



Executive Director's Recommendation

Commission Meeting: July 9, 2015

PROJECT

Dwight D. Eisenhower Memorial
National Mall and Memorial Parks
Bound by Independence Avenue, 4th Street,
and 6th Streets, SW, and by the
Lyndon B. Johnson - Department of Education
Headquarters Building
Washington, DC

NCPC FILE NUMBER

6694

NCPC MAP FILE NUMBER

1.71(73.10)44169

APPLICANT'S REQUEST

Final approval of site and building
plans

SUBMITTED BY

United States Department of the Interior
National Park Service on behalf of the Dwight
D. Eisenhower Memorial Commission

PROPOSED ACTION

Approve with comments

ACTION ITEM TYPE

Staff Presentation

REVIEW AUTHORITY

Approval
per 40 U.S.C. 8903, 40 U.S.C. § 8905, and 40 U.S.C.
8722(b)(1) and (d)

PROJECT SUMMARY

The National Park Service (NPS), on behalf of the Dwight D. Eisenhower Memorial Commission, has submitted final site and building plans for the Dwight D. Eisenhower Memorial. Congress authorized the memorial under P.L. 106-79, enacted October 25, 1999, as amended. The project is located on a four-acre site in Southwest Washington, DC. The project site includes sections of Maryland Avenue, SW and is adjacent to Independence Avenue, SW, both prominent L'Enfant streets. The site is in close proximity to the U.S. Capitol, National Mall, federal headquarters, national museums, and other commemorative works. The overarching design concept of the memorial continues to be based upon the notion of a commemorative object within a temple, similar to how the Lincoln Memorial is organized, that establishes a layered experience that transitions visitors through a series of defined spaces that move from the busy urban surroundings, through active and passive park spaces, and finally into an intimate commemorative core where the story of President Eisenhower unfolds.

A centrally located memorial core containing limestone bas-relief blocks, free-standing bronze sculpture, and quotations will commemorate Dwight D. Eisenhower's legacy and his role in American history as a Military General and as President of the United States. As a backdrop to the core, a large-scale stainless steel tapestry, supported by a monumental colonnade, is proposed along the southern edge of the site. The tapestry is approximately 80 feet high and 447 feet in length. The columns that support the tapestry are approximately 10 feet in diameter and 80 feet high. As proposed, the tapestry serves both functional and commemorative purposes. Functionally, the tapestry and supporting colonnade are used to define the southern edge of the memorial and provide visual separation from the Lyndon B. Johnson Department of Education Building. As a commemorative element, the tapestry will depict landscape scenery of Abilene, Kansas,

Eisenhower's hometown, and is meant to honor Eisenhower's Midwestern core values of strength, modesty, and integrity.

Two freestanding columns on the north side of the memorial help define a park space within the larger site and surrounding precinct. The freestanding columns are the same diameter and height as those supporting the tapestry, and are placed in alignment with each other, and with the end columns of the south tapestry approximately 155 feet to the north. The columns contribute to the layered experience of the memorial as they mark a threshold as one enters the site from the northwest and northeast.

The landscape design of the memorial reinforces the tapestry imagery through plant materials that are characteristic of the Kansas plains. The memorial ground plane includes groomed lawn along the historic Maryland Avenue cartway, and slightly taller grasses throughout the rest of site. Several types of canopy and understory trees are arranged in clusters throughout the site to frame the Maryland Avenue viewshed and views of the memorial core and tapestry. Visitor services will be located in a one-story information center placed in the southeast corner of the site. The building has a footprint of approximately 2,400 square feet and will contain restrooms, a bookstore, and an NPS ranger contact station. Paved entry plazas at the northeast and northwest corners of the site will receive visitors and direct them along walkways through the park space and towards the memorial core. The threshold into the memorial core will be delineated through the use of paving materials that differ from the walkways.

Finally, a new pedestrian promenade is proposed between the memorial and the Department of Education Building. The promenade, to be known as LBJ Promenade, will serve as a new entry forecourt to the Department of Education Building and provide outdoor seating, exhibit areas, and a memorial overlook that can accommodate gatherings of various sizes.

KEY INFORMATION

The recommendation for the final site and building plans for the memorial builds upon the Commission's preliminary approval of the project in October 2014. The main portion of this report focuses on the modifications made since the Commission's preliminary approval and how the applicant has responded to the Commission's comments as well as comments from other stakeholders. The U.S. Commission of Fine Arts approved the final site and building plans for the memorial on June 18, 2015.

In 2006, at the time NCPC approved the site for the memorial, the Commission adopted the following design principles:

1. Preserve reciprocal views to and from the U.S. Capitol along Maryland Avenue, SW.
2. Enhance the nature of the site as one in a sequence of public spaces embellishing the Maryland Avenue vista.
3. Create a unified memorial site that integrates the disparate parcels into a meaningful and functional public gathering place that also unifies the surrounding precinct.

4. Reflect L'Enfant Plan principles by shaping the memorial site as a separate and distinct public space that complements the Department of Education Headquarters and other surrounding buildings.
5. Respect and complement the architecture of the surrounding precinct.
6. Respect the building lines of the surrounding rights-of-way and the alignment of trees along Maryland Avenue.
7. Incorporate significant green space into the design of the memorial.

NCPC's site approval action was conditioned upon the memorial design satisfying these design principles. The principles were incorporated as required mitigation in the Finding of No Significant Impact issued by NCPC for its action to approve the memorial site.

Since site approval, NCPC has provided comments on concept designs (February 2011) and reviewed preliminary plans for the memorial in April 2014 and October 2014. Between the formal Commission reviews, the applicant provided information presentations to update the Commission on the project.

In October 2014, the Commission approved the preliminary plans for the memorial and found the memorial design to be consistent with the purposes of the National Capital Planning Act and the Commemorative Works Act. The Commission also found that the memorial design satisfied NCPC's adopted site selection design principles and that approval of the revised preliminary plans would not have a significant impact on the human environment. With its preliminary approval, the Commission recommended that the applicant return prior to submitting for final approval to update the Commission on modifications made to the preliminary design including any changes that responded to previous comments related to pedestrian circulation, perimeter security, and lighting.

RECOMMENDATION

The Commission:

Approves the final site and building plans for the Dwight D. Eisenhower Memorial.

Confirms that the final memorial design satisfies NCPC's adopted site selection design principles and that the Commission's action to approve the final plans will not have a significant impact on the human environment.

Notes that the applicant has modified the design of the memorial to respond to the Commission's previous comments regarding pedestrian circulation, perimeter security, and lighting.

Notes that the applicant has responded to the Commission's recommendation to strengthen the overall concept of the memorial as a "layered experience", enhance the openness of the Maryland Avenue right-of-way/viewshed, and improve the symbolic and physical relationship to the Department of Education Building.

Notes that the applicant has demonstrated that the tapestry material and welds will continue to meet the durability criteria enumerated in the Commemorative Works Act.

Notes that the applicant has submitted a maintenance plan, including operational protocols, that addresses such matters as cleaning the tapestry and public safety concerns when snow and ice accumulate on it.

PROJECT REVIEW TIMELINE

Previous actions	<ul style="list-style-type: none">• September 2006 – Approval of memorial site with adopted set of design principles• February 2011 – Review and comment on three concept design alternatives• October 2011 – Information presentation on proposed design• April 2014 – Disapproval of preliminary site and building plans• September 2014 - Information presentation on proposed revised preliminary design• October 2014 – Approval of preliminary site and building plans• November 2014 – Information presentation on lighting, perimeter security, pedestrian circulation
Remaining actions (anticipated)	<ul style="list-style-type: none">• None

Prepared by J. Hirsch
July 1, 2015

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I. PROJECT DESCRIPTION

Site



Figure 1: Aerial image of memorial site and surrounding context

The memorial site encompasses approximately four acres of land within the Southwest quadrant of Washington, DC. The site is located one block south of the National Mall and is bound by Independence Avenue on the north, 4th Street on the east, and 6th Street on west, and the Lyndon B. Johnson, Department of Education Building (LBJ Building) on the south. In addition to the LBJ Building, the site is surrounded by several other federal office buildings and cultural facilities. These include the Smithsonian National Air and Space Museum to the north, the historic Wilbur J. Cohen Building that is home to the Voice of America (VOA) to the east, and the Wilbur Wright Building, headquarters of the Federal Aviation Administration (FAA), to the west. The site is also in close proximity to the U.S. Capitol. Of note, these buildings house agencies that directly relate to Dwight D. Eisenhower's legacy, an important consideration for the applicant initially choosing the site for the memorial.



Figure 2: Memorial site existing conditions

Currently, the site is composed of three parts controlled by three separate entities. The historic [160'] Maryland Avenue right-of-way bisects the site and encompasses approximately two acres of land area. The United States Government owns the right-of-way with administrative jurisdiction held by the District of Columbia Government. As currently configured, Maryland Avenue does not follow its historic alignment with the U.S. Capitol, but rather has been realigned to form a midblock intersection with Independence Avenue with a one-way spur leading to 4th Street. Approximately 70 parking spaces exist within the right-of-way on-street and within a small surface parking lot (Figure 2).

To the north of the Maryland Avenue right-of-way is an approximately one-half acre area controlled by the National Park Service (NPS). This area currently contains a community garden and small exercise facility. The remaining 1.5 acres of the site located south of Maryland Avenue is controlled by the United States General Services Administration (GSA) and features a hardscape plaza that was constructed with the LBJ Building as the building's entry forecourt. The plaza is sparsely vegetated and contains a sunken courtyard that exists to provide natural light to the Department of Education's basement-level. Overall the site is approximately 70% paved and 30% green space.

Concurrently with the final site and building plans, the Commission will be providing comments on the closure of Maryland Avenue between 4th and 6th Street, SW to the District of Columbia Council (NCPC File No. 7684). In addition the Commission is reviewing the proposed transfer of jurisdiction of associated street space for Maryland Avenue, Independence Avenue, 4th Street,

and 6th Street. GSA has indicated that they will dispose of a portion of the LBJ Building plaza to NPS prior to construction of the memorial. GSA will retain control of a 50-foot buffer area along the north façade of the LBJ Building. Following construction, NPS will be responsible for the long-term operation and maintenance of the memorial.

Background

At its September 7, 2006 meeting, the Commission approved the site for the memorial provided that the applicant design the memorial to meet seven design principles. Along with being a condition of NCPC's site approval action, the design principles were incorporated as required mitigation in the Commission's Finding of No Significant Impact (FONSI) issued for site selection.

In February 2011, the Commission provided comments on three concept design alternatives. In general, the Commission supported the applicant's modern and innovative approach to commemorate Dwight D. Eisenhower, including the possible use of woven stainless steel tapestries, but the Commission found that none of the alternatives satisfied the 2006 site selection design principles.

In April 2014, the Commission disapproved the preliminary site and building plans for the memorial on account of the scale and configuration of the tapestries (Figure 3). While noting its continued support for a modern and innovative approach to commemorating Dwight D. Eisenhower, including the possible use of the stainless steel tapestries, the Commission found the project inconsistent with the purposes of the National Capital Planning Act, the Commemorative Works Act, and three of the seven design principles. The Commission also requested the applicant to address specific planning issues related to pedestrian circulation, perimeter security, lighting, and public space.



Figure 3: Memorial site plan (April 2014)



Figure 4: Memorial site plan (October 2014)

In October 2014, the Commission approved the revised preliminary site and building plans for the memorial (Figure 4). The revised preliminary plans eliminated the east and west tapestries and proposed two freestanding columns as a replacement to define the memorial space. With these modifications, there was improvement to how the memorial will relate to Maryland and Independence Avenues as well as buildings to the east and west. With its preliminary approval, the Commission found the project to be consistent with the purposes of the National Capital Planning Act, the Commemorative Works Act, and all of the design principles. The Commission also found that approval of the revised preliminary plans would not have a significant impact on the human environment. The Commission recommended that the applicant return prior to submitting for final approval to provide an update on modifications made to the preliminary design including any changes that responded to previous comments related to pedestrian circulation, perimeter security, and lighting. The Commission also noted that as a preliminary design, the project would continue to evolve and recommended that the applicant strengthen the overall concept of the memorial as a layered experience, enhance the openness of the Maryland Avenue right-of-way/viewshed, and improve the symbolic and physical relationship to the LBJ Building.

Proposal

The National Park Service, on behalf of the Dwight D. Eisenhower Memorial Commission (EMC), has submitted final site and building plans for the Dwight D. Eisenhower Memorial (Figure 5). The design of the memorial remains consistent with the preliminary plans the Commission approved in October 2014. The memorial design remains composed of several large-scale commemorative elements including bas-relief sculpture blocks, freestanding sculpture, speech excerpts and quotations, and stainless steel tapestry; freestanding columns; a robust landscape design; and a one-story information center. The design also includes a new pedestrian promenade, LBJ Promenade, which will distinguish the memorial from the LBJ Building and serve as a new entry forecourt to the Department of Education. The modifications made since the Commission's preliminary approval respond to the Commission's comments as well as comments from the other stakeholders. The following summarizes the changes to the design since the Commission's preliminary approval:

- Within the memorial core, the overlook stair has been reduced in size which minimizes the number of bollards required for perimeter security.
- The terraced seating area to the west end of the LBJ Promenade has been modified to eliminate the need for bollards.
- The lighting design has been revised to eliminate uplighting of understory trees and site lighting has been refined.
- The openings in the canopy trees at Independence Avenue have been closed.
- The proposed turf lawns have been designed for heavy pedestrian traffic throughout the memorial, especially as it relates to Maryland Avenue.
- The landscape design has been modified to regulate the street trees along Independence Avenue and the tree canopy species arrangement has been refined. Understory trees have been adjusted in response to these modifications.
- The granite curb along Maryland Avenue marking the historic cartway has been widened.
- Commemorative insignias have been added to the two northern columns.

- The sculptures and bas reliefs at the memorial core have been refined.
- The quotations and inscription layouts at the memorial core have been modified.
- The tapestry composition and panel support structure have been refined.

Each of these modifications is discussed below in more detail within the appropriate section. To provide context on the organization of the memorial and its elements, a description of the memorial concept is also provided.



Figure 5: Final Site Plan (July 2015)

Memorial Concept

The overarching concept of the memorial is to commemorate Dwight D. Eisenhower's monumental achievements as a military general and 34th President of the United States within a setting that also honors the humble way in which he approached these roles using the set of Midwestern values he acquired during his upbringing in Abilene, Kansas. The applicant's execution of the overarching concept seeks to establish a layered experience that transitions visitors, through a series of defined spaces, from the busy urban surroundings, through active and passive park spaces, into an intimate commemorative core where the story of President Eisenhower unfolds.

To create the layered experience, the applicant has drawn inspiration from the temple-like organization of the Lincoln Memorial, and envisions the Eisenhower Memorial as a

commemorative object placed within an open air temple (Figure 6). In the case of the Lincoln Memorial, the temple structure creates a unique setting that is separate from the surrounding, open expanse of the National Mall. Its monumental colonnade marks a point of transition from the surroundings to the commemorative core. Within the core, a statue of President Lincoln sits flanked by well-known quotations and speech excerpts. Upon arriving at the steps of the Lincoln Memorial, visitors experience a layered transition from the expansive landscape surroundings to the intimate commemorative core as they traverse the east plaza and monumental steps. Upon reaching the top of the steps, visitors arrive at the monumental colonnade that surrounds the commemorative core. The colonnade serves as a threshold where upon crossing visitors leave the open expanse of the Mall and begin the commemorative experience.

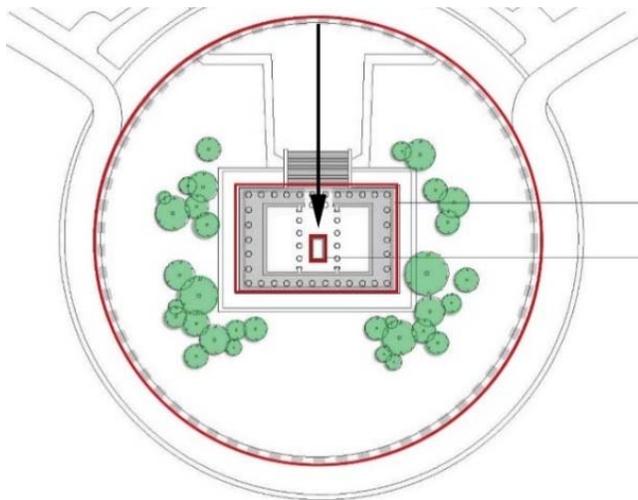


Figure 6: Diagram of Lincoln Memorial organization

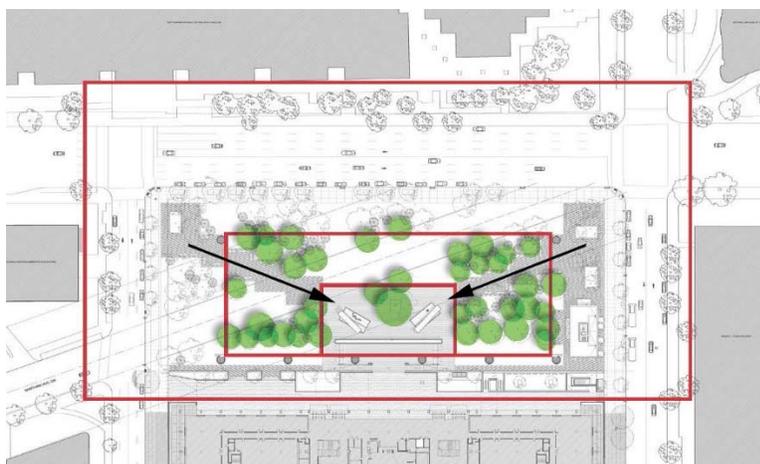


Figure 7: Diagram of Eisenhower Memorial organization

Similar to the Lincoln Memorial, the Eisenhower Memorial is organized as an object within a temple within a surrounding precinct (Figure 7). The applicant is proposing a memorial core containing the primary commemorative elements that honor President Eisenhower's legacy. The memorial core is the innermost layer of the proposed design and is where the commemorative experience occurs. To mark the significance of this space within the larger site, special paving and a central grove of trees will establish the core as an intimate space that has a purpose and function that is distinguished from the rest of the site. Beyond the memorial core is a park space and robust tree canopy that is now defined by a single, large-scale stainless steel tapestry supported by a colonnade along the southern edge of the site, and two freestanding columns to the north. The perimeter that is established by the tapestry and freestanding columns is intended to serve as the threshold

between the park space and the busy surroundings of the urban environment. As discussed below, the tapestry also serves an integral commemorative role. According to the applicant, the colonnade and freestanding columns are "similar in proportion to those in the Lincoln Memorial creating a sense of scale in keeping with other presidential monuments." Each of the commemorative

elements of the memorial design as well as other components such as the landscape, information center, lighting, and signage are further described below.

Memorial core

On axis with the LBJ Building entrances, the memorial core continues to contain a combination of freestanding sculpture, bas relief blocks, and engraved quotations and speech excerpts to commemorate Eisenhower's military and Presidential achievements (Figure 8). This area is set apart from the rest of the site through the use of special paving that will define the limits of the commemorative core. Large trees set in pavement will also help define the core from the rest of the surrounding landscape. The freestanding sculpture will be cast bronze and measure approximately 8 – 10 feet in height. The sculptural relief blocks will consist of limestone and measure approximately 15 feet high. In addition, a 9 ½ foot high limestone lintel block containing an Eisenhower quotation is proposed atop each relief block.



To commemorate his military achievements, a sculpture of General Eisenhower speaking to members of the 101st Airborne Division before D-Day is proposed in front of a bas relief depicting the landing on the beach of Normandy, France on June 6, 1944. The back of the relief block will include an excerpt from General Eisenhower's Guildhall Address.



Figure 8: Site plan and rendering of memorial core

To commemorate his Presidential legacy, a sculpture of President Eisenhower standing in the center of the White House's oval office flanked on one side by a military advisor and on the other side by two civilian advisors is proposed in front of a bas relief depicting a map of the world. This represents a departure of what was proposed in the preliminary plans - a solitary freestanding sculpture of President Eisenhower in front of a bas relief

scene of the signing of the Civil Rights Act of 1957. The proposed sculpture recognizes what President Eisenhower called the "middle way" which sought to balance domestic political and economic needs with our needs for global preparedness. On the lintel above the sculptures, the applicant proposes a quotation from President Eisenhower's Second Inaugural Address on January 21, 1957. The back of the relief block will contain excerpts from President Eisenhower's First Inaugural Address on January 20, 1953 and a quote from his Farewell address on January 17, 1961.

A sculpture of Eisenhower as a young man is proposed along the southern edge of the memorial core on top of the memorial overlook wall. The statue is intended to create a connection between the landscape imagery of Abilene, Kansas, Eisenhower's hometown, and the elements within the memorial core commemorating Eisenhower's future accomplishments as a General and President. Inspiration for this sculpture comes from a quote taken from Eisenhower's homecoming speech following his military service during World War II in which he reflected upon his achievements in life and the lifelong pride he held in being from Abilene, Kansas.

Tapestry and Freestanding Columns

The final plans for the memorial retain the stainless steel tapestry along the southern edge of the site (Figures 9 and 10). The tapestry is composed of stainless steel cable of various sizes, welded to create a drawing through the use of line and transparency. The image is inherent to the cable structure and is a two sided image (mirrored) which will change throughout the day with the passing light. The tapestry will attach to a cable net structural system which spans between the columns. The tapestry will have vertical and horizontal seams at a width of 3 feet and 15 feet in vertical length.

The proposed south tapestry remains approximately 447 feet long, supported by columns that are approximately 80 feet tall and 10 feet in diameter. The tapestry is centered on the LBJ Building approximately 71 feet from the building's north façade. The bottom of the tapestry is raised above the ground plane to allow pedestrian passage underneath with the top of the tapestry aligned with the first cornice line of the LBJ Building, approximately 80 feet above grade. According to the applicant, functionally the tapestry is intended to help define the southern edge of the site and provide a degree of visual separation from the LBJ Building. The tapestry holds commemorative value as well. Landscape scenery of Abilene, Kansas, Eisenhower's hometown, is proposed for the tapestry and honors Eisenhower's Midwestern core values of strength, modesty, and integrity. The tapestry art has been refined since the Commission's October 2014 approval. Eisenhower's homestead in Abilene, Kansas is included in the imagery and the trees and other features have been revised to emphasize the openness and expansiveness of the Midwestern plains.



Figure 9: Final design showing south tapestry and two freestanding columns (looking southwest)

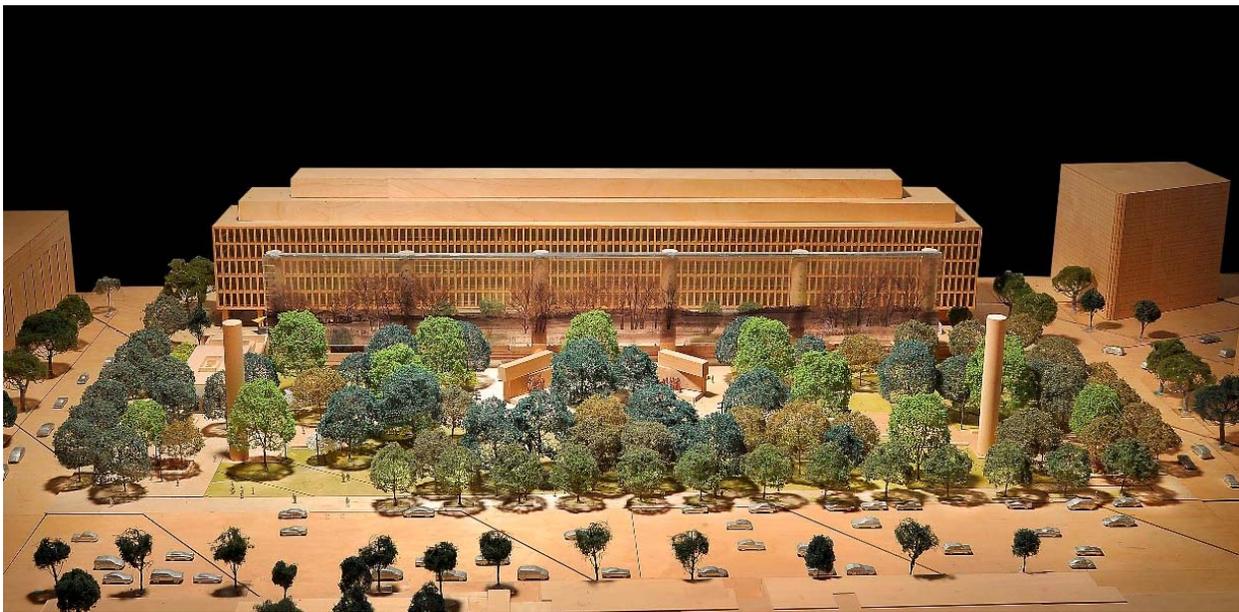


Figure 10: Final design showing south tapestry and freestanding columns (looking south)

Along with the single tapestry, the final plans retain the two freestanding columns proposed in the preliminary plans. The freestanding columns are similar in proportion to the columns supporting the proposed tapestry. The columns are placed in alignment with each other, and with the end columns of the south tapestry approximately 155 feet to the north. The placement of the freestanding columns and their relationship to the ends of the south tapestry defines the perimeter of a park space within the larger site and urban precinct. The perimeter establishes a threshold into

the contemplative park space within which visitors can enjoy the memorial, and marks the beginning of the visitor's transition towards the commemorative core. The placement of the columns relative to the tapestry is also intended to delineate a volume of space, and establish a scale, that is expressive of a Presidential memorial while allowing the adjacent buildings to define the edges of the site and maintain their thematic relationship to the memorial.

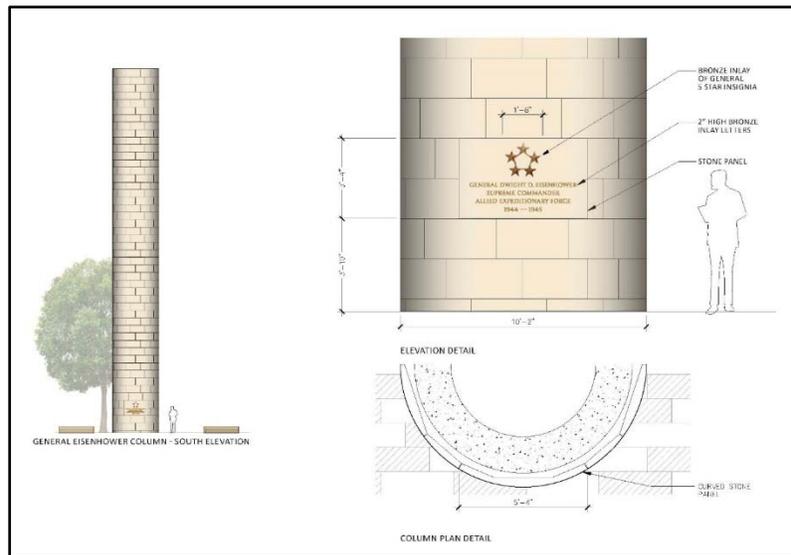


Figure 11: General Eisenhower column

The final design includes a commemorative element to the two freestanding columns located to the north of the memorial core (Figures 11 and 12). Comments from CFA requested that the design team consider a commemorative purpose for the two northern columns. In response, the final design proposes to dedicate each column to the accomplishments of Eisenhower as the Supreme Commander of the Allied Expeditionary Force, and the 34th President of the United States. The northwest column is

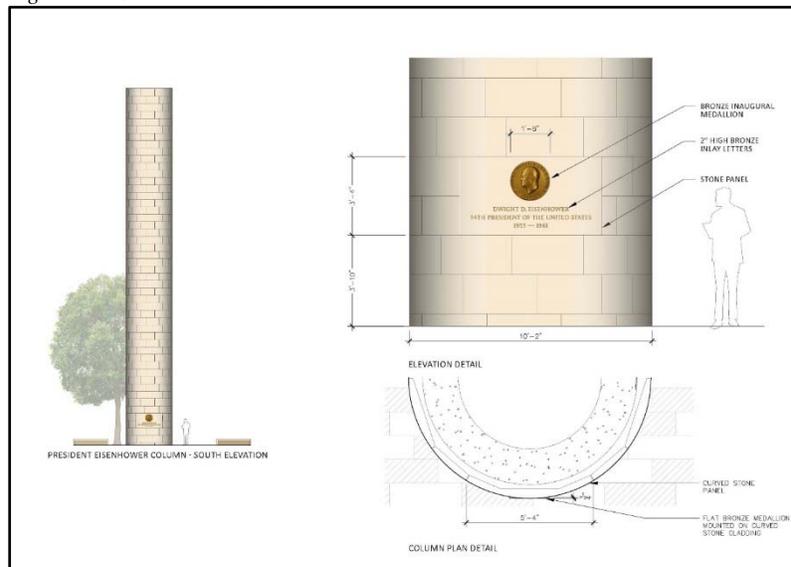


Figure 12: President Eisenhower column

dedicated to General Eisenhower, which is consistent with the memorial core, where the General memorial element is on the west side. The northeast column would be dedicated to President Eisenhower. The northwest column will include a plaque that features the 5-star General Insignia in bronze and below that will be inlaid lettering (also in bronze) indicating Eisenhower's title and years of service. The plaque will be located on the south side of the column so that it can be seen from the approach walkways as visitors enter the memorial park. The northeast column will feature the 1953 Inaugural Committee Medallion in bronze and inlaid letters below indicating Eisenhower's title and years of service as President. This plaque will also be located on the south side of the column.

Landscape design

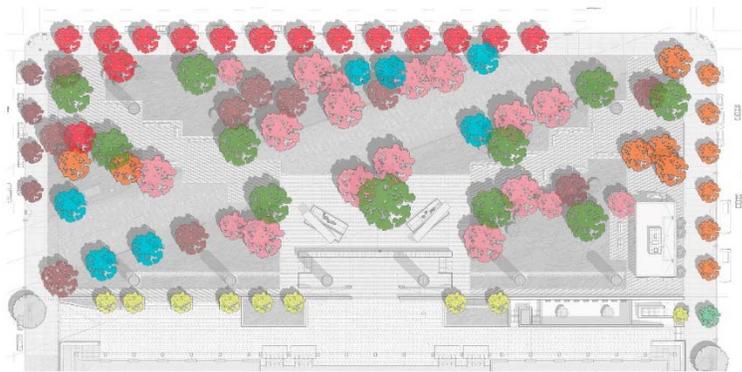


Figure 13: Final landscape plan



Figure 14: Entrance plaza at 4th and Independence

The memorial landscape plan has been modified since the Commission's preliminary approval in October 2014 (Figure 13). Overall, the landscape plan continues to introduce a substantial amount of new green space and is intended to reinforce the commemorative message of the memorial by complementing the Kansas landscape scenery depicted on the tapestry proposed along the southern edge of the site. The majority of the modifications relate to the tree canopy, selection of tree species, and street tree pattern.

The primary memorial access points continue to be located at the northeast and northwest corners where paved entry plazas with planters and integrated seating and signage will receive visitors and serve as transition areas between the urban surroundings and the memorial (Figure 14). The proposed freestanding columns located near the entry plazas mark the threshold into the contemplative memorial park

space and beginning of the approach walkways that will lead visitors toward the memorial core. The walkways maintain site lines to the memorial core and south tapestry and have staggered, orthogonal edges to form social gathering areas that contain seating. The entry plazas and approach walkways will share the same paving material and patterns while the paving material and pattern within the memorial core will be differentiated. The use of different paving materials is intended to delineate the commemorative core from the surrounding memorial park space.

The intent of the landscape plan is to establish a micro-climate that is both sunny and shaded and reminiscent of the landscape found around Abilene, Kansas. The ground plane continues to be treated simply with a groomed lawn along the 50-foot Maryland Avenue cartway and a more casual, un-groomed lawn throughout the remainder of the site. The granite curb along Maryland Avenue has increased in width. The increase in width will enhance the demarcation of the historic cartway and separate the groomed turf from the taller grasses on either side of Maryland Avenue (Figure 15).



Figure 15: View toward U.S. Capitol from Maryland Avenue

The proposed tree canopy is made up of a layered arrangement of informal groves that relate to the informal Kansas landscape depicted on the tapestry. Since the Commission's preliminary approval, the tree canopy has been refined and there are now fewer



Figure 16: View toward memorial core – looking west

trees to allow more sunlight for the groundplane. The tree species have been modified to amplify the layered experience of the memorial with larger trees located in the center of the memorial. The tree species selected complement each other and will consist of a number of specimens that are particular to Kansas though suitable to the Washington, DC microclimate. Generally, the larger canopy trees will consist of Hackberry, Oak, London Plane, and River Birch. Understory trees will consist of Dogwood, Ironwood, Redbud, and Hophornbeam, and Holly. In addition, the openings in the tree canopy along Independence Avenue looking towards the memorial core have been eliminated. By eliminating these openings, Maryland Avenue will be strengthened as the primary open space and view corridor. In addition, the potential for mid-block circulation patterns to develop will be minimized with the elimination of the openings.

The final landscape design also proposes modifications to the street tree placement along Independence Avenue, 4th, and 6th Streets. The street trees along the perimeter of the site will follow city standards and have been evenly spaced along Independence Avenue and re-spaced along 4th and 6th Street. The street tree placement will connect the memorial to the larger urban precinct.

Information center

The final memorial design continues to include a small, one-story information center in the southeast corner of the site along 4th Street, SW. The design of the building remains unchanged from the preliminary plans with a footprint of approximately 2,400 square feet. The building is intended to serve the maintenance and interpretive needs of the NPS through a basement level storage area and a ranger contact station. The information center will also contain visitor services such as restrooms and a bookstore.

LBJ Promenade

The final design for the memorial maintains the proposed pedestrian promenade between the memorial and the LBJ Building, referred to as LBJ Promenade (Figure 17). The promenade is intended to create a distinct zone separate from the memorial that recognizes the formal entrance to the Department of Education, and serves as a transition area into the memorial similar to the entry plazas proposed at the northeast and northwest corners.

The final design of LBJ Promenade remains consistent with what was proposed in October 2014. The promenade is broken into three areas that have specific purposes. On the west end of the promenade is an area that is designed to provide permanent exterior exhibit space for the Department of Education to display information about its mission or curate children's artwork as part of the programming of this area. Steps at the west end address the grade change between the promenade and the memorial and can be used as seating areas and small gathering spaces. The east end of LBJ Promenade, adjacent to the existing Department of Education cafeteria, will provide opportunities for outdoor seating. Finally, the center portion of the promenade, which is set apart from the east and west areas by two large planters, provides access to the LBJ Building entrances and is designed as an open area that can be used for gatherings. This area extends further north than the rest of the promenade to create a memorial overlook. A set of stairways and ramps on either side of the overlook allow visitors to transition down into the memorial core.



Figure 17: LBJ Promenade at northwest corner

LBJ Promenade will also serve a security function, providing a 50-foot security buffer between the north façade of the LBJ Building and the memorial. Much of the security barrier has been integrated into the north retaining wall of the promenade. Since the Commission's preliminary approval, the overlook stairs were modified to eliminate the need for some bollards by reducing the stairs along the east and west side, in front of the tapestry columns. In

addition, the terraced seating at the west end of the promenade was revised to eliminate the need for bollards by adding a structural wall at the top of the seating.

Lighting

The final design documentation describes the lighting plan for the memorial as a horizontal layering of light. This will reinforce the layered experience of the memorial and reinforce the transition from human scale to larger memorial elements. In some areas, the lighting will be limited to the pathway surfaces to reduce the glare of light as one looks to the memorial and surrounding context or iconic views. An intermediate light level will highlight the memorial objects and landscape that is above human height. The upper layers of light will illuminate the tapestry. The overall intent of the lighting design is to make the illumination feel like it is originating from the areas around the memorial objects themselves, similar to how people are drawn to a candle in the center of a dark room.

With respect to the Maryland Avenue view corridor towards the U.S. Capitol, the lighting concept will allow a visual progression (Figure 18). The view of the Capitol will remain unimpeded from glare or lighting of too large a scale. By keeping the light sources close to the ground, the eye will be able to explore areas beyond the site itself such as the Capitol. The upper level of the tapestry will be dark above the tree canopy because the light source will be uplighting the tapestry from below and will fade as it reaches the top of the tapestry. Only the north side of the tapestry will be lit. As one walks along Maryland Avenue within the site, the surface of green space will be lit differently than a typical street. The light is directed down and glare will be kept to minimum.

Lighting of the memorial core will be densely layered. Continuous linear uplights will be used, but in different ways. The linear uplighting of the tapestry will provide a backdrop for the site and fade as it reaches the top of the tapestry (Figure 19). Other uplights will illuminate the Eisenhower inscription wall that the statue of young Eisenhower sits upon. This will give the effect that the memorial core has a glowing center. The freestanding sculpture and bas relief blocks will also have linear uplights, but they will be backlit to bring out the textures of the bas relief walls. The statues will be lit from the front, with the exception of the young Eisenhower sculpture which will be lit from above and behind to create an edge glow.



Figure 18: Night view towards Capitol along Maryland Avenue



Figure 19: Night view towards memorial core from Maryland Avenue

Signage

Specific location and design information on the proposed memorial signage was included in the applicant's previous submissions for the preliminary design. Signage for the final memorial design remains consistent with the previous information.

II. PROJECT ANALYSIS/CONFORMANCE

Executive Summary

Staff's analysis of the final site and building plans for the Dwight D. Eisenhower Memorial builds upon the analysis presented at the time of preliminary review and approval in October 2014. In October, the Commission approved the preliminary plans for the memorial and found the memorial design to be consistent with the purposes of the National Capital Planning Act and the Commemorative Works Act. The Commission also found that the memorial design satisfied NCPC's adopted site selection design principles and that approval of the revised preliminary plans would not have a significant impact on the human environment. A brief review of the project's consistency with NCPC's adopted site selection design principles is provided below. In addition, a review of the projects conformance with the National Capital Planning Act and the Commemorative Works Act is included.

The analysis presented on the final design focuses on the outstanding general planning issues and comments that were raised in previous reviews. This includes comments related to pedestrian circulation, perimeter security, and lighting. Other comments raised by the Commission in October 2014 related to strengthening the memorial's design concept as a layered experience, and improving how the memorial relates to Maryland Avenue and the LBJ Building.

As discussed in its October 2014 recommendation, staff determined that the project met each of the specific decision criteria required under the Commemorative Works Act. This includes criteria pertaining to the memorial's surroundings, location, materials, landscape features, museums, and donor recognition. Regarding materials and durability, as part of its previous actions the Commission requested that at the final review stage the applicant demonstrate that the tapestry material and welds continue to reach the same durability standards as fabrication methods are refined, that the recommended maintenance regimen would not cause weld failure, and provide the operational protocols that will be employed to avoid danger to the public if snow and ice accumulates on the tapestry. The applicant has provided this information and responded to this request.

Throughout the review process for the project, the Commission has been supportive of employing a modern and innovative approach to commemorating President Eisenhower. The final plans continue to represent an innovative approach to commemoration. The final plans also reflect a design that balances the preservation of important historical and natural features of the National Capital, including the L'Enfant and McMillan Plans, with the desire to develop the site at a scale that is reflective of a major Presidential memorial. Therefore, staff recommends the Commission **approve the final site and building plans for the Dwight D. Eisenhower Memorial.**

Analysis

2006 Site Selection Design Principles

In 2006, at the time NCPC approved the site for the memorial, the Commission adopted design principles that were required mitigation in NCPC's Finding of No Significant Impact (FONSI). The design principles are as follows:

1. Preserve reciprocal views to and from the U.S. Capitol along Maryland Avenue, SW.
2. Enhance the nature of the site as one in a sequence of public spaces embellishing the Maryland Avenue vista.
3. Create a unified memorial site that integrates the disparate parcels into a meaningful and functional public gathering place that also unifies the surrounding precinct.
4. Reflect L'Enfant Plan principles by shaping the memorial site as a separate and distinct public space that complements the Department of Education Headquarters and other surrounding buildings.
5. Respect and complement the architecture of the surrounding precinct.
6. Respect the building lines of the surrounding rights-of-way and the alignment of trees along Maryland Avenue.
7. Incorporate significant green space into the design of the memorial.

In October 2014, when the Commission reviewed the revised preliminary design, the Commission found that the memorial design met these design principles. The final plans for the memorial continue to satisfy the design principles as described below.

Preserve reciprocal views to and from the U.S. Capitol along Maryland Avenue, SW

In October 2014, the Commission found that the preliminary plans satisfied this design principle. With the final design, the memorial continues to meet this design principle. As staff noted in October 2014, the use of two freestanding columns rather than the east and west tapestries as was proposed in April 2014, result in a substantial improvement to the Maryland Avenue view corridor and relationship of the memorial to its surroundings. As discussed in previous staff reports (April 2014 and October 2014), during site selection, the Maryland Avenue cartway was identified as a development restriction zone, and that the remainder of the 160-foot right-of-way and the viewshed needed to be treated in a sensitive manner with regard to placement of memorial elements.

The placement of the west freestanding column on the edge of the right-of-way preserves, to a great extent, the openness of Maryland Avenue and the horizontal orientation of the viewshed. The final design retains elements of the memorial within the 160-foot right-of-way, specifically the western end of the tapestry and eastern freestanding column. As was the case with the preliminary plans, the view towards the Capitol is approximately 135 feet wide or approximately 84% of the width of the right-of-way (Figure 20). Staff's position is that the placement of elements within the viewshed is proposed in a way that preserves the prevailing civic – *more horizontal* – character that is typical of the city's broader, more significant avenues which allows public buildings and commemorative works to be the dominant elements within these important view corridors. The

final design is a successful compromise between establishing a fitting scale for a Presidential memorial and respecting the site's historic context and unique constraints.

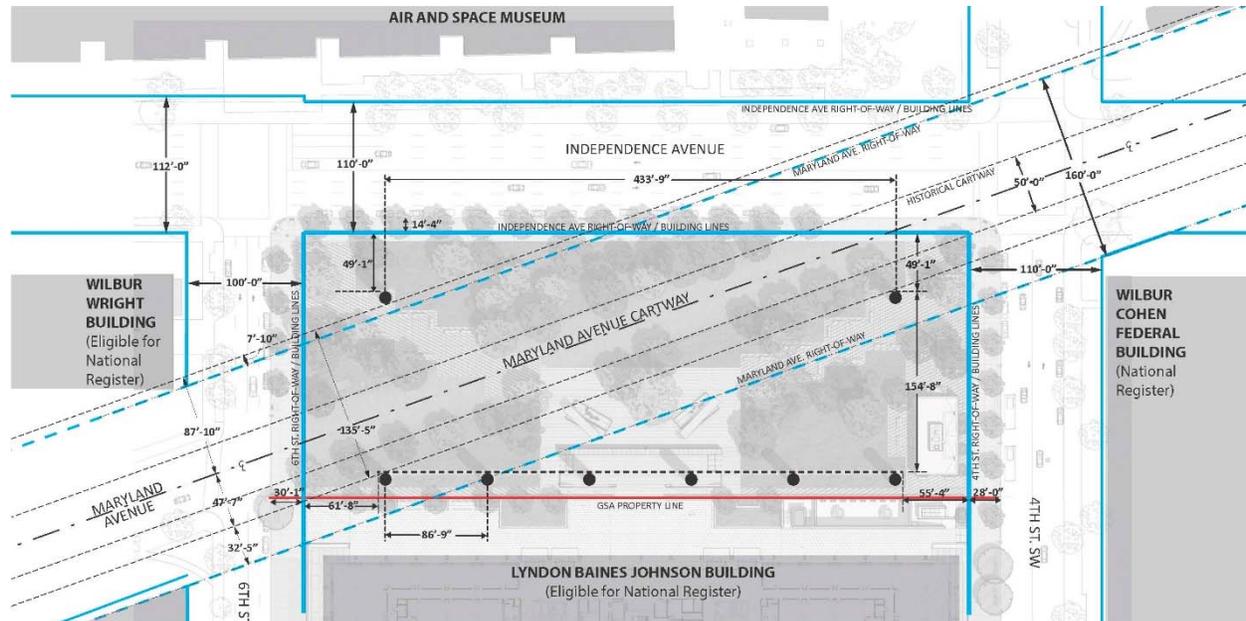


Figure 20: Diagram showing relationship of tapestry and freestanding columns to Maryland Avenue right-of-way

Enhance the nature of the site as one in a sequence of public spaces embellishing the Maryland Avenue vista AND Create a unified memorial site that integrates the disparate parcels into a meaningful and functional public gathering place that also unifies the surrounding precinct

The Commission considered these two principles to be satisfied in April 2014 and October 2014. The use of the two freestanding columns opens up the east and west sides of the site to the surrounding precinct and allows the adjacent buildings to play a more active role in defining the memorial and surrounding park. In addition, the placement of the freestanding columns relative to the end columns of the south tapestry is an effective means to defining the extent of the memorial park space and the memorial core. The freestanding columns also help to establish a monumental scale for the memorial, while still allowing the adjacent buildings to provide definition and maintain their thematic relationship to the memorial.

Reflect L'Enfant Plan principles by shaping the memorial site as a separate and distinct public space that complements the Department of Education Headquarters and other surrounding buildings

In its review of the October 2014 preliminary design, the Commission found the project consistent with this principle. The Commission's finding was based upon the elimination of the previously proposed east and west tapestries, and placement of the two freestanding columns, which opened up views to the adjacent Wilbur Wright and Wilbur Cohen buildings, and allowed the streets and buildings on the east and west to define the memorial and surrounding public space in much the same fashion as the National Air and Space Museum defines the site on the north. The proposed

south tapestry also complements the LBJ Building as views of the building will be possible through the tapestry, particularly at the top where the tapestry will be more transparent (Figure 21).



Figure 21: Transparency and composition of tapestry

Respect and complement the architecture of the surrounding precinct

The Commission considered this principle to be satisfied in April 2014 and October 2014. The intention of this principle is to have a memorial that utilizes modern and innovative approaches in its design as well as in the way it commemorates Dwight D. Eisenhower. The final design continues to meet this principle through the use of a modern material like stainless steel, and the highly-innovative development and use of the stainless steel tapestry as a commemorative element. The final design also continues to complement the surrounding precinct through the use of similar materials including limestone, granite, and concrete.

Respect the building lines of the surrounding rights-of-way and the alignment of trees along Maryland Avenue

The purpose of this principle is to provide guidance with regard to the placement of memorial elements on the site while taking into account constraints created by conditions that surround the site. In October 2014, the Commission found the preliminary plans to be consistent with this principle based on the elimination of the previously proposed east and west tapestries. This finding was also based on the placement of the freestanding columns south of the building line established by the setbacks of the Wilbur Cohen Building and Wilbur Wright Building. The final plans maintain the location of the freestanding columns and therefore the project continues to meet this design principle.

Incorporate significant green space into the design of the memorial

The final landscape plan reflects modifications from the preliminary plans the Commission approved in October 2014. However, the final plans continue to reflect that extensive use of trees and lawn will substantially increase the amount of green space on the site compared to existing conditions. In addition to the removal of a substantial amount of impervious surface, to be replaced with lawn and landscaped areas, the memorial will also increase the number and quality of trees, replacing immature or under-developed trees with a significantly more robust and mature tree canopy. Staff maintains that the final design satisfies this design principle.

In summary, the final design continues to satisfy the design principles. Fulfillment of the design principles were required as mitigation in the Finding of No Significant Impact for NCPD's approval of the site. Therefore, staff recommends that the Commission **confirm that the final**

memorial design satisfies NCPC's adopted site selection design principles and that the Commission's action to approve the final plans will not have a significant impact on the human environment.

Pedestrian Circulation

In April 2014, the Commission commented that the pedestrian circulation was too narrowly focused on providing access from the site corners to the memorial core and needs to take into consideration likely circulation patterns along Maryland Avenue and mid-block from Independence Avenue. In response, the landscape plan has been revised to eliminate the break in the street trees and canopy trees along Independence Avenue (Figure 22). This modification reduces the vistas towards the memorial core at this location and will deter pedestrians from walking across the lawn towards the memorial core. In addition, based on current pedestrian circulation in the area, the design team believes that the primary pedestrian circulation into the site will occur at the two corners: Independence Avenue and 4th Street and Independence Avenue and 6th Street. A secondary pedestrian circulation pattern onto the site is from Maryland Avenue and 6th Street. The applicant's position is that the final design has incorporated generous paved areas at the entry plazas and the Information Center to accommodate various circulation patterns. Staff agrees that by eliminating the break in the canopy trees, it is less likely that pedestrians will cross lawn to gain access to the memorial core.

The applicant has stated that the entire groundplane in the memorial site is accessible and that the turf and soil have been designed for high traffic. The groomed lawn along Maryland Avenue is intended to offer an opportunity for pedestrians to experience views to and from the U.S. Capitol. The design team considered a number of options for a paved walkway along Maryland Avenue, but ultimately determined the addition of a paved pathway interrupts the unity of the site organization and circulation pattern. The design team also believes a pathway would compromise the unique feature of the memorial landscape design with an open greensward along Maryland Avenue.

Staff finds that with the revised landscape design and elimination of the gaps in the canopy trees along Independence, it will be less likely for pedestrian to cross the site mid-block from Independence Avenue. In addition, while there is a secondary circulation pattern from Maryland and 6th Street which will encourage visitors to walk along the Maryland Avenue, the turf has been selected to withstand this kind of use.

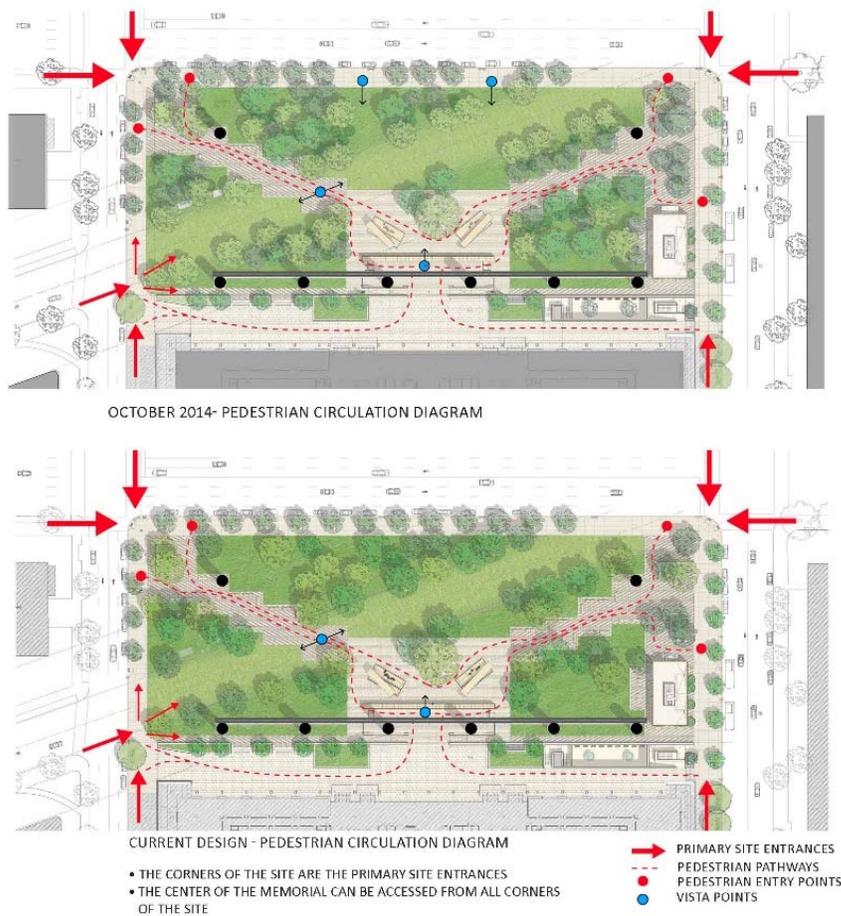


Figure 22: Pedestrian circulation diagrams (October 2014 – top; Final Design – below)

Perimeter Security

In April 2014, the Commission commented that the proposed bollards along LBJ Promenade should be eliminated, particularly those located at the base of the Memorial overlook, or modified in design and spacing to maintain the openness of the Promenade and avoid unnecessary obstructions to pedestrian circulation (Figure 23). In response, the design team developed a solution that involved a structural wall clad in stone that would eliminate the need for bollards and presented that to the Commission in November 2014. However, since that time, CFA commented that the structural walls break up the stair and so the design was modified in response. The stairs were shortened in front of the tapestry column and the overlook platform was extended. With this modification, the number of bollards was reduced to two in these locations (Figure 24).

Other modifications to the perimeter security design included the elimination of bollards at the terraced seating area as the west end of the LBJ Promenade. In place of the bollards, a structural wall was added at the top of the seating areas. The wall forms a back to the upper tier seating and allows access to the stairs on either side of the seating area. The wall will be clad in precast

architectural concrete, similar to the planters and other retaining walls along the Promenade's northern edge.

Staff finds that the Commission's comments related to perimeter security have been addressed by the applicant through modifications to the design and elimination of the bollards. The bollards that are proposed have been kept to a minimum and should not obstruct pedestrian circulation.

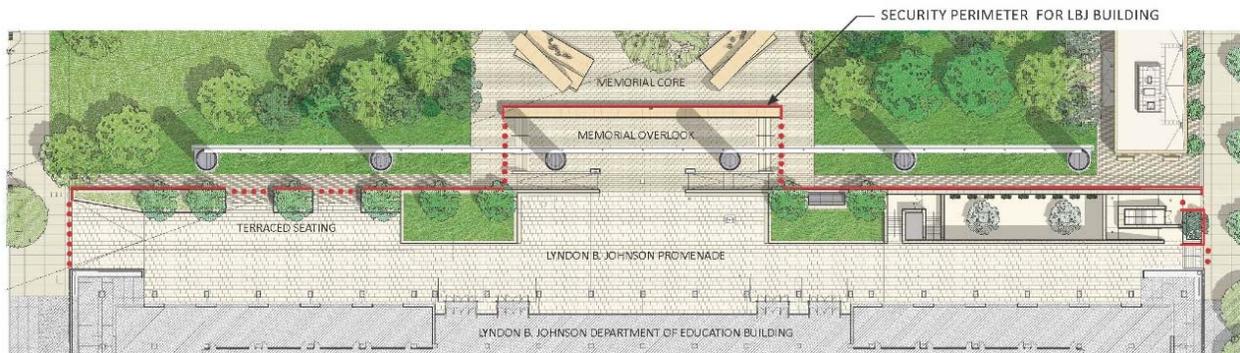


Figure 23: Perimeter Security for LBJ Promenade (October 2014)

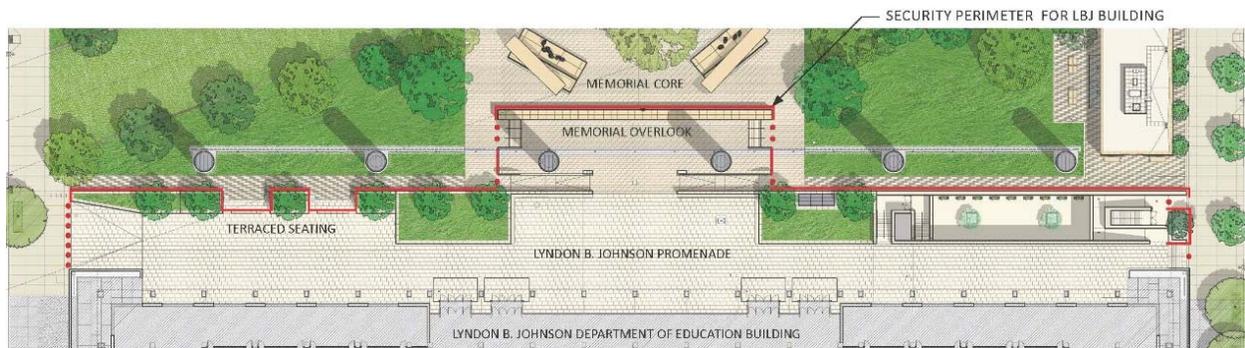


Figure 24: Perimeter Security for LBJ Promenade (July 2015)

Lighting

As part of its April 2014 action, the Commission noted that as a commemorative work located within the urban fabric of the city, the design of the memorial lighting should be informed by lighting at other similarly situated public spaces and must not diminish the nighttime prominence of the U.S. Capitol Building along the Maryland Avenue viewshed. In developing the lighting plan for the memorial, the applicant considered the location of the memorial within the context of other monumental avenues in Washington, DC as well as how other memorials terminate many vistas throughout the city. The proposed lighting plan calls for a layering of light that will consist of uplighting for memorial elements such as the tapestry and sculptural elements, and downlighting for the remainder of the site (ground and walkways).

Staff finds that the applicant has demonstrated that the lighting plan for the memorial takes into consideration the lighting of other memorials and icons such as the U.S. Capitol. The lighting plan considers the Eisenhower Memorial as part of a larger network of memorials and avenues within the city. The lighting of the memorial and the site will not detract from the prominence of the U.S. Capitol as the building remains the focal point of the Maryland Avenue viewshed.

As described above, the applicant has modified the design to respond to the Commission's comments regarding pedestrian circulation, perimeter security, and lighting and modified the project plans appropriately. Staff recommends that the Commission **note that the applicant has modified the design of the memorial to respond to the Commission's previous comments regarding pedestrian circulation, perimeter security, and lighting.**

Memorial as a "layered experience"

In October 2014, the Commission commented that the applicant should continue to strengthen the overall concept of the memorial as a "layered experience" consisting of a memorial core within a park within a surrounding urban landscape. Visitors will arrive to the memorial from the north and pass from the surrounding urban context to the edge of the memorial. As the plan for the street trees has been modified to be evenly spaced along Independence Avenue, the urban edge of the memorial has been strengthened. The freestanding columns at the northern entrance plazas mark the entrance to the walks that direct visitors to the memorial core and through the park. As visitors approach the memorial core, the understory tree canopy shapes the experience along the paths and directs views towards the memorial elements. The LBJ Promenade is another threshold as the promenade will be a separate and distinct experience. The promenade will serve the occupants of the LBJ Building, but also engage memorial visitors with a view out to the memorial.

The applicant has stated that the overarching concept for the memorial seeks to establish a layered experience that transitions visitors, through a series of defined spaces, from the urban environment, through active and passive park spaces, into a commemorative core dedicated to Eisenhower as a President and General. With the changes to the landscape design including a stronger definition of the urban edge and use of understory trees as well as the use of the freestanding columns to mark the entrance towards the memorial core, the layered experience has been strengthened.

Treatment of Maryland Avenue

At the time of preliminary approval in October 2014, the Commission requested that the design team continue to explore ways to enhance the openness of the Maryland Avenue right-of-way/viewshed. The final design includes an allée of trees along Maryland Avenue and since the Commission's preliminary approval the applicant has refined the tree species and placement of trees along the allée to reinforce the viewshed toward the U.S. Capitol (Figures 25 and 26). In addition, the historic cartway of Maryland Avenue has been enhanced with a wider granite curb to separate the groomed turf from the taller grasses on either side of Maryland Avenue. With the modifications to the landscape design and the allée of trees along Maryland Avenue, the openness of Maryland Avenue as the primary view corridor has been strengthened. The increase in the size of the granite curb marking the historic cartway of Maryland Avenue also contributes to enhancing the significance of Maryland Avenue.

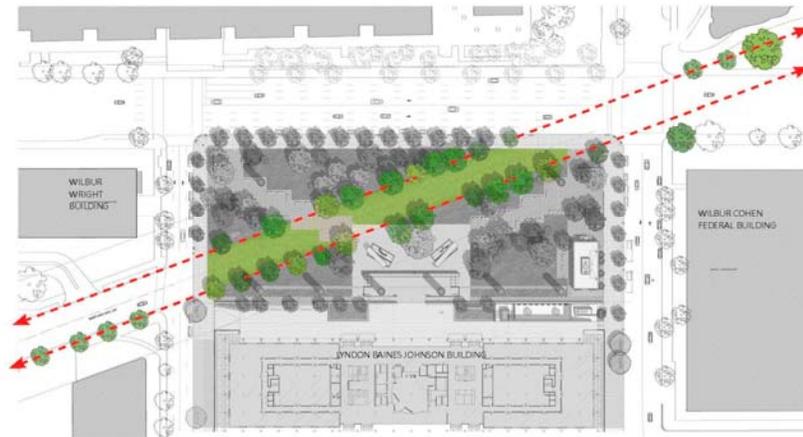


Figure 25: Alignment of trees on Maryland Avenue



Figure 26: View towards Capitol along Maryland Avenue

Symbolic and physical relationship between the memorial and LBJ Building

With its preliminary approval, the Commission recommended that the applicant continue to explore ways to improve the symbolic and physical relationship between the memorial and the LBJ Building. The proposed LBJ Promenade located between the memorial and the LBJ Building will provide space for the Department of Education to engage and educate the public regarding the mission of the agency. Exterior exhibit space is provided at the west end of LBJ Promenade along with an interior public outreach space in the building. The terraced seating at the west end of the promenade provides a physical connection between the memorial and the LBJ Building. Perimeter security has been integrated into the design of the seating areas which will serve as an amenity for visitors to the memorial as well as occupants of the LBJ Building. The memorial overlook which is centered on the entrance to the LBJ Building will also draw visitors up to the promenade. The memorial overlook can also be used for larger gatherings and events and this will strengthen the physical relationship between the memorial and the building. Staff finds that the applicant has

demonstrated both a symbolic and physical relationship between the memorial and LBJ Building by providing opportunities to engage visitors in a variety of ways such as through exhibits, formal events, social gatherings, and educational programs.

Based on the design modifications noted above, the applicant has responded to the general comments provided by the Commission in October 2014. Staff recommends that the Commission **note that the applicant has responded to the Commission's recommendation to strengthen the overall concept of the memorial as a "layered experience", enhance the openness of the Maryland Avenue right-of-way/viewshed, and improve the symbolic and physical relationship to the LBJ Building.**

Sustainability

The applicant has submitted a stormwater management plan for the project. The design of the stormwater system for the memorial captures the storm runoff in a new on-site storm retention system and from there the run-off will be pumped for reuse in the toilets in the information center and also be used as part of the irrigation system. The existing site area is approximately 4.2 acres, of which 0.9 acres is pervious area (lawn, trees, etc.), and 3.3 acres is impervious area (pavement, sidewalks). With the construction of the memorial, the site will be approximately 1.8 acres pervious and 2.4 acres impervious. As the pervious area on the site is approximately doubling, more rainfall will soak into the ground and produce less runoff, thereby satisfying the District of Columbia Department of the Environment requirements. The memorial project does not have final stormwater permits, however, the project is under review by District of Columbia Department of the Environment (DDOE) and the applicant will continue to work with DDOE to finalize plans for stormwater management.

National Capital Planning Act

The National Capital Planning Act established NCPC as the central planning agency for the federal government in the National Capital Region for purposes of preserving the important historical and natural features of the nation's capital. NCPC carries out this important mission partly through its mandate to develop, jointly with the Mayor of the District of Columbia, a Comprehensive Plan for the National Capital. In addition to various polices intended to protect and enhance parks, open space, and the natural environment, the Comprehensive Plan contains several policies intended to preserve historic and potentially historic resources. Several of these policies aim to protect the historic L'Enfant and McMillan Plans. In October 2014, the Commission found the preliminary plans for the memorial to be consistent with the purposes of the National Capital Planning Act. The final plans remain consistent as the adverse effects on the L'Enfant Plan have been minimized as the extent to which memorial elements encroach on the Maryland Avenue right-of-way has been reduced. As noted in the October 2014 staff report, the final plans continue to emphasize the horizontal orientation of the viewshed along Maryland Avenue and staff recognizes that there is a balance between establishing a Presidential memorial on the site and recognizing its historic setting.

Commemorative Works Act

The purposes of the Commemorative Works Act (CWA) are to preserve the integrity of the comprehensive design of the L'Enfant and McMillan Plans for the Nation's Capital, to ensure the continued public use and enjoyment of open space in the District of Columbia, and to encourage the location of commemorative works within the urban fabric of the District of Columbia.

In addition to providing the regulatory framework by which commemorative works are located in the District of Columbia and its environs, which in part is intended to help ensure commemorative works are appropriately designed, constructed and located, the CWA also contains a set of decision criteria that must be used by the agencies involved in making decisions on commemorative works. Specifically, the Act requires that agencies be guided, but not limited by, the following criteria:

- **Surroundings** - To the maximum extent possible, a commemorative work shall be located in surroundings that are relevant to the subject of the work.
- **Location** - A commemorative work shall be located so that:
 - It does not interfere with, or encroach on, an existing commemorative work; and
 - To the maximum extent practicable, it protects open space, existing public use, and cultural and natural resources.
- **Material** - A commemorative work shall be constructed of durable material suitable to the outdoor environment.
- **Landscape features** - Landscape features of commemorative works shall be compatible with the climate.
- **Museums** - No commemorative work primarily designed as a museum may be located on lands under the jurisdiction of the Secretary in Area I or in East Potomac Park.
- **Site-specific guidelines**¹ - The National Capital Planning Commission and the Commission of Fine Arts may develop such criteria or guidelines specific to each site that are mutually agreed upon to ensure that the design of the commemorative work carries out the purposes of this chapter.
- **Donor contributions** - Donor contributions to commemorative works shall not be acknowledged in any manner as part of the commemorative work or its site.

In October 2014, the Commission found the memorial successfully met each of the specific decision criteria of the CWA. The Commission also noted its prior request that at the final review stage the applicant demonstrate the following:

- The tapestry material and welds continue to reach the same durability standards as fabrication methods are further refined.
- The recommended maintenance regimen, including cleaning, will not cause weld failure if carried out properly.

¹ The criterion pertaining to site-specific guidelines is not applicable to this project as NCPC and the Commission of Fine Arts opted not to develop mutually agreed upon guidelines. Rather, NCPC's adopted design principles were developed during site selection and included as required mitigation in the Commission's Finding of No Significant Impact, issued under the National Environmental Policy Act, for approval of the site. The Commission of Fine Arts supported the intent of NCPC's guidelines, particularly the importance of maintaining the historic view corridor of Maryland Avenue, but decided against using guidelines in favor of leaving it to the design team to fully consider the appropriate treatment of the site in developing a concept for review.

- The operational protocols that will be employed to avoid danger to the public during instances where snow and ice has accumulated on the tapestries.

In response to the Commission's request, the applicant submitted a supplement to the Eisenhower Memorial *Tapestry Engineering and Technical Data Summary* (February 5, 2014) which was provided for NCPD's preliminary review. A robust discussion of the technical analysis previously submitted regarding material durability can be found in the April 2014 staff report.

The supplemental information indicates that additional material testing (Phase II) was performed by an independent testing company and results are consistent with the previous durability testing (Phase I). Corrosion testing was completed on the non-structural, braided wires to be used for the art image on the tapestry. The selected alloy 317L was tested in a salt fog environment and the results were consistent with the previous findings that 317L showed superior performance and corrosion resistance over the 316L alloy. Mechanical testing was also performed on the braided art wires as part of the Phase II testing. These tests indicated that the breaking loads for the various weld joints exceeded the tapestry design loads. Based on the information provided, staff recommend the Commission **note that the applicant has demonstrated that the tapestry material and welds will continue to meet the durability criteria enumerated in the Commemorative Works Act.**

With respect to the recommended maintenance regimen, the report indicates that the tapestry should be washed on an annual basis. The report recommends that the tapestry be washed with soap or a mild detergent with a synthetic brush and warm water followed by a clean potable water rinse. The annual cleaning will require a one man lift and the memorial has been designed with clearance for the lifts in mind. A cleaning test was conducted on a tapestry mockup sample with a power washer and three different tips were used. The different tips directed the water at different angles. The test results indicated that the widest angle tip was the best for a general cleaning due to the wider coverage area and reduced pressure. No weld failure was observed during the testing.

With respect to the operational protocols that will be employed during snow and ice accumulation, NPS submitted a memo concurring with the recommendations outlined by the Northern Microclimate Inc. report. The recommendations in that report indicate that the design of the support structure for the tapestry was modified to promote a melt in place strategy. In addition, due to the fabrication methods for the tapestry artwork there will be reduced and segmented ice and snow formations which aligns with the melt in place strategy. Laboratory tests also indicated that the size and density of individual ice or snow pieces that could release under typical winter conditions are not considered to be hazardous. In certain circumstances (heavy wet snow, high winds during heavy precipitation, ice storms, winter storms with a combination of precipitation types), a sudden release of multiple ice or snow pieces could occur. This would require restricting access to pedestrians or closures to be enacted. As NPS currently manages a diverse range of structures in publicly accessible areas, current NPS practices and procedures will likely be adequate and specific requirements pertaining to the Eisenhower Memorial would be similar to other NPS sites and structures.

Staff recommends that the Commission **note that the applicant has submitted a maintenance plan, including operational protocols, that addresses such matters as cleaning the tapestry and public safety concerns when snow and ice accumulate on it.**

NCPC Plans and Policies

Comprehensive Plan for the National Capital

As noted in previous staff recommendations on the memorial, the preliminary plans were not inconsistent with the policies of the Parks and Open Spaces, Federal Environment, and Visitors Elements of the Comprehensive Plan for the National Capital. This final plans for the memorial are also not inconsistent with the policies contained within these federal elements.

With respect to the Preservation and Historic Features Element, policies encourage the placement of memorials along L'Enfant avenues in a manner that protects historic views and vistas, the settings of historic properties, and the *openness of L'Enfant rights-of-way*. The policies place a heavy emphasis on protecting the integrity, form, and design of the L'Enfant Plan's system of streets and reservations from inappropriate new buildings and physical incursions. The two freestanding columns that have replaced the previously proposed east and west tapestries have reduced the impacts on the L'Enfant Plan. The number of memorial elements that encroach into the Maryland Avenue right-of-way and viewshed has been minimized when compared to earlier designs for the memorial. The western end of the tapestry and eastern freestanding column remain in the Maryland Avenue 160-foot right-of-way, but the view towards the Capitol has increased to 135 feet and retains a horizontal orientation. The final design is successful in balancing an appropriate scale for a Presidential memorial with the surrounding historic context.

Memorials and Museums Master Plan

The final plans are not inconsistent with the 2M Plan. As noted in the October 2014 staff recommendation, elimination of the east and west tapestries reduced the perceived mass and scale of the memorial in a manner that is more balanced with regard to the treatment of the Maryland Avenue viewshed. Additionally, the 2M Plan promotes a memorial on this site that allows for public gatherings as well as a commemorative reflection. The use of the two freestanding columns defines the perimeter of the park space within the larger site and surrounding urban environment. The overall result is a memorial core contained within a park. The final design successfully balances the establishment of a memorial to President Dwight D. Eisenhower and the need to protect public open space in the District of Columbia by having this site also function as a public park.

National Capital Urban Design and Security Plan Objectives and Policies

The final plans remain consistent with NCPC's *National Capital Urban Design and Security Plan Objectives and Policies*. The final plans contain a relatively minor amount of physical perimeter security along LBJ Promenade to provide security to the Department of Education. Much of the security barrier for LBJ Promenade is integrated into retaining walls along the north side. No physical perimeter security elements are proposed for the memorial itself. As noted previously in

this report, the perimeter security design has been modified to reduce the number of bollards at the stairs by the memorial overlook to minimize conflicts with pedestrian circulation. In addition, the bollards proposed for the terraced seating area at the west end of the LBJ Promenade were eliminated and replaced with a low wall.

III. U.S. COMMISSION OF FINE ARTS REVIEW

The U.S. Commission of Fine Arts (CFA) reviewed the project pursuant to the Commemorative Works Act and approved the final plans on June 18, 2015. Prior to its final approval, CFA reviewed the project on the following occasions: January 2011, September 2011, July 2013, November 2013, February 2014, October 2014, November 2014, February 2015, March 2015, April 2015, and May 2015.

IV. COMPLIANCE

National Environmental Policy Act (NEPA)

To fulfill its obligation under the National Environmental Policy Act (NEPA), NPS, in association with EMC, completed the Dwight D. Eisenhower Memorial Design Environmental Assessment (EA) which analyzes three design alternatives and a no action alternative. The EA prepared for the memorial design tiers off of the project's 2006 Site Selection EA. NCPC also has an independent NEPA obligation resulting from its approval authority over the project, and thus was a cooperating agency in the preparation of the EA. GSA was also a cooperating agency. The EA analyzed each of the alternatives for impacts to the following environmental topic areas: cultural resources; including aesthetics, viewshed, archeological, and historic; hazardous materials and waste; park operations and management; soils; transportation systems; vegetation; visitor use and experience; and water resources.

The NPS solicited public input on the scope and content of the EA by way of public meetings and its Planning, Environment, and Public Comment website. The final EA was also made available for a 30-day public comment period from September 19, 2011, to October 19, 2011. On March 6, 2012, following review and consideration of the comments received, NPS issued a Finding of No Significant Impact (FONSI) for implementation of EA Alternative #3, Maryland Park/Tapestry alternative.

NCPC relied upon the Site Selection EA to issue its August 31, 2006, Finding of No Significant Impact which found approval of the memorial site would not significantly affect the human environment on the condition that the applicant design the memorial using the design principles. NCPC's FONSI incorporated these design principles as required mitigation. In October 2014 with its preliminary approval the Commission found that an action to approve the memorial design would not cause significant impacts to the human environment based upon on the content of the two EAs prepared for the project, and the finding that the memorial design satisfied the required mitigation contained in the 2006 Site Selection FONSI. With its final approval for the project, staff is recommending that the Commission confirm that the action to approve the final plans will not have a significant impact on the human environment.

National Historic Preservation Act (NHPA)

Both NCPC and NPS have an independent responsibility under Section 106 of the National Historic Preservation Act. The National Park Service's undertaking is the issuance of the construction permit once the EMC has received final approvals from NCPC and the U.S. Commission of Fine Arts. NCPC's undertaking is the approval of the memorial site and design.

Through the Section 106 process, NPS and NCPC consulted with the District of Columbia State Historic Preservation Officer (DC SHPO) and several other consulting parties and determined that the undertakings would have an adverse effect on the L'Enfant and McMillan Plans, the National Mall, the LBJ Building and its northern plaza, the Wilbur Wright Federal Building, the National Air and Space Museum, and the Wilbur J. Cohen Building, which are listed or eligible for listing in the National Register of Historic Places. As a result of this determination, the NPS, NCPC, DC SHPO, and the Advisory Council on Historic Preservation entered into a Memorandum of Agreement (MOA) in 2012.

Following the Commission's preliminary approval, NPS continued consultation under Section 106 of the National Historic Preservation Act in accordance with the MOA. Following this consultation, NPS circulated their final determination of effect on the final design for the project. In the final determination of effect, NPS concluded that no new or intensified adverse effects would result from the final design for the memorial. The DC SHPO concurred with NPS' final determination of effect and noted that the adverse effects had been minimized sufficiently to achieve the goals of the Section 106 process.

Three consulting parties provided comments on the NPS final determination of effect including the National Civic Art Society, National Mall Coalition (formerly the National Coalition to Save Our Mall), and Arthur Cotton Moore. Comments from the National Civic Art Society indicated that the lighting plan would cause new and intensified adverse effects and that the structure of the tapestry would be highly visible and block views to the LBJ Building. The National Civic Art Society also stated that with a change to the artwork for the tapestry, the transparency will be reduced and block views of the LBJ Building, intensifying a previously identified adverse effect. Comments from the National Mall Coalition and Arthur Cotton Moore were addressed to the DC SHPO, but raised questions concerning the protection of the L'Enfant Plan, the significance of the Maryland Avenue corridor, the MOA, and the Section 106 process in general.

NPS acknowledged all of the comments concerning the final determination of effect in their June 4, 2015 memo to the signatories of the MOA. In response to the National Civic Art Society comments, NPS stated that that lighting was designed to be a background feature of the tapestry, that the tapestry will be lit from below along its bottom edge, and will not compete with the Capitol Dome. NPS also indicated that the cable structure has always been a part of the tapestry and will not be highly visible. As far as the transparency of the tapestry due to a change in the artwork, NPS maintains that when the MOA was signed in 2012, the tapestry was to include trees with full leaves rather than the spring-time emergent leaves that are now proposed and that the density had not been affected.

With respect to the comments from the National Mall Coalition and Arthur Cotton Moore, NPS indicated that the memorial would strengthen the Maryland Avenue corridor. In addition, many of the issues raised by both parties including the right-of-way dimensions, the placement of open space within the corridor, the re-direction of traffic from Maryland Avenue, and the adverse effects on the L'Enfant Plan were considered through the Section 106 process and the determination of effect. NPS also referenced the vision put forward in the Monumental Core Framework Plan to protect the National Mall from overuse and that the park and memorial would help achieve that goal.

National Capital Memorials Advisory Committee

As required by the Commemorative Works Act, memorial sponsors must consult with the National Capital Memorials Advisory Committee (NCMAC) on the selection of alternative sites and design concepts prior to submitting the project to NCPC and CFA for formal design review. In fulfillment of this requirement, EMC made an initial presentation of the memorial design to NCMAC at its April 21, 2010 meeting. Two additional presentations took place on February 16, 2011 and September 14, 2011.

Coordinating Committee

The Committee forwarded the proposed final site and building plans to the Commission with the statement that the project has been coordinated with all participating agencies. The participating agencies were: NCPC; the District of Columbia Office of Planning; the District of Columbia State Historic Preservation Office, the District Department of Transportation; the General Services Administration; the National Park Service; and the Washington Metropolitan Area Transit Authority.