



# World War I Memorial Cultural Resources Technical Memorandum Assessment of Effects

*Prepared for:*

National Park Service  
National Mall and Memorial Parks  
900 Ohio Drive SW  
Washington, DC 20024

*On behalf of:*

The United States World War One  
Centennial Commission

*Prepared by:*

Rachel Lloyd, Historic Landscape Architect  
Lauren Tuttle, Planner  
Claire Sale, Project Manager

**AECOM**

3101 Wilson Boulevard  
Suite 900  
Arlington, VA 22201

December 2018



# Cultural Resources Technical Memorandum

## Final Assessment of Effects

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## NOTE

On December 19, 2014, Congress enacted Public Law 113-291, Section 3091, which officially re-designated Pershing Park as a “World War I Memorial.” In this document, the “World War I Memorial site” is used when generally describing the site and its existing features. However, “Pershing Park” is used in this document in reference to the historic resource, its contributing features, and effects on this historic resource.

Public Law 113-291, Section 3091 references the “General Pershing Commemorative Work,” defined as “the memorial to the late John J. Pershing.” In this document, “General Pershing Commemorative Work” is used to reference the statue of General John J. Pershing, the two flanking granite walls, the bench, and the plaza of the commemorative work as a whole, formerly known as the “American Expeditionary Forces Memorial,” except in the description of historic resources and their contributing features (**4.1 Historic Resources**) and effects on these historic resources (**5. Effects Assessment**). In these descriptions, the specific terminology from the resource’s historic documentation is used to refer to the General Pershing Commemorative Work or its features.

# 1. INTRODUCTION

The World War I Centennial Commission (Commission) and the National Park Service (NPS) are developing a design to enhance the former Pershing Park in Washington, DC with a new World War I Memorial. 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.

On December 19, 2014, Congress enacted Public Law 113-291, Section 3091, which officially re-designated Pershing Park as a “World War I Memorial.” The Law states that the Commission may enhance the General Pershing Commemorative Work (i.e., the Memorial to General John J. Pershing) by constructing other commemorative elements, including, for example, sculpture and new vegetation, on the World War I Memorial site. The commemorative elements would honor the service of members of the United States Armed Forces in World War I.

As a federal undertaking, the project is subject to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulations (36 Code of Federal Regulations [CFR] Part 800) “Protection of Historic Properties” (Section 106). This technical memorandum has been prepared as part of the continuing consultation between the NPS and the District of Columbia Historic Preservation Office (SHPO). Section 106 consultation for the World War I Memorial was initiated with SHPO in a letter dated May 1, 2015 (**Appendix A**).

In support of the Memorial, the NPS has developed this Technical Memorandum to document the presence of historic properties, defined as those that are listed or eligible for listing in the National Register of Historic Places (NRHP) for the purposes of Section 106 review.

Identification of historic buildings, structures, sites, objects, and districts was undertaken within the Area of Potential Effect (APE) established for this project. The documentation process also included the identification of cultural landscapes and related character-defining features. The NPS consulted with SHPO and interested parties regarding the APE. Work was directed and conducted by staff that meet the *Secretary of the Interior’s Professional Qualification Standards* (36 CFR Part 61) in the disciplines of Historical Landscape Architecture, Architectural History, and History.

The Commission sponsored a national design competition for the Memorial and selected the winning design in early 2016. As part of the Section 106 compliance process, the Commission continued to refine the winning Memorial design and developed a series of concepts for the Memorial based on consultation with the NPS, SHPO, numerous federal agencies, and the public. One alternative has been advanced for analysis as part of the National Environmental Policy Act process. Two options for this alternative illustrate different design approaches to meet the program. The focus of this memorandum is on this action alternative.

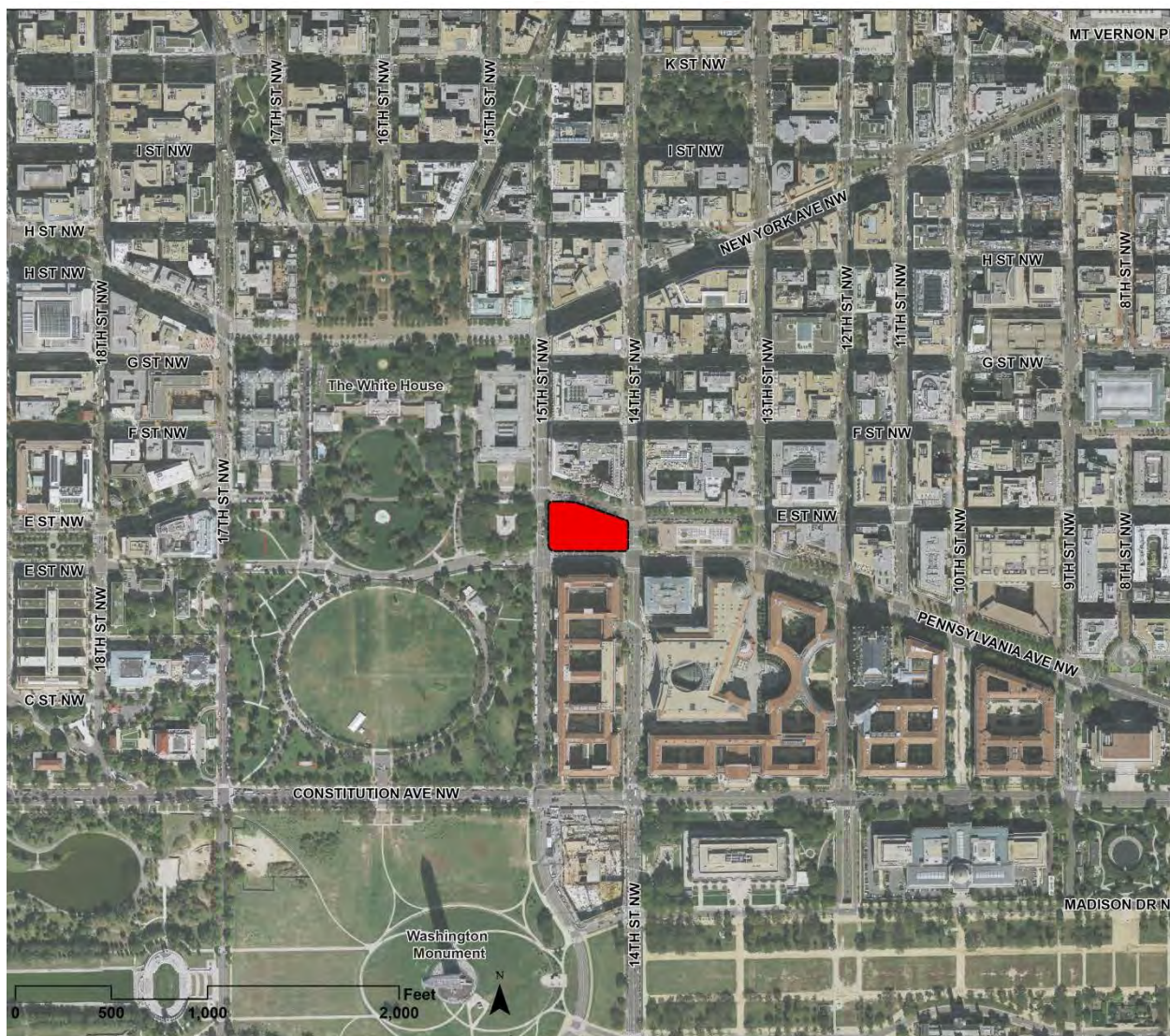
## 2. PROJECT DESCRIPTION

The World War I Memorial site is a 1.75 acre park set within a two-acre trapezoidal site under the jurisdiction of the NPS. It is bounded by Pennsylvania Avenue NW to the north and the south, 14<sup>th</sup> Street NW to the east, and 15<sup>th</sup> Street NW to the west (**Figure 1**). The purpose of the proposed project is to further honor the service members of the U.S. Armed Forces in World War I by enhancing the park and the General Pershing Commemorative Work, as provided within Public Law 113-291. This project is needed to fulfill the Congressional mandate for the establishment of a World War I Memorial.

The proposed action alternative includes the following elements:

- Remove the existing cascade fountain structure
- Insert a commemorative sculpture
- Modify the existing pool basin, including insertion of a walkway
- Remove the circular metal and plastic kiosk
- Modify, replace, or remove vegetation
- Repair, modify, replace, or remove hardscape
- Improve accessibility
- Identify opportunities for interpretation





**Figure 1: Location of the World War I Memorial site**

## 2.1 Action Alternative

The Action Alternative proposes to remove the existing cascade fountain and kiosk and add a commemorative sculpture that includes a fountain, a walkway through the pool, and an elevated interpretive overlook, referred to as the belvedere. The Action Alternative also proposes to modify vegetation and remove small-scale features, including the granite trash enclosures and the drinking fountains. These elements are described below. The design options for the sculpture and fountain are described as the Freestanding Sculpture Option and the Integrated Sculpture Option (see **Figure 2** and **Figure 3**). The design options for the walkway are described as the Island Walkway Option and the L Walkway Option (see **Figure 2** and **Figure 3**).

### Circulation and Access

The Action Alternative would retain the site's existing circulation framework and access with minor modifications to improve universal accessibility. Visitors would enter the site from its four corners and from the length of Pennsylvania Avenue NW along the site's north side. A set of steps at the southwest and southeast corners of the site would continue to lead to an upper terrace. Accessible entry would continue to be available only at the northwest corner of the site and along Pennsylvania Avenue NW on the site's northern perimeter.

The General Pershing Commemorative Work, located at the southeast corner of the site, would continue to be connected to the other site spaces with steps to the north and west. Two accessible ramps would continue to connect the General Pershing Commemorative Work with the south side of the upper terrace and with the tree grove along Pennsylvania Avenue NW. The width of the accessible ramp connecting to the south side of the upper terrace would be widened to the south to meet code requirements. The width of the accessible ramp connecting with the tree grove along Pennsylvania Avenue NW would be widened to the east. The length of the ramp would also be extended and the ramp's slope would be reduced to meet code requirements for accessibility.

### General Pershing Commemorative Work

The Action Alternative would retain the General Pershing Commemorative Work in its current condition and location. The General Pershing Commemorative Work consists of a bronze statue of General John J. Pershing flanked by two granite walls to the south and east and a bench to the west.

### Commemorative Sculpture Fountain

#### *Freestanding Sculpture Option*

The Freestanding Sculpture Option proposes to remove the existing cascade fountain and extend the granite steps through the former fountain structure location (see **Figure 2**). The six granite planters on the western edge of the pool would shift to align with the sculpture fountain. A freestanding 56.5-foot long commemorative sculpture fountain would be inserted into the pool between the pool's western edge and the proposed walkway. The eastern face of the commemorative work would include high relief sculpture with a fountain below, while the western face would include an etched quotation and a full height cascade fountain. Water would flow from the top of the sculpture fountain and cascade over the west face down to the pool to generate sound and a cooling effect in a manner consistent with the original design of the historic fountain. The three semi-circular alcoves along the western elevated walk would remain in place.

### *Integrated Sculpture Option*

The Integrated Sculpture Option proposes to replace the existing cascade fountain, portions of the western steps leading to the pool, and the two lower granite planters on the western edge of the pool with an integrated 56.5-foot long commemorative work, including cascade fountain (see **Figure 3**). The fountain water would flow from a pool on the top of the commemorative work and cascade over the north and south faces of the commemorative work. The water would then flow back into runnels at the base, carrying the water down to the pool in a manner consistent with the existing fountain. The eastern side of the commemorative work would include high relief sculpture with a fountain below.

An overlook would be provided on the western side of the commemorative work along the elevated upper terrace, which would include seating. The number of granite planters on the western edge of the pool would be reduced from six to two planters. The three semi-circular alcoves along the western elevated walk would shift to align with the commemorative work and planters.

### Walkway and Pool

The Action Alternative calls for modification to the existing pool basin to accommodate a walkway, which allows visitors to view the commemorative sculpture fountain more closely. The basin's existing concrete material would be replaced by dark granite. The walkway across the pool would be the same dark granite material; the walkway may be elevated slightly above the water or coplanar with the water surface. The walkway and pool would be in one of two possible configurations.

### *Island Walkway Option*

The island walkway would extend along the southern, northern, and western portions of the pool with a central entry point at the east side of the pool (see **Figure 2**). The tree planters at the eastern edge of the pool and the tree planter to the east of the pool on the lower plaza would be modified to accommodate the walkway.

The island walkway would enclose a scrim of water, 0.25 inches in depth, and set to be coplanar with the walkway itself. The exterior perimeter of the pool basin, along the pool edges would contain water at a depth of approximately 16 inches.

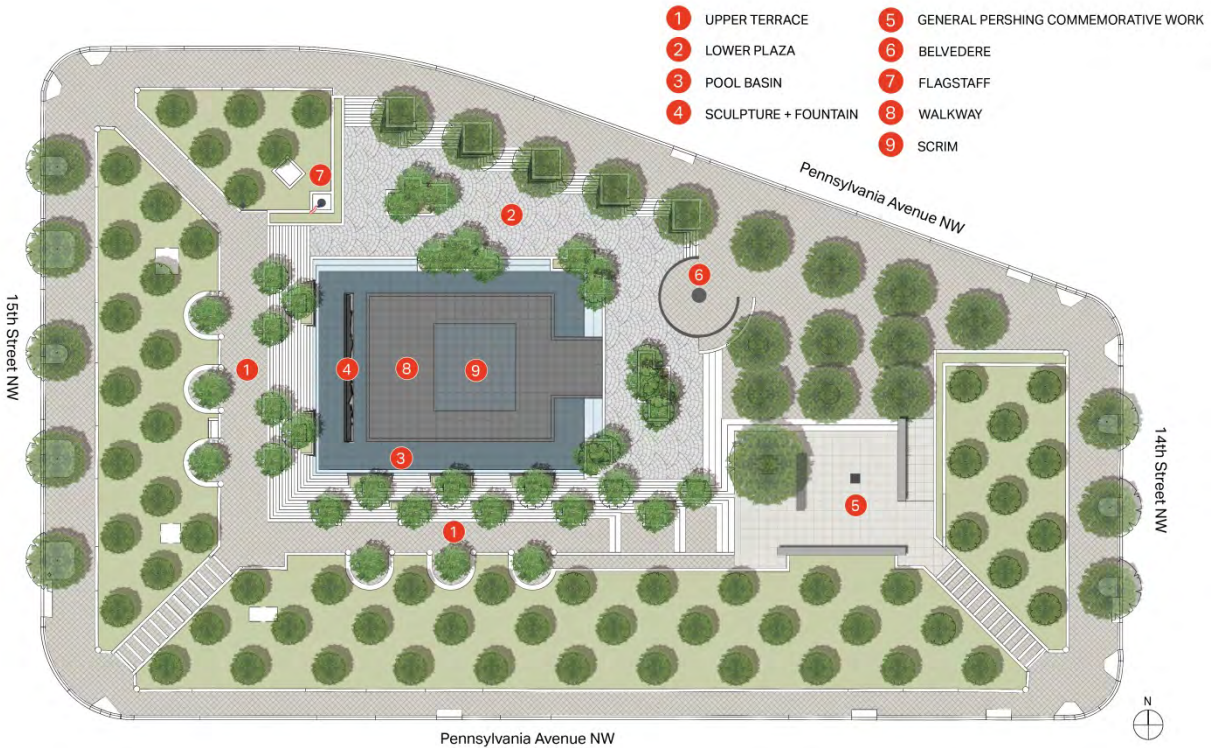
### *L Walkway Option*

An L-shaped walkway would be placed near the southern and western portions of the pool with entry points at both the east and north sides of the pool (see **Figure 3**). The walkway would rest on top of portions of the first step of the granite steps along the north and east edges of the pool. The granite planters located around the pool would remain intact to the north, south, and east. The tree planter to the east of the pool on the lower plaza would be modified to accommodate the walkway. The pool basin would contain water at a depth of approximately 16 inches.

### Vegetation

The rows of honey locust trees (*Gleditsia tricanthos inermis*) within the east, south, and west berms are in poor condition and would be replaced in-kind. The proposed planting plan would retain the gridded planting arrangement of the honey locust trees shown in the Oehme van Sweden planting plan, but reduce the total number of trees to provide larger soil volumes for each tree. The lawn on the berms would be replaced with understory plantings similar in character to the plants specified in the original Oehme van Sweden planting plan. The lawn on the berms would be replaced with Pennsylvania sedge (*Carex pensylvanica*) with red poppies (*Papaver orientale*) planted on the south berm and the southern portions of the east and west





**Figure 2: Action Alternative, Freestanding Sculpture Option with Island Walkway Configuration**



**Figure 3: Action Alternative, Integrated Sculpture Option with L Walkway Configuration**

berms. White astilbe (*Astilbe x arendsii* 'Deutschland'), white lirioppe (*Liriope muscari* 'Monroe's White'), and snowdrops (*Galanthus*) would be planted in the berm areas adjacent to the northwest, southwest, and southeast entrances to the site.

Pink crape myrtles (*Lagerstroemia indica*) in the alcoves along the elevated walks would be replaced with white crape myrtles (*Lagerstroemia indica x fauriei* 'Natchez').

New willow oaks (*Quercus phellos*) would replace in-kind the existing Pennsylvania Avenue street trees that are in poor condition. With the exception of one tree, which would be removed, willow oaks located in the tree grove at the northeast corner of the site would be replaced in-kind as needed. The total number of willow oaks would be retained. Unhealthy willow oaks in planters with English Ivy (*Hedera helix*) ground cover located along Pennsylvania Avenue would be replaced in-kind as needed; the number of willow oaks would be retained. The existing planter understory would be replaced with Asian ginger (*Asarum splendens*) and Japanese anemone (*Anemone hupehensis* var. *japonica* 'Honore Jobert').

White crape myrtles would replace pink crape myrtles with ground cover at their bases; a fountain grass (*Pennisetum alopecuroides*) understory would replace the existing ground cover within the terrace step planters. Sweetbay magnolias (*Magnolia virginiana*) with a white lirioppe (*Liriope muscari* 'Monroe's White') understory would replace the river birches (*Betula nigra*) in planters throughout the lower plaza. In both cases, the plan proposes to reduce the number of trees in order to provide larger soil volumes for each tree.

Native and naturalized grasses and perennial flowering plants would be replaced in-kind or with plants of similar ornamental characteristics as described above.

The soils would be amended within the planting areas, including planters, to improve the long-term viability of the trees.

#### Other Built and Small-Scale Features

The design proposes to replace the circular metal and plastic kiosk with an elevated interpretive overlook (referred to as the belvedere), which would offer a semi-enclosed area from which to view the park. The design would remove the elevator form associated with the kiosk, remove and replace the existing wall with a larger footprint to accommodate an accessible ramp, and install a new stone cap.

The Bex Eagle would remain in the park.

The design would remove the granite trash enclosures and replace the drinking fountains.

The design would place a flagstaff in the northwest berm, near the edge of the existing wall bordering the amphitheater-style steps. The face of the eastern existing wall of the northwest berm would include an etched quotation. A door would be added to the southern wall of the northwest berm to provide access to below grade spaces. The eastern and southern edges of the northwest berm would be elevated to accommodate access to below grade spaces.

## **2.2 Area of Potential Effect**

The APE for historic resources, cultural landscapes, and archeological resources encompasses the World War I Memorial site and areas beyond the site's boundaries to the north, south, east, and west. In general, the APE includes portions of the Pennsylvania Avenue National Historic Site (NHS) and National Register District, Federal Triangle Historic District (HD), Fifteenth Street Financial HD, Lafayette Square HD, National Mall, and the White House and grounds (see **Figure 4**). The APE is identical to that defined in the project's Environmental Assessment (EA) for these resources.



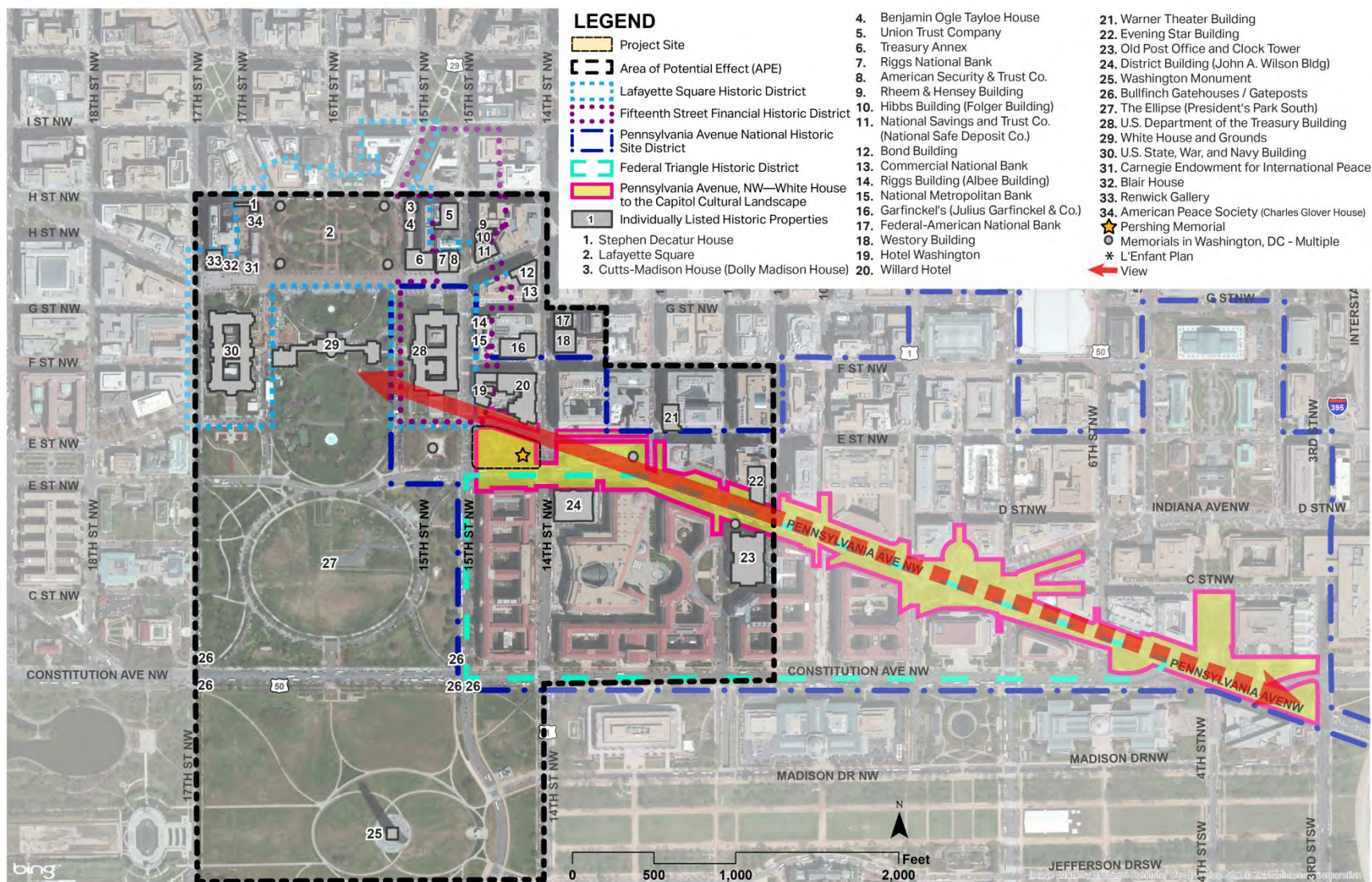


Figure 4: Area of Potential Effect

### **3. HISTORICAL SUMMARY OF THE WORLD WAR I MEMORIAL SITE**

Documented history of the site dates back to Pierre Charles L'Enfant's 1791 Plan for the City of Washington and Andrew Ellicott's 1792 plan of the city, in which the site was designated as Square 226 and set aside as a block for private development. Throughout the 1800s, the block was used for a variety of commercial and public uses including the Albaugh Opera House, the Polis Theater, and Light Infantry drills. The entire block was cleared of structures and developed as a park in the 1930s. On December 6, 1938, the block was transferred from the Treasury Department and Commissioners of the District of Columbia to the NPS. By the end of the 1930s, the block was planted with grass and bordered by trees. During World War II, many temporary buildings were constructed on the park, including an "Information Building," that was constructed in 1942 and demolished in 1955.

In 1956, the American Battle Monuments Commission (ABMC) was authorized to study and prepare plans for a Memorial to General John J. Pershing as part of the American Expeditionary Forces Memorial (Public Law 84-461). In 1958, the site was approved by the U.S. Commission of Fine Arts (CFA) and the National Capital Planning Commission (NCPC) and referred to as the John J. Pershing Memorial. The ABMC chose architect Wallace K. Harrison as the Memorial designer. The Memorial design was revised through the end of the 1950s and lay dormant for the next decade and a half. In 1966, the ABMC was authorized to erect a Memorial to General John J. Pershing on the site by Public Law 89-786.

In 1961, President John F. Kennedy initiated a three-decade long program to improve the deteriorated Pennsylvania Avenue corridor. The NPS added plants, paths, and site furniture to the park as part of President Lyndon B. Johnson's Beautification Program starting in 1965 (NPS 2016). In 1972, Congress formed the Pennsylvania Avenue Development Corporation (PADC) to promote the development and revival of the avenue. The PADC was responsible for carrying out major physical changes along the avenue as part of the implementation of the Kennedy initiative. Beginning in 1981, a number of streetscape improvements along Pennsylvania Avenue were implemented, including the addition of willow oak street trees, square brick paver sidewalks, benches, and tree grates. CFA determined in 1978 that landscape architect M. Paul Friedberg would undertake a new design for the site. Known for his design of urban public spaces, Friedberg was one of the most prominent and innovative designers in America. Between 1979 and 1981, Friedberg redesigned the site with several elements including rows of trees on the perimeter, a center pool with cascade on the western end, a concession kiosk, and stepped terracing around the pool to create amphitheater-style seating.

Friedberg's design for the site also incorporated Harrison's design for the General Pershing Commemorative Work. In 1973, Harrison redesigned his 1959 concept for the commemorative work in anticipation of the PADC improvements to the site. Revisions to the design continued and by 1979, Friedberg and Harrison agreed on a scheme for the commemorative work that closely resembled the design as built. Robert White was selected as the sculptor for the statue of General John J. Pershing. The General Pershing Commemorative Work was dedicated in 1981, although the commemorative work located at the southeast corner of the park was not built until 1983.

The PADC hired landscape architects Oehme, van Sweden & Associates in 1981 to supplement the existing Pennsylvania Avenue streetscape with additional plantings and to revisit the planting scheme of the avenue's parks, including Pershing Park. Oehme, van Sweden & Associates brought a unique horticultural knowledge and an innovative approach to planting design—later referred to as "New American Garden"—to Pennsylvania Avenue. Oehme, van

Sweden & Associates' work in Pershing Park resulted in supplementing and in some cases, changing Friedberg's plantings. (NPS 2007: 55-85, 89, NPS 2016:25-39, 59, Robinson & Associates, Inc. 2016: 4-20).



## 4. EXISTING CONDITIONS

The World War I Memorial site is an open, masonry-terraced park located in the downtown government-commercial district of Washington, D.C. The site is composed of terraces, a Commemorative Work to General John J. Pershing, a pool and fountain structure, the Bex Eagle, seating, lighting, and plantings (see **Figure 5**). Grass-covered berms enclose the site on the east, west, and south sides of the park. These berms are planted with rows of honey locust trees, some of which are in poor health.



**Figure 5: Existing Site Plan of Memorial Site**

Visitors enter the site from its four corners and from the length of Pennsylvania Avenue NW along the north side. Two sets of steps at the southwest and southeast corners lead to an upper terrace. Accessible entry is available at the northwest corner and along Pennsylvania Avenue NW on the northern perimeter of the site.

Elevated walks are located along the south and west sides of the upper terrace. Three alcoves with semi-circular steel seating on brick bases are located along both the southern and western elevated walks. Each alcove contains a central planter, with crape myrtle trees and ground cover vegetation. Some of these trees remain, but others are missing or have outgrown their containers; multiple trees are in poor health.

Near the center of the site, granite steps create amphitheater seating around a rectilinear pool basin; the basin does not contain water and no longer functions as a pool. A granite cascade fountain structure is also present, but is inoperable. Granite planters, which are planted or were once planted with crape myrtle and birch trees and base ground cover plantings, are located around the pool basin. In several cases, the existing ground cover has been removed or changed, and does not reflect the original planting design. Some of these trees remain, but others are missing or have outgrown their containers; multiple trees are in poor health.

Located at the southeast corner of the site, the General Pershing Commemorative Work consists of a bronze statue of General John J. Pershing by sculptor Robert W. White flanked by two granite walls to the south and east and a bench to the west. The walls separate the statue from the street. The south wall is incised with maps that portray the Western Front battlefield during World War I and the Meuse-Argonne campaign and text describing Pershing's participation in the war, his command of the United States 1st Army, and the signing of the armistice. The east wall is incised with Pershing's name and rank of General of the Armies (Robinson & Associates, Inc. 2016: 5). The commemorative plaza is composed of square granite paving, which is deteriorating. The commemorative work is connected to the other site spaces with steps to the north and west. An accessible ramp also connects the General Pershing Commemorative Work with the south side of the upper terrace. An additional accessible ramp connects the eastern edge of the General Pershing Commemorative Work with the tree grove along Pennsylvania Avenue NW.

The Bex Eagle, installed in 1982, is located at the northwest corner of the park in the berm.

A circular metal and plastic concession kiosk on a granite base is also located within the site; it is no longer in operation. An accessible ramp is located around the base of the kiosk. Additional small-scale features within the site include drinking fountains and granite trash receptacles.

Twenty-six PADC streetlights, which include Washington Globe lights and twin-headed lamps, line the northern perimeter and northwest corner of the site. Light fixtures original to the Friedberg design are located along steps into the site from the street, along the elevated walks inside the site, and at the General Pershing Commemorative Work.

Additional vegetation at the site includes Pennsylvania Avenue street trees (willow oaks), which are located along the north perimeter of the site. Willow oaks create a gridded bosque within the paving at the northeast corner of the site. Willow oaks in planters with English Ivy ground cover are located along Pennsylvania Avenue. Some of these trees are in poor health.

Paving at the site includes PADC 8" x 8" diagonally laid brown terra-cotta pavers along Pennsylvania Avenue NW and around the northeast grove of trees. These paved areas, edged with granite, create the steps, ramps, and elevated walks at the site. The seating area around the pool contains Belgian block paving in a fish-scale pattern.

#### **4.1 Historic Resources**

Historic resources in the APE include Pershing Park (now known as the World War I Memorial site), the L'Enfant Plan of the City of Washington (L'Enfant Plan), four historic districts, and several historic buildings and memorials.

##### Pershing Park

In July 2016, Pershing Park was determined to be eligible for listing in the NRHP. Character-defining features of Pershing Park include the park's spatial organization, omnidirectional views, built features, water features, vegetation, and small-scale features, itemized below:

- Design with the sunken pool at the center of the park, with earthen berms on three sides, elevated walks on the south and west, Pershing Memorial at the southeast corner
- Entrance to the park from the four corners of the site and from the length of Pennsylvania Avenue
- Separation of the Pershing Memorial from the remainder of the park through the use of walls on the south and east and steps on the north and west
- Free flow of space between the activity zones

- Omnidirectional views among the different levels of the park and among the character-defining features (including pool, cascade fountain, Pershing Memorial, kiosk, seating areas, dining area, etc.)
- Diagonally laid, brown terra-cotta pavers along Pennsylvania Avenue and around the northeast grove of trees
- Square granite flooring of memorial plaza
- Etched granite walls of the Pershing Memorial
- Belgian block paving in fish-scale pattern at seating area around pool
- Diagonally laid, brown terra-cotta pavers with granite edging creating steps, ramp, and elevated walks
- Alcoves along elevated walks, including paving, central brick planter, semicircular steel seating on brick bases
- Granite planters in seating areas and along pool
- Granite steps creating amphitheater seating around pool
- Granite cascade pool structure
- Circular metal and plastic kiosk on granite base
- Cascade fountain
- Pool basin
- Rows of honey locust trees over lawn on east, south, and west berms
- Willow oaks above paving at northeast corner
- Willow oaks in planters with English Ivy ground cover on north side of pool
- Multi-trunked crape myrtle trees in alcoves along elevated walks with ground cover at bases and grasses surrounding alcoves
- Multi-trunked crape myrtle and birch trees with ground cover at bases
- Native and naturalized grasses and perennial flowering plants.
- Robert W. White statue of Pershing
- Friedberg-designed light fixtures along steps into park from street, along elevated walks inside the park, and at Pershing Memorial
- PADC lighting on Pennsylvania Avenue
- Drinking fountain
- Granite trash can enclosures

## Pennsylvania Avenue, NW-White House to the Capitol Cultural Landscape

A Cultural Landscape Inventory (CLI) was completed by the NPS for Pennsylvania Avenue, NW - White House to the Capitol in 2016 (NPS 2016). The CLI concluded that Pershing Park is a contributing feature to the cultural landscape and also documented other features present in Pershing Park and the APE that contribute to the landscape's significance. These features include spatial organization, land use, circulation, vegetation, structures, views and vistas, and small-scale features.

The CLI specifies the spatial organization of Pennsylvania Avenue NW and the park interface with the avenue as a contributing characteristic. Pennsylvania Avenue is an open channel of space running between two fixed points, which was expanded at certain places into individual parks and plazas where the diagonal avenue intersected with the rectilinear street grid. Pershing Park is one such park. Freedom Plaza, located in the APE, is another.

The design for Pennsylvania Avenue was intended to enliven the area with pedestrian street life. The CLI therefore determined that land use activities, including commemoration, recreation, and transportation, contribute to the significance of Pennsylvania Avenue NW. The avenue today retains commemoration, recreation, and transportation (pedestrian, bicycle, and vehicular) land uses.

Contributing circulation features of the Pennsylvania Avenue NW cultural landscape include the Pennsylvania Avenue sidewalk. The sidewalk was intended to provide pedestrian continuity between the U.S. Capitol and the White House between 3<sup>rd</sup> and 15<sup>th</sup> Streets NW. The distinctive sidewalk materials comprise the PADC 8" x 8" pavers that extend into the World War I Memorial site.

Contributing vegetation of the Pennsylvania Avenue NW cultural landscape includes the willow oaks that serve as Pennsylvania Avenue street trees. The rows of willow oaks establish a simple visual frame for Pennsylvania Avenue's symbolic vistas. Willow oaks are located along the north perimeter of the World War I Memorial site today.

Contributing structures in the former Pershing Park include the General John J. Pershing Memorial and the Bex Eagle.

The cultural landscape also includes distinctive views and vistas. The axial view from the Treasury Building to the U.S. Capitol along Pennsylvania Avenue, from southeast to northwest, is a contributing view. The end points and reciprocal Pennsylvania Avenue NW views focus on the U.S. Capitol and the Treasury Building.

Identified contributing small-scale features include the PADC streetlights and site furnishings (i.e., tree grates, benches, trash receptacles, and drinking fountains).

## L'Enfant Plan

The L'Enfant Plan's design is the basis for the plan of Washington, D.C, and remains largely in place today. The APE is located entirely within the L'Enfant Plan and contains reservations, avenues, streets, and vistas which are contributing features to the Plan. Contributing features to the L'Enfant Plan within the APE include Reservation 617 (i.e., where the World War I Memorial site is located), Pennsylvania Avenue, and the Pennsylvania Avenue to the U.S. Capitol vista.

### Pennsylvania Avenue NHS and National Register District

The Pennsylvania Avenue NHS and National Register District encompasses the entire site and part of the APE. The Pennsylvania Avenue NHS was listed in the NRHP on October 15, 1966, with a listing amendment on October 12, 2007. Overall, the NHS includes approximately 160 contributing buildings from 1791-1930. The NHS is significant under Criteria A and C for its association with events that have made a significant contribution to the broad patterns of American history and its embodiment of the distinctive characteristics of a type, period, or method of construction, or representation of the work of a master, respectively. Within the site, contributing features to the Pennsylvania Avenue NHS include the General John J. Pershing Memorial and the vista along Pennsylvania Avenue NW to the U.S. Capitol (DC Office of Planning 2009, NPS 2007). Other contributing buildings, sites, or objects that are within the APE and are individually eligible or part of another resource are listed under additional historic resources within the APE.

### Other Historic Resources

Historic districts which are partially located in the APE include (DC Office of Planning 2009):

- **Federal Triangle HD:** Within Pennsylvania Avenue NHS, NRHP eligible.
- **Fifteenth Street Financial HD:** Includes 20 buildings total across HD built between 1835 and 1940, NRHP listed.
- **Lafayette Square HD:** Includes approximately 30 buildings total across HD, composed of a formal public park opposite the White House surrounded by a frame of buildings, National Historic Landmark (NHL).

Additional historic resources located in the APE include (DC Office of Planning 2009):

- **Stephen Decatur House:** Built in 1818, first private residence on Lafayette Square, NHL, within Lafayette Square HD.
- **Lafayette Square:** Indicated as part of “President’s Park” on the L’Enfant Plan, planted and walks laid out in 1824, redesigned in 1851-52, equestrian statue of Andrew Jackson statue erected in 1853, installation of Andrew Jackson Downing’s design completed in 1872, corner statuary groups erected in 1891, 1902, and 1910, park redesigned in 1937 and 1962, within Lafayette Square HD.
- **Cutts-Madison House (Dolley Madison House):** Built c. 1820, DC Inventory of Historic Sites (DC Inventory) listed, within Lafayette Square HD.
- **Benjamin Ogle Tayloe House:** Built in 1828, DC Inventory listed, within Lafayette Square HD.
- **Union Trust Company Headquarters Building:** Built 1907, addition in 1981, imposing headquarters of the city’s third trust company, NRHP listed, within Fifteenth Street Financial HD.
- **Treasury Annex:** Built in 1919, DC Inventory listed, within Lafayette Square HD.
- **Riggs National Bank:** Located at this site from 1846, granite bank built in 1899-1902, addition in 1922-24, headquarters of one of the city’s most important banks, Classical Revival architecture from the Beaux-Arts period, NRHP listed, within Fifteenth Street Financial and Lafayette Square HDs.
- **American Security and Trust Company Headquarters:** Built in 1904-05, interior remodeled 1931-32 upon construction of adjacent office wing, bank headquarters,

Classical Revival design, NRHP listed, within Fifteenth Street Financial and Lafayette Square HDs.

- **Rheem & Hensey Building:** Built in 1908, facade altered and incorporated in new building 1984, DC Inventory listed, within Fifteenth Street Financial HD.
- **Hibbs Building (Folger Building):** Built in 1906, NRHP listed, within Fifteenth Street Financial HD.
- **National Savings and Trust Company Headquarters Building (National Safe Deposit Company):** Built in 1888, additions in 1916, 1925, and 1985, imposing Queen Anne headquarters of Washington's second savings bank, NRHP listed, within Fifteenth Street Financial HD and Lafayette Square HD.
- **Bond Building:** Built in 1901, facade incorporated in new building 1985-86, NRHP listed.
- **Commercial National Bank:** Built in 1917, simplified and stylized classicism common in the 1920s, housed the city's fourth largest bank of the 1920s, NRHP listed.
- **Riggs Building (Albee Building):** Built in 1911-12, rear portion and Keith's Theatre (originally Chase's Theater) demolished in 1979, NRHP listed, within Fifteenth Street Financial HD.
- **National Metropolitan Bank:** Built in 1905-07, facade incorporated in new building in 1986, NRHP listed, within Fifteenth Street Financial HD.
- **Garfinckel's (Julius Garfinckel & Co.):** Built in 1929-30, NRHP listed.
- **Federal-American National Bank:** Built in 1925-26, bank headquarters, monumental Classical Revival facade, Renaissance Revival banking room, NRHP listed.
- **Westory Building:** Built in 1907-08, NRHP listed.
- **Hotel Washington:** Built in 1917, facade painting restored in 1985, NRHP listed, within Fifteenth Street Financial HD and Pennsylvania Avenue NHS.
- **Willard Hotel:** Built in 1901, addition in 1925, renovated 1984-85, NRHP listed, within Pennsylvania Avenue NHS.
- **Warner Theater Building:** Built in 1924, DC Inventory listed.
- **Evening Star Building:** Built in 1898, 1918 addition demolished in 1988, renovation and addition in 1988-89; DC Inventory listed, within Pennsylvania Avenue NHS.
- **Old Post Office and Clock Tower:** Built in 1891-99, renovated in 1978-81; NRHP listed, within Federal Triangle HD and Pennsylvania Avenue NHS.
- **District Building (John A. Wilson Building):** Built in 1904-08, NRHP listed, within Federal Triangle HD and Pennsylvania Avenue NHS.
- **Washington Monument:** Built in 1848-88, NRHP listed, within a L'Enfant Plan reservation.
- **Bullfinch Gatehouses/Gateposts:** Former gate structures built after 1814, gatehouses and posts removed in 1874, reassembled at their present locations in 1880, and restored in 1940, NRHP listed, within L'Enfant Plan reservation and National Mall HD.
- **The Ellipse (President's Park South):** Portion of Appropriation No. 1 surrounding the White House and departmental buildings planted and enclosed during the first half of the 19<sup>th</sup> century but large expanse to the south remained an unimproved open common, the

Ellipse was largely graded and planted by 1887 in the form that remains in place today, monuments and trees installed around the edges over time, NRHP listed.

- ***U.S. Department of the Treasury Building***: Built between 1836 and 1869, home to the federal government's second department, Greek Revival style, NHL, within Fifteenth Street Financial and Lafayette Square HDs and Pennsylvania Avenue NHS.
- ***White House and Grounds***
  - ***White House***: Built in 1792-1803, reconstructed from 1815-1818 after 1814 burning, south portico constructed in 1824, north portico constructed in 1829, East and West Wings added in 1902, repeatedly remodeled and expanded, first public building erected in Washington, home of every U.S. president since John Adams, NHL, exempt from NRHP listing, within a L'Enfant Plan reservation.
  - ***Grounds***: First improvements by Thomas Jefferson, other site improvements and plantings completed by 1830, carriageway added by 1861, substantially changed after the Civil War, most substantial 20<sup>th</sup> century redesign in 1936.
- ***U.S. State, War, and Navy Building (Old Executive Office Building)***: Built in 1871-88, NHL, within Lafayette Square HD.
- ***Carnegie Endowment for International Peace Headquarters***: Built in 1860, residence of Dr. Peter Parker, home to the Bureau of Pan American Republics, national headquarters of the Carnegie Endowment organization, NHL, within Lafayette Square HD.
- ***Blair House***: Built in 1824, substantially altered c. 1861, last restored and enlarged in 1988, federal government's official guest residence since 1942, NHL, within Lafayette Square HD.
- ***Renwick Gallery***: Built in 1859-64, restored in 1967-70 and 1985-86, NHL, within Lafayette Square HD.
- ***American Peace Society (Charles Glover House)***: Built in 1878, Italian Renaissance Revival facade, NHL, within Lafayette Square HD.

Several memorials which are included in NHRP Multiple Property Listings (MPL) are also located in the APE. These memorials include (NPS, NPS 1978a, 1978b, 2000):

- ***Major General Marquis Gilbert de Lafayette***: Erected in 1891, bronze, marble, and granite, American Revolution Statuary MPL; also within the Pennsylvania Avenue NHS Historic District.
- ***Major General Comte Jean-Baptiste de Rochambeau***: Erected in 1902, bronze, American Revolution Statuary MPL.
- ***General William Tecumseh Sherman***: Erected in 1903, bronze and granite, Civil War Generals and Monuments MPL.
- ***Brigadier General Thaddeus Kościuszko***: Erected in 1910, bronze and granite, American Revolution Statuary MPL.
- ***Major General Frederich Wilhelm von Steuben***: Erected in 1910, bronze and granite, American Revolution Statuary MPL.
- ***Brigadier General Count Casimir Pulaski***: Erected in 1910, bronze and granite, American Revolution Statuary MPL; also within the Pennsylvania Avenue NHP Historic District.

## **4.2 Archeological Resources**

Due to the long documented history of excavation and construction activity on the site of the World War I Memorial, no archeological resources are anticipated to be located at the site.



## 5. EFFECTS ASSESSMENT

This document assesses effects on historic resources as identified in the preceding sections. The effects of the Action Alternative are discussed in the section below, and address anticipated effects of the alternative on the World War I Memorial site's and the APE's historic resources and cultural landscapes.

### 5.1 Assessment of Effect for Action Alternative

#### Pershing Park

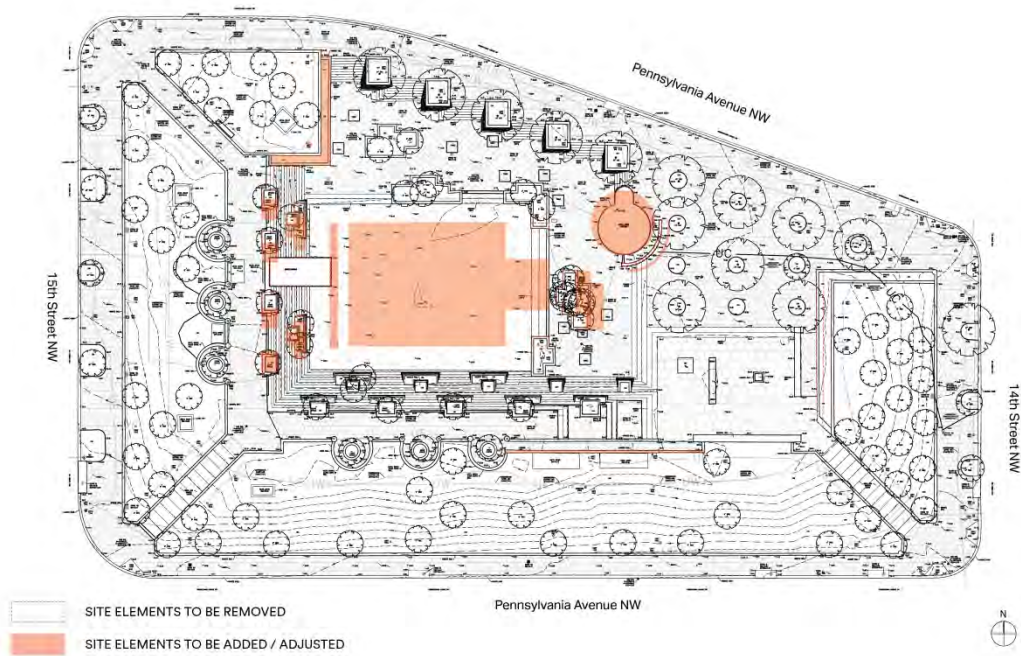
The Action Alternative would reinstate several of the site's missing functions and characteristics, while changing some of the character-defining features. The pool basin footprint would be retained in both the Freestanding Sculpture and Integrated Sculpture Options (see **Figure 6** and **Figure 7**) and the pool repaired to be operational. Insertion of a walkway through the pool structure would alter its use and appearance. The Action Alternative proposes to replace the cascading water in the pool basin, which is currently dry. The existing kiosk, one of the park's key focal points, would be replaced with an elevated viewing area located on the plinth of the kiosk.

#### *Freestanding Sculpture Option*

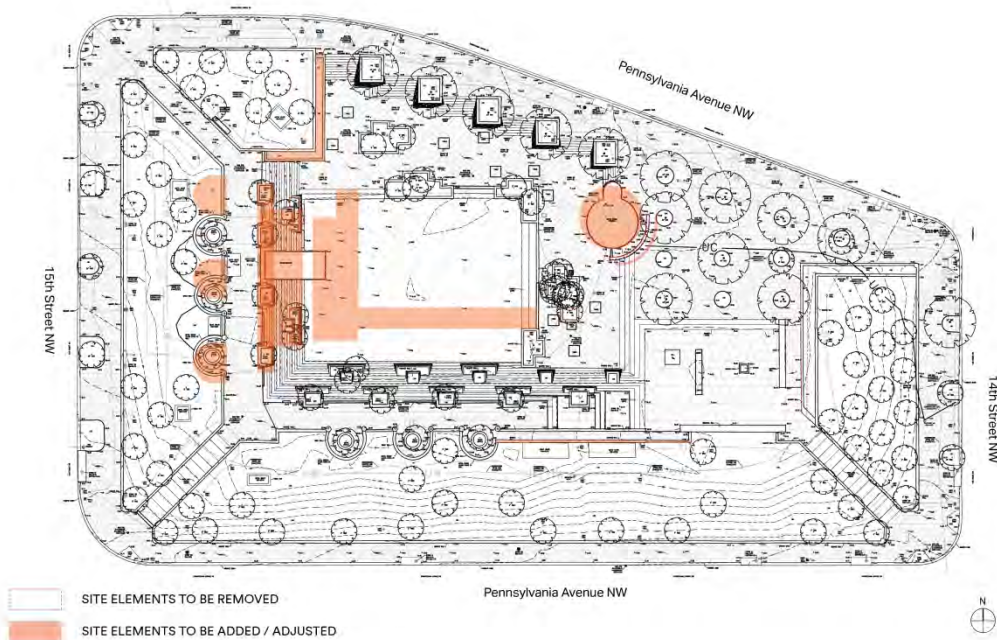
The Freestanding Sculpture Option's placement of a freestanding 56.5-foot long commemorative sculpture in the pool basin would result in the removal of the cascade fountain structure (one of the park's key focal points) and alter the spatial relationship of the fountain with the park. The Freestanding Sculpture Option would recreate a focal feature at the western portion of the pool; its position would be aligned to be even with the face location of the front of the existing fountain. The commemorative sculpture's placement in the pool basin would result in a new gathering space behind the commemorative sculpture and alter the continuous free flow of space that is one of the hallmarks of the park. The commemorative sculpture's placement in the pool basin would also shorten views across the pool and shrink the open space at the basin. The extended length of the commemorative sculpture would also block views from the western steps across the pool, changing the visual connection between the park and the western steps. The western steps would be expanded, providing new access to the western edge of the pool. This change represents a notable departure from Friedberg's design.

#### *Integrated Sculpture Option*

The Integrated Sculpture Option's placement of the integrated 56.5-foot long commemorative sculpture along the western edge of the sunken plaza would also result in the removal of the cascade fountain, along with granite steps and planters along the western edge of the sunken plaza. The fountain expansion and removal of the western steps would alter the spatial relationship between the upper and lower sections of the park and change the visual connection to and from the western edge of the pool basin. Although the fountain feature would change, the Integrated Sculpture Option would retain an integrated focal feature along the western edge of the pool basin, thus minimizing the adverse effect.



**Figure 6: Structural Modification to Pershing Park, Freestanding Sculpture and Island Walkway Options**



**Figure 7: Structural Modification to Pershing Park, Integrated Sculpture and L-Shaped Walkway Options**

The site's auditory, visual, and physical experiences generated by the cascade fountain would also be altered from its original historical condition. In the Freestanding Sculpture Option, water would cascade over the west face of the commemorative sculpture directly down to the pool; whereas in the Integrated Sculpture Option, water would cascade over the north and south faces of the commemorative sculpture into runnels which would bring the water down to the pool. In both sculpture options, water would also cascade below the sculpture. The fountain would help create ambient noise and visual interest that can be seen and heard from various points around the park, recreating a condition that is similar to the original design.

### *Walkways*

Insertion of a walkway through the pool structure would alter the pool's use and appearance. Both the Island Walkway and the L Walkway Options would minimize the perceived size of the pool basin. The Island Walkway and L Walkway Options would retain access to water at a depth of 16" along the basin's four sides, maximizing a visitor's interaction with the water. The L Walkway would afford greater surface area of the water.

Improved accessibility throughout the park would include the widening of walkways, specifically along the southern portion of the park between the General John J. Pershing Memorial and the southern elevated walk, along the eastern portion of the park between the General John J. Pershing Memorial and the tree grove along Pennsylvania Avenue NW, and the ramp near the kiosk. These potential changes would be undertaken in a manner that is consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. These modifications within the park would retain the circulation patterns, and would not substantively alter the spatial organization or character-defining features of the park.

### *Vegetation*

The Action Alternative would remove and replace all vegetation in-kind or with compatible vegetation, cultivars, or species, alter the configuration of planting beds throughout the park, and reduce the total number of trees from the Oehme van Sweden planting plan by approximately 47 trees (Freestanding Sculpture Option) or 55 trees (Integrated Sculpture Option) to provide more soil volume per tree and increase tree viability. A summary of the number of trees in the original canopy, existing canopy, and Action Alternative canopy is provided in **Table 1**.

The Action Alternative planting plan would replace in-kind the rows of honey locust trees within the berms, but the expanded grid layout would alter the planting configuration and reduce the quantity from the Oehme van Sweden planting plan by approximately 34 trees (Freestanding Sculpture Option) or 37 trees (Integrated Sculpture Option).

The willow oaks located at the northeast corner would be replaced in-kind as needed. The removal of one willow oak would reduce the quantity from the Oehme van Sweden planting plan by one tree.

The willow oaks in planters with English Ivy ground cover on the north side of pool would be replaced in-kind as needed. The total number of willow oaks in planters would be retained from the Oehme van Sweden planting plan.

The pink crape myrtles in the alcoves along the elevated walks would be replaced with compatible cultivar (i.e., white crape myrtle). The total number of crape myrtles would be retained from the Oehme van Sweden planting plan.

**Table 1: Original, Existing, and Action Alternative Tree Canopy**

Tree Location	Number of Trees			
	Original Canopy	Existing Canopy	Action Alternative Canopy	
			Freestanding Sculpture Option	Integrated Sculpture Option
Berms	95	57	61	58
Upper Terrace and Alcoves	32	44	22	18
Lower Plaza	18	14	16	16
Pennsylvania Avenue Street Trees and Northeast Grove	16	15	15	15
14 <sup>th</sup> and 15 Streets NW Street Trees	8	7	8	8
General Pershing Commemorative Work	1	0	1	1
<b>Total</b>	<b>170</b>	<b>117</b>	<b>123</b>	<b>115</b>

The pink crape myrtle and birch trees with ground cover at bases would be replaced with compatible cultivar (i.e., white crape myrtle) and compatible species (i.e, sweet magnolia), respectively. The total number of trees at these locations would be reduced from the Oehme van Sweden planting plan by approximately 12 trees (Freestanding Sculpture Option) or 16 trees (Integrated Sculpture Option).

The lawn on the berms and native and naturalized grasses and perennial flowering plants would be replaced with vegetation compatible to that in the Oehme van Sweden planting plan. Collectively, these changes would alter the historic visual and spatial qualities of the park, which have evolved over time.

As a result, the Action Alternative would result in an adverse effect on the former Pershing Park due to changes to the spatial organization, omnidirectional views, built features, water features, and vegetation. The Freestanding Sculpture option would result in an additional adverse effect on the property.

#### Pennsylvania Avenue, NW – White House to the Capitol Cultural Landscape

The proposed action would retain the spatial organization of the street and park interface. The basic outline of Pershing Park is shaped by city streets that would remain in place. Within the five-sided block containing the park, a framework of berms partially enclose the landscape's central spaces. This component of the park's spatial framework would remain in place. The proposed action would also retain the berms and park entrances. The park edges with the street would remain. However, the proposed action would result in changes to the spatial organization, omnidirectional views, built features, water features, and vegetation within Pershing Park.

The Action Alternative would result in no changes to the Pennsylvania Avenue sidewalk. The PADC lights and views of the U.S. Capitol and the Treasury Building would be retained. Changes to the Pennsylvania Avenue street trees would be consistent with the *Secretary of the*

*Interior's Standards for the Treatment of Historic Properties* because the trees would be replaced in-kind.

Overall, the commemorative, recreation, and transportation uses would remain the same under the proposed action. The park would continue to function primarily as a commemorative and recreational park. The concessions services and skating rink function and its supporting services were discontinued in 2006-2007 and are not proposed for renewal.

The General John J. Pershing Memorial statue, bench, and granite walls would be retained in their current location; their spatial relationship to one another would continue. The Bex Eagle would remain in place. As a result of the Action Alternative's adverse effect on Pershing Park, the Action Alternative would result in an adverse effect on the Pennsylvania Avenue, NW – White House to Capitol Cultural Landscape.

#### L'Enfant Plan

The Action Alternative avoids changes to the L'Enfant Plan's contributing features. The proposed action would retain the use of the project site as a park, the existing park boundary and street trees, the continuity of Pennsylvania Avenue, and the designed views through the Pennsylvania Avenue corridor. Although the memorial would place a flagstaff in the northwest berm within the E Street viewshed, E Street is not identified as a contributing vista to the L'Enfant Plan of the City of Washington. As a result, the Action Alternative would result in no adverse effect on the L'Enfant Plan.

#### Pennsylvania Avenue NHS

The Action Alternative would avoid changes to the Pennsylvania Avenue NHS's contributing features. The proposed action would retain the views through the Pennsylvania Avenue corridor. The General John J. Pershing Memorial statue and granite walls would also be retained and would continue to have the same spatial relationship to one another. As a result, the Action Alternative would result in no adverse effect on the Pennsylvania Avenue NHS contributing features.

#### Other Historic Properties within the APE

The Action Alternative would have no adverse effects on the other historic properties within the APE.

**Table 2: Summary of Assessment of Effect for Action Alternative**

<b>Resource</b>	<b>Assessment</b>
<b>Pennsylvania Avenue, NW – White House to the Capitol Cultural Landscape</b>	Adverse effect
<b>L’Enfant Plan of the City of Washington</b>	No adverse effect
<b>Pennsylvania Avenue National Historic Site</b>	No adverse effect
<b>Other Historic Properties within the APE</b>	No adverse effect
<b>Pershing Park</b>	Adverse effect
<b>Retained</b>	
Pershing Memorial granite walls, bench, and statue	No adverse effect
Terra-cotta pavers	No adverse effect
Memorial plaza granite flooring	No adverse effect
Belgian block paving	No adverse effect
Semi-circular alcoves (Freestanding Sculpture Option)	No adverse effect
PADC lighting	No adverse effect
<b>Removed</b>	
Kiosk	Adverse effect
Cascade fountain structure	Adverse effect
<b>Modified</b>	
Spatial Organization	Adverse effect
Semi-circular alcoves (Integrated Sculpture Option)	Adverse effect
Granite planters	Adverse effect
Granite steps	Adverse effect
Pool basin	Adverse effect
Omnidirectional views	Adverse effect
Honey locust trees over lawn on berms	Adverse effect
Willow oaks above paving at NE corner	Adverse effect
Willow oaks in planters on north side of pool	Adverse effect
Crape myrtle trees in alcoves	Adverse effect
Crape myrtle and birch trees	Adverse effect

Resource	Assessment
Lawn, native and naturalized grasses and perennials	Adverse effect
Drinking fountain	Adverse effect
Trash cans	Adverse effect



## 6. AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES

The Commission and the NPS will undertake measures to avoid, minimize, or mitigate adverse effects on historic properties. The proposed design has substantially minimized the changes to the park through its evolution from the initial design concept. The initial design in January 2016 removed many of the features integral to the fabric of Pershing Park. Over time, the design changed to minimize adverse effects by retaining the berms, General Pershing Commemorative Work, and much of the spatial relationship, seating, paving, vegetation, and views and vistas. Additionally, the central feature of the Memorial, the commemorative sculpture, has been reduced in length from the initial 324-foot wall to 56.5 feet (see **Figure 8**). The proposed design includes a cascade along the sculpture base, which would offer a sound similar to the former cascade fountain.



**Figure 8: Evolution of World War I Memorial Concept from January 2016-February 2018**

In order to further avoid and minimize effects on historic properties, the proposed design would retain numerous historic park features and replace others in-kind as described in the previous sections of this document. The Commission and the NPS will also undertake to improve the conditions of the character-defining features of the former Pershing Park and to replace missing features.

In addition to the efforts to avoid or minimize effects, the Commission and the NPS will also provide mitigation. The combined design and mitigation strategies would result in the rehabilitation of most of the original Friedberg design.

Minimization strategies could include:

1. Structural elements. The World War I Memorial site currently contains several paved/hardscape elements and vertical structural features. Proposed new structural



elements and materials would repair, retain, or complement the historic designed features.

The existing Pennsylvania Avenue pavers (terra cotta pavers and bricks of varying sizes), Coldspring carnelian granite setts, and General Pershing Commemorative Work paving (thermal finish, Coldspring carnelian granite) would remain at the site and be repaired and cleaned. New paving or other stone elements would contain materials consistent with the original design of the former Pershing Park as appropriate.

The Commission and the NPS will include a fountain structure in the design. The location of the fountain would be on the western side of the pool.

The vertical elements of the General Pershing Commemorative Work would remain in place.

The kiosk will be replaced with another notable feature, thereby maintaining the visual connections between three primary vertical elements within the site.

2. Vegetation. Vegetation at the site would be replaced in-kind or with vegetation that adheres to the planting strategies and framework to perpetuate the historic landscape design, to the extent practicable with current NPS policies. Existing vegetation suffers from dieback, poor soil conditions, or conflicts with infrastructure or utilities. In some cases, the existing vegetation has been removed or changed, and does not reflect the original planting design. The soils would be amended within planting areas, including planters, the quantity of trees per planter would be reduced in some planters, and plant spacing would be improved to increase soil volume per tree and maximize the long-term viability of vegetation.

Mitigation strategies could include:

1. Water. As mitigation for the removal of the cascade fountain and the deterioration of the pool, the replacement of water in the pool and fountain would replicate the historic auditory experience and movement to the pooled water.
2. Documentation. Documentation of the former Pershing Park's historic resources and design would provide mitigation for changes to the site:
  - A contribution toward a context study on modernist landscapes in Washington, D.C. would be made; and/or
  - A contribution toward preparation of a Historic American Landscape Survey (HALS) with plans, sections, and large format imagery to be included in an online database with the District of Columbia Office of Planning.
3. Interpretation. Permanent interpretation of the former Pershing Park's historic resources and design would be incorporated into the design of the World War I Memorial. Wayside interpretation or QR codes within the site that digitally connects visitors to additional information about the former Pershing Park's historic resources and design could also be provided.
4. NRHP Nomination. An NRHP nomination form for the World War I Memorial could be prepared to document the site's history, changes to the site, and the various elements of the World War I Memorial.
5. Donation of PADC Pavers. A stock of new 8" x 8" PADC custom pavers could be given to the NPS to assist in ongoing replacement and maintenance of the Pennsylvania Avenue NHS.

Additional minimization or mitigation measures could include those listed in **Table 3**.

**Table 3: Potential Minimization or Mitigation Measures**

Design Change	Potential Minimization or Mitigation Measure
<b>Removals</b>	
Remove cascade fountain structure	Interpret the missing design elements
	Introduce new steps in the former fountain area to be compatible with the existing steps
	Incorporate water into the east-facing façade of sculpture
Remove trash receptacles	Repair and retain
	Replace in-kind
Remove sections of eastern steps and portions of granite planters	Coordinate with new pool walkway design to minimize the loss of steps and planters
	Salvage stone for use in other locations within park
Remove section of planter parallel to ramp connecting the General Pershing Commemorative Work with the tree grove	Create enhanced accessible circulation
Remove section of south berm parallel to ramp connecting the General Pershing Commemorative Work with the upper terrace	Create enhanced accessible circulation
<b>Additions/Adjustments</b>	
Add commemorative sculpture, including fountain	Replace missing water and provide vertical element consistent with historic design
Add walkway over pool	Minimize size of new walkway
	Minimize number and size of connections to the pool edge
Adjust width, length, and slope of ramp connecting the General Pershing Commemorative Work with the tree grove	Adjust in a manner that is consistent with the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i>
Adjust width of ramp connecting the General Pershing Commemorative Work with the upper terrace	Adjust in a manner that is consistent with the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i>
Add flagstaff in northwest berm	Provide vertical element consistent with historic design
Adjust height of northwest berm to accommodate access door	Adjust in a manner that is consistent with the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i>
Add access door to southern existing wall of northwest berm	Adjust in a manner that is consistent with the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i>
<b>Replacements</b>	
Replace water in pool basin	Replace in-kind
Replace street trees	Replace in-kind

Design Change	Potential Minimization or Mitigation Measure
Replace river birch trees and reduce quantity	Replace with compatible species
Replace herbaceous plants	Replace with compatible vegetation
Replace kiosk and ramp with an elevated interpretive area and code-compliant accessible ramp	Minimize changes to the kiosk base and ramp
Replace honey locust trees and reduce quantity	Replace in-kind
	Retain the general planting pattern
Replace crape myrtles and reduce quantity	Replace with compatible cultivar
Replace drinking fountain	Replace in-kind
Replace lawn with flowering perennials to match Oehme van Sweden plan	Replace with compatible vegetation

## **7. SOURCES**

DC Office of Planning  
2009 District of Columbia Inventory of Historic Sites

NPS  
National Register of Historic Places Multiple Property Documentation Form, Memorials in Washington, DC

NPS  
1978a National Register of Historic Places Inventory – Nomination Form, American Revolution Statuary

NPS  
1978b National Register of Historic Places Inventory – Nomination Form, Civil War Monuments in Washington, D.C.

NPS  
2007 National Register of Historic Places Registration Form, Pennsylvania Avenue National Historic Site

NPS  
2016 Pennsylvania Avenue, NW, Cultural Landscape Inventory (CLI) – White House to the Capitol

Robinson & Associates, Inc. and Commonwealth Heritage Group, Inc.  
2016 Pershing Park (U.S. Reservation 617) Determination of Eligibility

## 8. APPENDIX A



### United States Department of the Interior



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

May 1, 2015

Mr. David Maloney  
State Historic Preservation Officer  
District of Columbia, Office of Planning  
1100 4th Street SW, Suite E650  
Washington D.C. 20024

Subject: Development of World War I Memorial in General John J. Pershing Park- Initiation of  
Section 106 Consultation

Dear Mr. Maloney:

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 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 District of Columbia State Historic Preservation Office, in accordance with 36CFR800.3 of Section 106 of the National Historic Preservation Act.

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.

In accordance with the National Environmental Policy Act of 1969 (NEPA), the NPS will prepare an Environmental Assessment (EA) to identify alternatives and analyze impacts potentially resulting from the establishment of the proposed memorial. Concurrent to the NEPA process, the NPS and the Commission will conduct consultation under Section 106 of the National Historic Preservation Act of 1966 (NHPA). The NPS plans to consult with the public per 36 CFR 800.3(e) by holding public informational meetings and through its Planning, Environment, and Public Comment website ([parkplanning.nps.gov/projectHome.cfm?projectID=58434](http://parkplanning.nps.gov/projectHome.cfm?projectID=58434)). The NPS anticipates that these outreach efforts will accommodate the requirements of both NEPA and the Section 106 process. To that end the

NPS and the Commission will hold a public scoping meeting on Wednesday, May 20, 2015, between 6:30 p.m. and 8:30 p.m. at the Jones Day offices, located at 51 Louisiana Avenue NW, in Washington, D.C. During this open house, the project team will be available to discuss alternatives and site characteristics. As part of the consultation process with the District of Columbia Historic Preservation Office, you or a member of your staff are cordially invited to attend the scoping meeting and offer comments.

Although we have initially drafted a proposed area of potential effect (APE) for this project (see attachment), we have not made a determination of effect. However, the site is within the Pennsylvania Avenue National Historic Site National Register District and contains the General John J. Pershing Memorial, which consists of a statue of Pershing with a bench and two inscribed walls. We are also aware that this project may affect other National Register eligible or listed properties.

We look forward to working with you on this project. If you have any questions, please do not hesitate to contact Catherine Dewey, Chief of Resource Management, at [catherine\\_dewey@nps.gov](mailto:catherine_dewey@nps.gov).

Sincerely,



Karen L. Cucurullo  
Acting Superintendent  
National Mall and Memorial Parks  
Attachment



