

IN REPLY REFER TO:  
NCPC FILE No. 7682

June 2, 2015

Mr. Glenn DeMarr  
National Park Service  
1100 Ohio Drive SW  
Washington, DC 20242

Re: Scoping for World War I Environmental Assessment

Dear Mr. DeMarr:

Thank you for the opportunity to provide comments on the scoping for the Environmental Assessment (EA) on the World War I Memorial and for working with the National Capital Planning Commission (NCPC) staff early in the process. As stated in the scoping notice and in Section 3091 of Public Law 113-291, Pershing Park along Pennsylvania Avenue is to be rededicated as the World War I Memorial; the law also authorized the World War I Centennial Commission to construct the World War I Memorial by enhancing the General Pershing Memorial through sculptural and other commemorative elements, including landscaping.

The World War I Memorial will be submitted to NCPC for review and approval, therefore, NCPC will rely on the EA to fulfill its National Environmental Policy Act (NEPA) responsibility. NCPC staff submits the following scoping comments, which are prepared in accordance with NCPC's Environmental and Historic Preservation and Procedures, and reflect the information that will be required to approve the project.

### Alternatives

It is difficult to provide comments on what alternatives we would like to see analyzed in the EA without understanding the scope and impact of the proposals that will be submitted in the design competition. Ideally, a wide range of alternatives should be evaluated. If a design is chosen that will modify the existing park infrastructure considerably, there should be an additional alternative(s) that would have a smaller, less impactful scope. NCPC requests that the Centennial Commission and NPS work with the review agencies to determine the alternatives analyzed in the EA.

It is also difficult to describe what alternatives should be analyzed without understanding existing site elements that must remain in place, can be relocated, or can be removed:

- As stated, the public law authorizing the World War I Memorial allows for enhancement of the John Pershing Memorial. Clarification is needed on whether the John Pershing

Memorial (including the statue and walls) must remain in place, can be altered, or relocated.

- In its review of Pershing Park in the early 1970s, NCPC reports made a distinction between the statue of John Pershing and the 8 foot tall walls around the statue that are a monument to the American Expeditionary Force of World War I. While we find the text and graphics on the walls to be informative and an important story, the walls lack readability during certain times of the day and in different weather conditions. The walls should also be evaluated from an urban design perspective and whether they meet broader goals for the new memorial elements, the overall park, and Pennsylvania Avenue. If allowed for modifications or replacement, NCPC staff recommends reevaluating the American Expeditionary Force of World War I monument.
- In 1982, the BEX Eagle was installed at the site to commemorate the bicentennial of the American bald eagle becoming the national bird of the United States. Background information on the gift should be evaluated to determine the appropriate location for the BEX Eagle.

In addition to the no build alternative, NCPC staff requests that one of the alternatives include an evaluation of the impacts if the park were maintained at a level consistent with that of the Pennsylvania Avenue Development Corporation's stewardship in the 1980's and 90's, including fully operational features.

### Urban Design and Visitor Experience

Regardless of the designs submitted in the competition, all alternatives analyzed in the EA should evaluate the entire site and its context holistically for a seamless park setting. NPS should work with the Centennial Commission to create a Pershing Park Master Plan that evaluates the entire site to ensure that even if the new memorial elements are within one section of the Park, the entire Park reads and functions as one place.

Urban parks in Washington serve many roles for residents and visitors. The most successful urban parks with commemorative elements balance these local and national roles and provide spaces that blend typical park uses (such as meeting for lunch with friends, attending an outdoor exercise class, or serving as a playground for children) with a respectful and dignified commemorative component. NCPC staff requests that all alternatives in the EA achieve this balance of roles. We stress to NPS and the Centennial Commission that the park needs to function foremost as an urban park that accommodates a variety of user experiences.

One of the most successful examples of a balance of local and national uses is the Navy Memorial located on Pennsylvania Avenue between 9<sup>th</sup> and 7<sup>th</sup> Streets, NW. The park is active nearly 18 hours a day, 7 days a week. It functions for all types of users: Navy veterans and their families who come to pay their respects; residents from Penn Quarter who catch a boot camp class before work; visitors who stop to hear a lunchtime concert; children from the nearby charter school who use it as their playground; active duty military members attending awards ceremonies; tourists looking for a great view of the Archives and Portrait Gallery; and many others. The memorial's fountain elements serve multiple functions; a commemorative element; a buffer from traffic noise and visual distractions; as well as a public amenity that enhances pedestrian comfort and

enjoyment on the important street axis. The Navy Memorial is a multi-functional urban space that uses an iconic design to accommodate a variety of commemorative and urban park uses. While the World War I Memorial's design and programming will be unique, we hope that it can successfully achieve both urban and commemorative uses as well.

In addition to a balance of urban park and memorial elements, and a consideration of the park's role as a physical transition point between the pastoral White House Grounds and Downtown Washington, NCPC has the following comments regarding the design:

- While costly to install and maintain, water features should be considered if a designer provides a cost-efficient solution (including an improvement to the existing feature).
- NPS and the Centennial Commission should work with the District Department of Transportation (DDOT) and other affected parties on the potential to remove the parking spaces on the north edge of the property in the Pennsylvania Avenue right-of-way. In addition to removing the taxi parking, an opportunity may be to narrow the cartway allowing for the site to provide an area for activating Pennsylvania Avenue.
- Any security element should be seamlessly incorporated into a design, and therefore, we recommend that the Centennial Commission analyze if security elements are needed now to help inform the needs and design of the project.
- Per NCPC donor recognition guidelines, donor recognition is not allowed in a landscape setting or on the exterior of a building.
- The potential use of a structure to define edges and reinforce viewsheds.

### Historic and Cultural Resources

This project is located within the Pennsylvania Avenue Historic District and is near multiple historic properties and districts, which may be impacted by the project. NCPC staff reviewed the draft Area of Potential Effect (APE) as shown in the scoping materials shared at the May 20<sup>th</sup> public scoping meeting and finds that the draft APE generally covers the area to be evaluated. However, we request that NPS at the first consulting parties meeting clarify how the draft APE boundary was determined; evaluate extending the draft APE to include the length of the Pennsylvania Avenue viewshed from 15<sup>th</sup> to 3<sup>rd</sup> Street, NW; and reconsider the need to include the Washington Monument Grounds in the APE.

NCPC staff requests analysis of the following historic resource topics in the environmental document:

- Effects to surrounding historic properties – including, but not limited to, the Willard and W Hotels, Federal Triangle, Sherman Park, and the White House Grounds.
- Effects to L'Enfant Plan streets – including, but not limited to, visual impacts of proposed permanent memorial features and landscape elements within the reciprocal viewshed along Pennsylvania Avenue.

We request that the EA include a visual analysis with photosimulations from multiple locations on Pennsylvania Avenue from the east, from the White House Grounds, and at Freedom Plaza. If a vertical element is considered, photosimulations of panoramic viewsheds may also be required.

We request that NPS coordinate with NCPC and the District of Columbia State Historic Preservation Officer (DC SHPO) on the best locations for the photosimulations.

It is our understanding that the National Park Service is near completing a Cultural Landscape Inventory (CLI) for Pennsylvania Avenue and the parks along the Avenue. We request that consulting parties have the opportunity to review the report prior to the first consulting parties meeting.

### Transportation Systems

The project is located in a high-use area for vehicular, bicycle, and pedestrian traffic. The project, particularly during construction, may have an impact on these transportation systems. NCPC requests that the following transportation topic areas be analyzed for short and long-term impacts in the environmental document:

- Parking displacement – including impacts on the surrounding neighborhood
- Pedestrian and bicycle circulation and safety
- Phasing of lane and sidewalk closures, if necessary

NPS and the Centennial Commission should evaluate areas for bicycle parking and the potential for a bike share station on the site.

### Environment and Sustainability

NCPC requests that the alternatives in the EA evaluate the use of sustainable features such as: low impact development (LID), bioretention, permeable pavement, retention of mature healthy trees, native species, low use water and electricity features and so on. We request analysis of the following environmental topics in the EA:

- Vegetation and tree canopy
- Impervious surfaces
- Stormwater runoff and retention
- Construction noise and air quality
- Energy use

### NCPC Plans and Policies

Federal actions in the region should conform to NCPC's Comprehensive Plan for the National Capital. Therefore, we request that the EA include an evaluation of each alternative's consistency with the policies and objectives of the Plan, particularly the Urban Design Element (current under review), Historic Preservation, Environment, Transportation, and Park and Open Space Elements.

In addition, Pershing Park is located within the study area of the Monumental Core Framework Plan and the EA should evaluate the alternatives against the goals and recommendations of that plan.

### Pennsylvania Avenue Development Corporation Plan and the Pennsylvania Avenue Imitative

In 1975, the Pennsylvania Avenue Development Corporation (PADC) adopted the Pennsylvania Avenue Plan (PADC Plan) to create an economically viable, active destination, and an avenue that has a high quality, consistent streetscape design. Pershing Park, Square 226, is located within the PADC area and is therefore required to meet the PADC Plan and guiding documents. The EA should evaluate the alternatives against the goals and objectives listed in the PADC Plan.

In the PADC Plan, Pershing Park serves as a transition between the more formal landscape of President's Park and the urban hardscape of Western (now Freedom) Plaza. It was intended to recognize the countless contributions and sacrifices of General Pershing to our country while also providing a lively and beautiful setting for urban park activities. While a change to the design of the park may be necessary to improve functionality and accommodate a new commemorative element, the park's physical role as a transition area should be given great weight throughout the Memorial design process. In 1979, the PADC adopted the Western Plaza Design Guidelines, which included recommendations for Square 226, as listed below. These guidelines should be taken into account as the Centennial Commission and NPS move forward with evaluating designs.

"The area between 14<sup>th</sup> Street and East Executive, Pennsylvania Avenue and E Street is to be designed as an extension of the White House Grounds – Ellipse park landscape into the downtown area. The Western portion of this area will remain substantially as it is, but the eastern part should be a transition in scale and character from the park landscape to the plaza and Avenue to the east and should provide an edge for that open space. Because it is surrounded by office buildings, hotels and shops, it should provide opportunities for strolling, sitting, picnicking, and so on. It must provide a suitable setting for the American Expeditionary Force/Pershing Memorial, which is being designed by Wallace K. Harrison as consultant to the Battle Monuments Commission."

"The landscape design of square 226 (14<sup>th</sup> – 15<sup>th</sup>, Pennsylvania Avenue – E Street) should serve as a transition between the Sherman monument grounds to the west and the Western Plaza to the east, relating in grass and tree cover to the Sherman Monument, but providing paved areas for more intensive pedestrian focusing on the Willard Hotel."

It should be noted that the PADC Plan recognized the Secretary of the Interior's position at the time that Pershing Park should be the site of a building rather than a public open space, as intended within the L'Enfant Plan. While the site needs to now accommodate the World War I Memorial, one alternative should evaluate the use of a structure on the site to help to improve the scale and relationship of building and open space to the street; reinforce the Pennsylvania Avenue view corridor; and perhaps provide visitor amenities that will also activate the space.

The 1996 law dissolving PADC transferred the authority to ensure projects are consistent with the PADC Plan to the General Services Administration (GSA) and NCPC. Preliminarily, it appears that the construction of the World War I Memorial on the site may require a PADC Plan amendment. We would also like to note to the Centennial Commission that it will need to add to its timeline the required review of the project by GSA and NCPC for PADC compliance per the

federal law that dissolved the PADC and the 1996 MOU among GSA, NCPC, and NPS on how those reviews would occur. We would be happy to work with the Centennial Commission and NPS on the process and a path forward.

In 2014, GSA, NCPC, and NPS launched the Pennsylvania Avenue Initiative (the Initiative) in cooperation with District and other federal agencies. The intent of the Initiative is to study the physical, maintenance, and operational needs of the Avenue and surrounding neighborhoods, identify an operational framework, and develop a vision for how the Avenue can meet local and national needs in a 21st century capital city. We request the NPS update the Initiative Steering Committee at key milestones for the project.

#### Coordination

The World War I Memorial will need to meet the requirements in 36 CFR 7.96 for the Inaugural Parade; NPS and the Centennial Commission should coordinate the potential alternatives with the Military District of Washington, the entity tasked with implementing the Parade. The EA should evaluate impacts to the parade's security needs and set-up and grandstand areas, as well as any potential impacts to the parade due to construction.

To ensure a full and proper analysis of the proposed project, NCPC staff also requests that NPS and the Centennial Commission coordinate the preparation of the EA with the following agencies and organizations: the General Services Administration, the United States Secret Service, the White House Visitors Center, the District of Columbia Office of Planning (DCOP), the District of Columbia Department of Transportation (DDOT), the District of Columbia Department of the Environment (DDOE), the Ward 2 District of Columbia Councilmember and the local Advisory Neighborhood Commission. Furthermore, NCPC staff also encourages NPS to coordinate the memorial project with the adjacent property owners, particularly the hotel uses on the north.

NCPC staff appreciates the opportunity to participate in the scoping stage and we look forward to continued involvement in the process and the project. If you have any questions regarding our comments, please contact me at 202.482.7257 or [lucy.kempf@ncpc.gov](mailto:lucy.kempf@ncpc.gov) or Cheryl Kelly at 202.482.7291 or [cheryl.kelly@ncpc.gov](mailto:cheryl.kelly@ncpc.gov).

Sincerely,

// Original Signed //

Lucy Kempf, Director  
Urban Design and Plan Review