



## Executive Director's Recommendation

Commission Meeting: November 3, 2016

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<b>PROJECT</b> <b>National World War I Memorial</b> Pershing Park Washington, DC	<b>NCPC FILE NUMBER</b> 7682
<b>SUBMITTED BY</b> United States Department of the Interior National Park Service	<b>NCPC MAP FILE NUMBER</b> 1.23(73.10)44433
<b>REVIEW AUTHORITY</b> Per 40 U.S.C § 8905 and Public Law 113-291	<b>APPLICANT'S REQUEST</b> Approval of comments on concept design
	<b>PROPOSED ACTION</b> Approve comments as requested
	<b>ACTION ITEM TYPE</b> Staff Presentation

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### PROJECT SUMMARY

The National Park Service (NPS), in collaboration with the World War I Centennial Commission (WWICC), has submitted concept design plans for the National World War I Memorial. The WWICC is the project sponsor of the Memorial and was established by the World War I Centennial Commission Act, in accordance with Public Law 112-272. WWICC is responsible for planning, developing, and executing programs, projects, and activities to commemorate the centennial of World War I through 2018.

Title 30, Section 3091 of the National Defense Authorization Act of 2015 (Pub. Law 113-291) designates Pershing Park in downtown Washington, DC, along with the Liberty Memorial in Kansas City, as national World War I memorials. The Act further authorizes the WWICC to honor the service of members of the United States Armed Forces in World War I by enhancing Pershing Park with appropriate sculptural and other commemorative elements, including landscaping.

A two-stage competition was held to select a memorial designer. Stage I included an open call for design concepts, and was completed in August 2015. The competition jury selected five finalists to continue to Stage II, and NCPC heard an information presentation on these finalists in December 2015. The winning design, "The Weight of Sacrifice," was selected by WWICC in early 2016. Since that time, the sponsor has continued to develop the proposed design, and seeks comments on the concept from the Commission.

### KEY INFORMATION

- The Commemorative Works Act (CWA) establishes requirements for building commemorative works on federal lands within the District of Columbia and its environs.

It applies to lands under jurisdiction of the US Department of the Interior (DOI) and the US General Services Administration (GSA).

- Public Law 113-291 designates Pershing Park in downtown Washington, DC, along with the Liberty Memorial in Kansas City, as national World War I memorials. The Act further authorizes the WWICC to honor the service of members of the United States Armed Forces in World War I by enhancing Pershing Park with appropriate sculptural and other commemorative elements, including landscaping.

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## RECOMMENDATION

### The Commission:

### Notes:

Pershing Park is located within the 1974 Pennsylvania Avenue Development Corporation (PADC) Plan area. The Plan called for a public open space at the site to serve as a transition between the more formal landscape of President's Park and the hardscape of Freedom Plaza.

Pershing Park is located within the Pennsylvania Avenue National Historic Site (NHS).

Pershing Park is a work of the landscape architect M. Paul Friedberg, and the park has been determined individually eligible for listing in the National Register of Historic Places.

### Supports general planning and design principles, including:

A memorial design that combines urban park and commemorative features successfully, integrating park uses and dignified commemorative components in a manner that is balanced and enduring.

A memorial design that respects the symbolic and civic importance of the Pennsylvania Avenue corridor, while preserving the unified streetscape and framed views of the US Capitol.

Strategies that enhance Pershing Park while rehabilitating or reusing elements of the original park design.

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**Finds:**

The concept proposal has evolved substantially since the initial competition entry and winner selection, and the current design considers the framework and features of the existing Pershing Park, as well as input received during the consultation process.

**Requests:**

A design alternative be evaluated through the National Environmental Policy Act (NEPA) process that includes a restoration and rehabilitation approach with minimal changes to the existing park features.

The plans clearly denote the existing park elements to be retained, and further explore whether additional features can be reused or rehabilitated, including the steps, planters, and waterfall.

Additional renderings be provided for several locations indicating how the proposed design frames views of the US Capitol and preserves the continuity of the Pennsylvania Avenue streetscape.

The plans denote the limits of the Pennsylvania Avenue Development Corporation (PADC) streetscape and show how the streetscape will transition to park and memorial space.

Details be provided regarding the commemorative wall, including the proposed content, narrative, materials and their durability.

The northern portion of the site be further developed to better define the sidewalk zone, increase green space, and create a clear transition between the public street and the memorial area.

Measures be identified to enhance the legibility of the Pershing Memorial walls.

Details be provided regarding the proposed material palette, signage, and lighting, including the location, types of fixtures, and illumination levels.

Information be provided regarding sustainable and low-impact design strategies, as well as the stormwater management approach.

A plan be prepared that identifies the proposed urban park spaces and potential programming or activities which can occur in those spaces.

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## PROJECT REVIEW TIMELINE

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<b>Previous actions</b>	<b>December 3, 2015</b> – Information Presentation on five finalists
<b>Remaining actions</b> (anticipated)	<ul style="list-style-type: none"><li>– Approval of preliminary memorial and site development plans</li><li>– Approval of final memorial and site development plans</li></ul>

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## PROJECT ANALYSIS

### Executive Summary

Staff analyzed this project using guidance in the Commemorative Works Act (CWA) and the Comprehensive Plan. A general principle set forth in the Comprehensive Plan is to protect and improve the open space and character of the Monumental Core and the integrity of each memorial and park element. Further, the Comprehensive Plan includes policies to enhance the quality of the visitor experience to the Nation's Capital, particularly at major cultural sites. Staff has also evaluated policies related to urban design given the memorial's position within downtown Washington, DC along Pennsylvania Avenue, NW.

Pershing Park is a prominent location and changes should ensure a high quality urban park that engages the surrounding context. Urban parks in Washington, DC serve residents, workers and visitors alike. The most successful urban parks with commemorative elements balance these local and national roles and provide spaces that blend more typical park uses with respectful commemorative elements. As such staff recommends the **Commission support a memorial design that combines urban park and commemorative features successfully, integrating park uses and dignified commemorative components in a manner that is balanced and enduring.**

Pershing Park is located along Pennsylvania Avenue, a symbolic and ceremonial corridor that connects the White House and the US Capitol. The Avenue is an important national destination and feature within the capital city, and contributes to the city's network of neighborhoods and work places. Therefore, staff recommends the **Commission support a memorial design that respects the historic, symbolic and civic importance of the Pennsylvania Avenue corridor, and preserves the unified streetscape and framed views of the US Capitol.**

Public Law 113-291 designated Pershing Park in downtown Washington, DC, as a national World War I memorial, and authorizes the WWICC to honor the service of members of the United States armed forces in World War I by enhancing Pershing Park with appropriate sculptural and other commemorative elements, including landscaping. The Park was once a vibrant, active place, and has recently been determined eligible for listing in the National Register in Historic Places. Therefore, staff recommends the **Commission support strategies**

**that enhance Pershing Park while rehabilitating or reusing elements of the original park design.**

The concept for the memorial has continued to develop since the initial competition entry and subsequent selection by the WWICC. These changes are described in the subsequent analysis. As such, staff recommends the **Commission find that the concept proposal has evolved substantially since the initial competition entry and winner selection, and the current design considers the framework and features of the existing Pershing Park, as well as input received during the consultation process.**

### **Analysis**

The project site is bounded by 14<sup>th</sup> Street, NW to the east, 15<sup>th</sup> Street, NW to the west, and Pennsylvania Avenue, NW to the north and south. The 1.75-acre site is surrounded by civic and governmental uses to the south, including the Commerce Building and Wilson Building. Sherman Park and Freedom Plaza are located to the west and east, respectively. A variety of commercial uses, including several hotels, can be found to the north.

The existing park, designed by M. Paul Friedberg, includes a central, sunken pool with waterfall, surrounded by amphitheater-style steps and seating. The west and south sides of the park are elevated above the central space to create a buffer from the surrounding city streets. A small gazebo formerly accommodated restrooms and a café. Movable furniture provides flexibility and adaptability for park users. The southeastern corner of the park is occupied by the General Pershing Memorial. This consists of two ten-foot granite walls engraved with quotes and maps. A statue of General Pershing occupies the space framed by these two walls.

Public Law 113-291, Section 3091, enacted on December 19, 2014, authorized the commemoration and designated the site as a national World War I Memorial. The park is federal property, a component of the Pennsylvania Avenue National Historic Site, and a unit of the National Park System administered by the Superintendent of the National Mall and Memorial Parks. Located one block east of the White House on Pennsylvania Avenue, NW, the memorial may include 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. The Secretary of the Interior, through the NPS, on completion of the enhancements will assume responsibility for maintaining the work.

### **Site History**

The project site was originally conceived as private lots in Pierre L'Enfant's 1791 Plan for the city of Washington. Over time, the property eventually moved from private ownership to federal control. By 1930, the site was cleared of buildings, and in 1938, the National Park Service took over the property. A temporary information building was built on the site during World War II and subsequently demolished in 1955. In 1956, Congress authorized creation of a memorial to General John Joseph Pershing on the site, but it was never constructed.

In 1972, the Pennsylvania Avenue Development Corporation (PADC) was created to oversee comprehensive revitalization efforts for the corridor. Design guidelines adopted by PADC indicated the site should remain a park space while providing a suitable setting for the Pershing Memorial. Staff recommends the **Commission note Pershing Park is located within the 1974 Pennsylvania Avenue Development Corporation (PADC) Plan area. The Plan called for a public open space at this site to serve as a transition between the more formal landscape of President's Park and the hardscape of Freedom Plaza.**

In 1979, landscape architects M. Paul Friedberg and Jerome Lindsey were commissioned to design Pershing Park. Generally, Friedberg has been recognized as the individual designer, and under his guidance, the park was imagined as a shaded refuge with waterfall and sunken water feature that transformed into an ice rink in the winter. The park design reflected a desire for seclusion from the noisy streets surrounding the site, while seating, restrooms and a café were also provided. The previously-approved memorial to General Pershing was also integrated into the plan. Soon after the park dedication in 1981, landscape architects Wolfgang Oehme and James van Sweden redesigned the planting plan, seeking to soften Friedberg's concept. Their plan preserved many of the original trees, including the groves of honey locust and willow oaks, but added water plantings and other mixed species throughout the park.

Pershing Park has remained generally the same since the 1980s. In 2008, the café ceased operation, and the ice skating rink was discontinued due to challenges with the pool and water pump. The park remains today a gathering place for office workers and visitors.

#### Historic Eligibility

Staff recommends the **Commission note that Pershing Park is located within the Pennsylvania Avenue National Historic Site (NHS).** Further, NPS has identified the park as eligible for listing in the National Register for Historic Places based upon the findings of the Pennsylvania Avenue National Historic Site (NHS) Cultural Landscape Inventory (CLI). According to the CLI, the NHS and its eligible resources, such as the park, are significant for their role in major city planning milestones in the United States. In particular, the NHS and its resources represent an innovated approach to urban design that utilized modern principles of landscape architecture. The NHS is also significant for several modern and post-modern parks initiated by the PADC, including Pershing Park by M. Paul Friedberg. His design exemplifies important elements of modernist landscape design, including simple designs, strong geometric lines and largely open plans.

In addition, a determination of eligibility (DOE) has been prepared to consider the eligibility of Pershing Park for the National Register of Historic Places as an individual site. The DOE found the park to be eligible under several criteria. First, the park is significant in the area of community planning and development as the site of the General Pershing Memorial. The park is also significant at the national and state levels as a signature landscape designed by M. Paul Friedberg, an accomplished modern landscape architect and urban designer. The DOE found the park to be an "exceptional example of 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.”<sup>1</sup>

The park was also found to be significant as one of the first modernist commemorative parks within the L'Enfant Plan, unifying Friedberg's modern principles with the commemorative elements of the Pershing Memorial. Finally, the DOE found Pershing Park to be an exceptional and highly intact example of Friedberg's work as an urban plaza. Therefore, staff recommends the **Commission note that Pershing Park is a work of the landscape architect M. Paul Friedberg, and the park has been determined individually eligible for listing in the National Register of Historic Places.**

### Alternatives

Based upon the submission materials, the sponsor continues to finalize the alternatives to be evaluated through the NEPA process. Current alternatives under consideration include the design competition entry and the current design as submitted to the Commission. These alternatives may alter the existing park significantly, and therefore an additional alternative with a smaller, less impactful scope should be considered and evaluated.

As such, staff recommends the **Commission request a design alternative be evaluated through the National Environmental Policy Act (NEPA) process that includes a restoration and rehabilitation approach with minimal changes to the existing park features.** The analysis that follows is based upon the current design alternative as submitted for review. Recommendations broadly relate to improving both commemorative and park elements, and ensuring the components are coordinated and complementary.

### Project Design

The concept has evolved since the designer winner was selected. Most significantly, the original scheme included a raised central space surround by commemorative walls. The primary open space was accessible only from the western portion of the site, and was occupied by a large figurative sculpture. The design has been revised to retain the current park's concept of a central, sunken open space, while a single new commemorative wall is proposed. Other elements of the existing park framework have been reinterpreted in a variety of ways to accommodate the new memorial program. New plantings, including flowering trees, perennials and grasses seek to extend the park landscape as developed by Oehm Van Sweden. For the submitted design, staff recommends the **Commission request the plans clearly denote the existing park elements to be retained, and further explore whether additional features can be reused or rehabilitated, including the steps, planters, and waterfall.**

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<sup>1</sup> Pershing Park Determination of Eligibility, prepared by Tim Kerr, Senior Architectural Historian, Robinson & Associates, Inc., and Laura Knott, Historical Landscape Architect, Commonwealth Heritage Group, Inc., July 14, 2016, pg. 23

The design is primarily organized around a central open space, bound on the west by a new commemorative bas relief wall, and to the east by the Pershing Memorial walls and statue. Steps and terracing define the north and south edges. The central area is comprised of a series of zones. The bas relief wall provides a focal point and the most sacred space within the park, while a scrim of water provides a visual and physical transition to the more active urban lawn located further to the east. Rows of maple trees border the lawn, and provide a visual connection to the Pershing Memorial, which is retained in its current location. Staff has stated previously that the text and graphics on the Pershing Memorial walls are important and informational; however, they can be difficult to read. Therefore, staff recommends the **Commission request measures be identified to enhance the legibility of the Pershing Memorial walls.**

Low berms frame the site to the west and south in a manner similar to the existing park. However, the proposed design lowers the berm heights slightly, while raising the central area modestly. These modifications will improve visibility and access to the central memorial and park precinct from the adjacent streets. The northern portion of the site includes a series of benches and tree plantings to create a new pedestrian space. Willow oaks have been proposed along Pennsylvania Avenue North to provide continuity with the corridor's streetscape and to frame views toward the US Capitol.

In general, the proposed design seeks to continue the tree plantings which define the Pennsylvania Avenue corridor. However, staff recommends the **Commission request additional renderings be provided for several locations indicating how the proposed design frames views of the US Capitol and preserves the continuity of the Pennsylvania Avenue streetscape.**

The northern portion of the site, located along Pennsylvania Avenue, is primarily paved. Although shade trees and benches are provided, this appears to be a large area of hardscape with little or no opportunities for programming. The existing area of lawn and trees currently located at the northwest corner of the park has also been removed. In addition, the transition from the public sidewalk to park and memorial space is not clear. Staff therefore recommends the **Commission request that the northern portion of the site be further developed to better define the sidewalk zone, increase green space, and create a clear transition between the public street and the memorial area.**

Staff notes that the PADC developed and implemented a specific palette of plantings, light fixtures and paving along the Pennsylvania Avenue corridor. This palette extends to Pershing Park site and should be addressed through any proposed designs, particularly around the perimeter of the site. Staff therefore recommends the **Commission request the plans denote the limits of the Pennsylvania Avenue Development Corporation (PADC) streetscape and show how the streetscape will transition to park and memorial space.**

As indicated previously, the most significant new commemorative element is the Wall of Remembrance located at the western side of the central space. The wall is intended to be a 75-foot long bas relief sculpture that honors the sacrifice of all World War I servicemen and women. The sculpture consists of a series of scenes which are organized temporally, starting with the



call of arms, proceeding through battle, and concluding with the aftermath of war and the return of loved ones. The wall is approximately ten feet tall and forms a retaining wall for the western portion of the site.

As the proposal is further developed, additional information will be necessary to evaluate this important element. As such, staff recommends the **Commission request that additional details be provided regarding the commemorative wall be provided, including the proposed content, narrative, materials and their durability.** The size and scale of the commemorative wall may be adjusted upon further analysis, considering the quality and quantity of content, and the relationship of the wall to other park elements.

As this and other design alternatives are further developed, additional information regarding a variety of topics will be helpful in evaluating the proposal. As such, staff recommends the **Commission request that details be provided regarding the proposed material palette, signage, and lighting, including the location, types of fixtures, and illumination levels.** In addition, staff recommends the **Commission request further information be provided regarding sustainable and low impact design strategies, as well as the stormwater management approach.**

Finally, staff recommends the **Commission request a plan be prepared that identifies the proposed urban park spaces and potential programming or activities which can occur in those spaces.** Such a plan will help evaluate the relationship of the commemorative and park spaces and ensure they can both be effectively incorporated into the design.

## **CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE**

### **Comprehensive Plan for the National Capital**

As noted above, the planning comments are designed to ensure the proposal meets basic goals of the Comprehensive Plan.

### **Commemorative Works Act**

The Commemorative Works Act (CWA) contains a set of foundational level decision criteria that NCPC is required to use when considering site and design proposals for commemorative works. Specifically, the CWA states that in considering site and design proposals, NCPC shall be guided by a number of criteria, including surroundings, location, material, landscape features, and site specific guidelines. As noted above, the planning comments area designed to ensure the proposal broadly meets the CWA criteria.

### **Memorials and Museums Master Plan**

The 2001 Memorials and Museums Master Plan ("2M Plan") provides guidance regarding the placement of future commemorative works. In particular, the Plan seeks to reinforce the historic urban design features of the city, minimize intrusion on existing memorials, and reduce adverse environmental and transportation impacts and enhance positive economic and other effects on local neighborhoods. The Plan states that memorials, when properly placed and sensitively designed, can provide a source of community identity and pride, while bolstering revitalization efforts.

### **National Historic Preservation Act**

NCPC and NPS each have an independent responsibility to comply with Section 106 of the National Historic Preservation Act (NHPA). NPS initiated consultation with the District of Columbia Historic Preservation Office (DCSHPO) on May 1, 2015. Two consulting party meetings have been held to date. On December 16, 2015, the five finalist designs were presented, along with a draft area of potential effects (APE). Several attendees expressed concern that a determination of eligibility (DOE) for Pershing Park had not been completed, and that a preservation alternative was not being considered. The DOE was subsequently completed and found the park eligible for listing in the National Register of Historic Places. On September 21, 2016, the consulting parties reviewed the draft DOE for Pershing Park, and discussed the proposed design concept. Consultation will continue as the project proceeds. NCPC will complete the requirements of Section 106 prior to the Commission's final approval of the project.

### **National Environmental Policy Act**

NCPC and NPS will each have an independent responsibility to comply with the National Environmental Policy Act (NEPA); NCPC's responsibility stems from its approval authority over the site and design of the monument. A public scoping meeting was held on May 20, 2015 to discuss the memorial authorization and site characteristics. NPS is preparing an Environmental Assessment (EA) to identify alternatives and assess the potential impacts of the proposed memorial. NCPC is a cooperating agency for purposes of the EA, and NCPC staff provided scoping comments on June 2, 2015. These recommended evaluation of a number of topics through the NEPA process, including urban design and visitor experience, historic and cultural resources, transportation systems and sustainability.

With its current review and action, the Commission is providing comments on the concept design for the project. Final NEPA documentation is not required at this time. Final NEPA documentation will be completed prior to the Commission's action on the final site and memorial design.

## **CONSULTATION**

### **Coordinating Committee**

The Coordinating Committee reviewed the proposal at its October 11, 2016 meeting. The Committee forwarded the proposal to the Commission with the statement that it has been coordinated with all participating agencies. The participating agencies were: NCPC; the District of Columbia Office of Planning; the DC SHPO; the General Services Administration; the National Park Service and the Washington Metropolitan Area Transit Authority. DC SHPO noted that consultation was ongoing through the Section 106 process.

### **U.S. Commission of Fine Arts**

The US Commission of Fine Arts (CFA) reviewed the five finalists at an information presentation on November 19, 2015 meeting. At that time, the CFA "expressed concern that the designs are excessively focused on completely reinventing the existing site without addressing the park's outstanding characteristics and vital role within a series of symbolic urban spaces." Further, the CFA stated the memorial design should consider the existing landscape and the surrounding urban context while enhancing the park for a broader commemorative purpose.

The CFA reviewed the concept design for the new memorial at its October 20, 2016 meeting. No approval action was taken, but the CFA commented that additional information, including sections, would be helpful to compare the existing conditions and proposed design so that the breadth and scale of changes could be better understood.

### **National Capital Memorial Advisory Commission**

Section 8905(a)(1) of the Commemorative Works Act requires memorial sponsors to consult with the National Capital Memorials Advisory Committee (NCMAC) on the selection of alternative sites and design concepts prior to submitting the project to NCPC for formal review. The proposed memorial will be submitted to NCMAC for review prior to approval by NCPC.

## **ONLINE REFERENCE**

The following supporting documents for this project are available online:

- Submission Package
- Project Synopsis

Prepared by Matthew Flis  
10/27/2016

## **POWERPOINT (ATTACHED)**