



United States Department of the Interior



NATIONAL PARK SERVICE

National Mall and Memorial Parks
900 Ohio Drive, S.W.
Washington, D.C. 20024-2000

July 10, 2017

Christopher Wilson
Program Analyst
Advisory Council on Historic Preservation
401 F Street NW
Washington, DC 20001

Subject: Development of National World War I Memorial in General John J. Pershing Park (U.S. Reservation 617) - Notification of Potential Adverse Effects Finding

Dear Mr. Wilson:

The World War I Centennial Commission, per authorization of Public Laws 112-272 and 113-291 and in cooperation with the National Park Service (NPS), proposes to develop a permanent memorial in Pershing Park (U.S. Reservation 617) honoring the service of members of the United States Armed Forces during World War I. The NPS would like to formally initiate consultation for this undertaking with the Advisory Council on Historic Preservation (ACHP), in accordance with 54 U.S.C. 306108 of Section 106 of the National Historic Preservation Act. As detailed in the attached draft Assessment of Effects table, the NPS has initially determined that this project has the potential to have adverse effects on historic properties.

On December 19, 2014, Congress enacted Public Law 113-291 Section 3091, which officially redesignated Pershing Park as a "World War I Memorial." The law calls for the enhancement of the site to honor the service of members of the United States Armed Forces in World War I and may include commemorative elements such as sculptural and overall landscape design. The project area, formerly known as Pershing Park, is located one block to the southeast of the White House and is bounded by Pennsylvania Avenue NW to both the north and south, and 15th Street NW and 14th Street NW to the west and east, respectively. This site is also a component of the Pennsylvania Avenue National Historic Site, an administrative unit of the National Park Service (NPS) and managed by the National Mall and Memorial Parks. The World War I Centennial Commission (the Commission) is a Congressionally-established organization responsible for planning, developing, and executing programs, projects and activities to commemorate the centennial of World War I. The Commission, along with the National Park Service (NPS), and in cooperation with the National Capital Planning Commission (NCPC) is responsible for the overall planning, design and construction of the new memorial, and once completed, the Secretary of the Interior, through the NPS, will assume responsibility for administering the site.

Pershing Park (Reservation 617) is listed on the National Register of Historic Places (National Register) as part of the L'Enfant Plan of the City of Washington, DC, National Register Nomination (1997) and Pennsylvania Avenue National Historic Site National Register District (administratively listed in 1966; updated in 2007). *Note: the Pennsylvania Avenue National Historic Site National Register District boundary is much larger than the NPS managed Pennsylvania Avenue National Historic Site boundary.* Finally, the site has been determined eligible as a contributing resource within the Pennsylvania Avenue, NW, cultural landscape ("Pennsylvania Avenue, NW, Cultural Landscape Inventory—White House to the Capitol, 2016). It is also individually eligible for listing on the National Register as a significant work of

modern landscape design by M. Paul Friedburg and being the first modernist commemorative park on one of the important elements of the nationally significant Washington city plan (Pershing Park Determination of Eligibility, 2016).

In accordance with the National Environmental Policy Act of 1969 (NEPA), the NPS is in the process of preparing an Environmental Assessment (EA) to identify alternatives and analyze impacts potentially resulting from the establishment of the proposed memorial. Concurrent with the NEPA process, the NPS and the Commission are conducting consultation under Section 106 of the National Historic Preservation Act of 1966 (NHPA). The NPS initiated consultation with the District of Columbia State Historic Preservation Office (DC SHPO) on May 1, 2015. A joint Section 106/NEPA public scoping meeting was held on May 20, 2015, during which the consulting parties were introduced to the project, presented with a draft area of potential effects, and invited to comment on the proposal. Four additional consulting parties meeting have been held to date: December 16, 2015; September 21, 2016; February 9, 2017; and June 28, 2017. Public meetings, as well as the NPS Planning, Environment, and Public Comment website (<http://parkplanning.nps.gov/WWIMemorial>), are being used to involve the public in the Section 106 process. The NPS anticipates that these outreach efforts will accommodate the requirements of both NEPA and the Section 106 process.

In compliance with 36 CFR Part 800.11(e), the attached draft Area of Potential Effects (APE) map and Assessment of Effects table have been prepared for the Development of National World War I Memorial in General John J. Pershing Park (U.S. Reservation 617). The Assessment of Effects table identifies the historic properties within the area and evaluates the effects based on the most recent June 2017 "Restored Pool Concept." Although additional alternatives will be developed in the preparation of the EA, the NPS anticipates the potential for adverse effects on historic resources. The adverse effects would include modifications to the character-defining features associated with the design of Pershing Park.

We look forward to working with you, DC SHPO, and other consulting parties to identify ways to avoid, minimize, or mitigate the potential adverse effects for this project. If you have any questions, please do not hesitate to contact Catherine Dewey, Chief of Resource Management, at catherine_dewey@nps.gov.

Sincerely,



Gay E. Vietzke
Superintendent
National Mall and Memorial Parks
Attachment