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Washington, DC 20009-4021
July 10, 2017

Chairman L. Preston Bryant, Jr.
National Capital Planning Commission
401 9th Street, NW, Suite 500 North
Washington, DC 20024

Dear Chairman Bryant:

I appreciate the opportunity to comment on the latest revised design for the WWI Memorial to be located in Pershing Park, a National Register-eligible park on Pennsylvania Avenue, NW which will be considered at your July 13 Commission meeting, and urge you not to approve this as designed.

I am submitting these comments as a landscape architect who retired from the National Park Service as Chief of Cultural Resources, National Capital Region. Prior to that, I was Chief, Design Services and had reviewed plans for all of the Pennsylvania Avenue Parks, including Pershing Park, as they were developed, starting in the 1970's.

The determination of eligibility (DOE) of Pershing Park for the National Register of Historic Places “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*. ... 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 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 2016 DOE, subsequent proposed designs for the WWI Memorial on that site should have reflected both that DOE and 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*”.

They 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... the materials and workmanship possess a moderate to high degree of integrity...** And “*Original plant materials, including trees, lawn, grasses, and flowers, are also present.*”

Unfortunately, however, this did not happen with the subsequent designs, all of which would have had varying degrees of severe adverse impacts on Pershing Park. The extensive discussions of the adverse effects of those prior designs should have also informed and influenced this latest revised design, but unfortunately 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 even shown in the project “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. This, in spite of project text stating that “*The sunken pool is the dominant space within the park, and the focal point around which the park is organized in plan and section.*”

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 also 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”.

Although project text re: “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” and lists them, unfortunately, it appears that *minimal effort* was made *to protect and maintain them*, since almost all of those listed are affected in varying degrees.

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

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.

Consequently, I urge reconsideration of the “Upper Wall Design” shown on the project “Design Evolution” plan which was rejected by the Commission. This design would locate the commemorative wall along the upper north-south walk behind the fountain. This placement would require *little change to existing park features* and have no consequences on the experience and function of the park, other than somewhat affecting views from the west that are already limited by existing trees. Most important, the focal fountain and pool would be retained in place, with the wall visible above the fountain, as viewed from the pool area, where it would be directly accessible from the 15th and PA Avenue, NW corner and visible from PA Avenue.

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. Such a Kiosk could increase visitor use, education and enjoyment.

Rehabilitation of the existing park as-designed, with minimal changes, would also considerably reduce the cost of construction.

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,



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Landscape Architect

(Former Chief, Cultural Resource Preservation Services, NCR, National Park Service)

cc: Marcel Acosta, National Capital Planning Commission; Julia Koster, National Capital Planning Commission; David Maloney, State Historic Preservation Officer for the District of Columbia; Thomas Luebke, Secretary, U.S. Commission of Fine Arts; 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