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Correspondence: 1

Author Information

Keep Private: No
Name: Stephen A. Hansen
Organization: The Committee of 100 on the Federal City (Committee of 100) ;  Member
Organization Type: O - Civic Groups
Address: 945 G Street, N.W.
Washington , DC 20001
USA
E-mail:

Correspondence Information

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The Committee of 100 on the Federal City (Committee of 100) Comments on recent World War I Memorial Design. These comments are based on the design presentation at the Consulting Parties meeting on February 9, 2017 and other materials that are now posted on the National Park Service PEPC website.

The Committee of 100 on the Federal City



www.committeeof100.net

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Stephen A. Hansen

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Kate Montague Perry

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Elizabeth Purcell

Laura M. Richards, Esq.

Pat Tiller

Kirby Vining

Beverley Wheeler

Evelyn Wrin

945 G Street, N.W.

Washington, D.C. 20001

202.681.0225

info@committeeof100.net

February 22, 2017

Gay Vietzke, Superintendent
National Mall and Memorial Parks
National Capital Region
900 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 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 February 9, 2017 and other materials that are now posted on the National Park Service PEPC website.

In 1974 the Pennsylvania Avenue Development Plan proposed redesign of Pershing Park. In the late 1970s, M. Paul Friedberg and Partners designed Pershing Park for the Pennsylvania Avenue Development Corporation. Construction was completed and the park opened in 1981. Oehme van Sweden & Associates redesigned some of the park planting at that time. The Pershing Memorial was constructed in the southeast corner of the park. Most of the park has continued to serve an important "urban park" function, though affected by the problems which caused terminating the skating rink/outdoor plaza and the concession stand. Unfortunately, there has been significant deterioration 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, 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 the design had issues, it seemed to have the potential for refinement to reduce adverse impacts. We note that the design refinement process continued for some eight months, with no public information.

A revised proposed design for the World War I Memorial in Pershing Park was presented at the Section 106 Consulting Parties Meeting on September 21, 2016, followed by an October 2016 Concept, which proposed removing a significant amount of park fabric. The Committee of 100 outlined our concerns with the proposed design in our letter to you of October 24, 2016. Other local and national organizations also commented on the proposed design. The U.S. Commission of Fine Arts and the National Capital Planning Commission also reviewed the design and commented on it. Essentially, all these comments expressed concerns and requested design revisions to the proposal that would better respect the original park design. The National Capital Planning Commission action on November 3, 2016 was especially strong in suggesting design issues that needed more study.

Since November 2016, the World War I Centennial Commission and its consultants have been working on two alternative designs, the Pool & Plaza Concept and the Scrim & Green Concept. The World War I Centennial Commission has endorsed the Scrim & Green Concept, though we understand that the Pool & Plaza Concept was not presented to the Commission.

These two Concepts were presented at the Consulting Parties Meeting on February 9, 2017. A member of the Committee of 100 attended that meeting. At the end of the meeting, the National Park Service staff said that a two-week comment period would begin the next day, Friday, February 10 and would end on Friday, February 24. The plans presented at the meeting were posted on the National Park Service PEPC site on February 10. We do want to note that a two-week comment period is a very short time for such an important project.

Since February 10, members of the Committee of 100 have viewed the materials online, printed out the materials, and visited Pershing Park with the materials in hand to better visualize the two plans.

The two Concepts presented at the Consulting Parties Meeting on February 9 both improve over the concepts presented last September and October. However, we still have some concerns, questions and suggestions as outlined below. It is clear that significant design work, analysis and expense have gone into preparing the two revised designs. However, we want to note that it is still somewhat difficult, even standing in Pershing Park with the designs in hand, to be completely sure of what is being proposed. We hope that the National Park Service will request more clarity in the next stage of plan refinement. That would certainly improve the design review process.

Both Concepts retain the Pershing statue, walls and paving (though moving the Pershing statue eight feet to the north); eliminate the fountain and part of the western edge stairs; and eliminate the kiosk and, in its approximate location, add a flagpole (free standing or on a plinth). We summarize our understandings of the revised designs below.

Pool & Plaza Concept

This Concept preserves the views and vistas in the original park design, retains the park's orientation around a sunken plaza and pool, preserves part of the pool, and also preserves more of the park's fabric, i.e., the planting beds around the plaza and portions of the terraced seating and planters on the south side.

Scrim & Green Concept

This Concept eliminates much of the terracing and planters on the south side as shown on the February 9 report, p. 49, and raises the sunken portion of the park in order to create a level walkway linking the Pershing statue to the Memorial Wall on the west. This Concept eases pedestrian access because there are no stairs. The pool is replaced by a smaller scrim. One of the objectives of the design competition was: "Establish a memorial with weight and gravity commensurate with that of the war memorials on the Mall." (February 9 report, p. 14). The two war memorials on the National Mall with water features (World War II and Korean War) have pools, not shallow scrims. Visitors will expect a thoughtful, solemn experience at the World War I Memorial, and a pool is a key part of that experience. After further review, we are concerned that a scrim looks insubstantial. If the Scrim & Green Concept is chosen, we urge that the scrim be replaced with a pool, which would improve visitors' experience, and would be very feasible.

Both Concepts as presented at the February 9, 2017 meeting have adverse effects on land use, built features, and the water feature. The Scrim & Green Concept has an additional adverse effect on vegetation. Our October 24, 2016 letter advocated maintaining many of Friedberg's and Oehme van Sweden's design elements. We believed that a modified design raising the ground level slightly, providing a new central grass area and a scrim, might meet the goal of retaining many of the park's original design elements. However, after reviewing both Concepts, we now believe that the Pool & Plaza Concept best preserves essential elements of Pershing Park as an "urban park."

Questions

It would be helpful to have additional information on the following points:

- The Memorial Wall is longer in the Scrim & Green Concept than in the Pool & Plaza Concept. What length of wall is needed to convey the sculptural artwork and message of the Memorial? What written explanation will be provided, and where, or will the Memorial Wall simply make its own statement?
- Is it correct that the shorter walls at a right angle on the Memorial Wall in the Pool & Plaza Concept are retaining walls?
- How do the two Concepts comply with the Americans with Disabilities Act?

- Is the volume of soil in the tree boxes on Pennsylvania Avenue changed or reduced in either of the Concepts?
- Will the light pole near the Pershing statue, and perhaps other light poles, be relocated?
- The quality of the writing on the south wall in the Pershing Statue area is very difficult to read. We understand that steps will be taken to make it more legible. Can any additional information be provided on how to address this problem?

We want to raise the question, once the World War I Memorial in Pershing Park is completed, what will be done to provide visitors with an interpretation of the park design, the World War I Memorial, and indeed some additional information on World War I. Where will National Park Service rangers be located? Where is there a simple place to provide information (pamphlets, etc. or electronically) about the Pershing Park and about World War I? We suggest these questions be addressed now as part of the refinement of the park design.

We also note that the Consulting Parties process for this project raises a number of questions, aside from just the design process, which we hope the National Park Service will address. That is a matter for another time and place, but we believe it is one of the important concerns coming out of the review process for the World War I Memorial.

The Committee of 100 on the Federal City appreciates the opportunity to make these comments. We hope further design refinements can be made so that the World War I Memorial will be more compatible with the urban park character of Pershing Park.

Respectfully submitted,



Stephen A. Hansen
Chair

cc: Marcel Acosta, Executive Director -- National Capital Planning Commission
Thomas Luebke, Secretary -- U.S. Commission on 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
Edwin Fountain -- World War I Centennial Commission
Claire Sale -- AECOM

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Correspondence: 2

Author Information

Keep Private: No
Name: William Brown
Organization: Association of the Oldest Inhabitants of DC
Organization Type: I - Unaffiliated Individual
Address: 4425 Greenwich Pkwy NW
District of Columbia, DC 20007
USA
E-mail: aoiofdc@gmail.com

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February 24, 2017

Gay Vietzke, Superintendent
National Mall and Memorial Parks
900 Ohio Drive, SW
District of Columbia 20024

Ref: Pershing Park

Dear Superintendent Vietzke:

I have reviewed the last Section 106 meeting's plans for Pershing Park and its transformation into a national World War I Memorial and have heard from partner organizations about the two revised plans submitted for the park.

The Association of the Oldest Inhabitants of the District of Columbia does not support either revision. The plan labeled "Scrim and Green" is, in our opinion, a non-starter. We believe there may be some potential in the "Pool and Plaza" design, but since it eliminates the waterfall/fountain feature and changes other significant elements of Friedberg's design, we cannot support it in its present form.

"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,

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including landscaping.'" - Memorial Design Competition from WWI Centennial Commission web site

The revised plans, both based upon the design competition winning entry "The Weight of Sacrifice," contain the Memorial Wall feature which we believe, in some form, conforms to the directive to "enhance the existing... memorial" but not at the expense of a focal animated water feature. The plans, as presented, all but destroy the M. Paul Friedberg-designed memorial and Oehme van Sweden's landscape design.

We believe 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 which are absent in the revised design. As it now stands, even these revised plans for Pershing Park render it virtually unrecognizable as the product of Friedberg's and Oehme van Sweden's designs and should be rejected.

We are urging the parties reviewing this project to reject the two proposed designs and urge the development of a revised plan that would incorporate only those modifications that would have the least impact on the existing park's design, while sensitively adding elements that would make it a national WWI Memorial with the essential design elements of the original work preserved. 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 it to incorporate appropriate design elements could make it truly a national WW I Memorial, while still retaining its original design. In fact, this approach would be most in keeping with the authorization quoted in our first paragraph above: "...to enhance the existing Pershing memorial by constructing on Pershing Park "appropriate sculptural and other commemorative elements, including landscaping..."

Sincerely,

William N. Brown, President

Cc: The National Capital Planning Committee
The U.S. Commission on Fine Arts
National Capital Memorial Advisory Commission
District of Columbia State Historic Preservation Officer
The Committee of 100 on the Federal City
The DC Preservation League
The Cultural Landscape Foundation

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Correspondence: 3

Author Information

Keep Private: No
Name: N/A N/A
Organization: National Capital Planning Commission - Staff
Organization Type: I - Unaffiliated Individual
Address: Washington, DC, DC 20004
USA
E-mail:

Correspondence Information

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NCPC staff appreciates the opportunity to provide comments at this time. Both the Scrim and Green and Park and Plaza appear to result in cumulative adverse effects to the historic character of the original design of the park, and impact the character-defining features that make up the park's design. NCPC staff generally concurs with the NPS assessment of adverse effects resulting from the two presented designs. While both designs maintain the setting as an urban park, and retain its relationship as a transitional space between the urban context of Pennsylvania Avenue and the park setting of President's Park, each have different approaches to the retention of the historic elements that comprise the original design.

The Park and Plaza design appears less impactful on the historic character of the park, as a majority of the original park design, materials, and spatial hierarchy is retained, and recognizable as the original design intent. The Scrim and Green design appears to have a more impact on the character-defining features of the original Friedberg design, in particular the removal of historic materials, spatial relationships, and park focal elements, such as the foundation and pool.

Regarding the assessment of effects, we recommend the analysis provide more clarity regarding effects on individual resources. In some cases, the analysis is grouped together. For example, on page 6, for Pool and Plaza, the adverse effect determination is due to the removal of the waterfall, pool and kiosk. For Scrim and Green, the analysis indicates adverse effect, but it does not clearly state which features are impacted.

Any adverse effects will require mitigation measures. NCPC staff recognizes that historic preservation

goals must be balanced with the both the commemorative program and the need to create an active, successful urban park.

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Correspondence: 4

Author Information

Keep Private: No
Name: Charles A. Birnbaum
Organization: The Cultural Landscape Foundation
Organization Type: I - Unaffiliated Individual
Address: 1711 Connecticut Avenue, Suite 200
Washington, DC 20009
USA
E-mail: charles@tclf.org

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The Act of Congress that redesignated Pershing Park in Washington, DC, as the World War I Memorial also said that the WWI Memorial Commission "may enhance" the park with "appropriate sculptural and other commemorative elements." The park, which opened in 1981, was originally designed by the award-winning landscape architect M. Paul Friedberg, and has a subsequent planting plan by the pioneers of the New American Garden style, Wolfgang Oehme and James van Sweden. Since its redesignation as the World War I Memorial, Pershing Park has been determined eligible for listing in the National Register of Historic Places, and Section 106 review meetings, which seek to mitigate "adverse effects," have been held involving members of the WWI Memorial Commission, the National Park Service, the architect and consulting designers, and other official consulting parties.

At the most recent Section 106 meeting (February 9, 2017), a very detailed analysis of the planning process set a framework for the discussion and we were grateful for this more sensitive orientation. However, as a result, nearly all of the time was consumed in the presentation of four new design options, two of which had already been rejected by the Commission, leaving little time to explore and discuss the adverse effects of the remaining two proposals - titled "Pool and Plaza" and "Scrim and Green" (only the latter was presented to and approved by the WWI Memorial Commission).

Here are some of the issues we would want to have discussed. First, over the course of his long career, M. Paul Friedberg has designed hundreds of projects throughout the U.S. and internationally - of those, four are acknowledged as significant. The first is the plaza at Jacob Riis Houses in New York City, a work that landed Friedberg in LIFE magazine and was funded by Brooke Astor (sadly, it was demolished in 2000 before Friedberg's body of work could be assessed). The remaining three projects are Battery Park City in New York, Peavey Plaza in Minneapolis, which was listed in the National

Register of Historic Places in 2013, and Pershing Park, which was determined National Register-eligible July 2016.

Within the existing park, the waterfall and pool together are the key focal element. This needs to be emphasized and repeated, within the existing park, the waterfall and pool together are the key focal element.

Unfortunately, both of the Commission's most recent proposals eliminate this dynamic feature, and either circumscribe or eliminate the pool. This central water feature was designed to mitigate noise (from the surrounding vehicular traffic); have a cooling effect (from the mixing of air and water resulting during evaporation); serve as a place of respite in the center of the city, offering opportunities for recollection, contemplation and remembrance.

In addition, when considering any proposed alteration to this work of landscape architecture, it is important to carefully evaluate the park's integrity, defined by the National Register through seven aspects or qualities: location, design, setting, materials, workmanship, feeling, and association. The proposed designs would negatively impact five of those aspects - design, materials, workmanship, feeling, and association.

It is also worth noting that the proposed designs not only negatively impact one of Friedberg's most significant extant works, they threaten the integrity of the Pennsylvania Avenue National Historic Site's expanded period of significance as outlined in the Cultural Landscapes Inventory (May 10, 2016). That period of significance spans 1976-1990, and encompasses a collection of modernist and post-modernist parks commissioned by the Pennsylvania Avenue Development Corporation (PADC) and designed by Dan Kiley, Hideo Sasaki, Robert Venturi, Denise Scott Brown, George Patton, Carol Johnson, Wolfgang Oehme and James van Sweden. While this body of work was built less than fifty years ago, its significance in landscape architecture and community development has been confirmed by substantial scholarly evaluation. As a result the avenue is exceptionally important, with Pershing Park arguably the most significant extant design in the collection. Taken in total these works of landscape architecture meet the National Register's Criteria Consideration G.

We strongly suggest that the project's architect and consultant team take a more surgical approach to inserting memorial elements into this historic park. Given the significance of the park in Friedberg's career, and that it's the only Friedberg project with a planting plan by Wolfgang Oehme and James van Sweden, significant changes to this National Register-eligible project merit close scrutiny and a more careful application of "The Guidelines for the Treatment of Cultural Landscapes."

In closing, we would like to note that it became clear during the meeting that other consulting parties had received the proposed designs up to two weeks in advance. Had all of the meeting participants received the materials in advance, the purpose of the meeting, a discussion of mitigating "adverse effects," could have been had. The "Historic Preservation Resource Summary" shown at the conclusion of the meeting, for example, was overly broad in determinations about adverse effects and required a more in-depth discussion. But time ran out before that could happen in a meaningful way.

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Correspondence: 5

Author Information

Keep Private: No
Name: Eric D. Groft
Organization: Oehme, van Sweden & Associates
Organization Type: I - Unaffiliated Individual
Address: 800 G St SE
Washington, DC 20003
USA
E-mail: egroft@ovsla.com

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I represent Oehme, van Sweden & Associates (OvS), the landscape architecture firm that worked with the Pennsylvania Avenue Development Corporation to bring the exuberance of the American Meadow to America's Main Street - Pennsylvania Avenue NW. This stretch of the Avenue included Pershing Square, Freedom Plaza, and the Meade Memorial by the U.S. Capitol. In bringing a profusion of American native perennials and grasses to Pennsylvania Avenue, the planting plan brought diversity, four seasons of interest, and a tapestry of color and texture. In addition to their aesthetic appeal, these plants required minimal irrigation, fertilizer and herbicide. This revolutionary new plant palette created an ecosystem and a habitat for wildlife never before seen in this urban environment. Songbirds, including Goldfinches, Northern Cardinals, and Kentucky Warblers, and Blue Herons found sanctuary in the space.

OvS' planting plan for Pershing Park softened the granite steps, walls, and paving, creating an urban oasis. Pedestrians, strolled, picnicked, and read within a contemplative park, sunken below the busy Washington streets. A large reflecting pool, planted with aquatics, attracted ducks, geese, and fish - all in the shadow of the Great General of the Great War.

While we applaud the recognition of our country's effort in World War I, we would like to see a planting palette and a water feature that maintains the integrity of the original design of this memorial space. From what is discernible in Pershing Park's latest design submission, there is neither a proportional water feature, nor a planting scheme that preserves the contemplative nature that the park once provided its visitors. We feel that for this public space to truly serve as a reverent memorial and a public amenity, consideration should be taken for an approach that better preserves Pershing Park's original design context.

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Correspondence: 6

Author Information

Keep Private: No
Name: Darwina L. Neal
Organization:
Organization Type: I - Unaffiliated Individual
Address: 1608D Beekman Place, NW
Washington, DC 20009
USA
E-mail: darwina_neal@verizon.net

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I attended the WWI Memorial Section 106 Consultation meeting on February 9, 2017.

I had also attended the September 21, 2016 Section 106 Consultation meeting whose announcement included the final determination of eligibility (DOE) of Pershing Park for the National Register of Historic Places that "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 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, and 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."

Because of that DOE, I had expected that the then-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.

This adaptation should also have taken into consideration the DC State Historic Preservation Office DOE Form determination that "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." 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."

Unfortunately, however, this did not happen with that design, nor was it achieved with either of the two Alternative Design Concepts presented at the February 9, 2017 meeting, because both would have varying degrees of adverse impacts on Pershing Park, as is clearly apparent in reviewing both designs in comparison with the existing one, as shown in the presentations.

The WWI Memorial Historic Preservation Resource Summary chart that was very briefly presented at the end of the meeting described the various Resources of the Existing Park and the Pool and Plaza and Scrim and Green Concepts and determined the impacts of both concepts on the existing park as designed by Friedberg and Oehme van Sweden, but did not accurately describe or evaluate those effects on Pershing Park as being Adverse for both, especially in regard to Spatial Organization, Views and Vistas, Built Features, and Vegetation, although the effects of the Pool and Plaza concept would be less adverse on some resources than those of the Scrim and Green concept. Because that chart is so lengthy, I will not comment further on it, except to say it would have been more accurate and helpful to describe the degree of adverse effect, such as minimal, moderate or major.

The following are my comments on the proposed WWI Memorial plans and designs that were presented at the February 9 meeting.

The Existing Park Analysis, Rooms and Focal Points (p.9), shows the pool area and fountain to be a major room and focal point respectively, and two Key Observations under Spatial Investigations (p.10) are:

- Pershing Park includes distinct rooms on clearly articulated levels and
- The sunken pool is the dominant space within the park, and the focal point around which the park is organized in plan and section.

Even Balancing Preservation and Commemoration, Design Iterations (p.23) cites the importance of an:

" • Effort to protect and maintain critical character-defining features, according to Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Treatment of Cultural Landscapes:

- Views and vistas
- Spatial organization
- Pershing Memorial
- PADC streetscape
- Terraced seating and planters
- Granite materials
- Distinct rooms bounded by steps
- Three focal points
- Water cascade, including sound "

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Taken together, these statements indicate that preservation of the elements of both the pool space and the fountain are crucial to maintaining the integrity of the park as-designed by Friedberg. The sunken pool and fountain "room" served as a much-used oasis within the increasingly-used Pennsylvania Avenue area. The fountain is not only a park focal point, but also its falling water mitigates the city noise and creates a cooling effect.

Likewise, the Existing Park Analysis Planting Investigations (pp.11-12) show the intricacy and variety of the combined Friedberg and Oehme van Sweden-designed plantings. Although some of both plantings have died, their replacement in-kind and in-place, with accompanying soil replacement/modification, would preserve the integrity of the original designs.

Concept Comparisons:

Both concepts would remove the focal fountain and replace it with a memorial wall, which would be of different size and shape in each and with accompanying changes to adjacent areas, although the Pool and Plaza concept would make less changes. The Pool and Plaza would retain a pool, but decreased in size, with an increase in size of its surrounding plaza and changes in southern steps and planters.

Scrim and Green would completely change the pool and fountain area by eliminating the pool, as well as the fountain, and replacing it with a scrim and lawn area, and eliminating/changing steps, terraced seating, planters and grades, with accompanying planting location changes.

Both concepts would change spacing, locations, quantities and types of all plantings, except for trees along adjacent streets. Pool and Plaza would change less locations, while the Scrim and Green would both change and add new locations, thus completely changing spatial relationships.

Instead of replacing plant materials in-kind to even attempt to retain the integrity of the original planting design and plant palette, both concepts would change/replace all plant materials, ostensibly with those of "habitat value", implying native materials, but there is no excuse for replacing existing urban condition-tolerant plants with native ones of different bloom and foliage color and habit, such as adding red maples in place of some summer-flowering pink crape-myrtles, as well as in new locations, especially in Scrim and Green.

In summary, although both the Pool and Plaza and Scrim and Green concepts were presented at the February 9 meeting, we were informed that only the Scrim and Green was approved by the World War I Centennial Commission. When this was questioned, we learned that the Pool and Plaza had not even been presented to the Commission, because staff felt that it did not meet their goals, even though the Pool and Plaza would have less adverse effects. Ironically, a comparison of the Scrim and Green with the October 2016 Concept (p.50), shows that they are very similar, despite requests for changes by various review bodies and 106 Consulting Parties.

In fact, Scrim and Green Concept Modifications to existing Park (p.49), Critical Character-Defining Features shows and documents that almost all of them have been modified or moved, so that, in fact, it adversely affects or destroys all of these character-defining features! Because even the Pool and Plaza has adverse effects, although less, both designs 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.

As stated in prior comments, the so-called reasons given for many 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, there 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 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."

One such possible design that would preserve the integrity of the existing park would be to rehabilitate the existing park as-designed, keeping the fountain, but modifying its adjacent areas to add sculptural walls on both sides, perhaps even with a passage beneath or in front of the falls to connect them. The sculptural walls flanking the waterfall could create a strengthened focal point within this "central room", and an oasis for quiet contemplation.

Whatever the design, it is crucial to maintain the fountain, which is the "heart" of the design and when working pumped life into the focal pool and plaza area, creating a vibrant public space that anchored 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 this vitality could be brought back to life!

1608D Beekman Place, NW
Washington, DC 20009-4021
February 24, 2017

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

I attended the WWI Memorial Section 106 Consultation meeting on February 9, 2017.

I had also attended the September 21, 2016 Section 106 Consultation meeting whose announcement included the final determination of eligibility (DOE) of Pershing Park for the National Register of Historic Places that “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 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, and 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.*”

Because of that DOE, I had expected that the then-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.

This adaptation should also have taken into consideration the DC State Historic Preservation Office DOE Form determination that “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.*” 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.*”

Unfortunately, however, this did not happen with that design, nor was it achieved with either of the two Alternative Design Concepts presented at the February 9, 2017 meeting, because both would have varying degrees of adverse impacts on Pershing Park, as is clearly apparent in reviewing both designs in comparison with the existing one, as shown in the presentations.

The WWI Memorial Historic Preservation Resource Summary chart that was very briefly presented at the end of the meeting described the various Resources of the Existing Park and the Pool and Plaza and Scrim and Green Concepts and determined the impacts of both concepts on the existing park as designed by Friedberg and Oehme van Sweden, but did not accurately describe or evaluate those effects on Pershing Park as being Adverse for both, especially in regard to Spatial Organization, Views and Vistas, Built Features, and Vegetation, although the effects of the Pool and Plaza concept would be less adverse on some resources than those of the Scrim and Green concept. Because that chart is so lengthy, I will not comment further on it, except to say it would have been more accurate and helpful to describe the *degree* of adverse effect, such as minimal, moderate or major.

The following are my comments on the proposed WWI Memorial plans and designs that were presented at the February 9 meeting.

The Existing Park Analysis, Rooms and Focal Points (p.9), shows the pool area and fountain to be a major room and focal point respectively, and two Key Observations under Spatial Investigations (p.10) are:

- ***Pershing Park includes distinct rooms on clearly articulated levels and***
- ***The sunken pool is the dominant space within the park, and the focal point around which the park is organized in plan and section.***

Even Balancing Preservation and Commemoration, Design Iterations (p.23) cites the importance of an:

“ • Effort to protect and maintain critical character-defining features, according to Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Treatment of Cultural Landscapes:

- *Views and vistas*
- ***Spatial organization***
- *Pershing Memorial*
- *PADC streetscape*
- ***Terraced seating and planters***
- *Granite materials*
- ***Distinct rooms bounded by steps***
- *Three focal points*
- **Water cascade, including sound “**

Taken together, these statements indicate that *preservation of the elements of both the pool space and the fountain are crucial to maintaining the integrity of the park as-*

designed by Friedberg. The sunken pool and fountain “room” served as a much-used oasis within the increasingly-used Pennsylvania Avenue area. The fountain is not only a park focal point, but also its falling water mitigates the city noise and creates a cooling effect.

Likewise, the Existing Park Analysis Planting Investigations (pp.11-12) show the intricacy and variety of the combined Friedberg and Oehme van Sweden-designed plantings. Although some of both plantings have died, *their replacement in-kind and in-place, with accompanying soil replacement/modification, would preserve the integrity of the original designs.*

Concept Comparisons:

Both concepts would remove the focal fountain and replace it with a memorial wall, which would be of different size and shape in each and with accompanying changes to adjacent areas, although the Pool and Plaza concept would make less changes. The Pool and Plaza would retain a pool, but decreased in size, with an increase in size of its surrounding plaza and changes in southern steps and planters.

Scrim and Green would completely change the pool and fountain area by eliminating the pool, as well as the fountain, and replacing it with a scrim and lawn area, and eliminating/changing steps, terraced seating, planters and grades, with accompanying planting location changes.

Both concepts would change spacing, locations, quantities and types of all plantings, except for trees along adjacent streets. Pool and Plaza would change less locations, while the Scrim and Green would both change and add new locations, thus completely changing spatial relationships.

Instead of replacing plant materials in-kind to even attempt to retain the integrity of the original planting design and plant palette, both concepts would change/replace all plant materials, ostensibly with those of “habitat value”, implying native materials, but there is no excuse for replacing existing urban condition-tolerant plants with native ones of different bloom and foliage color and habit, such as adding red maples in place of some summer-flowering pink crape-myrtles, as well as in new locations, especially in Scrim and Green.

In summary, although both the Pool and Plaza and Scrim and Green concepts were presented at the February 9 meeting, we were informed that only the Scrim and Green was approved by the World War I Centennial Commission. When this was questioned, we learned that *the Pool and Plaza had not even been presented to the Commission, because staff felt that it did not meet their goals, even though the Pool and Plaza would have less adverse effects.* Ironically, a comparison of the Scrim and Green with the October 2016 Concept (p.50), shows that they are very similar, despite requests for changes by various review bodies and 106 Consulting Parties.

In fact, Scrim and Green Concept Modifications to existing Park (p.49), Critical Character-Defining Features shows and documents that almost all of them have been modified or moved, so that, in fact, *it adversely affects or destroys all of these character-defining features!* Because even the Pool and Plaza has adverse effects, although less, both designs 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.

As stated in prior comments, the so-called reasons given for many 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, *there 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.*

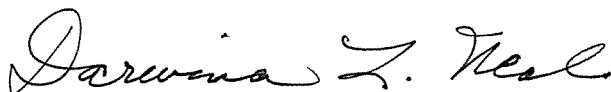
In previous comments, I have never questioned the selection of this site or its *enhancement* as a WW I Memorial, but I have urged that careful consideration be given to limiting the scope of that enhancement, so that it would not adversely affect the integrity of the existing design. I have also stated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

One such possible design that would preserve the integrity of the existing park would be to rehabilitate the existing park as-designed, keeping the fountain, but modifying its adjacent areas to add sculptural walls on both sides, perhaps even with a passage beneath or in front of the falls to connect them. The sculptural walls flanking the waterfall could create a strengthened focal point within this “central room”, and an oasis for quiet contemplation.

Whatever the design, *it is crucial to maintain the fountain, which is the “heart” of the design and when working pumped life into the focal pool and plaza area,* creating a vibrant public space that anchored 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 this vitality could be brought back to life!

Thank you for the opportunity to comment.

Sincerely yours,

A handwritten signature in cursive script that reads "Darwina L. Neal". The signature is written in dark ink and is positioned above the printed name and title.

Darwina L. Neal, FASLA, HM.IFLA, F.US/ICOMOS

Landscape Architect


(Former Chief, Cultural Resource Preservation Services, NCR, National Park Service)

cc: Claire Sale, AECOM; David Maloney, State Historic Preservation Officer for the District of Columbia; Thomas Luebke, Secretary, U.S. Commission of Fine Arts; Marcel Acosta, National Capital Planning Commission; Julia Koster, National Capital Planning Commission; Peter May, Associate Regional Director, National Capital Region, National Park Service; Charles Birnbaum, The Cultural Landscape Foundation; Rebecca Miller, DC Preservation League, Stephen Hanson, The Committee of 100; Bill Brown, AOI; Chris Wilson, Advisory Council for Historic Preservation; Edwin Fountain, World War I Memorial Commission

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Correspondence: 7

Author Information

Keep Private: No
Name: Andrew Lewis
Organization: DC SHPO  Official Rep.
Organization Type: S - State Government
Address: 1100 4th Street
Washington , DC 20024
USA
E-mail:

Correspondence Information

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Correspondence Text

As a random follow-up to last week's WWI meeting, it occurred to me that placing a tall flagpole in the L'Enfant ROW may not be a good idea since it may interrupt the vista. For that reason, please be sure to have sightline studies conducted and renderings developed so we can evaluate the effects of the proposal (if you haven't already).

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