



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 26, 2017

Memorandum

To: Consulting Parties

From: Gay E. Vietzke, Superintendent 

Subject: WWI Memorial (Pershing Park, Res. 617) –June 28th Section 106 Consulting Parties Meeting Comments and NPS Response

Thank you to those who attended and commented on the most recent “Restored Pool Concept” design proposal that was shared at the June 28, 2017 Section 106 Consulting Parties meeting for the development of the National World War I Memorial. The viewpoints of consulting parties are essential in the Section 106 process as an aid in information gathering and as a basis for sound decision-making. This is no more evident than in the design evolution of the proposed memorial since 2016. We appreciate the shared commitments by everyone to find a balance in the integration of a congressionally authorized memorial within a designed cultural landscape. We do realize that additional refinements are necessary, and we are confident that as part of the Section 106 process, all stakeholders will continue to work together to avoid, minimize, or mitigate the potential adverse effects on the cultural resources. We hope that this memorandum will address some of the comments that have been raised during the compliance process.

Design Evolution and Dismissed Alternatives

Public Law 113-291, Section 3091, enacted on December 19, 2014, authorized the commemoration and designation of Pershing Park as the site of the National World War I Memorial. The Act stated that the World War I Centennial Commission (WWICC) may enhance the General Pershing Commemorative Work by constructing sculptural and other commemorative elements, including landscaping in Pershing Park. Shortly thereafter, a design competition was held and the winning design, “The Weight of Sacrifice,” was selected by the WWICC in early 2016. Since that time, the design team and the WWICC have continued to refine the design based on consultation with the National Park Service, the District of Columbia State Historic Preservation Office, numerous federal agencies, and the public. Multiple design iterations have been developed and dismissed because they either failed to meet the commemorative goals of the WWICC, significantly altered the original park design, or had negative consequences on the experience and function of the park. In particular, the “Upper Wall Design” was dismissed for the following reasons: the park is spatially organized, in both plan and section, around the central room; placing the proposed commemorative artwork outside of

this space positioned the Memorial as a secondary feature; placement of the proposed commemorative artwork along the perimeter of the park created a dichotomous experience, with a primary urban park experience at the center and a secondary memorial experience along the perimeter; the proposed position of the commemorative work would have required modifications to the existing berm on the west elevation of the park, and may have required modifications to the existing fountain and pool in order to allow for adequate viewing distances; it created a “corridor effect”; the proposed placement of the memorial wall along the upper terrace adversely affected the existing design’s balance of three focal points (fountain, kiosk, and Pershing Statue), which has been recognized as a key component to the park’s original design; and the proposed memorial wall was a visual barrier for inward/outward views along the west elevation of the park.

Potential Adverse Effects to Existing Park Design

As part of the Section 106 process, federal agencies are required to consider effects of any proposed action on cultural resources that are either listed or eligible for listing in the National Register of Historic Places; and through consultation seeks ways to avoid, minimize, or mitigate any adverse effects on cultural resources. As shown in the most recent “Restored Pool Concept” design proposal, the WWICC and their design team have made significant progress in minimizing adverse effects to character-defining features within the existing M. Paul Friedberg design. Specifically, the proposed design maintains the integration of Pennsylvania Avenue Development Corporation (PADC) design features along Pennsylvania Avenue, including the diagonally set, brown terra-cotta pavers punctuated by the willow oaks and standard lighting; preserves the multi-level spatial arrangement and relationships between the park’s major spaces and features, including sunken pool, earthen berms, elevated walks, and Pershing Memorial; retains the park’s focal points and omnidirectional views between park spaces; and largely preserves the existing topographic conditions, which is defined by the retention of the earthen berms, elevated walks, and terraced granite steps that created distinct rooms and seating opportunities. The proposed planting plan also maintains the park’s historic vegetative character, while addressing contemporary issues such as maintenance and ecological value.

Despite efforts to minimize changes to the original M. Paul Friedberg design, the NPS recognizes that the “Restored Pool Concept” design proposal also includes alterations that are not consistent with the *Secretary of the Interior’s Standards for the Treatment of Historic properties with Guidelines for the Treatment of Cultural Landscapes*, and continue to have adverse effects on character-defining features within the park. The placement of the 65-foot bronze bas-relief commemorative wall along the western edge of the sunken plaza will result in the loss of the cascade fountain, granite steps and planters along the western edge of the sunken plaza, as well as five specimen trees. Although the footprint of the pool basin will be retained, the insertion of a walkway through the water feature will alter its use and appearance. Finally, the existing kiosk may be replaced with a flagpole located on a circular plinth. Collectively, these changes diminish the visual and spatial qualities of the park, as well as the experiential character that Friedberg envisioned. However, despite these adverse effects on character-defining features, the NPS believes that the overall design and integrity of the park has been largely retained and its contributing status within the larger Pennsylvania Avenue, NW cultural landscape will not be adversely affected. Moving forward, the NPS hopes that the WWICC and design team will make additional revisions to avoid and minimize adverse effects on character-

defining features by better integrating the commemorative wall and water feature into the existing terracing and steps and reevaluating the placement of the walkway within the pool basin. The NPS also encourages WWICC and its design team to explore additional opportunities to incorporate the commemorative program in other areas of the park.

Finally, we realize the “Restored Pool Concept” design proposal is not a Restoration as defined in the *Secretary of the Interior’s Standards for the Treatment of Historic properties with Guidelines for the Treatment of Cultural Landscapes*, but rather a Rehabilitation of a significant cultural landscape. We will work with the WWICC and its design team to find a more suitable name for this design concept.

Thank you again for your comments regarding the development of the National World War I Memorial, but more importantly your on-going advocacy for the preservation and protection of historic properties within the District. If you have any further questions or comments, please do not hesitate to contact me or Catherine Dewey, Chief of Resource Management, at (202) 245-4711 or Catherine_dewey@nps.gov.
