacWood Chair

cc: Marcel Acosta, Executive Director National Capital Planning Commission

Thomas Luebke, Secretary U.S. Commission of Fine Arts

Eric Shaw, Director D.C. Office of Planning

David Maloney State Historic Preservation Officer for the District of Columbia

Catherine Dewey National Park Service

Clair Sale AECOM