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Washington, DC 20009-4021  
July 10, 2017

Ms. Catherine Dewey  
National Park Service  
Chief of Resource Management  
National Mall and Memorial Parks  
900 Ohio Drive, SW  
Washington, DC 20024

Dear Ms. Dewey,

I attended the WWI Memorial Section 106 Consultation meeting on June 29, 2017. I had also attended the February 9, 2017 meeting, as well as the September 21, 2016 Section 106 Consultation meeting, whose announcement included the final determination of eligibility (DOE) of Pershing Park for the National Register of Historic Places that “concluded that Pershing Park is nationally significant under Criterion A in the area of community planning and development as the site of the General John J. Pershing Memorial. It is also nationally and locally significant under Criterion C in the area of landscape architecture as a signature designed landscape by M. Paul Friedberg, one of modern American landscape architecture's most accomplished urban designers. The park is an exceptional example of a landscape design of the modern period and of an approach to the design of public space as an integral part of the revitalization of an urban neighborhood in decline. Pershing Park is also significant at the national and state levels under Criterion C as the first modernist commemorative park on one of the important elements of the nationally significant Washington city plan, and meets Criterion Consideration F for a commemorative property and Criterion Consideration G for a property having achieved significance within the last fifty years for its exceptional significance as a highly intact example of M. Paul Friedberg's concept of the urban park plaza.”

Because of that DOE, I had expected that the September 21, 2016 proposed design for the WWI Memorial on that site would have reflected both the WWI Memorial Competition Design Objective, which stated that “Congress has authorized the World War I Centennial Commission to **enhance** the existing Pershing memorial by constructing *...appropriate sculptural and other commemorative **elements**, including landscaping*”, and the DOE.

This adaptation should also have taken into consideration the DC State Historic Preservation Office DOE Form determination that “**Pershing Park demonstrates a high degree of integrity in location, design, and setting...Paul Friedberg’s design of the park’s hardscape and his structural plantings and English ivy remain in place...and the materials and workmanship possess a moderate to high degree of integrity.**” The polished, honed, or rough-cut granite, Belgian block pavers, and diagonally set brick tiles still express their original workmanship.” And “**Original plant materials, including trees, lawn, grasses, and flowers, are also present.**”

Unfortunately, however, this did not happen with that design, nor was it achieved with either of the two Alternative Design Concepts presented at the February 9, 2017 meeting, because both would have had varying degrees of severe adverse impacts on Pershing Park, as was clearly apparent in reviewing both designs in comparison with the existing one, as shown in the presentations.

The extensive discussions of the adverse effects of those prior designs should have informed and influenced the design that was presented at the June 29, 2017 106 meeting; unfortunately they did not.

Although this design is billed as the “**Restored Pool Concept**”, this is a serious misnomer! **Rehabilitation** would have been a more apropos treatment description, but it does not achieve that either, because in reality it would not only **destroy the existing fountain**, which is shown on Sheet 5 - Existing Park Analysis - Rooms and Focal Points, as ***the major focal point within the central room of the park***, but it also compromises the pool itself by putting walks across it.

It is commendable that the berms enclosing the park would remain intact, but the proposal to remove the existing fountain, change the size and depth of the pool, and cover about 40% of its surface with new walks would have extreme adverse effects on the integrity of the National Register-eligible existing park design, because the existing fountain is the integral focal feature of the pool area within this significant historic landscape that anchors the west end of the PA Ave. Historic District, so that **removing the fountain with its animating and cooling effects would essentially remove the “heart of the park”**!

Replacing the fountain with a 65’ long sculptural wall would disrupt visual and access continuity between the pool area and the west end of the park., and the proposed pool behind the new memorial wall with what appear to be side “sheets” of water would not even be visible from the pool area, let alone heard – and thus would not be a splashing fountain.

The following are specific comments on the proposed WWI Memorial plans and design that were presented at the June 29 meeting.

- Sheet 5 - Existing Park Analysis - Rooms and Focal Points - clearly shows that the existing fountain is the major focal point within the pool room. Thus removing it would remove a significant contributing element of the park.
- Sheet 8– June 2017 Restored Pool Concept
  - Although introductory text states that “The intent of this design is to create a memorial which shares a symbiotic relationship with the existing park”, this is not achieved; rather, the design disrupts the existing park design by removing focal elements and changing the relationships and circulation within it. Nor, despite the statement in the text, would the water provide sound, and the pool would not even reflect the sculpture, because of the walk in front of it, let alone the so-called fountain behind it.

- The last sentence of the text states: “A pathway has been created within the pool to allow for visitors to access the artwork.” Adding a walk along the existing south edge of the pool and a narrower walk in front of the sculpture wall would have been less intrusive. As it is, the proposed 2’ gap between the face of the wall and the edge of the walk in front of it is dangerously narrow, because a child could easily slip within that gap and be trapped under water, as could even an adult.
- Statements under “Assessment” are incorrect:
  - “Redefines the existing fountain and pool as the primary commemorative expression” - Would realistically read: “Removes the existing fountain and changes the pool in order to add a commemorative wall and walks in it.”
  - “Redefines circulation of the lower pool area while maintaining pool integrity” - Would truthfully read: “Changes circulation of lower pool area by adding paving that adversely affects its integrity.”
  - “Requires a change to the western terrace seating” - Would truthfully read: “Eliminates at least 75% of western terrace seating, and both restricts western access and severely limits views from the pool to the upper west park terrace.”
  - All of the above would be adverse effects!
- Sheet 10 –View Looking South West – Doesn’t even show that there would be a pool behind the sculptural wall, or sheets of water down the end of it, let alone a fountain!
- Sheet 11 - View Looking West – Same as above, plus it appears that a cobblestone surface lies just below the water level, so that water is a scrim, rather than a pool.
- Sheet 13 –Restored Pool Concept - Actual text states: *“The “Restored Pool Concept” requires that some means of pathway be created in order to facilitate visitors with an accessible route from the lower terrace region to the sculptural bas relief wall. By merging the materiality of this route with an appropriate pool bottom covering the design team intends that the entire pool region will read as a single continuous surface. The pathway through the water is only revealed by the presence of water within the pool basin. Examples of similar design strategies can be found on page 25.”*
  - Numerous misspellings and awkward text make meanings unclear.
  - What is meant by the second sentence? If the pool is restored at its existing size and depth, as was stated at the 106 meeting, no one would see the pool bottom unless it was empty; even then, because of the difference in elevation, “the entire pool region” would not read as a “continuous surface”!
  - With the pool empty, would the walks across it appear to be on “stilts” or whatever else would be required to support them? In any case, there would be a dangerous drop from the walk surfaces to the empty pool bottom below.
  - Sheet 25 shows cross-sections, not “Examples of similar design strategies

- Sheet 20 - Assessment of Effects for Pershing Park: Vegetation – States that all character-defining vegetation would be “modified” with “No likely adverse effect”, which implies that it would be replaced. If this is true, there would be adverse effects. But at the 106 meeting it was stated that all vegetation would be replaced in kind, which is what should be done, as necessary.
  - Sheet 21 - Assessment of Effects for Pershing Park: Small Scale Features – describes drinking fountain and trash receptacles as being removed, with No Adverse Effect. These were custom-designed for this park and should be retained, because both would be needed.
  - Sheet 22 - Balancing Preservation and Commemoration, Design Iterations - cites the importance of an:
    - “ Effort to protect and maintain critical character-defining features, according to Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Treatment of Cultural Landscapes:
      - *Views and vistas*
      - ***Spatial organization***
      - *Pershing Memorial*
      - *PADC streetscape*
      - ***Terraced seating and planters***
      - *Granite materials*
      - ***Distinct rooms bounded by steps***
      - *Three focal points*
      - **Water cascade, including sound “**
- Unfortunately, it appears that minimal effort was made to protect and maintain critical character-defining features, since almost all of those listed are affected in varying degrees, except for the PADC Streetscape.

Taken together, although not followed, these various statements indicate that ***preservation of the elements of both the pool space and the fountain are crucial to maintaining the integrity of the park as-designed by Friedberg.*** The sunken pool and fountain “room” served as a much-used oasis within the increasingly-used Pennsylvania Avenue area. The fountain is not only a park focal point, but also its falling water mitigates the city noise and creates a cooling effect.

The WWI Memorial Historic Preservation Resource Summary chart that was very briefly presented at the end of the meeting described the various Resources of the Existing Park and the Restored Pool Concept and determined the impacts of it on the existing park as designed by Friedberg and Oehme van Sweden, but did not accurately describe or evaluate those effects on Pershing Park, since there were conflicts between what was written on the chart and what was stated at the meeting, especially in regard to whether vegetation would be replaced in kind, whether the Pershing statue would be moved, and what would happen to the small-scale features. Because that chart is so lengthy, I will not comment further on it, except to say it would have been more accurate and helpful to describe the degree of adverse effect, such as minimal, moderate or major.

The so-called reasons given for many of these changes is that plantings have become overgrown, and built and mechanical elements have not been properly replaced or maintained, thus discouraging use by the public. **However, since the basic well-designed framework of the park still remains, there is no excuse for abandoning the original design, which is a significant work of landscape architecture by master landscape architects. Rather, it should be rehabilitated. “Demolition by neglect” should not be tolerated.**

I have never questioned the selection of this site or its *enhancement* as a WW I Memorial, but I have urged that careful consideration be given to limiting the scope of that enhancement, so that it would not adversely affect the integrity of the existing design. I have also stated that “An imaginative and sensitive designer should be able to develop a solution that would both commemorate WW I and preserve and enhance the significant components of the existing park’s design.”

Consequently, I would urge reconsideration of Sheet 7 – Design Evolution. The last sentence of text there states:

*“Each of the solutions was evaluated and ultimately dismissed because it either failed to meet the commemorative goals of the WWICC, caused significant change to the existing park features, or resulted in a design which had overall negative consequences on the experience and function of the park.”*

The validity of this evaluation is questionable, however, because the “**Upper Wall Design**” shown there, which was rejected by the Commission, would require *little change to existing park features* and have no *consequences on the experience and function of the park*, other than eliminating some benches and affecting views from the west that are already somewhat limited by existing trees. **Most important, the focal fountain and pool would be retained in place, with the wall visible above the fountain.**

Instead of a flagpole, the existing concession Kiosk could be replaced by an interpretive/informational kiosk – perhaps an interactive high tech one with stations on which users could get information on the war and perhaps even be able to input names of relatives who served in the war and information on them and/or leave messages/comments, etc.

Advantages of placing the commemorative wall here would be:

- Major character-defining features of the existing design would remain intact.
- Three existing focal points of the park would remain.
- WWI Wall would provide a complementary balance with the two walls of the Pershing Memorial.
- Direct visitor access to the wall from 15<sup>th</sup> and PA Avenue, NW corner.
- An interactive Information Kiosk could increase visitor use, education and enjoyment of the park.
- Direct visitor access to the Information Kiosk from PA Avenue.
- Wall would be readily visible from PA Avenue along north side of park.

- Wall would be readily visible from within the park, including as a highlighted background above the focal fountain.
- Only three non-significant semicircular seating areas and three trees within them would be lost.
- Rehabilitation of the existing park as-designed, with minimal changes, would considerably reduce the cost of construction.
- Because impacts on the existing park design would be minimal, this design would most probably be more readily approved by the various review bodies.

Whatever the design, *it is crucial to maintain the fountain, which is the “heart” of the design and when working pumped life into the focal pool and plaza area*, creating a vibrant public space that anchored the west end of the grand ceremonial Pennsylvania Avenue between the Capitol and the White House within the larger urban context of our Nation’s Capital. I would hope that this vitality could be brought back to life!

Thank you for the opportunity to comment.

Sincerely yours,

A handwritten signature in cursive script that reads "Darwina L. Neal".

Darwina L. Neal, FASLA, HM.IFLA, F.US/ICOMOS  
Landscape Architect  
(Former Chief, Cultural Resource Preservation Services, NCR, National Park Service)

cc: Claire Sale, AECOM; David Maloney, State Historic Preservation Officer for the District of Columbia; Thomas Luebke, Secretary, U.S. Commission of Fine Arts; Marcel Acosta, National Capital Planning Commission; Julia Koster, National Capital Planning Commission; Peter May, Associate Regional Director, National Capital Region, National Park Service; Charles Birnbaum, The Cultural Landscape Foundation; Rebecca Miller, DC Preservation League, Stephen Hanson, The Committee of 100; Bill Brown, AOI; Chris Wilson, Advisory Council for Historic Preservation