STAFF RECOMMENDATION

S. Dettman

NCPC File No. 6694

DWIGHT D. EISENHOWER MEMORIAL

Bounded by Independence Avenue, 4th Street, and 6th Streets, SW, and by the Lyndon B. Johnson - Department of Education Headquarters Building

Southwest Washington, DC

Submitted by United States Department of the Interior – National Park Service

January 27, 2011

Abstract

The National Park Service, on behalf of the Dwight D. Eisenhower Memorial Commission, has submitted three concept design alternatives for the Dwight D. Eisenhower Memorial. The memorial site, approved by the National Capital Planning Commission in 2006, is bounded by Independence Avenue, 4th and 6th Streets, SW, and the Lyndon B. Johnson - Department of Education Headquarters building on the south. The three concept designs differ primarily in the treatment of the Maryland Avenue corridor, which bisects the site, and in the arrangement of a common set of memorial elements. These elements consist of a central memorial grove or plaza defined by large stone blocks and lintels containing sculptures and inscriptions and/or monumental stone columns, small water features, landscaping, and support facilities such as a Park Ranger station, restrooms, and a bookstore. In addition, the third concept alternative utilizes large tapestries of woven stainless steel along the north and south sides of the site. As proposed, the tapestries depict a landscape montage of Abilene, Kansas, President Eisenhower's place of birth, and are intended to establish the memorial as a special precinct within the surrounding urban context.

Commission Action Requested by Applicant

Approval of comments on concept design alternatives, pursuant to Public Law 107-117, 109-220 and the Commemorative Works Act, as amended (40 U.S.C. 8905).

Executive Director's Recommendation

The Commission:

Supports the applicant's efforts to develop a memorial that utilizes modern and innovative ways to commemorate President Dwight D. Eisenhower in a manner that is unlike any other Presidential memorial in Washington, DC, including the use of the woven stainless steel tapestries as a memorial element with modifications.

Finds that the proposed concept designs have been developed in a manner that is inconsistent with the Commission's 2006 site approval action that requires the applicant to use the Section 106 process to design the Memorial to meet, to the Commission's satisfaction, the established design principles.

Finds that relative to the design principles the Maryland Roadway (Alternative #1) concept design satisfies the following principles:

- Enhance the nature of the site as one in a sequence of public spaces embellishing the Maryland Avenue vista.
- Reflect L'Enfant Plan principles by shaping the Memorial site as a separate and distinct public space that complements the Department of Education Headquarters and other surrounding buildings.
- Respect and complement the architecture of the surrounding precinct.
- Respect the building lines of the surrounding rights-of-way and the alignment of trees along Maryland Avenue.

And does not satisfy:

- Preserve reciprocal views to and from the U.S. Capitol along Maryland Avenue, SW.
- Create a unified memorial site that integrates the disparate parcels into a meaningful and functional public gathering place that also unifies the surrounding precinct.
- Incorporate significant green space into the design of the memorial.

Finds that relative to the design principles the Maryland Promenade (Alternative #2) concept design satisfies the following principles:

- Enhance the nature of the site as one in a sequence of public spaces embellishing the Maryland Avenue vista.
- Create a unified memorial site that integrates the disparate parcels into a meaningful and functional public gathering place that also unifies the surrounding precinct.
- Reflect L'Enfant Plan principles by shaping the Memorial site as a separate and distinct public space that complements the Department of Education Headquarters and other surrounding buildings.
- Respect and complement the architecture of the surrounding precinct.

- Respect the building lines of the surrounding rights-of-way and the alignment of trees along Maryland Avenue.
- Incorporate significant green space into the design of the memorial.

And does not satisfy:

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

Finds that relative to the design principles the Maryland Park (Alternative #3) concept design satisfies the following principles:

- Enhance the nature of the site as one in a sequence of public spaces embellishing the Maryland Avenue vista.
- Incorporate significant green space into the design of the memorial.

And does not satisfy:

- Preserve reciprocal views to and from the U.S. Capitol along Maryland Avenue, SW.
- Create a unified memorial site that integrates the disparate parcels into a meaningful and functional public gathering place that also unifies the surrounding precinct.
- Reflect L'Enfant Plan principles by shaping the Memorial site as a separate and distinct public space that complements the Department of Education Headquarters and other surrounding buildings.
- Respect and complement the architecture of the surrounding precinct.
- Respect the building lines of the surrounding rights-of-way and the alignment of trees along Maryland Avenue.

Notes that the design principles are included as required mitigation in the Executive Director's Finding of No Significant Impact (FONSI) for site selection and must be met to mitigate otherwise potentially significant environmental impacts.

Requires that the applicant modify the design through the Section 106 consultation process to fully meet the design principles to better relate the Memorial to the surrounding context, and to avoid, minimize, or mitigate any identified adverse effects as required by the National Historic Preservation Act.

* * *

PREVIOUS COMMISSION ACTION

At its September 7, 2006 meeting, the Commission approved the site for the Dwight D. Eisenhower Memorial on the condition that "the applicant design the Memorial using the Section 106 consultation process to meet, to the Commission's satisfaction, the following design principles:"

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

These design principles were developed during the Section 106 consultation process by NCPC staff, with input provided by NPS, the District of Columbia State Historic Preservation Officer (DC SHPO), the Committee of 100 and the National Coalition to Save Our Mall. NPS also submitted a set of 11 more detailed design guidelines but the Commission ultimately opted not to adopt them. In its recommendation to the Commission, staff expressed that it considered the applicant's guidelines to be too prescriptive, and that a more general set of design principles would better address the Memorial both within its immediate precinct and within the L'Enfant Plan, and would more appropriately guide the project through the Section 106 consultation as the Memorial design is developed. Furthermore, staff noted that the Section 106 process would provide for the interpretation and refinement of the design principles, and that these principles could be incorporated into a Memorandum of Agreement, if deemed necessary. The DC SHPO supported this approach.

Also included in its action, the Commission highlighted the importance of protecting Maryland Avenue, finding that the "potential effects to the historic Maryland Avenue right-of-way and associated views and vistas merit special attention." The Commission went on to underscore the requirement that the applicant obtain, <u>prior to and during design development</u>, the views of the DC SHPO and consulting parties using the Section 106 consultation process. Finally, the Commission noted in its action that the Executive Director had issued a Finding of No Significant Impact (FONSI) for approval of the site <u>subject to the development and implementation of appropriate mitigation through adherence to the adopted design principles and the Section 106 consultation process</u>. A copy of the Commission's 2006 site selection approval action and the Executive Director's FONSI are attached.

PROJECT DESCRIPTION

<u>Site</u>

The Memorial site encompasses approximately four acres of land within the Southwest quadrant of Washington, DC. The site is located one block south of the Mall and is bounded by Independence Avenue on the north, 4th Street on the east, and 6th Street on west, and the Lyndon

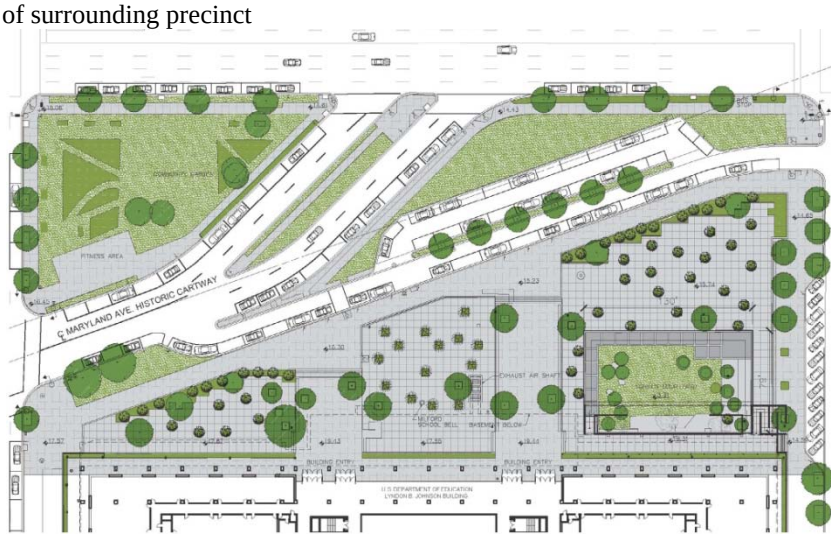
B. Johnson - Department of Education headquarters building (LBJ Building) on the south. In addition to the LBJ Building, the site is surrounded by several other federal office buildings and cultural facilities. These include the Smithsonian National Air and Space Museum to the north, the historic Wilbur J. Cohen Building that is home to Voice of America (VOA) to the east, and the Wilbur Wright Building, headquarters of the Federal Aviation Administration (FAA), to the west.

Aerial image of memorial site and surrounding context

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

To the north of the Maryland Avenue right-of-way is an approximately one half-acre area controlled by the National Park Service (NPS). This area currently contains a community

Diagram showing Memorial site in relation to 50-foot promenade and size of surrounding precinct



Memorial site existing conditions (70% paved area / 30% green space)

garden and small exercise facility that will be removed as a result of the project. The remaining 1.5 acres of the site located south of Maryland Avenue is controlled by the United States General Services Administration (GSA) and features a hardscaped plaza that was constructed with the LBJ Building as the building's entry forecourt. The plaza is sparsely vegetated and contains a sunken courtyard that exists primarily to provide natural light to the Department of Education's basement-level library. Prior to construction of the Memorial, all portions of the site will be transferred to NPS with the exception of a 50-foot buffer area along the north façade of the LBJ Building, for which GSA will retain jurisdiction. Following construction, NPS will be responsible for the long-term operation and maintenance of the Eisenhower Memorial.

Maryland Avenue (existing view)

Independence Ave. (existing view)

4th Street (existing view)

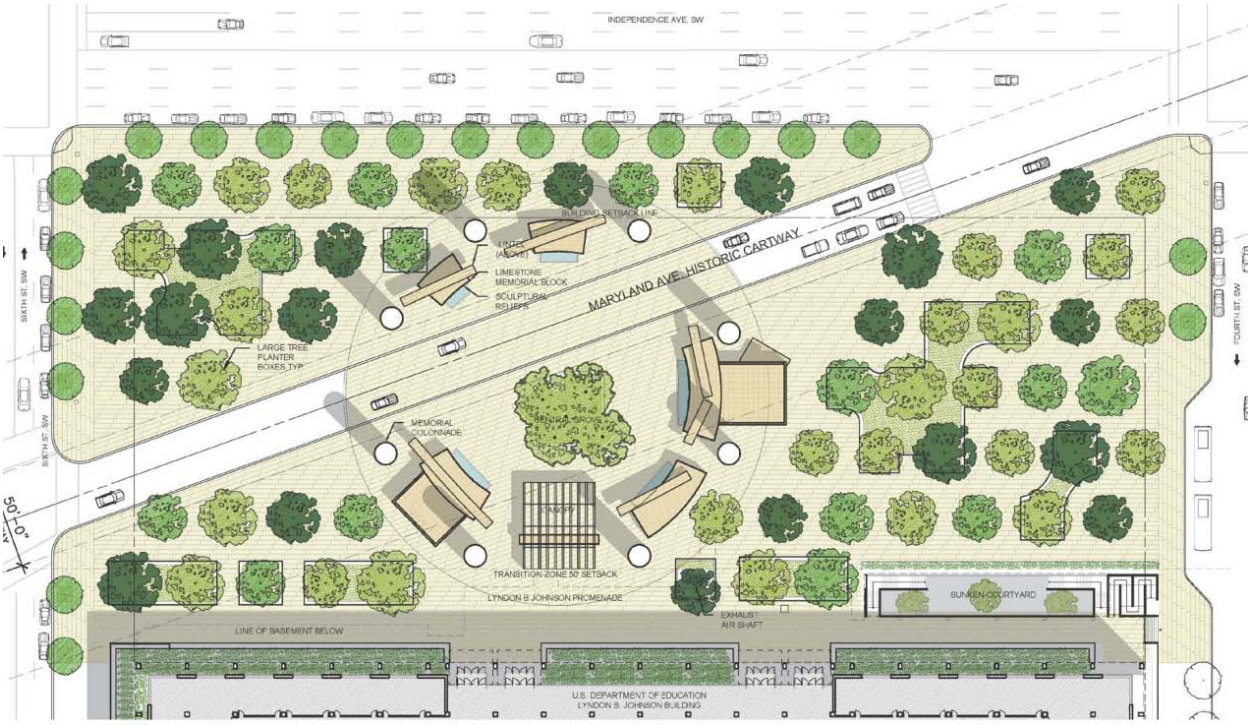
Proposal

The National Park Service (NPS), on behalf of the Dwight D. Eisenhower Memorial Commission (EMC), has submitted three concept design alternatives for the Eisenhower Memorial, individually referred to as Maryland Roadway (Alternative #1), Maryland Promenade (Alternative #2), and Maryland Park (Alternative #3). According to information provided by the applicant, the underlying premise in each of the concepts is to represent a president widely viewed as modest in character but defined by great and vast accomplishments" by developing a memorial that engages people from within as well as in the larger urban context. Drawing inspiration from the contexts and settings of existing Presidential memorials, the applicant endeavors to design a memorial that establishes a new, autonomous precinct that is worthy of a Presidential memorial while respecting and complementing the surrounding urban context. Using the Lincoln Memorial as a specific reference, each concept alternative is organized around the notion of creating an object, within a temple, within a picturesque landscape setting.

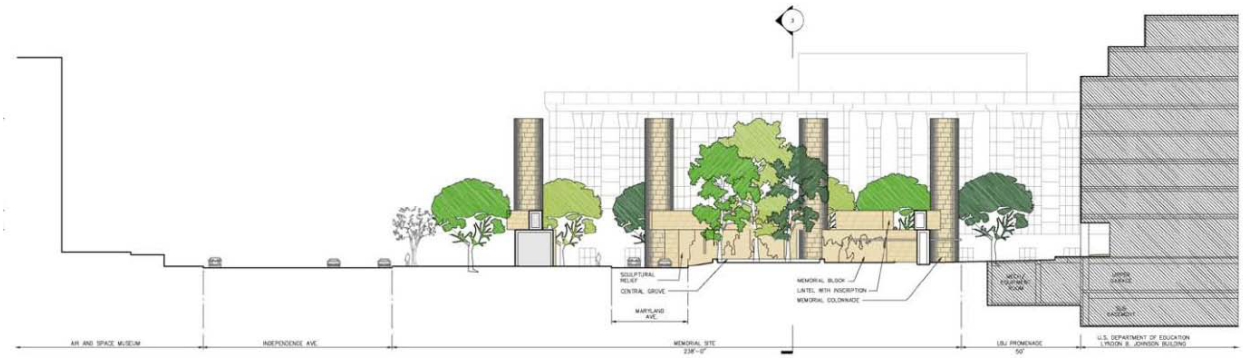
The three concepts take different approaches to incorporating Maryland Avenue into the memorial design, and in the arrangement of a collection of memorial elements on the site consisting of: a central grove, stone blocks and lintels containing sculpture and inscriptions, columns / colonnades, and stainless steel tapestries. Each concept proposes a different approach to treating the ground plane and landscape design for the Memorial, and will each contain memorial support uses such as a Park Ranger station, restrooms, and a bookstore. The building area for these uses will not exceed 2,500 square feet. Finally, within the 50-foot buffer area that will remain in GSA control, each alternative proposes a new pedestrian promenade, referred to as LBJ Promenade, will be created along the length of the Department of Education's north façade. According to the applicant, LBJ Promenade is intended to "create a distinct zone separate from the Memorial that recognizes the formal entrance to the Department of Education" that also serves as a "fourth frame" around the Memorial It is also intended to serve as a security buffer for the Department of Education.

Alternative 1 – Maryland Roadway

The Maryland Roadway alternative retains Maryland Avenue as a functional street realigned with the U.S. Capitol. Along this portion of the avenue, the historic 50-foot cartway will be slightly narrowed to permit one-way travel with the remainder of the cartway taken up by sidewalks. The narrowing of the functional roadway is intended to reduce traffic flow and increase pedestrian safety. As a result of the active road dividing the site, two triangular parcels are created and remain for the development of the Memorial.



Site plan of Maryland Roadway concept (Alternative #1)



Maryland Roadway concept (north-south cross-section)

In order to unify the site into a cohesive public space, a central grove of mature trees located near the center of the site will serve as the main gathering place for the Memorial. The grove will be surrounded by a circular colonnade composed of eight large columns that spans both sides of the roadway, and is intended to define the core of the Memorial within the larger urban square and surrounding precinct. At 68-feet high and 10-feet in diameter, the columns are meant to relate to the scale of the buildings that border the site. In addition, large stone blocks containing sculpture depicting scenes from Eisenhower's life and career will be located between the columns and will further define the Memorial core. Situated on top of the blocks are stone lintels inscribed with Eisenhower quotations. Simple water features are also proposed at

Images of Model Depicting the Maryland Roadway Concept Design Alternative

Aerial view looking south towards the LBJ Building

View looking northeast along Maryland Avenue towards U.S. Capitol

View looking east along Independence Avenue

View of central grove from within the Memorial core

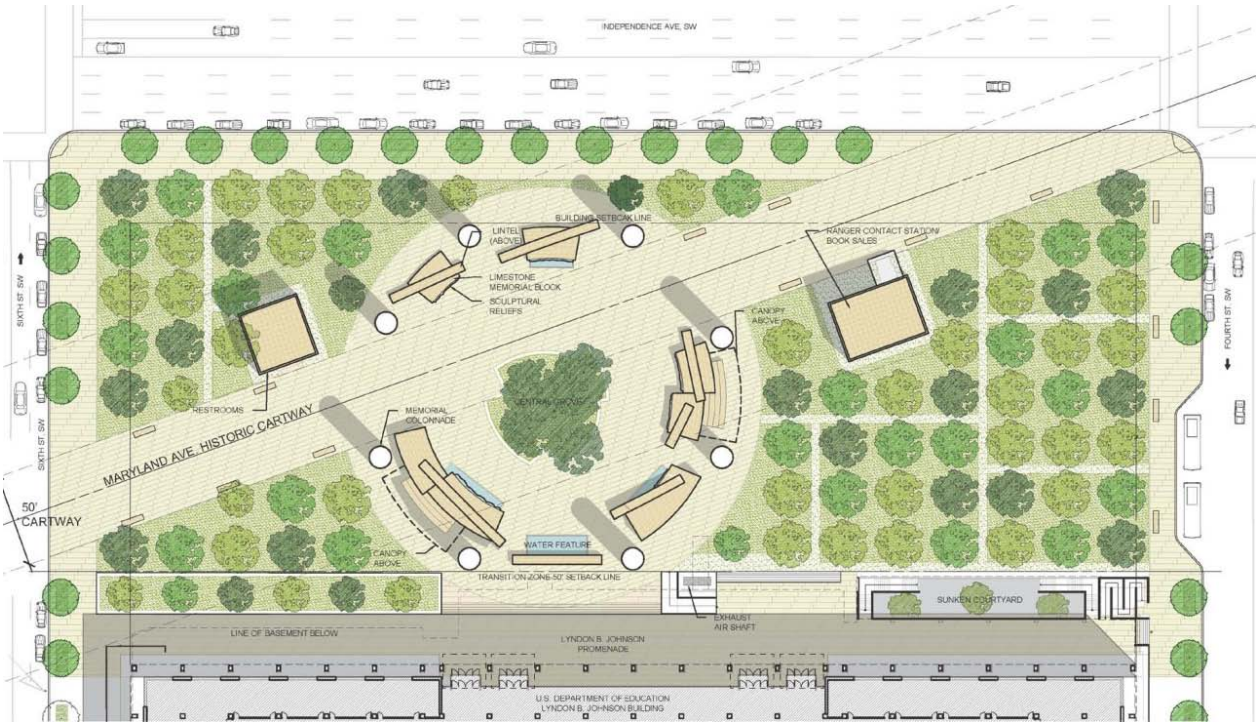
View looking east along LBJ Promenade

the base of each stone block. It is envisioned that from below the protective canopy of the grove visitors will be able to sit and focus outward towards the reliefs and lintels. At the south end of the colonnade a glass canopy structure is proposed to provide shelter from the elements and serve as a place where Memorial interpretation could take place. Finally, the memorial support buildings (Park Ranger station, restrooms, and bookstore) will be composed of two separate structures located on the south side of Maryland Avenue behind two of the stone blocks.

Surrounding the Memorial core is a formal grid arrangement of mature trees set within a paved plaza. The grid surrounds the colonnade and extends over the remainder of the site, defining the Memorial core within the urban square, and the urban square within the surrounding precinct. A number of native deciduous species that would vary in color and seasonal change is proposed to provide a uniform and continuous overhead canopy. The majority of the trees will be placed in individual planters that are at grade; others will be grouped into larger raised planters. The raised planters will also provide seating throughout the square.

Along the south side of the site, LBJ Promenade separates the Memorial from the Department of Education building and further defines this edge of the Memorial site. The promenade is also intended to serve as a new forecourt to the LBJ Building. Physical separation is provided through a series of raised planters at the west end of the promenade and the existing sunken courtyard at the east end, which will be slightly modified as a result of the project. The planters will also provide an integrated security barrier for the Department of Education. Access to the Memorial from the promenade will be provided along hardscape pathways between the planters.

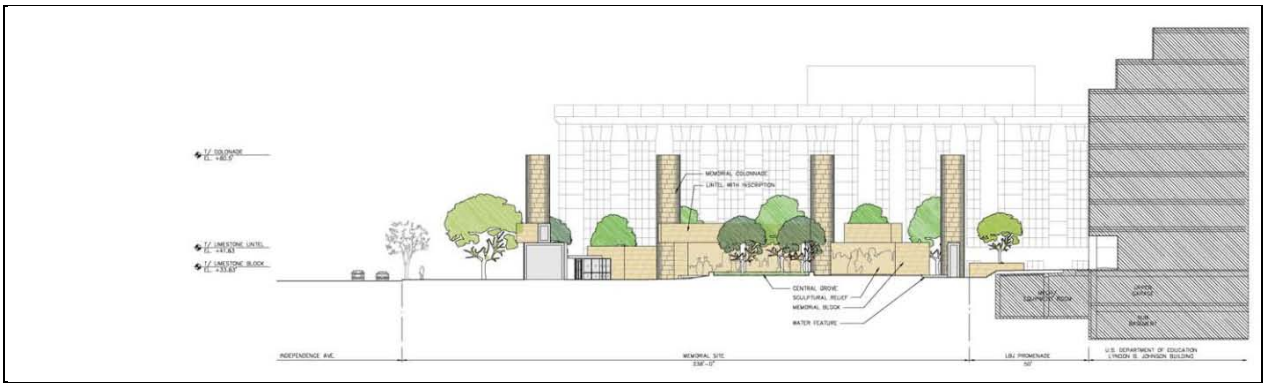
Alternative 2 – Maryland Promenade



Site plan of Maryland Promenade concept (Alternative #2)

The Maryland Promenade alternative is similar to Alternative #1 in terms of the organization of the memorial elements. However, in this alternative the 50-foot Maryland Avenue corridor is closed to vehicular traffic and maintained as a pedestrian promenade. Under this configuration, vehicular traffic traveling east on Maryland Avenue is diverted at 6th Street and the Memorial site is unified into a true urban square. The Memorial core continues to be defined by a

colonnade surrounding a central grove, stone blocks, and lintels containing Eisenhower quotations. In this alternative the columns are proposed to be 10-feet in diameter and 50-feet in



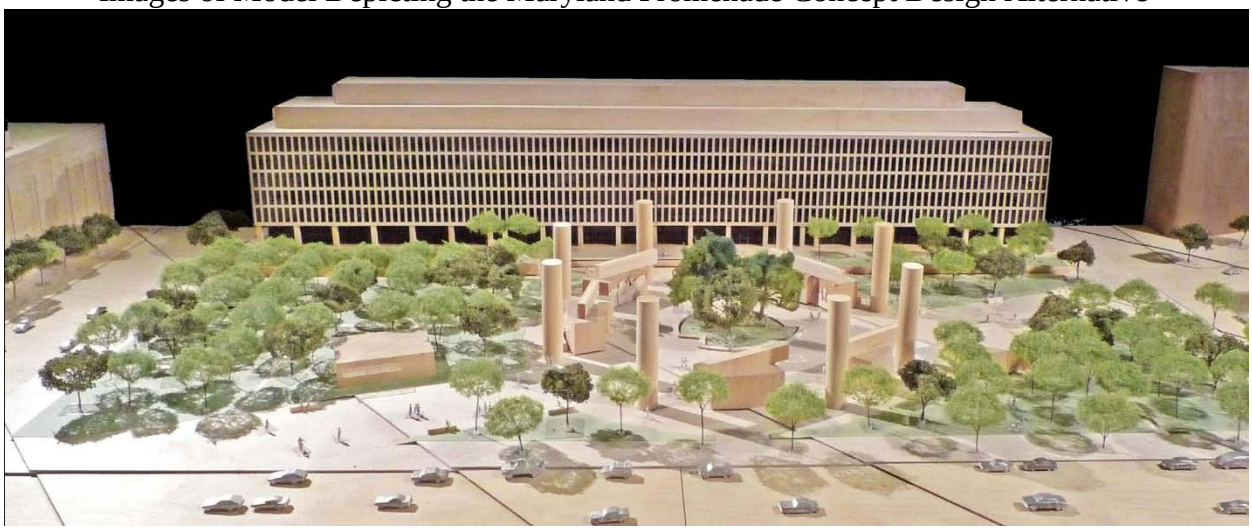
Maryland Promenade concept (north-south cross-section)

height, 18-feet lower than the first alternative. Simple water features continue to be located in front of some of the stone blocks; while covered tiered seating has been introduced on the backside of other blocks facing the surrounding landscape. Elimination of the roadway that bisects the site allows for the Memorial core to be a cohesive and contemplative space for learning about President Eisenhower and his vast accomplishments. As in the first alternative, the space under the grove will provide a shaded place for visitors to sit and look outward toward the surrounding sculptural reliefs and quotations.

In contrast to the first concept design, the ground plane in this alternative is treated as an expansive greensward composed of shaded lawn areas and mixed groundcover zones that are separated by modest gravel pathways. The greensward accentuates the Memorial core as well as the Maryland Avenue cartway as the principal pedestrian pathway through the square. Within the greensward, an orthogonal grid of trees reinforces the geometry of the ground plane and is a strong counterpoint to the Memorial core and the diagonal avenue. This consistent and uniform tree canopy also will assist in distinguishing the Memorial core from the rest of the site, and define the site as an urban square within the surrounding precinct. Finally, in this alternative the two memorial support buildings have been moved from behind the stone blocks and placed at the edges of the cartway.

In Alternative #2, LBJ Promenade is physically separated from the Memorial by an elevation change that extends to the entrance of the Department of Education Building. Access down to the Memorial is provided by a wide stairway that is centered on the building entrances. A large raised planter is located to the west of the stairway; the existing sunken courtyard balances the planter at the east end of the promenade.

Images of Model Depicting the Maryland Promenade Concept Design Alternative



Aerial view looking south towards LBJ Building

View looking northeast along Maryland Avenue towards U.S. Capitol

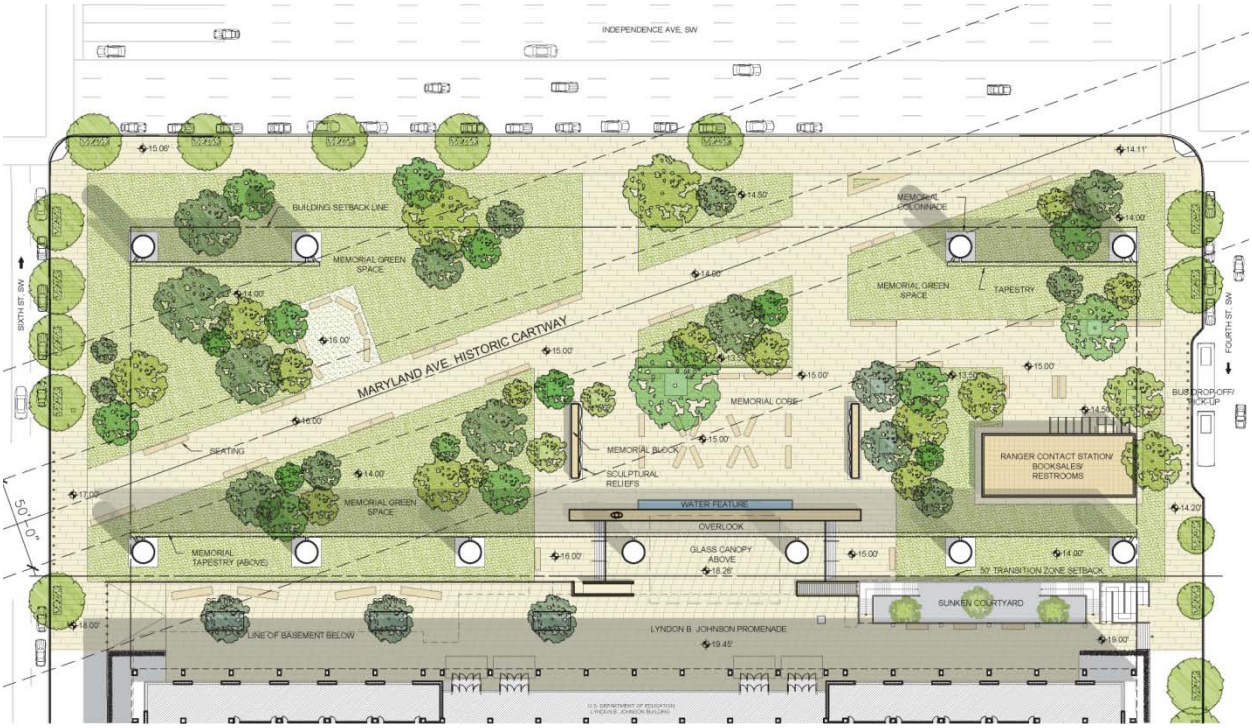
View looking east along Independence Avenue

View of central grove from within the Memorial core

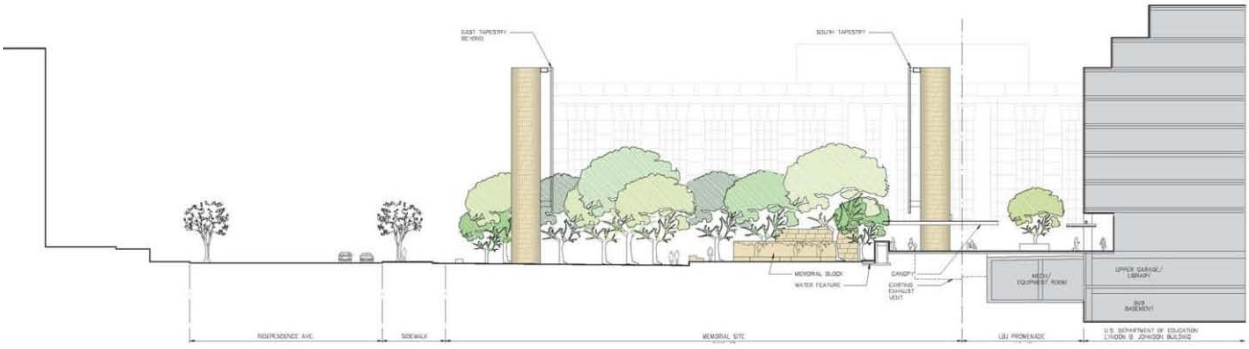
View looking east along LBJ Promenade

Alternative 3 – Maryland Park

The Maryland Park alternative takes a different approach to establishing the Memorial as a new, autonomous precinct within the surrounding urban context by proposing large memorial tapestries of woven stainless steel wire along the north and south edges of the site that are designed to establish the entire site as a memorial precinct, and create a proscenium stage setting when viewed from Independence Avenue. According to the applicant, the tapestries are intended



Site plan of Maryland Park concept (Alternative #3)



Maryland Park concept (north-south cross-section)

to serve two purposes. “The first is to establish the site as a special memorial precinct along the northern edge of the site at Independence Avenue and along the southern side of the Memorial, adjacent to the US Department of Education Building.” The second purpose of the tapestries is to memorialize President Eisenhower. The tapestries will be supported by a linear colonnade composed of columns that will be a minimum of 9-feet in diameter, although structural necessity may require the columns to reach 12-feet in diameter. The height of the columns will reach 79-feet high. The bottoms of the tapestries have been raised above the ground plane to align with the underside of the soffit elevation of the LBJ Building. Depending on where the measurement is taken this distance will range between 15- to 22-feet above the finished grade. The tops of the tapestries have been aligned with the first cornice line of the LBJ Building approximately 75- to 79-feet above grade. Along the southern edge of the site, a tapestry is proposed to span the entire length of the LBJ Building’s north façade, approximately 550 feet. In addition, two, 100-foot long tapestries are proposed at either end of the site’s northern edge along Independence Avenue,

with the space between the tapestries framing the view of the Capitol and producing an entrance into the Memorial core. According to the applicant, "the cues of the tapestry and column height taken from the LBJ Building, and the linear alignment of the columns along Independence Avenue, complement the scale of the surrounding precinct."

Near the center of the site, a rectilinear Memorial core is defined by the central grove and two equally sized stone blocks that face the center of a large gathering space. The two blocks will depict imagery representing President Eisenhower's careers as a military general and as a President. The south edge of the Memorial core will be defined by an elevated overlook and linear water feature that is intended to represent a bridge that connects the two periods of Eisenhower's life. The applicant has expressed the potential for a modest statue of President Eisenhower to be placed on the bridge overlooking the Memorial core. Bench seating within the core will invite visitors to sit and look outward towards the stone block sculptures. Outside of the Memorial core, large grassy areas with groundcover plantings have been expanded to the fullest extent possible, emphasizing the Memorial core as the central gathering space. The applicant states that the forms of these green spaces have been developed as "a garden counterpoint to the orthogonal layout of the tapestries and as a complement to the general informality of the Memorial core." Unlike the formal arrangement of trees in the previous two alternatives, the distribution of plantings in this alternative is more naturalistic, or episodic, symbolizing the pattern of a Kansas landscape. The tree canopy also will be different than the other alternatives in that it will be more varied, consisting of medium to large trees at the edges of the site and smaller understory trees serving to provide a gradual scaling down to the pedestrian pathways. The primary pedestrian pathways of this alternative are along Maryland Avenue, which moves diagonally through the otherwise orthogonal orientation of the Memorial precinct created by the tapestries. The memorial support facilities, which have been combined into one building, are located in the southeast corner of the site along 4th Street near a proposed bus pick-up / drop-off area.

Images of Model Depicting the Maryland Park Concept Design Alternative

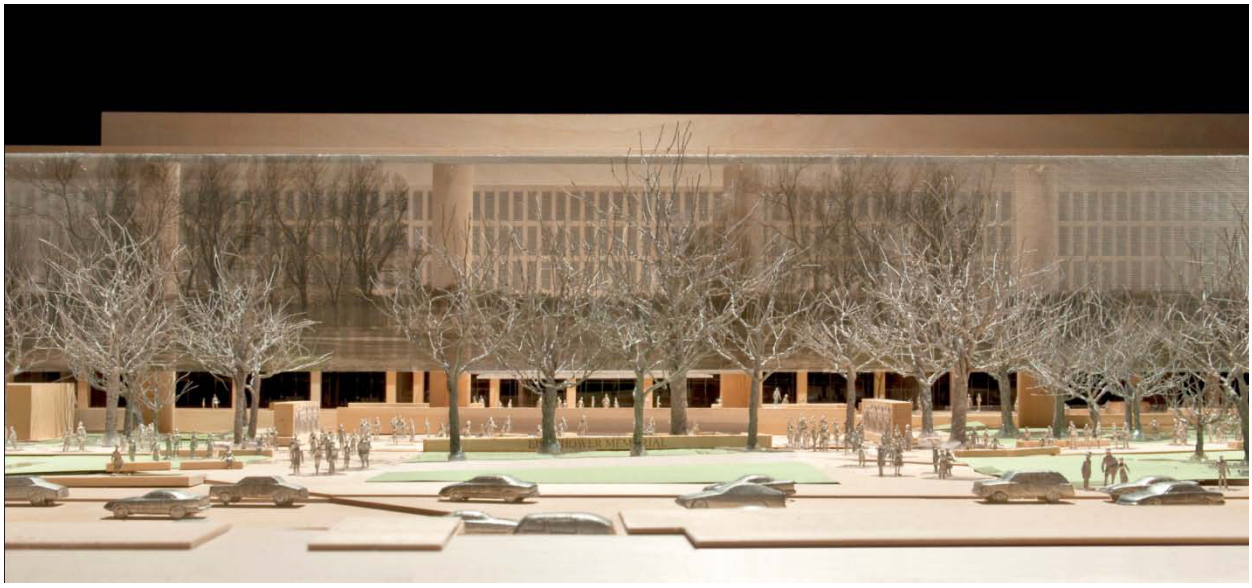
Aerial view looking south towards LBJ Building

View looking southeast from Independence Avenue

View looking southwest from Independence Avenue

View looking northeast towards the U.S. Capitol

As currently proposed, the imagery depicted on the tapestries will express a Midwestern landscape based on Abilene, Kansas. The black and white landscape imagery depicted on the tapestries is intended to interact with the actual landscape of the Memorial. The applicant intends to place the trees on the site so that they "have a specific and intentional relationship with the tapestry imagery as a natural foreground" while also taking into consideration the best possible site lines to the memorial elements, with the central grove being the dominant landscape feature. At the same time, the applicant is currently investing a great deal of research into developing the tapestry in a way that serves its intended purpose but also achieves a high level of transparency that will afford views to and from the LBJ Building. At present, the applicant is envisioning the tapestry as a "layered or integrated assembly comprised of three elements:" 1.) a dense weave landscape tapestry, 2.) a loose weave landscape tapestry, 3.) and an open or architectural weave. The dense weave structure would be used to represent the landscape imagery and major tree limbs. It would be composed of a high resolution woven jacquard tapestry made of silver and black stainless steel wire. The second-level, loose weave tapestry is a less resolute image and would be used for the spaces between major tree



View looking south from Air and Space Museum towards the Memorial core and the LBJ Building (winter)

limbs. The applicant states "that this element will be partially transparent." Finally, the third tapestry element would be an open weave, or architectural mesh section, composed of a stainless steel base material. This third element would be used in the portions of the tapestry image that represent sky. The applicant states that 'this portion will have no "image" detail and have a high degree of openness. Concerning the status of the applicant's research and development efforts on the tapestry, the applicant has submitted the following statement:

> "The samples received thus far demonstrate a level of dignity that can be achieved through this process that would offer a memorial design concept truly worthy of President Eisenhower. Although further technical and aesthetic advancements are necessary, the information gathered at this point leaves the design team very optimistic that this desired objective can be achieved. Moving forward, the design team will continue to advance the tapestry element to meet the technical and aesthetic goals as follows:
>
> - Image resolution through black and silver wire colors.
> - Continued progress on the tapestry composition and assembly, to balance quality image resolution as well as high transparency at different assembled portions of the image. This will permit views of the Department of Education from the Memorial and vice versa.
> - Finalization of the material to be used for the tapestry (color, size and gage).
> - Age testing and durability for the proposed material.
> - A full scale mock up on the site is intended for the preliminary design submission to the agencies and stakeholders at the end of the design development phase."

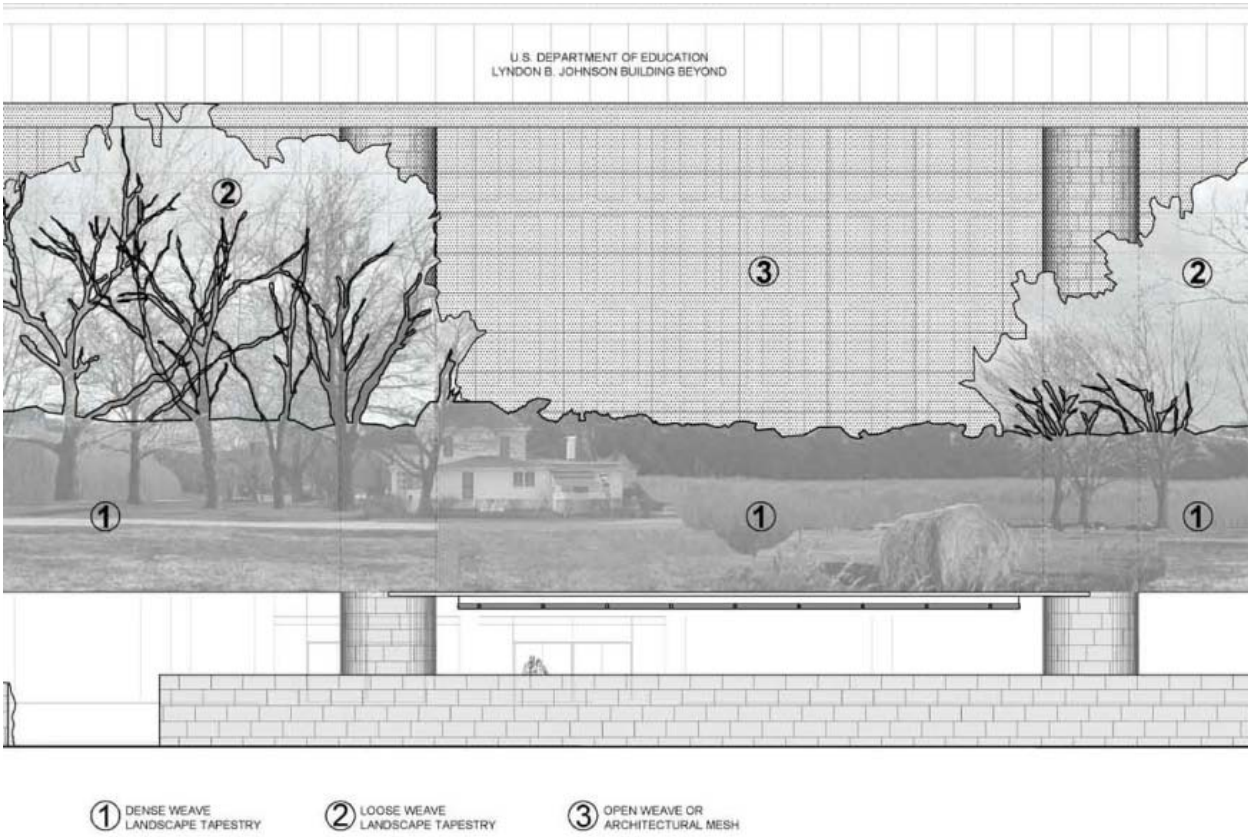


Illustration of three-tiered layered assembly of proposed tapestry

View of central grove, Memorial core and tapestry with LBJ Building behind

View of tapestry with LBJ Building behind (winter)

View looking east along LBJ Promenade

In the Maryland Park concept alternative, the applicant states that LBJ Promenade "acts as an urban street for access to the entrance of the building." The 50-foot promenade will be situated between the north façade of the LBJ Building and the southern tapestry of the Memorial, a distance of approximately 72 feet. The promenade will sit about four feet above the Memorial core. Taking advantage of this grade differential, an overlook is being proposed across from the entrances of the LBJ Building looking over the core. A glass canopy is planned for above this area to provide shelter and can be used as a gathering space for Memorial visitors and events. Benches and landscaping are also proposed for along the length of the promenade.

PROJECT ANALYSIS

2006 Site Selection Design Principles

Staff's review of the proposed concept design alternatives primarily focused on each alternative's consistency with the 2006 site selection design principles that were adopted by the Commission and included as required mitigation in NCPC's Finding of No Significant Impact (FONSI) for site selection. The design principles are as follows:

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

Although more detailed design guidelines were contemplated, the design principles adopted by the Commission were intentionally developed to be more general in order to better address the design of the Memorial both within its immediate context and within the framework of the L'Enfant Plan. For example, during site selection NPS had proposed a more detailed set of design guidelines that would have limited memorial elements within the Maryland Avenue right-of-way to a height of 10 feet. However, the Commission ultimately decided not to adopt these based on staff's input that during the design development stage the Section 106 process would provide opportunity for the development of more detailed guidelines, as necessary, and that such guidelines could be incorporated into a Memorandum of Agreement. The DC SHPO agreed with this approach.

Staff is able to rely primarily on the design principles to carry out its review since the principles incorporate, to a large extent, the recommendations and policies of other NCPC planning and design tools that staff typically uses to critique projects, including: the Comprehensive Plan, the Memorials and Museums Master Plan, and the Monumental Core Framework Plan. Generally speaking the principles can be summarized into three basic questions as they relate to the proposed concept designs:

- Does the design preserve views along the historic Maryland Avenue corridor?
- Does the design form a unified square in the spirit of the L'Enfant Plan that complements the Department of Education Building?
- Does the design respect and complement the surrounding precinct?

General Comments

Staff has reviewed the proposed concept design alternatives for the Dwight D. Eisenhower Memorial and finds that the process by which the concept designs have been developed thus far to be inconsistent with the Commission's 2006 action which requires the applicant to use the Section 106 consultation process to design the Memorial to meet an established set of general design principles. Staff supports the applicant's efforts to develop a memorial that utilizes modern and innovative ways to commemorate President Dwight D. Eisenhower in a manner that is unlike any other Presidential memorial in Washington, DC, and in particular supports the use of the woven stainless steel tapestries as a commemorative element and as a way to define the site within the surrounding context. Overall, the scale of the memorial elements used in the three concept designs seems correct given the size of the site and its surrounding public space. However, staff considers the placement of the columns at the edge of the 50-foot cartway in the Maryland Roadway and Maryland Promenade alternatives to be an unacceptable intrusion into the historic viewshed toward the U.S. Capitol. In addition, the proposed size and placement of the tapestries and supporting columns in the Maryland Park alternative also compromise the ability to preserve the historic viewshed as well as produce contextual impacts on surrounding buildings, especially the Department of Education headquarters building.

As a concept, the use of tapestry composed of stainless steel to commemorate President Eisenhower's life and accomplishments is an exciting idea that utilizes a traditional method of storytelling in a modern way. Assuming the desired resolution can be reached, the contrast between the landscape imagery of the tapestry and the actual landscape of the Memorial will create a unique urban experience. The decision to use imagery that expresses Eisenhower's modesty and humble beginnings on such a large scale also creates an interesting contrast on an interpretive level, conveying the idea that Eisenhower continuously viewed his vast achievements in life within the context of the values he learned while growing up in middle-America. However, as described more fully below, staff currently finds the tapestry alternative to be inconsistent with several of the 2006 site selection design principles. This is primarily due to its proposed size and placement relative to the Maryland Avenue viewshed and the impacts it has on surrounding buildings. Similar concerns have also been expressed by the Department of Education and the District of Columbia State Historic Preservation Officer. As a possible way to resolve some of the planning and design issues related to the tapestry, the applicant is encouraged to explore alternative approaches to incorporating this element into the project in ways that will better relate to the surrounding context and be consistent with the design principles, including the possibility of relocating the columns and tapestries. Integration of the columns and tapestries could also help resolve some of these issues and have the added benefit of simplifying the Memorial design thereby placing greater focus on the Memorial's content. Integrating the tapestries and the columns would also redefine the use of an architectural element that has come to symbolize Washington over time. It would also give the columns interpretive value rather than simply being used for framing views or structural purposes.

Alternative 1 – Maryland Roadway

By transforming the existing collection of disparate parcels into a new Presidential memorial and landscaped square the Maryland Roadway alternative would enhance the nature of the site as one

in a sequence of public spaces embellishing the Maryland Avenue vista. Other public spaces along this vista include the U.S. Capitol grounds and Union Square, historic Reservation 113, and the Jefferson Memorial. The concept is also respectful of the surrounding building lines and reflective of the principles of the L'Enfant Plan as they pertain to the shaping of public space by surrounding buildings. The concept creates a public space that is defined by the buildings that surround the site, and is visually connected to other public spaces along Maryland Avenue. In this respect the alternative also complements the architecture of the surrounding precinct by relying upon it to define the space rather than trying to compete with or marginalize the surroundings. The concept design is also a complementary counterpoint to the area by way of its introduction of green space into an area that is characterized by significant amounts of impervious surface and lacking in useable open space.

View of southern portion of Memorial core with Maryland Avenue in the foreground

Although the concept design integrates the disparate parcels into a unified memorial site, with the central grove, stone block sculptures, and surrounding colonnade in the middle of the site providing a strong yet modest commemorative focal point, the presence of the roadway bisecting the Memorial's core into two parts would likely dominant the space and impede the ability to establish a public gathering space that is meaningful and functional due to traffic queuing and noise. The presence of the roadway would also likely detract from the success of the Memorial as a place to reflect and learn about President Eisenhower. Furthermore, with the roadway bisecting the site there is potential for vehicle/pedestrian conflicts to occur as a result of visitors attempting midblock crossings while circulating within the Memorial core. The roadway would also diminish the ability of the Memorial to unify the surrounding precinct by interfering with the creation of a unified landscape upon which the surrounding buildings can organize around. Finally, while a marked improvement from what currently exists on the site, staff finds that this alternative could do more to maximize the amount of green space provided, especially considering the amount of impervious surface that currently exists on and around the site including the Maryland Avenue roadway. In the spirit of designing this space to function as a standalone Presidential Memorial within a surrounding landscape, staff recommends that the applicant increase the use of vegetation along the ground plane. Doing so would further distinguish this site from the hustle and bustle of the surrounding urban environment. It would also help dampen traffic noise along Maryland and Independence Avenues, and establish a more informal setting outside of the Memorial core for visitors to enjoy.

Regarding views, in staff's judgment the Maryland Roadway concept does not go far enough to preserve reciprocal views to and from the U.S. Capitol along Maryland Avenue. For example, five of the eight columns that encircle the central grove are located within the historic 160-foot

right-of-way, and four of them are located directly on the edges of the proposed 50-foot cartway. At 68-feet high and 10-feet in diameter, these columns would dominate the viewshed along the avenue towards the Capitol Building. While it was previously determined during site selection that the 50-foot cartway would be recognized as being completely off limits to any physical memorial elements, the actual historic viewshed encompasses the entire right-of-way. Therefore, the placement of any memorial elements within the right-of-way must be done sensitively so as not to compromise the integrity of the historic view toward the Capitol. As stated earlier, staff considers the scale of the columns to be appropriate and effective in defining the Memorial space within the larger site and surrounding context. In this instance, it is the placement of the columns in such close proximity to the cartway that is problematic.

Maryland Avenue viewshed toward U.S. Capitol (Alternative #1)

Alternative 2 – Maryland Promenade

Overall, the treatment of Maryland Avenue and the size of the memorial elements in this alternative successfully create a unified memorial site that integrates the disparate parcels into a meaningful and functional gathering place that also unifies the surrounding precinct by providing a new central green space upon which the surrounding buildings can organize around. In addition, by establishing a new Presidential memorial and landscaped square the concept design would also position the site as one in a sequence of public spaces along the Maryland Avenue vista including the U.S. Capitol grounds, historic Reservation 113, and the Jefferson Memorial. The concept is also consistent with the design principle pertaining to the need to respect existing building lines in how the memorial elements are organized on the site. The central grove, colonnade, stone block sculptures and lintels are all located at or behind the building lines along Independence Avenue, 4th Street, and 6th Street. These elements also respect the alignment of trees along Maryland Avenue.

The alternative reflects the principles of the L'Enfant Plan as they pertain to the relationship of public squares to avenues, and to the shaping of public spaces by the buildings that surround them. By closing Maryland Avenue to vehicular traffic, the Maryland Promenade concept successfully creates a cohesive public square that reads as a separate and distinct public gathering space that is defined by the surrounding buildings. The concept design also respects and complements the architecture of the surrounding precinct by relying upon it to define the space rather than trying to compete with or marginalize it. This is especially true of the

Department of Education building where under this alternative is provided with an improved entry forecourt and renewed presence along Independence Avenue. Finally, this particular concept incorporates significant green space into the design of the Memorial by establishing areas of greensward that frame and accentuate the Memorial core and the Maryland Avenue cartway. The greensward areas will be planted with a consistent canopy of deciduous trees which will provide a uniform canopy and further add to the greening of the site.

Maryland Avenue viewshed toward U.S. Capitol (Alternative #2)

Regarding the need to preserve reciprocal views to and from the U.S. Capitol along Maryland Avenue, staff notes that while an improvement from the previous concept design this alternative also needs refinement in order to satisfy this design principle. This alternative proposes columns that are 10-feet wide by 50-feet high, 18 feet lower than in Alternative #1. The lower columns seem to relate better to the overall composition of the viewshed along Maryland Avenue, and through further refinement to their placement could establish an appropriate foreground to the view of the Capitol Building. Furthermore, the placement of the memorial support buildings at the edge of the cartway is problematic from the standpoint of preserving the viewshed along Maryland Avenue, as is the slight intrusion of the Memorial's central grove. As support facilities of the Memorial, the buildings need not be located so prominently within the historic viewshed. In addition, buildings would not typically be allowed to be located inside the 160-foot right-of-way. Therefore, staff recommends that these buildings be relocated, and possibly consolidated, to a more discrete location on the site outside of the Maryland Avenue right-of-way.

<u>Alternative 3 – Maryland Park</u>

Like the previous two alternatives, the Maryland Park alternative also unifies the site's collection of disparate parcels into a unified memorial site. The use of the stainless steel tapestries along the north and south sides of the site create an autonomous, stand alone precinct within which the memorial elements are located. The configuration of the tapestries has been influenced by the notion of building an object within a temple within a picturesque landscape, likened to the Lincoln Memorial. In addition, the tapestries take the form of a proscenium stage, with the south tapestry as the backdrop, upon which the story of Eisenhower can be told when viewed from Independence Avenue. In addition, the design concept creates a unique public gathering space that establishes the site as one in a sequence of public spaces along the Maryland Avenue vista. Significant green space is also proposed for along the ground plane and through a diverse landscape plan that proposes a more irregular arrangement of vegetation intended to reflect a

typical Kansas landscape. The informal landscape will establish a non-uniform tree canopy across the site that will relate to the landscape imagery of the tapestries. This significant amount of green space will be a welcomed amenity in an area of the city that is characterized by significant amounts of impervious surface and lacking in useable open space.

View through Memorial core towards LBJ Building

While staff finds that the Maryland Park alternative creates a unified memorial site and public gathering space, it cannot find that the proposed concept design unifies the surrounding precinct. The placement of the tapestries along the north and south edges of the site essentially establishes walls that define a self-contained memorial precinct, with the exception of the proscenium stage view along Independence Avenue. The applicant's efforts to create a memorial precinct in the image of the Lincoln Memorial does not translate into a memorial that reads as an object, within a temple, within a picturesque landscape. Instead, the tapestries, analogous to the walls of the temple, have been pushed to the outer edges of the site forcing the actual landscape to be located inside of the memorial precinct, with the landscape imagery of the tapestry serving as the surrounding picturesque landscape. This results in a memorial design that essentially turns its back on the surrounding precinct, especially the Department of Education building, rather than creating a common space which the surrounding buildings help to define. Specific to the Department of Education, the size and placement of the tapestries will overshadow the LBJ Building and eliminate its chances to participate fully in the definition of this new urban square. In addition, irrespective of the level of transparency ultimately attained, the placement of a 78-foot high, 550-foot wide structure supported by columns that are nine to twelve feet in diameter will have a detrimental effect on the quality of the working environment of Department of Education employees, specifically with respect to natural light and views. In staff's judgment, the concept also does not respect and complement the architecture of the surrounding precinct other than taking cues from the height and scale of the surrounding buildings to design memorial elements such as the tapestries and supporting colonnade. Staff would consider this appropriate if the site was to be developed with a building as opposed to the public open space envisioned by the design principles.

Regarding the design principles that address the need to respect the building lines of the surrounding rights-of-way and reflect L'Enfant Plan principles by shaping the Memorial site as a separate and distinct public space, the applicant has indicated that the tapestries create or help to reinforce the street wall, particularly along Independence Avenue. However, as can be seen at any other square throughout Washington, as one approaches the square the defined street wall gives away to an open space that is defined by the surrounding buildings. When commenting on the 2006 design principles DC SHPO stated "it is the shaping of view corridors and public spaces

View looking west along I Street, NW towards McPherson Square

View looking west along Independence Avenue (Alternative #3)

framed by building sites that is the essence of the plan." As proposed, staff considers the tapestries to read more like an extension of the street wall similar to what would occur if a building was constructed on the site. Rather than striving to reinforce or extend existing street walls, the design principles encourage the site to be an opening in the street wall similar to the function of other public squares throughout the city.

The concept's proscenium stage setting also does not contribute to shaping the Memorial site in a manner that is reflective of L'Enfant Plan principles and complements the Department of Education building. According to the applicant, this concept creates a virtual proscenium stage upon which the Eisenhower story can be told when viewed from Independence Avenue, with the southern tapestry serving as a backdrop. While the concept of creating a virtual stage setting is an intriguing idea, the creation of a proscenium within this particular context is contrary to the notion of establishing a Memorial as an urban square in the spirit of the L'Enfant Plan by interfering with the existing buildings' ability to define the Memorial site, all of which have thematic ties to President Eisenhower. Instead it unnecessarily creates a precinct within a precinct. Rather, a more appropriate approach may be to design a setting akin to theater in the round, where those at street-level as well as the occupants of the buildings that surround the site can participate equally in the Memorial.

View from Independence Avenue showing tapestry configuration as a proscenium stage setting

View looking northeast along Maryland Avenue towards the U.S. Capitol

The Maryland Park alternative also compromises the reciprocal views to and from the U.S. Capitol along Maryland Avenue by placing columns and portions of the tapestries within the 160-foot right-of-way in a manner that dominates views to the Capitol. While the applicant has made minor modifications to the tapestries as they relate to the viewshed and the LBJ Building, staff recommends that they still disrupt views of the U.S. Capitol given their proposed size and placement. The placement of the columns and tapestries also reframes the viewshed in a way that is visually off center and disrupts the visual perspective converging on the Capitol. The east-west orientation of the tapestries also takes away from the avenue being read as the dominant element over the orthogonal street grid, a basic L'Enfant Plan principle.

CONFORMANCE

Commemorative Works Act

The Commemorative Works Act (CWA) contains a set of foundational level decision criteria that NCPC is required to use when considering site and design proposals for commemorative works. Specifically, the CWA states: "In considering site and design proposals, the Commission of Fine Arts, National Capital Planning Commission, and the Secretary or Administrator (as appropriate) shall be guided by, but not limited by, the following criteria:

- **Surroundings -** To the maximum extent possible, a commemorative work shall be located in surroundings that are relevant to the subject of the work.
- **Location -** A commemorative work shall be located so that:
  - It does not interfere with, or encroach on, an existing commemorative work; and
  - To the maximum extent practicable, it protects open space, existing public use, and cultural and natural resources.
- **Material -** A commemorative work shall be constructed of durable material suitable to the outdoor environment.
- **Landscape features -** Landscape features of commemorative works shall be compatible with the climate.
- **Museums -** No commemorative work primarily designed as a museum may be located on lands under the jurisdiction of the Secretary in Area I or in East Potomac Park as depicted on the map referenced in Section 8902(2).

- **Site-specific guidelines -** The National Capital Planning Commission and the Commission of Fine Arts may develop such criteria or guidelines specific to each site that are mutually agreed upon to ensure that the design of the commemorative work carries out the purposes of this chapter.
- **Donor contributions -** Donor contributions to commemorative works shall not be acknowledged in any manner as part of the commemorative work or its site.

Thus far it appears the proposed concept alternatives are consistent with the criteria listed above. The memorial location is surrounded by buildings and uses that are relevant to President Eisenhower's achievements and the time period in which he served in the White House. As noted above, this was an important factor in the EMC's decision to select this site. Furthermore, the Memorial will not interfere or encroach upon an existing commemorative work, will increase the amount of open space and public use in the surrounding area, and will be landscaped in a manner that is compatible with Washington's microclimate. The material make-up of the Memorial is yet to be determined, though the applicant has expressed a desire to construct the major memorial elements out of stone and stainless steel; the latter of which will be age tested by the applicant to determine its feasibility. Finally, at present none of the three concept designs contain elements intended to recognize donor contributions. Staff notes, the CWA prohibits donor recognition in any manner as part of the Memorial project.

National Historic Preservation Act

By Memorandum dated August 9, 2006, NPS formally initiated consultation with the DC SHPO and informed DC SHPO of its consideration of "a portion of U.S. Reservation 5, a triangular parcel of parkland formed by the intersection of Independence Avenue, Maryland Avenue and 6th Street, as well as two other parcels of public space located between 4th and 6th Streets, as the proposed site for the Dwight D. Eisenhower Memorial." In its memo, NPS requested DC SHPO concurrence with its determination that "the unification of the three parcels into a single landscaped public plaza as the site of the memorial would have no adverse effect on the National Register qualities of the L'Enfant/McMillan Plan." This determination was contingent upon adherence to a set of design guidelines that were developed by NPS in order to mitigate any potential adverse effects of the memorial. NPS concluded its memorandum with an invitation to the DC SHPO to develop a Memorandum of Agreement (MOA) that provides for consultation in order to continue to avoid adverse effects during the design development of the memorial. In its response to the NPS's memorandum, DC SHPO stated that it did not believe it was necessary to make an official determination of effect for the project at that time. Rather than endorsing the of design guidelines prepared by NPS, DC SHPO expressed general support for the creation of design guidelines and the development of an MOA, stating: "we believe that further discussion of the proposed guidelines among the parties will be beneficial, and appreciate your invitation to continue consultation toward a Memorandum of Agreement. In our opinion an agreement that incorporates design guidelines and indicates a procedure for review of the memorial design would be an appropriate vehicle to address the effects of the project on historic features." Since the Commission's 2006 approval of the site there have been no discussions among the consulting parties regarding the development of an MOA that would guide development of the memorial design.

In February 2010, NPS held informal meetings with NCPC, CFA, DC SHPO, Committee of 100, National Coalition to Save Our Mall, and other parties involved in the project. The purpose of these meetings was to familiarize agencies and parties with the project and the design team, and receive initial thoughts on the three concept alternatives. Meeting attendees voiced support for the use of the woven stainless steel tapestries as a memorial element, including NCPC staff, but expressed concern for its size and placement, and the impacts it may have on the Department of Education building. Several comments were provided related to the treatment of Maryland Avenue and whether it should be reestablished as a functional roadway. One participant noted that the entire 160-foot right-of-way vista of Maryland Avenue should be protected, and not just the 50-foot cartway. Finally, the representative from the National Coalition to Save Our Mall commented that the Maryland Park alternative seemed "too architectural," and that the size and placement of the tapestries seemed to contradict the idea of maintaining the diagonal avenue. Staff notes, that the concept designs currently before the Commission are largely the same with respect to size and placement of the memorial elements as those presented by the applicant in February 2010.

NPS formally "re-initiated" Section 106 consultation for the design of the Memorial on April 12, 2010, and held the first coordinated public Section 106 / NEPA meeting on April 22, 2010. The focus of the meeting was to provide background for the project and to describe the three initial design concepts. The few comments that were made at the meeting pertained to the removal of the community garden at the site, and the size and placement of the proposed tapestries. A second Section 106 Consulting Parties meeting was held on May 21, 2010 at which only DC SHPO was able to attend. The purpose of the meeting was to: review the design alternatives, present the history of the site and the historic alignments of Maryland Avenue, discuss the historic resources in the area, and determine the Area of Potential Effect (APE). By memorandum dated Jun 3, 2010, DC SHPO provided NPS its initial comments regarding the effects of the Memorial on historic properties. The DC SHPO recommended that none of the alternatives be completely dismissed from further consideration as "they may offer design solutions to avoid or minimize any adverse effects that are identified through the Section 106 process." It also commented on the need to expand the boundaries of the APE "to take the visual effects of the project into account since we are concerned about the scale and location of several elements of the Preferred Alternative, most notably the proposed Columns/Colonnade and the Tapestries." DC SHPO concurred with NPS that construction and operation of the Memorial has the potential to adversely affect the National Mall, several elements of the L'Enfant Plan, and possibly the Wilbur J. Cohen Building.

In addition, at the request of DC SHPO, Determinations of Eligibility (DOE) have been prepared for the LBJ Building and the Wilbur Wright Building in order to discern whether other historic properties exist immediately adjacent to the site. The DOE for the Wilbur Wright Building found that the structure is eligible of listing in the National Register of Historic Places for its association with urban renewal, and as a significant example of the adaptation of the International Style to the specific requirements of federal design in Washington, DC. The DOE for the LBJ Building found that the building and its designed landscape are not eligible for listing. Staff notes, however, that GSA is in the process of finalizing a second DOE for the LBJ Building. According to GSA, it would like to conduct additional analysis before finalizing its

position on the historic status of the building and landscape. Once complete, GSA will submit the new DOE for review by DC SHPO prior to the release of the EA for the project.

Thus far, staff considers the Section 106 consultation for this project to be very limited and unproductive, and not in compliance with the Commission's 2006 approval of the Memorial site which requires the applicant to "design the Memorial using the Section 106 consultation process to meet, to the Commission's satisfaction" a set of design principals. Recent comments received by staff indicate that DC SHPO agrees with staff's position regarding the status of the consultation process, stating that the process "has not resulted in alternatives to the proposed design" and that "there has been little specific discussion about how the preferred alternative does or does not conform to the design principles." In addition, DC SHPO commented that "there has been relatively little participation in the design review process by consulting parties."

National Environmental Policy Act

To fulfill its obligations under the National Environmental Policy Act (NEPA), NPS, in association with EMC, is in the process of preparing an Environmental Assessment (EA) that analyzes the three proposed concept design alternatives. NCPC also has an independent NEPA responsibility given its approval authority over the project, and thus has signed on as a cooperating agency in the preparation of the EA. GSA is also a cooperating agency. The environmental topic areas analyzed in the EA include: cultural resources; including aesthetics, viewshed, archeological, and historic, hazardous materials and waste; park operations and management; soils; transportation systems; vegetation; visitor use and experience; and water resources. Currently, the EA is undergoing internal review by NPS, EMC, NCPC, and GSA. Once internal review is complete the EA will be made available to the public for a 30-day public comment period.

The EA currently being prepared tiers off of the 2006 Site Selection EA. NCPC relied upon the Site Selection EA to issue its August 31, 2006 FONSI which found approval of the Memorial site would not significantly affect the human environment on the condition that the applicant design the Memorial using the design principles developed by NCPC staff in consultation with NPS, DC SHPO, and other consulting parties. The FONSI incorporated these design principles as required mitigation. The FONSI further states that the principles shall be refined within the context of the National Historic Preservation Act Section 106 consultation process with a resulting Memorandum of Agreement, and that the principles would be enforced by the Commission in subsequent design reviews for the Memorial. Therefore, staff notes that in order to recommend approval of a future memorial design the Executive Director must issue another FONSI based on the content of the 2006 and 2011 EAs, and only after finding that the Memorial design successfully meets the required mitigation contained in the 2006 Site Selection FONSI. Failure to satisfy the mitigation could call into question the standing of the 2006 FONSI and not result in a new FONSI for the Memorial design.

Comprehensive Plan for the National Capital

With respect to the location of the Memorial, and the potential of the proposed concept designs to provide environmentally sustainable benefits, staff finds the project to be consistent with the

policies of the Parks and Open Spaces, Federal Environment, and Visitors Elements of the Comprehensive Plan for the National Capital. The Comprehensive Plan encourages federal agencies to locate memorials in accordance with the 2001 Memorials and Museums Master Plan, and within walking distance of public transportation stations and routes, which the Memorial is on both accounts.

The Comprehensive Plan also includes policies that encourage federal agencies to employ innovative and environmentally-friendly site and building design and construction practices in order to reduce stormwater runoff, moderate urban heat island effects, and minimize energy consumption. Although still very much in the conceptual design stage, the applicant and its design team have indicated that the Memorial will incorporate Low Impact Development (LID) strategies intended to reduce, reclaim, and reuse stormwater runoff, and incorporate other design strategies geared toward environmental sustainability. Staff notes, however, that compared to existing conditions each of the three concept alternatives already appear to provide substantial environmental benefits through increases in the site's tree canopy coverage and pervious ground surfaces. As the design of the Memorial is developed further the applicant should explore the use of underground cisterns, rain gardens, and green roofs atop Memorial support buildings to maximize reduction and reclamation of stormwater runoff, and in so doing consider the requirements of the Energy Independence and Security Act of 2007. The applicant should also consider other federal and local requirements that exist for the benefit of the environment, and that may apply to construction of the Memorial, such as Executive Order #13514, Federal Leadership in Environmental, Energy, and Economic Performance, and Executive Order #11988, Floodplain Management.

Staff reviewed the three concept designs for consistency with the Comprehensive Plan's historic preservation policies and notes a general inconsistency with the policies of this particular element. While this element encourages the placement of memorials along L'Enfant avenues such that they provide views and points of reference, it stresses doing so in a manner that protects historic views and vistas, the settings of historic properties, and the openness of L'Enfant rights-of-way. The policies of the Comprehensive Plan place a heavy emphasis on protecting the integrity, form, and design of the L'Enfant Plan's system of streets and reservations from inappropriate new buildings and physical incursions. Staff considers the placement of the columns at the edge of the Maryland Avenue cartway to be an intrusion that could potentially compromise the integrity of this historically significant viewshed. The degree of this intrusion is even further exacerbated with the introduction of the tapestries in the Maryland Park alternative.

The Comprehensive Plan also seeks to protect historically significant properties as well as properties not yet listed in the National Register of Historic Places (NRHP) but that are nonetheless noted for their potential future significance. In particular, federal agencies are encouraged to identify and protect significant modernist architecture and landscapes. The proposed tapestries and associated colonnade could likely have an adverse effect on properties currently listed in the National Register of Historic Places, such as the Wilbur J. Cohen Building. They could also have adverse effects on the Wilbur Wright Building, which recently was determined to be eligible for listing in the NRHP, and the LBJ Building, which is currently being evaluated for its historic significance.

Memorials and Museums Master Plan

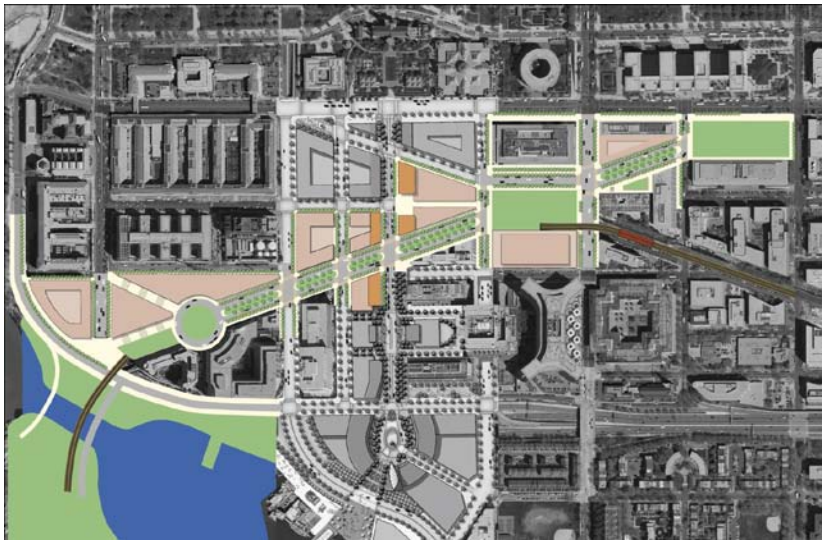
To advance NCPC's Extending the Legacy Plan (the Legacy Plan) vision for distributing new memorials and museums to all quadrants of Washington, the 2001 Memorials and Museums Master Plan (2M) identifies 100 potential sites for these types of facilities and provides guidelines for their development. The location of the Eisenhower Memorial is identified as Prime Candidate Site #3 in the 2M Plan. Some of the characteristics that qualify this site as a "Prime Candidate" include its location along two special streets, Maryland Avenue and Independence Avenue, proximity to the National Mall and U.S. Capitol, and its proximity to public transportation. The site's potential to accommodate a major memorial that relates to its surroundings is also a recognized asset. In particular, the plan states that "a primary memorial on this site could relate thematically to the Department of Education."

Staff finds, however, that the proposed concepts, and in particular the Maryland Park alternative, are inconsistent to varying degrees with certain general 2M policies, and the design considerations that are specific to this site. 2M's general policies stress the importance of designing new memorials that are respectful of their surroundings, and of key design features of the L'Enfant and McMillan Plans, especially when locating memorials along major avenues. Specific to the project site, 2M contains the following design considerations:

- Any future memorial should respect and reinforce this location's prominence as a civic plaza at the intersection of two special streets, Maryland and Independence, and its association with the Department of Education.
- Any future memorial should incorporate existing reciprocal views along Maryland Avenue. The mass and scale should not obstruct or obscure the primary axial relationships along the Avenue, and should not overshadow the Department of Education building.

The proposed columns in the Maryland Roadway (Alternative #1) and Maryland Promenade (Alternative #2) concepts are inconsistent with the general policies and design considerations noted above due to their placement at the edge of the 50-foot Maryland Avenue cartway. While it was determined during site selection that the 50-foot cartway would be the area that is off limits to any physical memorial elements, placement of elements within the historic 160-foot Maryland Avenue right-of-way must be done carefully with special considered for the potential impacts on views along the avenue toward the U.S. Capitol. Regarding the Maryland Park concept (Alternative #3), the columns and proposed tapestries have similar impacts on the Maryland Avenue right-of-way as the first two alternatives, but the intensity of these impacts is greater considering their size and placement. Overall, the placement of the columns in all three alternatives obstructs the primary axial relationships along Maryland Avenue. In addition, as currently designed and configured, the proposed tapestries would overshadow the LBJ Building resulting in a loss of the thematic relationship between the Department of Education and the Memorial.

Monumental Core Framework Plan



Framework Plan illustration showing a reestablished Maryland Avenue punctuated with a series of green spaces including the future Eisenhower Memorial at the intersection of Maryland Avenue and Independence Avenue.

The project site is located within the Southwest Rectangle precinct of the Monumental Core Framework Plan (Framework Plan), and the Eisenhower Memorial has the potential to advance two of the Framework Plan's key goals for this area: to restore Maryland Avenue as a grand urban boulevard that links the U.S. Capitol to the Jefferson Memorial while enhancing mobility and environmental quality, and to repair the urban fabric by restoring the street grid, decking over highways, and redeveloping superblocks to integrate open space and improve the public realm. The Framework Plan refines the Legacy Plan's vision of a fully restored Maryland Avenue and proposes that the avenue be reestablished as an urban boulevard punctuated with a series of green spaces designed according to typical L'Enfant Plan principles. As part of this new vision, the Framework Plan specifically acknowledges the future Eisenhower Memorial as a key contributor to the renewed Maryland Avenue and a significant visitor destination that will mark the avenue's arrival at the National Mall.

NCPC Donor Recognition Policies

In December 1988, NCPC adopted "Policies Relating to the Recognition of Private Contributors to Memorial, Museums, and Other Cultural Facilities on Public Lands in the National Capital." The Commission considered these policies to be necessary to ensure that those soliciting donations or contributed services will know at the earliest stage of fund raising or project planning what types of acknowledgements will ultimately be permitted. As a memorial to be constructed on public land in the National Capital, the design of the Eisenhower Memorial is required to adhere to these policies. Therefore, the applicant is encouraged to take these policies into consideration as the design of the Memorial proceeds towards subsequent stages of review.

CapitalSpace

Upon completion the Eisenhower Memorial will advance several of the CapitalSpace Plan's recommendations for enhancing parks within central Washington. Consistent with the CapitalSpace planning concepts of "Celebrating Urban Parks" and "Expanding Park System Capacity," the Memorial will extend the city's system of urban parks by creating a new open space that offers commemorative, cultural, recreational, and sustainable value.

CONSULTATION

National Capital Memorials Advisory Committee

Section 8905(a)(1) of the Commemorative Works Act requires memorial sponsors to consult with the National Capital Memorials Advisory Committee (NCMAC) on the selection of alternative sites and design concepts prior to submitting the project to NCPC for formal design review. In fulfillment of this requirement, EMC presented the three proposed design concepts at the April 21, 2010 NCMAC meeting. In general, the Commission members saw the use of this space bringing a great potential benefit to the city, and both U.S. Commission of Fine Arts and NCPC representatives expressed that the memorial has the potential to introduce a new typology into the city's public spaces. The Commissioners noted that there were site specific design guidelines in the 2M Plan which should be considered as the concept designs evolve, in addition to the required site selection design principles issued by NCPC.

As to the actual design of the space, the NCMAC members expressed concerns related to the treatment of Maryland Avenue and an overall lack of unity among the Memorial's several design elements. They also conveyed specific concern for the size and placement of the proposed columns and tapestries in Maryland Park concept design (Alternative #3).

Specific to Maryland Avenue, the NCMAC members stressed the importance of maintaining the avenue as an open pedestrian street and that the vista and view corridor should not be compromised. Members also noted that bisecting the Memorial site with a functional roadway may create aesthetic and safety problems, and may hinder the ability to create an integrated place at the Memorial site. Regarding the overall lack of unity, it was noted that the design moved in very different directions and that an inherent desire to fill up a large space with too many elements could compromise the basic message of the Memorial.

Specific to the Maryland Park alternative, all NCMAC Commission members were sensitive to the concerns raised by the Department of Education regarding the scale of the columns and tapestries and their proximity to the LBJ Building. Noting the thematic relationship between the Department of Education and President Eisenhower, the Commissioners felt the LBJ Building should be as important in framing the Memorial space as the other buildings that surround the site. It was suggested that the EMC consider moving the tapestries farther away from the building, and manipulating their form, height, and material. One member of the Commission recommended against the symmetrical placement of the columns given the asymmetrical disposition of the site caused by the Maryland Avenue right-of-way.

Coordinating Committee

The Coordinating Committee reviewed the proposal at its January 12, 2010 meeting and forwarded it to the Commission with the statement that the proposal has been coordinated with the following agencies: the District of Columbia Office of Planning, the District Department of Transportation, NCPC, GSA, and NPS.

U.S. Commission of Fine Arts

On January 20, 2011, the applicant presented the project to the U.S. Commission of Fine Arts (CFA). While the applicant provided a summary of the three concept alternatives, the presentation and discussion focused mainly on the Eisenhower Commission's preferred Maryland Park alternative. While CFA approved the concept by unanimous vote, several of the Commission members expressed uncertainties on the use of the tapestry as a memorial element. The Commission members supported the proposed combination of large-scale elements to capture the overall site and to define a central memorial precinct that focuses on commemorating President Eisenhower. They expressed strong support for the proposed colonnade along the north and south sides of the site noting their potential to effectively frame the site and create a beautifully defined space along the LBJ Building's north façade. However, the Commissioners questioned the presence and character of the proposed metal tapestries, primarily the tapestry in front of the Department of Education headquarters.

In its follow-up letter to the applicant, CFA strongly suggested consideration of eliminating the tapestries altogether, and instead relying on "the unexpectedly successful strategy of using the colossal columns to both define the urban space and establish the character of the memorial itself." CFA's letter also states that even if the large tapestry remains, the applicant should eliminate the two smaller tapestries along Independence Avenue to avoid distraction from the design's major gestures. Regarding the Memorial's landscape design, the Commission members expressed a preference for filling the surrounding space with a formal arrangement of trees such as what is proposed in Alternatives #1 and #2. They noted the importance of providing shade within the large site. They also suggested that the Memorial design more strongly acknowledge the diagonal alignment of the Maryland Avenue corridor. Finally, they supported the consolidation of all memorial support uses into a single structure located in the southeast portion of the site.