



6 July 2017

Ms. Catherine Dewey  
National Park Service  
Chief of Resource Management  
National Mall and Memorial Parks  
900 Ohio Drive, S.W.  
Washington, D.C. 20024

Dear Ms. Dewey:

This letter concerning the proposed WWI memorial on the site of Pershing Park in Washington, D.C. serves as an addendum to the one we sent on June 20, 2017. It is prompted by material provided to the Section 106 Consulting Parties at the June 28, 2017 meeting, specifically the WWI Centennial Commission's presentation and the excel spread sheet titled, "Historic Preservation Resource Summary." We are grateful to have this detailed spread sheet of adverse effects in our quest to gain a better understanding of the WWI Centennial Commission's current proposal, the "Restored Pool Concept," which is, in fact, not a restoration, by any standard or definition.

**We continue to believe that there are solutions that could accommodate a memorial without having significant adverse effects on the park. These solutions could honor the spirit of the enabling legislation without threatening the [determination of the park's eligibility for listing in the National Register of Historic Places](#) and, by extension, the expanded period of significance (1976-1990) for the Pennsylvania Avenue National Historic Site.**

As noted during the June 28 meeting, we respectfully request greater transparency and something more than a summary assessment of thumbnail-scaled alternatives – shown on page seven of the WWI Centennial Commission's presentation labeled "Design Evolution" – that were dismissed by the Commission. In particular, the alternative titled "Upper Wall Design" does not appear, based on the one diagram shown, to significantly diminish this National Register eligible work of landscape architecture. Moreover, it would seem to provide the proposed monumental wall/bas-relief with greater visibility from Pennsylvania Avenue and a much more direct, less convoluted route to the memorial wall for those that are not able bodied, thus better satisfying requirements of the Americans with Disabilities Act. However, since only one concept diagram for this alternative was shown and the concept summarily dismissed by the Commission rather than explained or otherwise articulated, it's difficult to make an informed assessment. In fact, despite the evolution of the proposed memorial's design – from the initial concept presented in January 2016 to the present one – we remain unconvinced that the WWI Centennial Commission has taken essential measures to reduce harm to the heart of the park – the waterfall and pool basin – its most iconic feature.

Moreover, we are troubled by [a] the absence of WWI Centennial Commission vice chair Edwin Fountain and memorial wall's sculptor Sabin Howard at a meeting held earlier this year with members of the proposed memorial's design team and Pershing's original landscape architect, M. Paul Friedberg (members of the U.S. Commission of Fine Arts in their February 16, 2017 hearing about the proposed memorial encouraged the memorial's proponents to meet with Mr. Friedberg); and, [b] by Mr. Fountain's absence from this most recent Section 106 meeting. We are concerned that Mr. Fountain's absence signals an unwillingness to acknowledge that others have legitimate interests and that he does not appear to be truly seeking to understand and accommodate them.

Indeed, in a June 21, 2017 email to the WWI Commission’s consulting landscape architect, Phoebe Lickwar, Mr. Friedberg noted that the absence of Mr. Fountain “from our discussion may account for the design outcome, the persistent and intrusive one note wall that’s being forced into the space thus obliterating the scale and meaning of the original design.”

With this as a preamble, the following comments are being made in an attempt to simplify the application of the Secretary of the Interior’s Standards for the Treatment of Historic Properties with [Guidelines for the Treatment of Cultural Landscapes](#). In an attempt to evaluate adverse effects, these comments are organized as follows:

1. Visual and Spatial – Yes, there are adverse effects;
2. Water features – Yes, there are adverse effects;
3. Circulation – Yes, there are adverse effects;
4. Vegetation – Yes, there are adverse effects;
5. Structures, furnishings/objects – Yes, there are adverse effects;
6. Topography – No, there are not adverse effects.

Please note that in the discussion that follows, for all features, from spatial organization to smaller-scale objects, the Rehabilitation Standards being applied weighs the impact of **“Alterations/Additions for the New Use.”** Before going through these individually, it is important to remember that the Guidelines state: “When alterations to a cultural landscape are needed to assure its continued use, it is most important that such alterations do not radically change, obscure, or destroy character-defining spatial organization or features and materials.” In addition: “The installation of additions to a cultural landscape may seem to be essential for the new use, but it is emphasized in the Rehabilitation guidelines that such new additions should be avoided, if possible, **and considered only after it is determined that those needs cannot be met by altering secondary, i.e., non character-defining, spatial organization and land patterns or features. If, after a thorough evaluation of alternative solutions, a new addition is still judged to be the only viable alternative, it should be planned, designed, and installed to be clearly differentiated from the character-defining features, so that these features are not radically changed, obscured, damaged, or destroyed”** [emphasis added].

#### 1. Spatial Organization: Rehabilitation - Alterations/Additions for the New Use

In the section of the Rehabilitation Guidelines concerning: “*Designing new features when required by the new compatible use to assure the preservation of the historic spatial organization,*” there are four specific treatments for additions and alterations that are [“Not Recommended.”](#) The “Restored Pool Concept” has all four of the [“Not Recommended” treatments](#):

- “Adding a new feature that detracts from or alters the spatial organization.”
- “Placing a new feature where it may cause damage to, or be intrusive in spatial organization and land patterns. For example, inserting a new visitor’s center that blocks or alters a historic view or vista.”
- “Introducing a new feature that is visually incompatible in size, scale, design, materials, color and texture.”
- “Removing historic features which are important in defining spatial organization and land patterns.”

## 2. Water Features: Rehabilitation - Alterations/Additions for the New Use

We believe that the water feature of Pershing Park – the waterfall and pool basin – is one inseparable unit. When considering adverse effects, those interrelated elements cannot be treated individually. Once again, when looking at the [Rehabilitation Guidelines, specifically considering additions and alterations](#), the “Restored Pool Concept” treatment of the water feature is [“Not Recommended”](#):

- “Introducing a new water feature which is in an appropriate location, but **is visually incompatible in terms of its shape, edge, and bottom condition/material; or water level, movement, sound, and reflective quality**. For example, introducing a wading pool in a non-significant space, but utilizing non-traditional materials and colors” [emphasis added].

In addition to the Rehabilitation Guidelines for Alterations and New Uses, the Guidelines for “Deteriorated Historic Features” notes that “*Removing a water feature that is unrepairable and not replacing it, or replacing it with a new feature that does not convey the same visual appearance*” is [“Not Recommended.”](#)

## 3. Circulation: Rehabilitation - Alterations/Additions for the New Use

Regarding the [Recommended Standard for Alterations and Additions](#) – “*Designing and installing compatible new circulation features when required by the new use to assure the preservation of historic character of the landscape*” – the proposed circulation alterations in the “Restored Pool Concept” meets all three treatments determined as [“Not Recommended”](#):

- “Placing a new feature where it may cause damage, or is incompatible with the historic circulation.”
- “Locating any new circulation feature in such a way that it detracts from or alters the historic circulation pattern.”
- “Introducing a new circulation feature which is in an appropriate location, but making it visually incompatible in terms of its alignment, surface treatment, width, edge treatment, grade, materials or infrastructure.”

## 4. Vegetation: Alterations/Additions for the New Use

We believe that the many adverse effects that destroy the integrity of the sunken plaza and central water feature require a more sympathetic approach, and as a result, the idea of exploring replacement guidelines for specific genus and species of plant materials seems premature. We are concerned however that the removal of five of the six canopy trees that frame and provide shade on the western edge of the sunken plaza disconnects this side of the terraced steps from the southern perimeter edge, while also losing the canopy and framing for the upper terrace walkway. Leaving just one of the six trees results in a lack of continuity between the two critical enclosures.

Here the [Rehabilitation Guidelines for Replacing Deteriorated Historic Materials](#) notes that it is [“Not Recommended”](#) to “*Remove deteriorated historic vegetation and not replacing it, or replacing it with a new feature that does not convey the same visual appearance.*”

## 5. Structures, Furnishings + Objects: Alterations/Additions for the New Use

Finally, we concur with the statements made by others at the consulting party meeting of June 28, that when small-scale features that survive are removed there is an adverse effect. However, of greatest concern, when applying the Standards for [Rehabilitation and the Guidelines for Alterations and Additions](#), the greatest adverse effect is the result of the size and location of the 65' long memorial wall. Here, the proposed work aligns with all three of the [“Not Recommended”](#) treatments:

- Placing a new structure, furnishing, or object where it may cause damage, or is incompatible with the historic character of the landscape;
- Locating any new structure, furnishing or object in such a way that it detracts from or alters the historic character of the landscape;
- Introducing a new structure, furnishing or object in an appropriate location, but making it visually incompatible in mass, scale, form, features, materials, texture or color. For example, constructing a visitors' center that is incompatible with the historic character of the cultural landscape.

As previously stated, the idea that the “Restored Pool Concept” is a restoration is completely false. This is not a restoration; rather it is a rehabilitation effort with significant adverse effect. Largely the result of the placement of a singular feature that is so incompatible in scale that its insertion destroys the integrity of the heart of the park. In fact, nearly every one of the proposed treatments in the “Restored Pool Concept” yields a [“Not Recommended”](#) according to the Secretary of the Interior’s Standards for the Treatment of Historic Properties with [Guidelines for the Treatment of Cultural Landscapes](#). Moreover, this proposal, if implemented, would destroy the integrity of the most important work of landscape architecture in the Pennsylvania Avenue National Historic Site’s expanded period of significance, as outlined in the Cultural Landscape Inventory (May 10, 2016). That period of significance spans 1976-1990, and encompasses a collection of modernist and postmodernist parks commissioned by the Pennsylvania Avenue Development Corporation.

Thank you, again, for providing us with the opportunity to offer comments.

Sincerely,



Charles A. Birnbaum, FASLA, FAAR  
President + CEO

cc: Claire Sale, AECOM; David Maloney, State Historic Preservation Officer for the District of Columbia; Thomas Luebke, Secretary, U.S. Commission of Fine Arts; Elizabeth Miller, National Capital Planning Commission; Peter May, Associate Regional Director, National Capital Region, National Park Service; Darwina Neal; Rebecca Miller, D.C. Preservation League, The Committee of 100; M. Paul Friedberg, FASLA; Lisa Delplace, OvS; Bill Brown, AOI