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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 Commissions 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 Commissions 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 parks eligibility for listing in the National Register of Historic Places and, by extension, the expanded period of significance (1976-1990) for the

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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 Commissions 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, its difficult to make an informed assessment. In fact, despite the evolution of the proposed memorials 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 walls sculptor Sabin Howard at a meeting held earlier this year with members of the proposed memorials design team and Pershings 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 memorials proponents to meet with Mr. Friedberg); and, [b] by Mr. Fountains absence from this most recent Section 106 meeting. We are concerned that Mr. Fountains 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 Commissions 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 thats 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 Interiors 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

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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 visitors 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 Interiors 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 Sites 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



June 20, 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:

We are grateful for the opportunity to provide comments in advance of the June 28, 2017 Section 106 meeting concerning the most recent iteration of *The Weight of Sacrifice*, the World War I Memorial proposed for Pershing Park in Washington, D.C. We had a glimpse of this proposal – the so-called “[Restored Pool Concept](#)” – at the May 18, 2017 meeting of the U.S. Commission of Fine Arts (CFA), and subsequently in more detail on the National Park Service’s website. The design team is to be commended for its sympathetic treatment of the park’s perimeter. In fact, when the as-built plan for the [National Register-eligible](#) M. Paul Friedberg-designed Pershing Park is overlaid with the most recent proposal, many of the character defining features along the perimeter are retained.

In the National Park Service’s “Secretary of the Interior’s Standards with Guidelines for the Treatment of Cultural Landscapes,” which have direct bearing on the Section 106 review of the proposed memorial, the “Guidelines” are organized along two primary areas: [1] Organizational Elements of the Landscape and [2] Character-Defining Features of the Landscape. As the author of that document, I can confirm that what the memorial’s proponents call the “Restored Pool Concept” would have adverse effects as noted in both of those primary areas. In fact, the proposed design would have adverse effects on the heart of the park’s spatial organization and circulation, and the water features. Let me explain:

Currently, Pershing Park’s waterfall, whose east-facing side is approximately thirteen feet wide, is flanked by sets of stairs that run 40 to 45 feet in length. This open amphitheater-like seating wraps around with its southern perimeter, creating a welcoming cradle that shelters the pool and the sunken plaza. The openness of the staircases also provides visual connectivity with the elevated western end of the park, and facilitates comfortable movement between the upper and lower levels of the park. The proposed “Restored Pool Concept” would replace this open area with a 65-foot-long east-facing wall that severs the connection between the upper and lower levels. [NOTE: the [scale drawing provided by the memorial’s proponents](#) on pages ten and seventeen of the most recent proposal appears to illustrate a wall that’s approximately 75 feet in length – this discrepancy is repeated in the [plans submitted by the memorial’s proponents to the National Capital Planning Commission](#) for their forthcoming July 13, 2017 meeting]. Using the memorial proponents’ scale drawing as a guideline, the points of access and egress flanking the fountain would be reduced in width by at least 75%, down from 40 to 45 feet in length, to ten feet on either side of the wall. This very diminished area would no longer be sufficient to

accommodate casual seating in these areas and would limit sight lines that make people feel safe – both considerations of Friedberg’s original design. Moreover, part of these considerably constricted ten-foot-wide areas would also have to accommodate a channel that captures water that would flow down the north and southern sides of the wall (it is also assumed that since these channels would be of a very limited width, that this would be more of a sheet of water).

The purpose of these changes is to remove the fountain and replace it with a 65-foot-long wall with a bronze bas-relief sculpture with life-sized figures, which would have a “pool” behind it. It is our understanding that this new static feature would have a “sheet” of, rather than rushing, water, and would significantly alter what Paul Friedberg described in a February 12, 2017 letter about Pershing Park as, “The range and character of water -- sound, reflection, movement, focal point and symbolism.”

Regarding the pool, which is labeled as “restored,” the adverse effect is significant (for a comparison see Exhibit A as an Appendix to this letter). A new “L-shaped” path would be inserted within the pool’s existing footprint, reducing the pool’s surface area by some 40%, since the water would be replaced with hardscape. The depth of the remaining pool areas surrounding this new hardscape is ill-defined; it’s unclear whether the current depth will be maintained or would become a scrim or a combination of the two (for example, the walk area to the south of the pool basin, is shown dry in the rendering on page eleven, wet in the rendering on page fourteen, and shallow in the axonometric on page twelve). Whichever way, the integrity of the pool is significantly diminished. Moreover, according to the site plan of the proposed memorial, steps that currently lead down to the pool on the northern and eastern sides would be eliminated. By definition, that is not restoration.

In addition to the loss of some 40% of the pool surface, the removal of the existing fountain is more than a physical loss; it impacts the integrity of Friedberg’s design, especially the “feeling” that it conveys. The fountain in Friedberg’s Pershing Park was not only aesthetically pleasing and commanding, it was designed to mitigate noise (from the surrounding vehicular traffic); have a cooling effect (from the mixing of air and water resulting during evaporation); and serve as a place of respite in the center of the city, offering opportunities for recollection, contemplation and remembrance, or, as Friedberg noted, “where the topography and the viewer came to rest.” The proposed wall, more than six times the length of the existing fountain, only provides small areas along its sides along which water would sheet down. This is a substantial change from the more exuberant cascade that mitigated noise and provided a cooling effect.

This shared concern has been well documented by the CFA. In their [February 16, 2017 meeting](#), CFA members expressed reservations about the wall, which was presented as part of an earlier design iteration called the “Pool and Plaza” concept (the proposed wall in this concept was 75 feet long by 10.5 feet high). Vice Chair Elizabeth Meyer, FASLA, according to [detailed meeting minutes](#):

Advised abandoning the idea of the wall and developing a new concept. She supported treating a memorial here as an insertion in the existing park; she emphasized that the

fabric of Pershing Park is intact, and an insertion implies that pieces would be removed and altered in some precise, limited way. She said that the commemorative program has many other potential expressions than the large wall, which is holding back the creativity of the designers; she encouraged them to reimagine the stairs or the [now disused] kiosk as opportunities for commemorative features. [Emphasis added]

At the May 18, 2017 CFA meeting, the memorial's proponents presented the "Restored Pool Concept," and reiterated their position that the wall – now 65 feet long – was the only option for their preferred commemorative element, a bronze bas-relief. On [page nine of their presentation, in a section labeled "Design Studies," they presented four vaguely-articulated alternatives](#), accompanied by the following text:

The solutions shown here were attempts to reconfigure the design and meet the aforementioned goal [of the WWI Centennial Commission]. Each of the solutions was evaluated and ultimately dismissed because it either failed to meet the commemorative goals of the WWI Commission, 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.

Following that presentation, a June 1, 2017 letter from CFA Secretary Thomas Luebke summarizing the meeting, noted that the Commissioners, "emphasized the fundamental importance of the design's experiential character—including the visual, auditory, and tactile qualities of water— in making this park work successfully as a memorial." Moreover: "For the proposed bas-relief wall, they advised further study to determine whether its length is appropriate, and they requested more information about the treatment of the top and rear of this wall, as well as the design of the stairs at its sides."

Collectively, the visual and functional barrier created by the insertion of a 65-foot-long wall; the corresponding loss of more than 50 feet of open access between the upper and lower plaza levels; the severed relationship between the southern and western amphitheater stairs/risers; the introduction of new hardscape into the pool basin (changing the pool's shape and diminishing its surface area by more than 40%); and, the loss of the dynamic, animating qualities of water that is fundamental to the park's feeling and integrity, constitute substantial adverse effects on the Friedberg design, which has been [determined eligible for listing in the National Register of Historic Places](#). This is all being done because of the memorial proponents' insistence on the insertion of a 65-foot-long wall with a bronze bas-relief sculpture into the heart of the park.

The memorial's proponents have not sufficiently demonstrated, despite the repeated urging of the CFA and others, much more than a perfunctory willingness to explore alternatives that would carefully integrate memorial elements into the existing historic park, interventions that would mitigate adverse effects on its central defining feature.

As noted at the outset, the memorial proponents' design team is to be commended for its sympathetic treatment of the park's perimeter. However, the idea that the "Restored Pool Concept" is a restoration is completely false. **This is not a restoration; rather it is a rehabilitation effort, but with the addition of a feature that is so incompatible in scale that its insertion destroys the integrity of the heart of the park.** Moreover, it destroys 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.

We thank you for the opportunity to provide comments.

Sincerely,

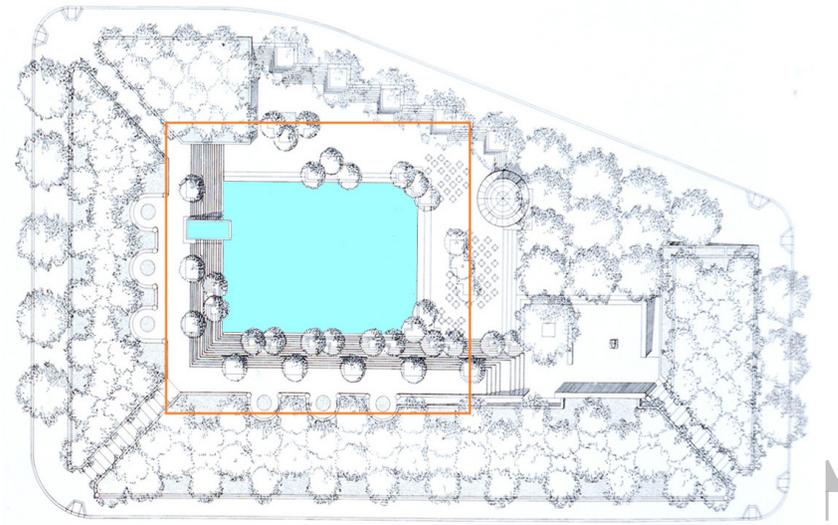
A handwritten signature in dark ink, consisting of a large, stylized 'C' followed by a horizontal line that tapers to the right.

Charles A. Birnbaum, FASLA, FAAR
President + CEO, TCLF

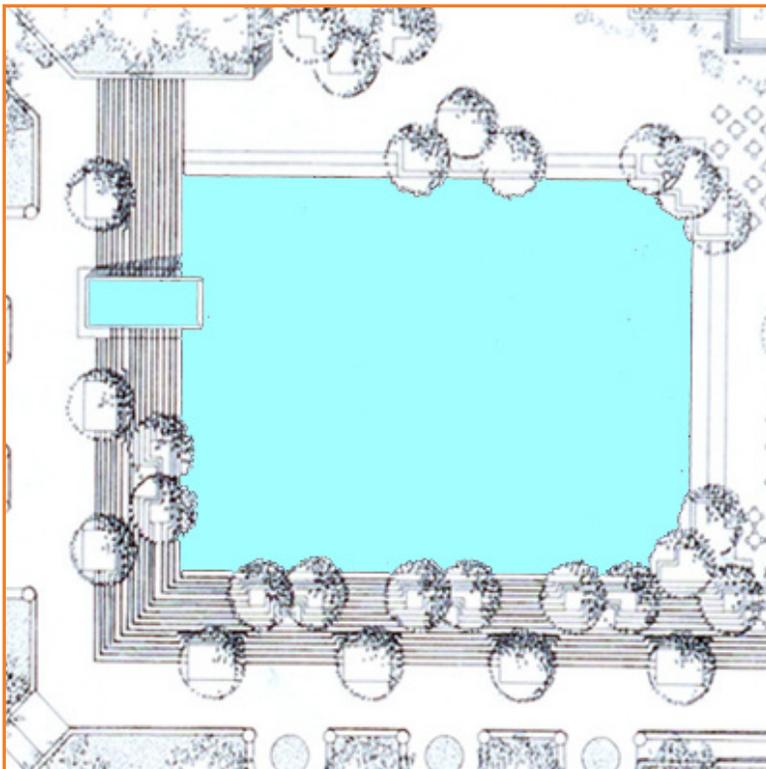
cc: Claire Sale, AECOM; David Maloney, State Historic Preservation Officer for the District of Columbia; Thomas Luebke, Secretary, U.S. Commission of Fine Arts; Elizabeth Miller, National Capital Planning Commission; Peter May, Associate Regional Director, National Capital Region, National Park Service;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

Exhibit A

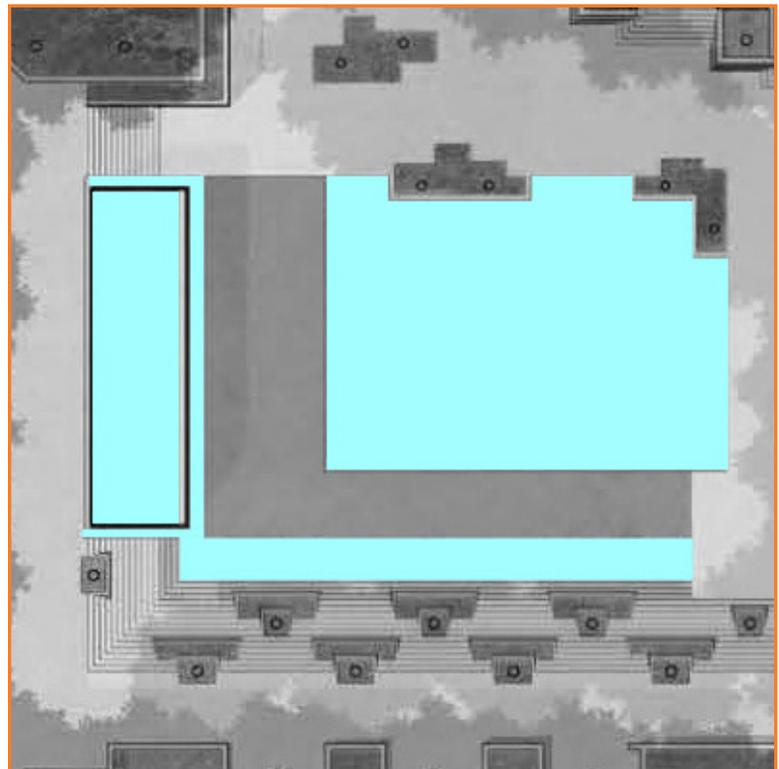
M. Paul Friedberg Design (1981)



Pool Basin



Existing



Proposed



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

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PEPC Project ID: 58434, DocumentID: 80871

Correspondence: 2

Author Information

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Correspondence Information

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Date Sent: Jul 11, 2017 Date Received: Jul 11, 2017
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Committee of 100 on the Federal City
July 10, 2017
Catherine Dewey
National Park Service
Chief of Resource Management
National Mall and Memorial Parks
900 Ohio Drive, SW
Washington, D.C. 20014

SUBJECT: Comments and Questions on the Latest Design for the World War I Memorial in Pershing Park

Dear Ms. Dewey:

At the Consulting Members Meeting on the World War I Memorial in Pershing Park, held on Wednesday, June 28, 2017, the attendees were invited to submit questions and comments on the new "Restored Pool Concept" that was presented at the meeting. We note that the concept was not completely clear and attendees were asked to submit questions and comments by Wednesday, July 12. We understand that revisions/refinements to the concept design will be made after the review of the latest design by the National Capital Planning Commission (July 13), the Commission of Fine Arts (July 20) and review of questions and comments received from the Consulting Parties. We note that the comments and questions in "Restored Pool Concept" that was presented at the

meeting. We note that the concept was not completely clear and attendees were asked to submit questions and comments by Wednesday, July 12. We understand that revisions/refinements to the concept design will be made after the review of the latest design by the National Capital Planning Commission (July 13), the Commission of Fine Arts (July 20) and review of questions and comments received from the Consulting Parties.

We note that the comments and questions in this letter are provided for the purpose of obtaining answers to questions and hopefully stimulating the next stage of design development. We want to stress that these comments and questions do NOT represent the final position of the Committee of 100 on the Federal City on the latest design concept that was presented at the June 28 Consulting Parties Meeting, because some elements of that design are unclear and others appear to be evolving.

Elizabeth Purcell and John Fondersmith represented the Committee of 100 at the June 28 Consulting Parties Meeting and draft comments and questions have been reviewed with other C100 members involved in the World War I Memorial in Pershing Park. We note that the Committee of 100 has most recently submitted comments to the National Park Service on this matter on February 22, 2017.

June 2017 Restored Pool Concept

This new "Restored Pool Concept" was presented at the June 28, 2017 Consulting Parties Meeting. The material provided indicates that "The intent of this design is to create a memorial which shares a symbiotic relationship with the existing park. The fountain provides the water, sound, and ambiance to the park while the water in the pool reflects the fountain, trees and the sky". Please describe the expected sound of the fountain's water flow.

Our understanding is that the dimensions of the pool in this concept are the same as the existing pool in Pershing Park. Is this true? Please provide the dimensions and, if there are differences, please provide the information on the differences. Is it true that this is not really a full pool, with a walkway across it, but is actually separate pools of water? Please confirm.

This Restored Pool Concept has an "L" shaped walkway with water on both sides. The long side (east-west) of the L walkway will have water on two sides. The somewhat shorter north-south portion of the walkway is wider and parallels the World War I sculptural wall. Is a railing or other barrier needed to ensure visitor safety? If so, what design and materials should be used?

What is the plan to ensure visitor safety when they are viewing the WWI sculptural artwork separated from the walkway by two feet of water? Is this two-foot gap intended to prevent visitors from touching the artwork? If so, will it fulfill this function? Would it further the goals of the design to install a Plexiglas barrier to prevent people from reaching across the gap? Alternatively, would it be possible to eliminate the two-foot water gap while preserving the water, sound, and ambiance of the fountain?

The materials state:

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 reion [sic] 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.

What does this mean?

Is there a plan that the long side of the "L" walkway might be a scrim? If so, will this be safe for all pedestrians, including the disabled and families with strollers?

What material will be used on the bottom of the pool?

In an earlier Consulting Parties Meeting, NPS referred to its financial problems in maintaining other water features. Will there be funds to maintain the restored pool and fountain?

What will be the depth or depths of the pool? The June 28 presentation mentions varying depths.

Will the pool be drained during the winter? Would it be possible to have a "bubbling" water feature in part of the pool that would make it possible to maintain the pool even in the winter?

2017 Restored Pool Concept-POSSIBLE MODIFICATION

We suggest that a modification of the "Restored Pool Concept" be considered in which the full pool would be visible (similar to the existing pool design). There would be a walk along the south side of the pool and a walkway at the west end of the pool, in front of the World War I Sculpture. It appears that the long walk on the south side of the pool might then line up with the Pershing statue to the east.

Pershing Statue Area

Some discussion of the Pershing statue would be useful, including if it is to be moved. It would also be useful to have more information about what is to be done, if anything, to the walls, etc. around the Pershing statue. The walls now provide text and maps, but are difficult to read. Is there a plan to re-gild these?

Condition of Trees and Shrubs

It would be useful to have more information about which trees or shrubs are in poor health, and where they are located? We note that the "Existing Park Analysis-Planting Investigations" graphic on page 11 of the material provided to the National Capital Planning Commission shows missing trees and some information about other types of trees, but just what the symbols mean is not clear.

Flag Pole at the Kiosk Location

We understand that a flag pole will be provided at the location of the existing kiosk and that some sculptural element may be included. It would be useful to have information on this feature of the design.

More Information Needed

Despite what has been done, there are still many questions. We hope that some more clarity can come out of the presentations and discussions at the National Capital Planning Commission (July 13) and at the Commission of Fine Arts meeting on July 20, and as answers to questions and comments from the consulting parties. The Commission of Fine Arts recommended preparing a physical model of the World War I Sculptural Feature and the related fountain and walkways. We agree that a model of the entire proposed memorial would be helpful, with separate details that include narrative descriptions of the bas-relief, fountain, pool, and walkway.

World War I Information

The bas-relief at the west end of the pool is the main World War I commemorative feature. We do have questions about how the visitor to the World War I Memorial will gain some appreciation of American involvement in the war, as well as the effect on Europe. Will this be handled at the Pershing area at the Correspondences - Design and Develop National World War I Memorial - PEPC ID: 58434

southeast corner of Pershing Park?

We raised the question at the June 28 meeting about how information on World War I will be provided to visitors by National Park Service rangers in the form of tours, brochures, etc. While we understand that such operating matters may come later, we believe it will be useful to think about how information will be provided and how they might relate to the overall park design.

Thank you for considering our questions and comments. We hope that with the actions of the National Capital Planning Commission and the Commission of Fine Arts, and the questions and comments of the Consulting Parties, that the design of the World War I Memorial in Pershing Park can be resolved at the next Consulting Parties meeting.

Respectfully submitted,
Stephen A. Hansen
Chair

cc: Marcel Acosta, Executive Director - - National Capital Planning Commission
Thomas Luebke, Secretary - - U.S. Commission of Fine Arts
Eric Shaw, Director - - D.C. Office of Planning
David Maloney- -State Historic Preservation Officer for the District of Columbia
Edwin Fountain - World War I Centennial Commission
Claire Sale - - AECOM

The Committee of 100 on the Federal City



www.committeeof100.net

Founded 1923

July 10, 2017

Chair

Stephen A. Hansen

Vice-Chair

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Catherine Dewey
National Park Service
Chief of Resource Management
National Mall and Memorial Parks
900 Ohio Drive, SW
Washington, D.C. 20014

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Catherine Dewey
July 10, 2017
Page Two

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Catherine Dewey
July 10, 2017
Page Four

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Respectfully submitted,



Stephen A. Hansen

Chair

cc: Marcel Acosta, Executive Director -- National Capital Planning Commission
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David Maloney--State Historic Preservation Officer for the District of Columbia
Edwin Fountain – World War I Centennial Commission
Claire Sale -- AECOM

PEPC Project ID: 58434, DocumentID: 80871

Correspondence: 3

Author Information

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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Jul 11, 2017 Date Received: Jul 11, 2017
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
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Correspondence Text

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 Friedbergs design of the parks 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

o 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.

o 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

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slip within that gap and be trapped under water, as could even an adult.

o 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!

" Sheet10 -View Looking South West - Doesnt 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.

o Numerous misspellings and awkward text make meanings unclear.

o 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!

o 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.

o Sheet 25 shows X-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 Interiors 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

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- 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 parks 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

Correspondences - Design and Develop National World War I Memorial - PEPC ID: 58434

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 15th 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 Nations Capital. I would hope that this vitality could be brought back to life!

Thank you for the opportunity to comment.

PEPC Project ID: 58434, DocumentID: 80871

Correspondence: 4

Author Information

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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Jul 7, 2017 Date Received: Jul 7, 2017
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Letter
Notes:

Correspondence Text

See letter



July 6, 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

Re: Pershing Park

Dear Ms. Dewey:

The current proposal to modify Pershing Park, misses the mark! The somber sculptural artwork that is intended to be the central feature of revisions to the Park is not what General Pershing would have wanted his family to experience had they the opportunity to visit the memorial later in life.

Pennsylvania Avenue including its parks should be an inspirational connection between parts of the Federal government with appropriate references to events and people that have made significant contributions to sustaining it. Pershing Park, had been a joyful place year-round for those who enjoyed its quiet waters, skating rink, and food offerings until they were eliminated by the U.S. Department of the Interior. The Park requires reactivating, not redesign and reconstruction, to best inform and inspire the thousands of visitors on their way to visit the White House who are deposited at its edge hourly by tour buses, as well as citizens of the city who frequent this area as part of their daily activities.

Willard Associates will be happy to join D.C. Councilmember Jack Evans to lead an effort to rescue the Park with the support and collaboration of the Department of the Interior hopefully, with the cooperation of those whose objective is to provide appropriate recognition of the many contributions made by General Pershing during his extensive military career, as well as increase the number of visitors experiencing the significant memorial, and all who served in World War 1.

July 7, 2017
Pershing Park
Page 2 - 2

I look forward to receiving your response.

Most Sincerely,

A handwritten signature in blue ink, appearing to read "Oliver T. Carr Jr.", with a long horizontal flourish extending to the right.

Oliver T. Carr Jr.
Chairman
The Oliver Carr Company
Managing General Partner
Willard Associate

CC: Councilman Jack Evans, District of Columbia
Secretary Ryan Zinke, U.S. Department of the Interior
Edwin Fountain, Executive Chairman of WW1 Commission
Michael T. Reynolds, Acting Director, National Park Service
Marcel Acosta, Executive Director, Elizabeth Miller, Director of Physical Planning
Division, National Capital Planning Commission
Neil Albert, Executive Director, Downtown BID
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
Rebecca Miller, DC Preservation League, The Committee of 100
Claire Sale, AECOM

PEPC Project ID: 58434, DocumentID: 80871

Correspondence: 5

Author Information

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Status: New Park Correspondence Log:
Date Sent: Jun 28, 2017 Date Received: Jun 28, 2017
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Letter
Notes: See Letter

Correspondence Text

See letter

The Association of Oldest Inhabitants of The District of Columbia¹

Established Dec. 7, 1865 – Celebrating our 152nd year!

Officers:

President –

William N. Brown

Vice President –

Jan A.K. Evans

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June 28, 2017

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

Dear Ms. Dewey:

I attended today's Section 106 meeting on the evolving plans for Pershing Park as a national World War I memorial.

We appreciate the continuing efforts of the design team to respond to the issues and concerns raised by consulting parties to incorporate modifications that have been requested. While we had believed that an adaptation of the "memorial wall" portion of the "Weight of Sacrifice" could be successfully incorporated into the existing park without destroying the water features (fountain and pool that are an integral part of the Friedberg design) many of these elements are all but absent in the revised design. As it now stands, the revised plan for Pershing Park renders it virtually unrecognizable as the product of Friedberg's and Oehme van Sweden's designs and the memorial wall element along the west border ("Restored Pool concept"), obliterating the existing water feature, should be rejected. We believe, instead, that the design variation previously identified as "Upper Wall Design" should be given serious consideration leaving the existing cascade fountain and pool intact but placing the sculpture along the west border of the park, behind but still a focal point to the existing fountain.

The Association of the Oldest Inhabitants of the District of Columbia continues to stand by its original position regarding designating Pershing Park as a national memorial to World War I. We have pointed out during Congressional hearings, National Capital Memorial Advisory Commission hearings, in public talks and programs and in the media that the American Battle Monuments Commission's memorial to General Pershing already serves as a 'national' memorial to World War I:

"Instead of attempting to build a new memorial, modest funds should be sought to *rehabilitate* Pershing Park and to *enhance* the Pershing Memorial by adding new interpretive signage and memorial elements, such as sculptural ones, to *recognize other participating*

The Association of the Oldest Inhabitants of the District of Columbia -- the District's oldest civic organization -- was established on December 7, 1865, to preserve memories and matters of historic interest. By virtue of our long presence and participation in the city's prosperity and improvement, we continue to work and strive for the city's stability, security and advancement -- to aid in every way the prosperity and well-being of the District while preserving the heritage of its past.

¹Effective June 1, 1871, Congress revoked the charters of the cities of Washington, Georgetown and the County of Washington and established a consolidated government of the District of Columbia. For all intents and purposes, on that date Washington -- as far as a jurisdiction -- ceased to exist.

branches of the services to make the Pershing Memorial a comprehensive World War I memorial. Such rehabilitation would have a *minimum impact on the existing park* as designed by M. Paul Friedberg, FASLA, with plantings by Oehme van Sweden.”

Support for the long-held position of the AOI is further evidenced by a quote provided by the World War I Centennial Commission in its call for a memorial design competition:

“Congress has authorized the World War I Centennial Commission to **enhance** the existing Pershing memorial by constructing on Pershing Park "appropriate sculptural and other commemorative elements, including landscaping.”

I understand there will be future opportunities to comment on the “Memorial Wall’s” sculptural elements but I have to state that we are extremely disappointed at the lack of attention given to other branches of the military, the nurses who valiantly served, the Merchant Marine, the civilian labor force that supported the war effort on the home front, et al. Even the graphic on Page 5 of the NCPC submissions depicts nurses who are now absent.

The fact that Pershing Park has not been adequately maintained over the years is no excuse for demolishing it or severely modifying its water features. Rehabilitating it to incorporate appropriate design elements could make it a true national WW I Memorial, while still retaining its original design.

It is our sincere hope that restoration and modest new elements would occur in time for a rededication of the park by November 11, 2018. As it now appears, this deadline is unlikely to be met and that is very unfortunate.

Sincerely,



William N. Brown, President

Cc: U.S. Commission on Fine Arts
National Capital Planning Commission
National Capital Memorial Advisory Commission
District of Columbia State Historic Preservation Officer
The Committee of 100 on the Federal City
The DC Preservation League
The Cultural Landscape Foundation