



Executive Director's Recommendation

Commission Meeting: December 4, 2014

PROJECT

Francis Marion Memorial

NCPC FILE NUMBER

7615

Washington, DC

NCPC MAP FILE NUMBER

00.00(73.10)44021

SUBMITTED BY

The U.S. Department of the Interior
National Park Service

APPLICANT'S REQUEST

Approval of comments on alternative sites

REVIEW AUTHORITY

Approval
per 40 U.S.C. § 8905

PROPOSED ACTION

Approve comments as requested

ACTION ITEM TYPE

Staff Presentation

PROJECT SUMMARY

Public Law 110-229, Section 331, authorizes the Marion Park Project to establish a commemorative work that honors Brigadier General Francis Marion on federal land, in accordance with the Commemorative Works Act (40 U.S.C. 8901 et seq.) (CWA). The CWA defines approval requirements related to the location, design and construction of commemorative works in the District of Columbia and its environs. In accordance with the CWA, NCPC approves site and design for new commemorative works.

The National Park Service, on behalf of the Marion Park Project, submitted the Marion Memorial Site Selection Overview, a preliminary study of six potential sites, to the National Capital Planning Commission for review and comment. The Site Study alternatives include:

- A. Garfield Park (West), between New Jersey and 2nd Street, SE
- B. Garfield Park (East), between 2nd and 3rd Street, SE
- C. Marion Park, on South Carolina Avenue between 4th and 6th Streets, SE
- D. Pennsylvania and South Carolina Avenues, SE
- E. South Carolina Avenue and C Street, SE
- F. South Carolina and Massachusetts Avenues, SE

The Commission is not formally approving a site at this time. Rather, NCPC will submit planning comments related to each site consistent with a new pilot review process for modest memorials that has been developed by NCPC and NPS staff. The purpose of the pilot is described in the NEPA section on page 22. Moving forward, the memorial sponsor will take NCPC's comments into account as it identifies a preferred site and develops design concepts. Based on information provided by the memorial sponsor, the memorial is currently envisioned as a modest memorial sculptural element.

KEY INFORMATION

- The CWA establishes requirements for building new commemorative works on federal lands within the District of Columbia and its environs. It applies to lands under jurisdiction of the U.S. Department of the Interior and the U.S. General Services Administration (GSA).
- In general, in accordance with the CWA, the key benchmarks for authorizing a new memorial are summarized below:
 - (1) Congress authorizes each new memorial purpose (subject) and a memorial sponsor by separate federal law.
 - P.L. 110-229 authorizes the Marion Park Project to construct a commemorative work honoring General Francis Marion.
 - (2) The sponsor consults with The National Capital Memorial Advisory Commission (NCMAC) on alternative sites and design concepts.
 - NCMAC commented on potential sites at its October 2, 2014 meeting.
 - (3) NCPC and the U.S. Commission of Fines Arts (CFA) must each approve the site and design for new commemorative works.
 - The Marion Memorial Site Selection Overview study, which is the subject of this EDR, is an early step towards approval of site and design.
 - CFA reviewed and commented on the Site Selection Overview study at its November 20, 2014 meeting.
 - (4) NPS or GSA, as appropriate, must approve and permit the final site and design for each new memorial, after the steps above are completed. NPS is generally responsible for the long-term maintenance and interpretation of memorials.
- As indicated above, the Marion Park Project is in the site review and approval phase of the memorial process. The CWA contains decision criteria related to site and design. Specifically, the Act 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.
- 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.”

RECOMMENDATION

The Commission:

Provides the following comments on the Francis Marion Memorial Site Selection Study:

Supports locating the memorial within Marion Park, Alternative C, which is linked to General Marion by name. The park is also physically aligned with the commemorative work honoring Revolutionary War figure Nathaniel Green, located directly to the north within Stanton Park. Finally, at 1.5 acres, Marion Park is of a size that can accommodate several different public uses.

Recommends that if Marion Park is selected as the preferred site that the memorial sponsor develop design concepts that accommodate the memorial program while protecting the open space and public uses that currently exist on the site. The development of the memorial program and design concepts should be carried out in consultation with the community.

Notes that South Carolina Avenue and C Street, SE, Alternative E, is another feasible location that could possibly hold a very modest memorial, which could add visual interest to the site. However, given the small size of this parcel, the ability to accommodate the memorial program while protecting existing open space and public uses would be more limited than some of the other alternatives.

Notes that the Commission considers Alternatives A, B, D, and F to be less viable for a new commemorative work at this time; and therefore, does not recommend these sites for further study.

PROJECT REVIEW TIMELINE

Remaining actions (anticipated)	Approval of site and design (preliminary and final)
---	---

Table of Contents

I. Project Description 5
 Background 5
 Proposal 6

II. Project Analysis/Conformance 7
 Executive Summary..... 7
 Alternatives A and B: Garfield Park (East and West)..... 11
 National Environmental Policy Act (NEPA) 21
 National Historic Preservation Act (NHPA)..... 22

III. Consultation..... 23
 Coordinating Committee..... 23
 U.S. Commission of Fine Arts 23

Figures and Maps

Figure 1: Potential Sites Identified within the Marion Memorial Site Study 7
Figure 2: 100 Potential Sites, Memorials and Museums Master Plan 10
Figure 3: The Legacy Plan Map 10
Figure 4: Site Area: Garfield Park West 11
Figure 5: Site Area: Garfield Park East 11
Figure 6: Images of Garfield Park Today. West (Left); East (Right) 12
Figure 7: Site Area: Marion Park and Context..... 13
Figure 8: Site Area: Marion Park 13
Figure 9: Historic Photos of Marion Park..... 14
Figure 10: Images of Marion Park Today 15
Figure 11: Site Area: Pennsylvania and South Carolina Avenues 16
Figure 12: Images of Pennsylvania Avenue and South Carolina Today 16
Figure 13: Ellicott Plan with Study Area 17
Figure 14: View of Study Area along Pennsylvania Ave, 1885 17
Figure 15: Public Reservations within and near the study area, 1880s..... 17
Figure 16: Easter Market Metro Project: Programmatic Areas..... 18
Figure 17: Site Area: South Carolina Ave and C Street, SE..... 19

Figure 18: Images of Current Conditions..... 19
Figure 19: Site Area: South Carolina and Massachusetts Avenues..... 20
Figure 20: Current Conditions 21

I. PROJECT DESCRIPTION

Background

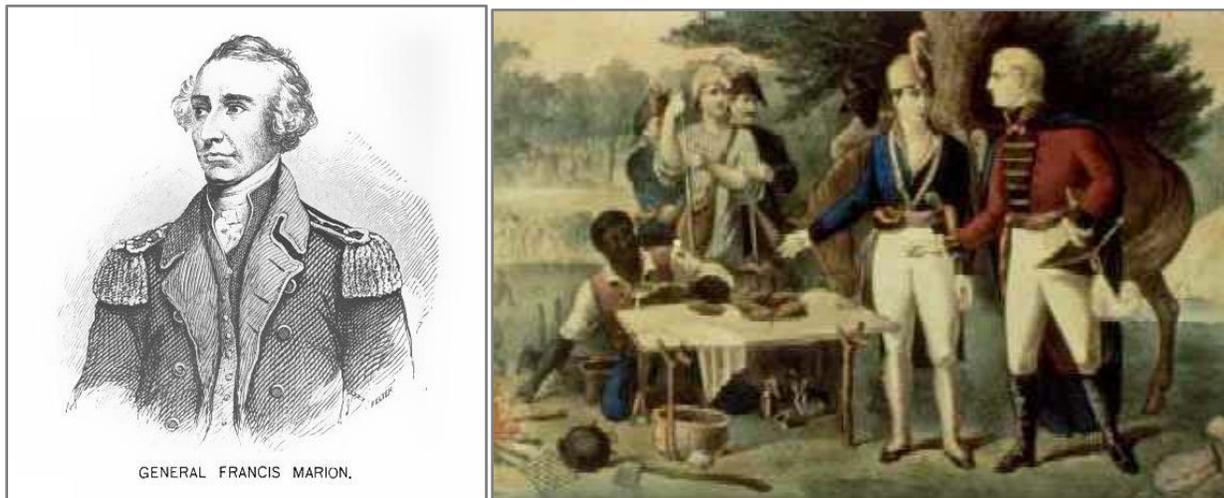
Francis Marion (c.1732— February 27, 1795), known as “The Swamp Fox,” was a military officer who served in the American Revolutionary War. He was a leader of the Continental Army and South Carolina militia against the British. In 2008, President Bush signed P.L. 110-229, which authorized the Marion Park Project to build a new commemorative work honoring General Marion within the District of Columbia and its environs pursuant to the CWA. The Findings Section of P.L. 110-229 describes his accomplishments.

(a) FINDINGS.—The Congress finds the following:

- (1) Francis Marion was born in 1732 in St. John’s Parish, Berkeley County, South Carolina. He married Mary Esther Videau on April 20th, 1786. Francis and Mary Esther Marion had no children, but raised a son of a relative as their own, and gave the child Francis Marion’s name.
- (2) Brigadier General Marion commanded the Williamsburg Militia Revolutionary force in South Carolina and was instrumental in delaying the advance of British forces by leading his troops in disrupting supply lines.
- (3) Brigadier General Marion’s tactics, which were unheard of in rules of warfare at the time, included lightning raids on British convoys, after which he and his forces would retreat into the swamps to avoid capture. British Lieutenant Colonel Tarleton stated that “as for this damned old swamp fox, the devil himself could not catch him”. Thus, the legend of the “Swamp Fox” was born.
- (4) His victory at the Battle of Eutaw Springs in September of 1781 was officially recognized by Congress.
- (5) Brigadier General Marion’s troops are believed to be the first racially integrated force fighting for the United States, as his band was a mix of Whites, Blacks, both free and slave, and Native Americans.
- (6) As a statesman, he represented his parish in the South Carolina senate as well as his State at the Constitutional Convention.
- (7) Although the Congress has authorized the establishment of commemorative works on Federal lands in the District of Columbia honoring such celebrated Americans as George Washington,

Thomas Jefferson, and Abraham Lincoln, the National Capital has no comparable memorial to Brigadier General Francis Marion for his bravery and leadership during the Revolutionary War, without which the United States would not exist.

- (8) Brigadier General Marion's legacy must live on. Since 1878, United States Reservation 18 has been officially referred to as Marion Park. Located between 4th and 6th Streets, S.E., at the intersection of E Street and South Carolina Avenue, S.E., in Washington, DC, the park lacks a formal commemoration to this South Carolina hero who was important to the initiation of the Nation's heritage.
- (9) The time has come to correct this oversight so that future generations of Americans will know and understand the preeminent historical and lasting significance to the Nation



Left: General Marion. Right: John Blake White Painting of General Marion Inviting a British Officer to Dinner, informally known as "The Sweet Potato Supper," 1836.

Proposal

The proposal to locate a new commemorative work to General Francis Marion is authorized by federal law. As part of this proposal, the Francis Marion Memorial Project would ultimately design and construct a memorial within the site selected. The NPS would be responsible for its long-term maintenance.

In accordance with the CWA, the applicant developed the Marion Memorial Site Selection Overview study ("Site Study") to analyze alternative locations for the new commemorative work. The Site Study is a first step towards NCPC's approval of the memorial site and design. The purpose of NCPC's review of the Site Study is to provide a general planning analysis of each potential site and to support the Commission's consultation on sites. Following public scoping meetings and the Commission's site consultation, the memorial sponsor will select a preferred site and begin developing alternative design concepts. NCPC will formally approve the site at a later time, with its review of the memorial design concepts.

The Site Study alternatives include:

- A. Garfield Park (West)
- B. Garfield Park (East)
- C. Marion Park
- D. Pennsylvania and South Carolina Avenues, SE
- E. South Carolina Avenue and C Street, SE
- F. South Carolina and Massachusetts Avenues, SE

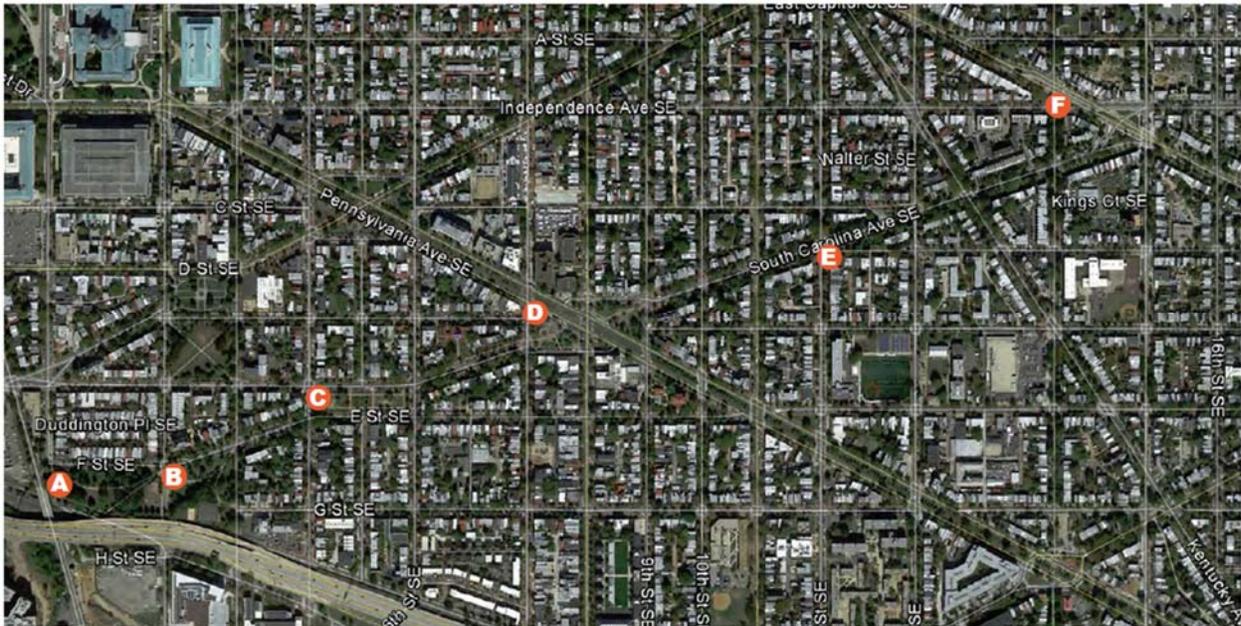


Figure 1: Potential Sites Identified within the Marion Memorial Site Study

II. PROJECT ANALYSIS/CONFORMANCE

Executive Summary

NPS, on behalf of the Marion Park Project, has submitted the Site Study of six potential locations for this commemorative work. All of the parks are situated along South Carolina Avenue in the District of Columbia's Capitol Hill neighborhood. Given the importance of South Carolina to General Marion's identity, the memorial sponsor believes it is appropriate to locate a memorial in his honor along this avenue. Capitol Hill is a historic neighborhood located to the east of the U.S. Capitol and is characterized by tree-lined, residential streets and some neighborhood-serving commercial areas. It is one of the city's oldest and most architecturally significant neighborhoods, and includes many important cultural and historic resources, including the U.S. Capitol Complex, the Supreme Court, Eastern Market, historic homes and buildings, and a number of national parks and memorials. All locations within the Site Study except Marion Park are under the jurisdiction of

the District of Columbia government. Although the applicant has not yet proposed a specific memorial design concept, a modest sculptural element is anticipated.

The Study includes general opportunities and constraints for each of the six locations. Staff's analysis evaluates the potential for locating this commemorative work at each site using the following criteria and information:

(1) Commemorative Works Act Decision Criteria

The CWA §8905 includes decision criteria for site approval:

- 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—
 - a. it does not interfere with, or encroach on, an existing commemorative work; and
 - b. to the maximum extent practicable, it protects open space, existing public use, and cultural and natural resources.

(2) Planning Considerations

- Location and Scale - Compatibility with existing public park uses in neighborhood, including context, existing programming.
- Jurisdiction – The study includes sites under both DC and NPS jurisdiction.
- Urban Design – Visibility of the memorial and potential for design integrity.
- Memorials and Museums Master Plan (as applicable), the Comprehensive Plan.

(3) Public Comments

The Marion Park Project submitted the Site Study to the NCMAC for its October 2 meeting. NCMAC received both written and oral testimony, which was primarily focused on Marion Park's potential as a future site for this memorial. Public comments have also been made during the scoping phase. A record of these comments may be available upon request.

Memorial Location: Planning Influences

A discussion of potential sites for the Marion Memorial should be placed within a broader city planning context. The question of where to locate new memorials within the nation's capital is one of the city's earliest planning considerations, dating back to the 1791 L'Enfant Plan. Since that time, NCPC has prepared numerous plans and studies to further explore the important planning considerations associated with new memorials, including matters related to urban design, surrounding land uses, and community development.

The L'Enfant Plan established the physical layout of the original capital city and continues to be the single greatest planning and urban design influence in the historic city. The central positions of the

Capitol Building and the White House, the basic shape and system of open spaces, and the urban grid are shown on the L'Enfant Plan. In notes, L'Enfant specified that the main avenues should be wide, grand, and lined with trees. These avenues are situated in a manner that visually connects ideal topographical sites throughout the city where important structures, monuments, and fountains should be located. On paper, L'Enfant shaded and numbered 15 large open spaces at the intersections of these avenues and indicated that they would be divided among the states. He also specified that each reservation would feature statues and memorials to honor worthy citizens.

Today, the Plan's system of open spaces are vital contributors to the design and livability of the city. Many parks provide spaces for memorials, natural areas and passive and active recreation. They also function for neighborhood identity and placemaking purposes. Every project is unique, and NCPC has prepared plans and policies to sensitively locate each memorial with respect to the context and surrounding uses. These policies are rooted in the Commemorative Works Act, which requires that a memorial be located such that "to the maximum extent practicable, it protects open space, existing public use, and cultural and natural resources." This guidance is applicable both within the monumental core and neighborhood settings. The L'Enfant Plan established a forward-looking urban design framework that included future areas for new memorials. More recent plans respond to current conditions and address opportunities and constraints within potential locations for new memorials.

- The Comprehensive Plan policies strive to protect the historically significant and symbolic avenues, streets and parkways, reservations, squares, and circles that contribute to the spatial organization of the city. The Comprehensive Plan also recognizes the importance of these elements in providing symbolic and physical connections between key areas of the city and focal points for important civic activities.
- The 1997 Legacy Plan proposes placing memorials and museums and other federal activities outside the traditional core of the city, in locations that provide not only appropriate settings for commemorative works but also meet neighborhood objectives. As important contributing elements within the urban landscape, memorials can add visual imagery and cultural resources to the network of open spaces throughout the city and enhance symbolic connections.
- The 2003 Memorials and Museums Master Plan (2M) furthers the Legacy Plan vision and identifies 100 potential sites for future memorials throughout the city. These sites are based on an urban design framework of symbolic and natural elements rooted in the original plans for the city. The 2M Plan includes planning and design considerations for each site related to site conditions and neighborhood context.

- The 2010 Monumental Core Framework Plan studies potential memorial and museum locations within the monumental core. The Plan includes strategies to enhance these sites and increase access to them. Strategies address streetscape and infrastructure improvements, as well as placemaking opportunities.

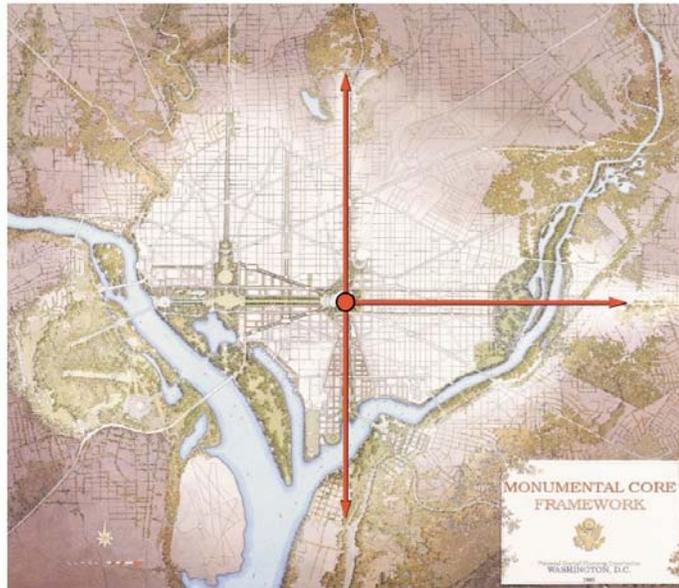
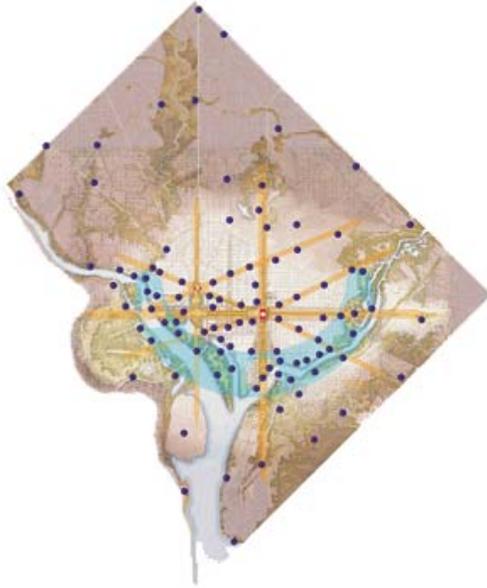


Figure 2: 100 Potential Sites, Memorials and Museums Master Plan

Figure 3: The Legacy Plan Map

Alternatives A and B: Garfield Park (West and East)

A. Garfield Park West

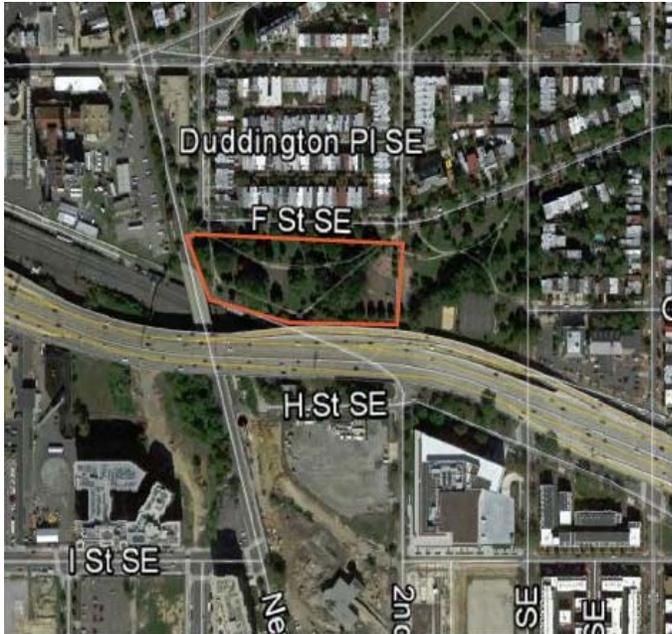


Figure 4: Site Area: Garfield Park West

Site Information

Site Area: 3.5 acres; 3.8 acres. Likely area for memorial: 300-500 sq. feet

Key Features: A medium-large neighborhood park that includes active programming, playgrounds, landscaping, and some open spaces

Site Jurisdiction:
District of Columbia, Res. 17

Adjacent Land Uses:

- Transportation infrastructure (Southeast Freeway and New Jersey Avenue)
- Residential
- Government (US Capitol Facilities)

Surrounding Visual Character: A mix of tree-lined historic residential, low density, institutional and transportation infrastructure.

B. Garfield Park East

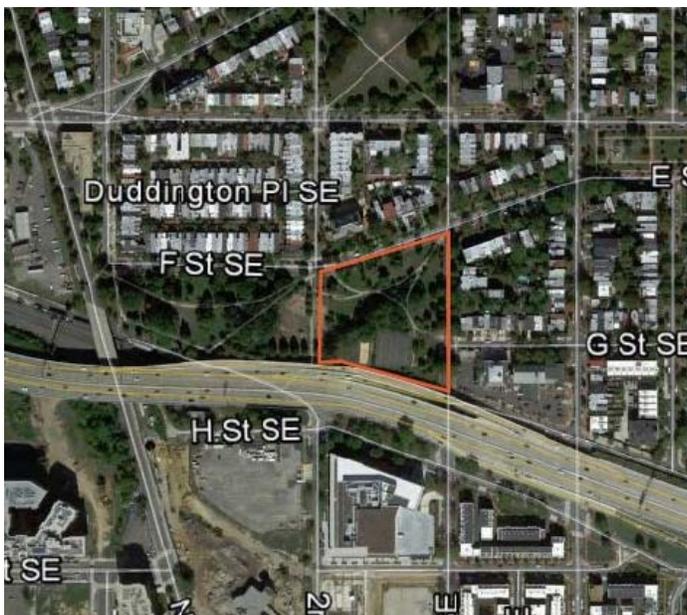


Figure 5: Site Area: Garfield Park East



Garfield Park: History

Garfield Park is one of seventeen original federal appropriations purchased by the government in 1792. It is described by location and function in a note accompanying Ellicott's engraving of the L'Enfant plan. L'Enfant originally identified this site – Reservation 17 – for a “grand cascade.” It was improved and transformed into a public park in the late nineteenth century and named Garfield Park. For over two centuries it has remained an open public space. Garfield Park is bounded by several significant diagonal streets, including South Carolina and New Jersey Avenues, which are integral components of the L'Enfant Plan.



Figure 6: Images of Garfield Park Today. West (Left); East (Right)

Staff Comments

This site is the largest of the alternatives and is the most actively programmed, with a diversity of uses. A modest memorial could feasibly co-locate with existing open spaces and recreation amenities. However, a potential memorial use should be examined within the context of the overall plan for this park, including consideration of the demands on its existing open spaces and program elements. It is of note that the existing programming, including tennis courts and a playground, are an advantage in terms of drawing pedestrian traffic. On Garfield West, the open spaces are generally located at more remote portions of the site. By comparison, Garfield East has better visibility along South Carolina Avenue and the open spaces that may be feasible for a memorial are less remote. This site is under jurisdiction by the District of Columbia and managed by the Friends of Garfield Park, a non-profit 501(c)(3) organization.

Alternative C: Marion Park



Figure 7: Site Area: Marion Park and Context

Site Information

Site Area: 1.5 acres. Likely area for memorial: 300-500 sq. feet.

Key Features: A rectangular flat open space landscaped in three panels, including one playground, and an iron fence.

Site Jurisdiction:
National Park Service, Res.18

- Adjacent Land Uses:
- Residential
 - Neighborhood retail
 - Public facilities (police station)
 - Institutional (church)

Surrounding Visual Character: A mix of tree-lined residential streets with site specific institutional uses



Figure 8: Site Area: Marion Park

Marion Park: History

Marion Park is original to the L'Enfant and Ellicott plans, and the reservation has served continuously as a park since its first improvements in 1885. In 1887 the Army Corps of Engineers named the park after Brigadier General Francis Marion. In the center of the park, tropical summer flowers filled a vase each summer. The large "Hilton Iron Vase" was an ornamental element that created a roundabout for the carriage ways. NPS removed the vase in the early 1960s when traffic was redirected around the park.

Today, the park is landscaped into three panels, including a playground. It is widely used by residents for passive and active activities. In 2014, NPS completed a \$597,000 brick walkway pavement replacement project at Marion Park. Other recent projects include replacement of the playground equipment and lighting improvements.



Figure 9: Historic Photos of Marion Park
Source: The Library of Congress

Public comments regarding the memorial at this location

NCMAC received written and oral public testimony regarding the Site Study at its hearing on October 2, 2014. Most of the comments focused on Marion Park. Since that time, the public has submitted additional comments both in opposition to and support of the memorial project. Of the opposition letters, in summary, the most frequently cited comments and concerns include:

- A goal to protect existing public passive and active uses of the park. This also includes concerns about location and size of the memorial (a desire to ensure that an element does not overwhelm the site or diminish existing uses).
- A desire to protect the residential character and use of the park.
- Concerns about how the memorial will be interpreted. In particular, it has been noted that General Marion owned slaves. Residents have questioned the appropriateness of this subject for a diverse neighborhood like Capitol Hill. Several residents have recommended that the design of the memorial include interpretive information about this aspect of his life.

Staff Comments

Staff recommends prioritizing Marion Park for further study as a location for the proposed commemorative work. Today, the park honors General Marion by name, and it is physically aligned with an existing commemorative work honoring Revolutionary War figure, Nathaniel Green, located directly north within Stanton Park. Staff considers the physical relationship between similarly-themed memorials to be one aspect of defining subject matter nexus, as required in the CWA. Finally, at 1.5 acres, Marion Park is of a size that can provide for several uses including, active recreation, and passive open space. In response to community concerns, staff recommends that NPS and the Marion Park Project identify and study alternative locations and design concepts within Marion Park, including but not limited to, the middle and northern portions of the central landscaped panel. Future study should also consider strategies to accommodate current public uses of Marion Park in addition to the memorial program. Development of the memorial program and design should be carried out in consultation with the community.



Figure 10: Images of Marion Park Today

Alternative D: Pennsylvania and South Carolina Avenues, SE

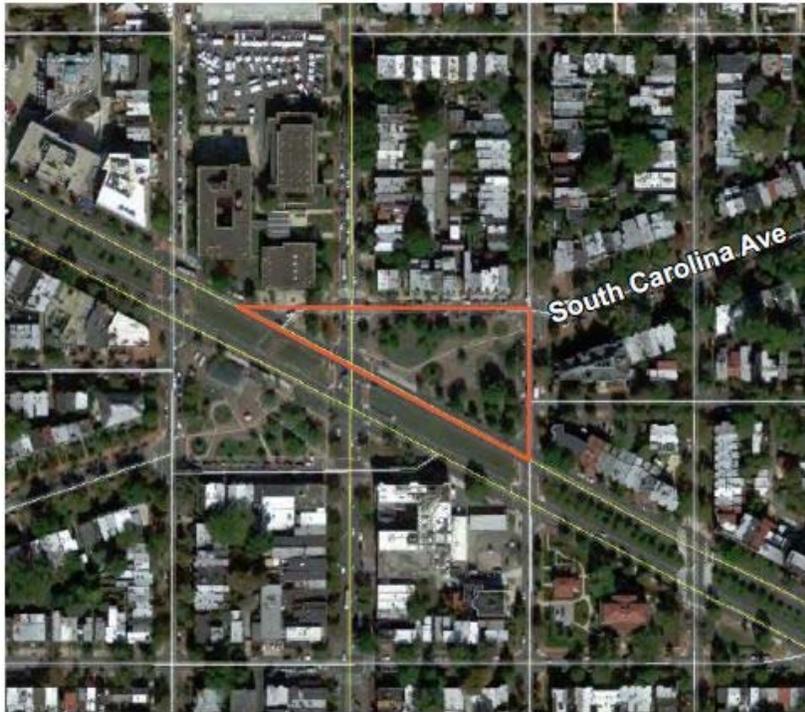


Figure 11: Site Area: Pennsylvania and South Carolina Avenues



Figure 12: Images of Pennsylvania Avenue and South Carolina Today

Site Information

Site Area: 1 acre, Likely area for a memorial: 300-500 sq feet

Key Features: Triangular sites of landscaped elements, lawn areas, an informal playground, and seating at the entrance of Eastern Market Metro

Site Jurisdiction:
District of Columbia, Study area includes: Res.46, 48, 49

Memorials and Museums Plan Site 35

Adjacent Land Uses:

- Residential
- Neighborhood and destination retail
- Public Library
- Transportation corridor

Surrounding Visual Character: This area is one of several important physical nodes along Pennsylvania Avenue. It is a public space within a historic neighborhood setting, including a mix of tree-lined residential streets, active commercial uses, destination retail, and transit amenities.

Site Area: Background

Alternative D identified within the Site Study is historically part of a larger site area, including reservations north and south of Pennsylvania Avenue. A vision for the configuration and purpose of these reservations has evolved over time. Today these reservations are separate triangular parcels bisected by Pennsylvania Avenue. Within the last ten years, a proposal to create a unified park at this location was studied and dismissed. Today, these reservations remain a series of small parks and function in a variety of ways, including as important un-programmed open space for the neighborhood. Across the street, several related parks are an entrance to Eastern Market metro and front the local library. Alternative D within the Memorial Site Study only considered the northern reservations as a potential location for this memorial.

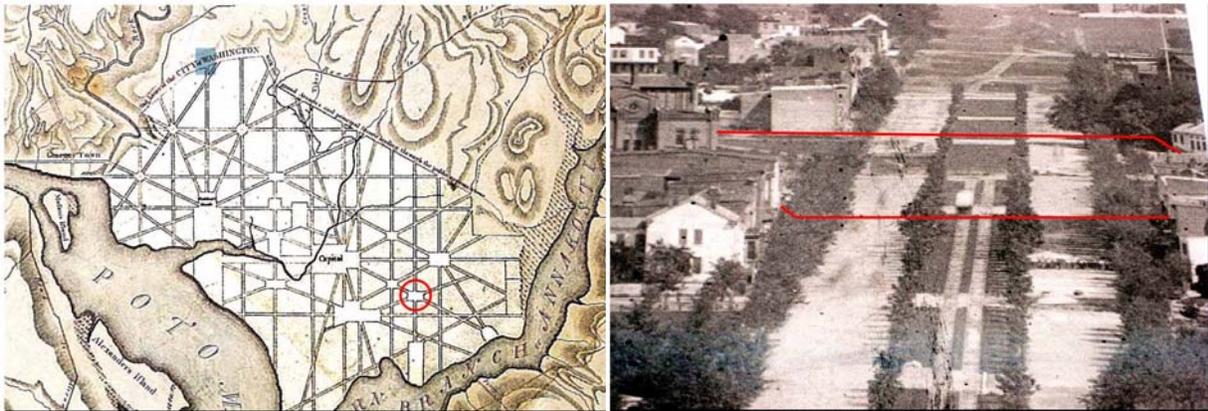


Figure 13: Ellicott Plan with Study Area

Figure 14: View of Study Area along Pennsylvania Ave, 1885

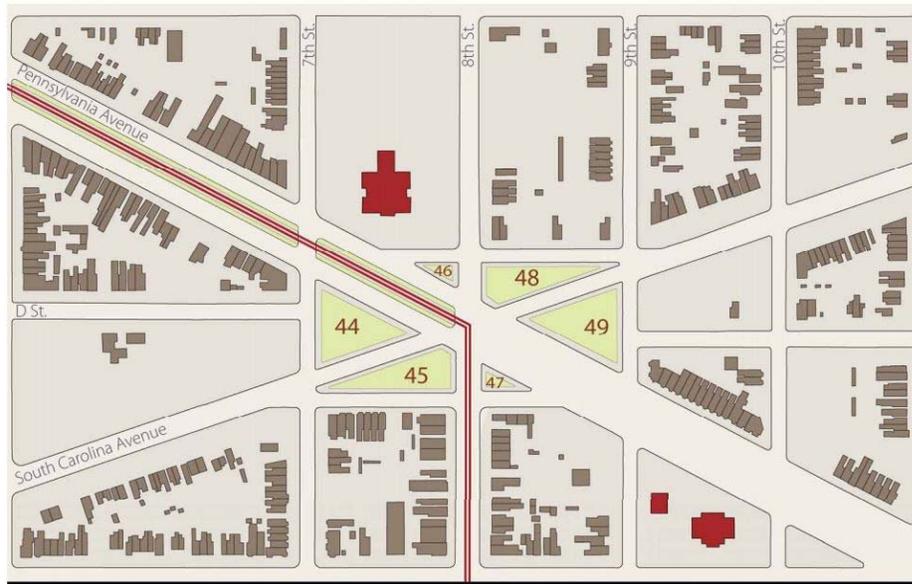


Figure 15: Public Reservations within and near the study area, 1880s.

Source for visuals on this page: Amy Weinstein, The Weinstein Studio. Note: The Memorial Study only considered the northern parcels for the Marion Memorial.

This site is currently part of a larger planning initiative, the Eastern Market Metro Park project. The final master plan, completed this fall, is the result of a five-year visioning and community process sponsored by the Barracks Row Main Street. The estimated \$45 million project includes recommendations for a new site plan on both sides of Pennsylvania Avenue, programming, a library expansion, park maintenance, and placemaking. The purpose of this project is to make a great public space for the community and the city.



Figure 16: Easter Market Metro Project: Programmatic Areas

Staff Comments

Alternative D is an important node along Pennsylvania Avenue and is identified in the 2003 Memorials and Museums Master Plan for its potential as a location for a future memorial. As noted above, this project is currently part of the Eastern Market Metro Park project. Alternative D within the Marion Park Site Study generally covers the Eastern Market Park program locations 1 and 6, shown above. According to the master plan, Area 1 is planned as a children's play area, and Area 6 is planned as a green space with stormwater management gardens.

Given the level of commitment already demonstrated for this project and the goal for an integrated vision for this park's future, staff does not recommend locating a memorial here at this time. A future memorial may be an appropriate land use in this location, however, the feasibility of such a project should be studied within the context of the Eastern Market Metro Park master planning process prior to making any decisions regarding where to locate a memorial within the site and the memorial's subject matter.

Alternative E: South Carolina Avenue and C Street, SE



Figure 17: Site Area: South Carolina Ave and C Street, SE

Site Information

Site Area: 0.2 acres. Likely area for memorial: 300-500 sq. feet

Key Features: A small triangular flat residential park, with currently un-programmed, passive open space uses

Site Jurisdiction:
District of Columbia, Res. 240

Adjacent Land Uses:
• Residential

Surrounding visual character: tree-lined streets and historic residences

Staff Comments

Residents primarily use the small triangular parcel at South Carolina and C Street, SE for passive activities and dog-walking. A very modest memorial could potentially be situated here; however, given the parcel's size, the ability to accommodate the memorial program while protecting existing open space and public use may be more limited than some of the other alternatives. Should this site be selected by the memorial sponsor it is important to address the size and location of the memorial.

Figure 18: Images of Current Conditions



Alternative F. South Carolina and Massachusetts Avenues, SE



Figure 19: Site Area: South Carolina and Massachusetts Avenues

Site Information

Site Area: 0.5 acres, including several open triangular parcels created by the transportation network. Likely area for memorial: 300-500 sq. feet

Memorials and Museums Master Plan Site 75

Site Jurisdiction: District of Columbia

Adjacent Land Uses:

- Residential
- Neighborhood retail
- Transportation

Surrounding visual character: tree-lined residential streets, neighborhood-serving commercial.

Staff Comments

Alternative F, at South Carolina and Massachusetts Avenue, is listed as a potential site in the Memorials and Museums Master Plan, which notes that a modest memorial may add to the neighborhood's visual imagery. From an urban design perspective, this site is located at the intersection of three prominent streets (South Carolina, Massachusetts, and Independence Avenues) and at the midpoint between Lincoln Park and the terminus of Massachusetts Avenue. This site includes several smaller triangular parcels, which are segmented by streets, so the memorial would function primarily as visual imagery within that context, not as a memorial within a park.

Staff considers there to be long-term opportunity for a memorial at this location. However, there are important constraints associated with the existing road network and parcel configuration. A study should first explore the infrastructure improvements required to make this a more viable site prior to a decision about a memorial proposal.



Figure 20: Current Conditions

National Environmental Policy Act (NEPA)

In accordance with the National Environmental Policy Act (NEPA), the NPS, NCPC, and the Francis Marion Memorial Project are preparing an Environmental Assessment (EA) to analyze the potential environmental impacts of the proposal. The NPS and NCPC held scoping meetings for potential memorial sites on October 28 and December 3, 2014. Public comments made during the scoping phase are available upon request. Scoping for the design of the memorial will be scheduled at a later date.

In previous memorial projects, in accordance with NCPC's submission guidelines, the NPS and NCPC conducted two separate NEPA analyses for the site selection phase and the memorial design phase. NCPC approved site without information about design. At times this approach raised concerns with the public and made it difficult to identify potential impacts during the site selection phase in the absence of a design concept. To address these issues, the NPS and NCPC staff are

evaluating an updated review process for modest memorials, including the Francis Marion Memorial, the Peace Corps Memorial, and the Liberty Memorial. The purpose of this revised process is to better align and support key decision points associated with each agency's NEPA and Section 106 responsibilities, and to ensure that the review is commensurate with the complexity of the project.

The revised process addresses several public comments that were raised during site selection for the Ukrainian Famine Memorial:

- (1) Public comment: Recommend a more in-depth consultation and vetting process during the site selection phase.

Staff comment: Traditionally, NCMAC is responsible for providing comments on sites, and NCPC and CFA approve sites. To address this public comment, NPS and NCPC staff are proposing a site consultation with the Commission and CFA in addition to NCMAC, as part of a scoping period. This consultation would be conducted prior to approval of a site. This additional consultation is an opportunity to more fully develop planning comments and for public participation.

- (2) Public comment: Recommend more information about design before a site is approved.

Staff comment: As noted above, traditionally NCPC approved site without information about design. To address this comment, NCPC staff proposes that the Commission will eventually approve a site at the same time as its review of memorial concept design alternatives. Under this scenario a single EA – rather than multiple – will be prepared to reflect information about site and design.

The proposed approach to combine site approval with some information about design is a deviation from NCPC's existing Environmental and Historic Preservation Procedures, which today treats site approval and design approval as two separate processes, and two separate Commission actions. It is important to note - while under this proposal the steps of the process are being slightly changed, the actual substantive environmental analysis is still being conducted. And, additional information about design may improve how we approach site approval and related decision points. Therefore, staff recommends using this project as a case study to evaluate the effectiveness of this approach. If successful, then NCPC staff may recommend amending the agency's submission requirements.

National Historic Preservation Act (NHPA)

Concurrent to the NEPA process, the NPS and NCPC will conduct consultation under Section 106 of the National Historic Preservation Act of 1966 (NHPA). Consultation with the SHPO has been initiated. The SHPO sent comments by letter dated November 19, 2014. In summary, the letter notes that the Francis Marion Park appears to be the most logical of the six sites under consideration for the proposed memorial. The letter includes information about Marion Park's history and notes that this project offers an opportunity to erect a monument that would be consistent with the

L'Enfant ideal of creating focal points for major parks and avenues. The letter also notes that there is no readily apparent reason why the selection of any of the potential sites would result in an adverse effect.

III. CONSULTATION

Coordinating Committee

The Coordinating Committee reviewed the proposal at its October 15, 2014 meeting. The Committee forwarded the memorial site selection review with the statement that it has been coordinated with all participating agencies. The participating agencies were: NCPC; the District of Columbia Office of Planning; the District of Columbia State Historic Preservation Office (DC SHPO); the District Department of Transportation; the District of Columbia Fire and Emergency Medical Services, the General Services Administration; the National Park Service and the Washington Metropolitan Area Transit Authority.

U.S. Commission of Fine Arts

The CFA provided comments on the study at its November 20, 2014 meeting.

National Capital Memorial Advisory Commission

The Marion Park Project submitted the Site Study to the NCMAC for its October 2 meeting. NCMAC received both written and oral testimony, which was primarily focused on Marion Park's potential as a future site for this memorial. A record of these comments may be available upon request.