



# Executive Director's Recommendation

Commission Meeting: December 4, 2014

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<b>PROJECT</b> <b>Peace Corps Memorial</b> Washington, DC	<b>NCPC FILE NUMBER</b> 7623
	<b>NCPC MAP FILE NUMBER</b> 00.00(73.10)44040
<b>SUBMITTED BY</b> United States Department of the Interior National Park Service	<b>APPLICANT'S REQUEST</b> Approval of comments on alternative sites
<b>REVIEW AUTHORITY</b> Approval per 40 U.S.C. § 8905	<b>PROPOSED ACTION</b> Approve comments as requested
	<b>ACTION ITEM TYPE</b> Staff Presentation

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## PROJECT SUMMARY

On January 24, 2014, President Obama signed Public Law 113-78 that authorizes the Peace Corps Commemorative Foundation (PCCF) to establish a memorial to commemorate “the mission of the Peace Corps and the ideals on which the Peace Corps was founded,” on federal land in the District of Columbia or its environs and in accordance with the Commemorative Works Act (40 U.S.C. 8901 et seq.) (CWA).

In accordance with the CWA, the National Park Service (NPS), on behalf of the PCCF, has submitted the following four alternative memorial sites for Commission review and comment:

- Reservation 727, a 0.25 acre parcel at Louisiana Avenue and 1st and C Streets, NW;
- Reservation 31, a 0.33 acre parcel at Pennsylvania Avenue and 18th and H Streets, NW, named for Edward R. Murrow;
- Reservation 30, a 0.33 acre parcel at Pennsylvania Avenue and 19th and H Streets, NW; and
- A 1 acre parcel of Rock Creek Park at Pennsylvania Avenue and 26th and M Streets, NW.

The Commission is not formally approving a site at this time. Rather, NCPC will submit a set of planning comments related to each site consistent with a new pilot commemorative works review process that has been developed by NCPC and NPS staff in coordination with GSA and CFA staff. Moving forward, the memorial sponsor will take NCPC's comments into account as it identifies a preferred site and develops design concepts.

## KEY INFORMATION

- The CWA defines approval requirements related to the location, design and construction of commemorative works in 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

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Administration. In accordance with the CWA, NCPC approves site and design for new commemorative works.

- The PCCF intends to build a modest scale memorial and is only proposing memorial sites that are smaller in size.
  - All four potential sites are under the jurisdiction of the NPS and are identified in the Memorials and Museums Master Plan within Area II.
  - The design of the memorial is currently unknown. The PCCF intends to host an open design competition after selecting a site. The PCCF will determine which site to move forward with based on comments raised by the public, the Commission, the National Capital Memorials Advisory Commission, and the U.S. Commission of Fine Arts. The public comment period for the scoping of the Memorial's Environmental Assessment was open from October 8, 2014 to November 18, 2014.
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## RECOMMENDATION

The Commission:

Provides the following comments on the alternative sites proposed for the Peace Corps Memorial:

**Supports** Reservation 727 (Memorial Site 25) and Reservation 31 (Edward R. Murrow Park/Memorial, Site 44 North) to be viable locations for the Peace Corps Memorial due to the following reasons:

- Reservation 727 is an appropriate location for a modest memorial in close proximity to the Monumental Core, the U.S. Capitol building, and Union Station.
- Reservation 31 offers strong thematic ties between the Peace Corps and the surrounding institutional uses and international organizations in the surrounding area.
- Both properties have potential to accommodate the memorial program while protecting available open space and public uses.

**Requests** that the following comments be considered if the memorial sponsor selects Reservation 727 or Reservation 31 as its preferred memorial site:

Regarding Reservation 727:

- Any memorial design should retain all existing healthy, mature trees.
- The memorial design should include seating opportunities, retention of green space, and low impact development stormwater management features.
- Pursuant to Public Law 104-333 Section 514, the Architect of the Capitol (AOC) has jurisdiction over the sidewalk along Louisiana Avenue, NW; and therefore, development of the memorial design should be coordinated with the AOC and any changes to the sidewalks should be done in accordance with AOC standards.

Regarding Reservation 31:

- The Golden Triangle BID is currently evaluating potential streetscape and public space improvements along Pennsylvania Avenue, NW from 17<sup>th</sup> Street, NW to Washington Circle; and therefore, coordination with this effort is encouraged.

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- The memorial design should include seating opportunities, retention of green space, and low impact development stormwater management features.
  - The site was dedicated to Edward R. Murrow in 1979; and therefore, opportunities for additional interpretive elements related to Edward R. Murrow should be explored as part of the memorial design.
  - The memorial design should be sensitive to the current plan of the site as it dates to the 1930s.

**Notes** that the Commission considers Reservation 30 (Memorial site 44 South) and the Rock Creek Park site (Memorial site 46) to be less viable for a new commemorative work at this time based on the following reasons:

- Reservation 30 is a well maintained park with newly improved infrastructure and site furniture that is regularly used for passive recreation.
- The Rock Creek Park site is more than twice as large as the other sites considered and could accommodate a memorial larger in scope than what is anticipated for the Peace Corps Memorial.

#### **PROJECT REVIEW TIMELINE**

<b>Previous actions</b>	None
<b>Remaining actions</b> (anticipated)	Approval of site and design (preliminary and final)

Prepared by C. Kelly  
November 26, 2014

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## I. PROJECT DESCRIPTION

### Background

On October 14, 1960, while campaigning for the presidency, Senator John F. Kennedy conducted an impromptu speech at 2am to students at the Michigan University where he asked which students would be willing to give two years in a foreign service to contribute to developing countries. Following up with that idea, a few weeks after taking office, on March 1, 1961, President Kennedy signed Executive Order 10924 that established the Peace Corps as a pilot program. In September 1961, Congress passed legislation to make the Peace Corps a permanent independent agency. In the Peace Corps Act (Public Law 87-293), Congress noted the purpose of the Act is “to promote world peace and friendship through a Peace Corps, which shall make available to interested countries and areas men and women of the United States qualified for service abroad and willing to serve, under conditions of hardship if necessary, to help the peoples of such countries and areas in meeting their needs for trained manpower, and to help promote a better understanding of the American people on the part of the peoples served and a better understanding of other peoples on the part of the American people.”



Figure 1: Senator Kennedy at Michigan University - October 14, 1960

In January 2014, Congress passed and President Obama signed Public Law 113-78 that authorizes the Peace Corps Commemorative Foundation (PCCF) to establish a memorial to commemorate “the mission of the Peace Corps and the ideals on which the Peace Corps was founded.” According to information provided by the PCCF, the ideals and values of the Peace Corps include:

- Caring about and tangibly offering assistance to people in need through volunteerism;
- Reaching around the globe and across borders to break down cultural barriers;
- Promoting person-to-person mutual respect and understanding through living and working together with people in other cultures;
- Sustaining unflinching optimism and dedication to achieving worthy goals despite challenging obstacles, hardships and setbacks;
- Contributing in some way, no matter how modestly or imperceptibly, to building a more peaceful, prosperous world.

The PCCF notes that the ideals and values that inspired creation of the Peace Corps are not unique to the Peace Corps, but rather are an inherent part of America's culture, history and institutions, and the American character. The PCCF also notes that the memorial legislation recognizes one other historically significant aspect of Peace Corps service - the value and lasting impact of contributions to and engagement in American society by returned volunteers.

### **Proposal**

The National Park Service (NPS), on behalf of the PCCF, has submitted four potential memorial sites for the Commission's review and comment. To determine the site, the PCCF developed goals and criteria for evaluating the sites located in Area II. That criteria is as follows:

1. The site should be in proximity to Washington's historically significant national edifices, monuments and grand civic space, the Mall. This will ensure that the Commemorative will be seen and experienced by the largest possible number of American and foreign visitors.
2. The site should be in a location enabling a perceivable sense of meaningful nexus with other historically significant national edifices, monuments and spaces. Views toward and from the site should provide visual connectivity and induce contemplative association linking fundamental Peace Corps ideals and values to those expressed or implied throughout the national capital's Monumental Core.
3. The site should be modest in size to enable creation of a modestly scaled, financially feasible yet aesthetically compelling national Commemorative. A small but readily visible, well located site will allow the Peace Corps Commemorative to achieve presence and gravitas among much larger memorials and buildings.
4. The site should be conveniently accessible for pedestrians and situated adjacent to or near "beaten paths" trod yearly by millions of visitors.
5. The site should be transit-accessible, within comfortable walking distance of Metrorail stations and Metrobus lines; accessible for cars and tour buses; and accessible to nearby parking garages and on-street parking.
6. The site should not be complicated and costly to develop for a commemorative work because of complex topographic or geometric conditions; because of existing on-site structures or below-grade utilities; or because of numerous mature trees and elaborate vegetation necessitating expensive, potentially controversial removal or preservation.

Once establishing the criteria, the PCCF evaluated 25 sites throughout Area II. All the sites the PCCF evaluated are located within the Memorials and Museums Master Plan (2M Plan) that was adopted by NCPC in 2001. As indicated in the selection criteria, the PCCF intends to construct a modest sized memorial and evaluated sites that were smaller in size to adequately accommodate the potential memorial. Of the 25 sites, the NPS and PCCF have submitted the four sites that ranked the highest:

- Reservation 727 located at Louisiana Avenue and 1st and C Streets, NW;
- Reservation 31 at Pennsylvania Avenue and 18th and H Streets, NW, named for Edward R. Murrow;
- Reservation 30 at Pennsylvania Avenue and 19th and H Streets, NW; and
- A parcel of Rock Creek Park at Pennsylvania Avenue and 26th and M Streets, NW.

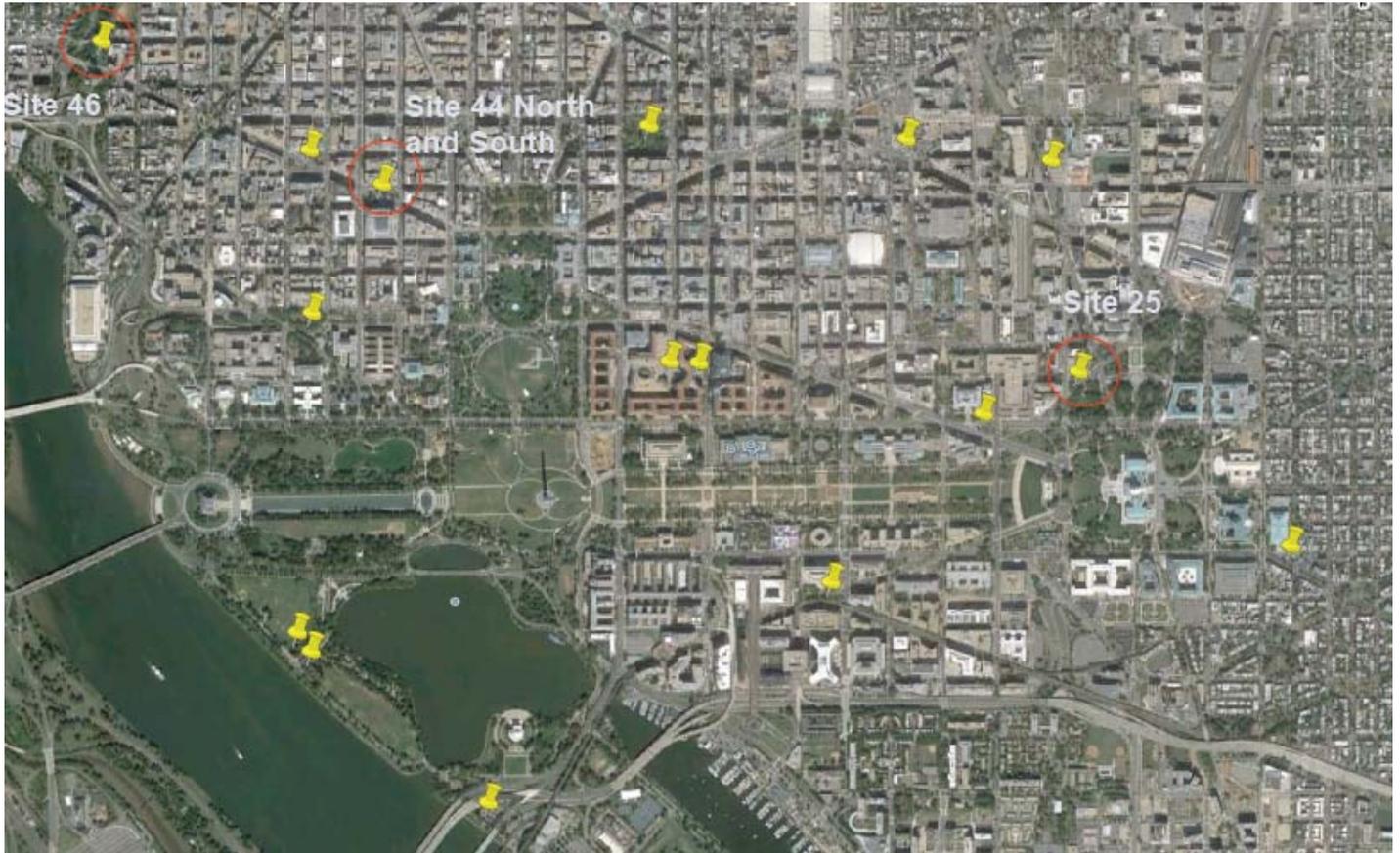


Figure 2: Sites Analyzed in the Peace Corps Site Selection Study

At this time, the NPS and the PCCF are requesting comments on the potential locations of the Peace Corps Memorial. The design of the memorial will be developed through a design competition once the NPS and the PCCF evaluate all comments received during the scoping of the alternative sites with the public as well as comments made by NCPC and the Commission of Fine Arts through review of the potential sites. The PCCF has indicated to staff that the memorial design will be: largely a landscape intervention; low maintenance; use native plants; and will not have any sculpture for a particular person, such as President Kennedy or Sargent Shriver (the first Director of the Peace Corps).

## II. PROJECT ANALYSIS/CONFORMANCE

### Commemorative Works Act

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.
  - Public Law 113-78 that authorizes the Peace Corps Commemorative Foundation (PCCF) to construct a commemorative work honoring the Peace Corps.
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 May 6, 2014 meeting. Comments stated at the meeting are discussed later in the document.
3. NCPC and the U.S. Commission of Fine Arts (CFA) must each approve the site and design for new commemorative works.
  - CFA reviewed and commented on the alternative sites 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.

The Peace Corps Memorial is in the site review and approval phase of the memorial process. The Commemorative Works Act §8905 includes the following decision criteria related to site and design. Specifically, the Act states: in considering site proposals, CFA, National Capital Planning Commission, and the Department of Interior or the GSA shall be guided by, but not limited by, the following criteria:

1. Surroundings. To the maximum extent possible, a commemorative work shall be located in surroundings that are relevant to the subject of the work.
2. Location. A commemorative work shall be located so that—
  - a. it does not interfere with, or encroach on, an existing commemorative work;
  - b. to the maximum extent practicable, it protects open space, existing public use, and cultural and natural resources.
3. 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.

The section below will discuss each project site and staff's analysis regarding the alternative sites and how the site meets the CWA criteria and other planning considerations.

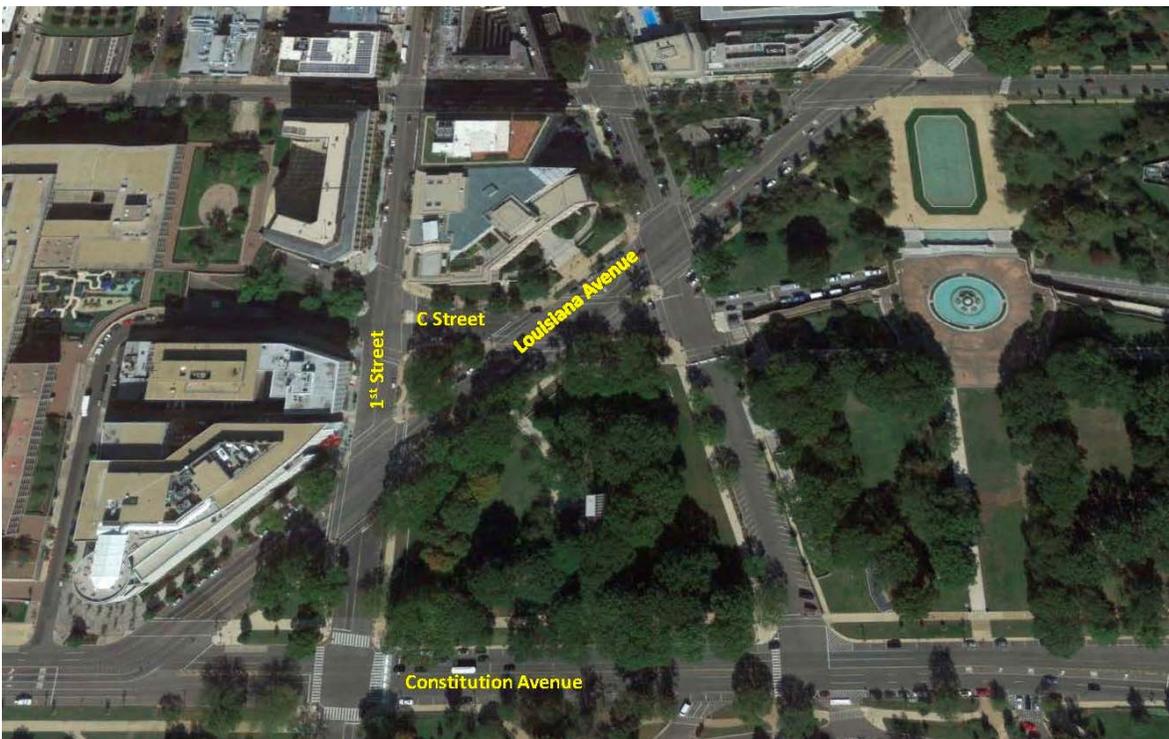
## Site Information/Analysis

### *Reservation 727 – NCPC 2M Plan Site 25*

Site Area: 0.25 acres

#### Surrounding Streets:

The site is bounded by Louisiana Avenue NW, on the east side, runs southwest-northeast from Constitution Avenue, NW to Union Station, carrying two-way traffic between these two endpoints and by 1<sup>st</sup> and C Streets, NW, on the north and west sides, both of which are two-way.



*Figure 3: Reservation 727 Location*

Adjacent Land Uses: A six-story office building is located across C Street; and an eight-story office building across 1<sup>st</sup> Street, housing the Postal Workers' Union headquarters. On the other side of Louisiana Avenue is the densely tree-covered Robert A. Taft Memorial Park, which slopes gently upward to the southeast, toward the U.S. Capitol Building. Located two blocks north of the site on Louisiana Avenue is the Memorial to Japanese-American Patriotism in World War II.

Existing Conditions: The site is relatively flat. Concrete sidewalks of varying width and condition running around the perimeter; adjacent to the curb on 1<sup>st</sup> and C Streets but separated by a 12-foot planting strip along Louisiana Avenue. Three deciduous street trees - with approximately 22", 24" and 14" calipers - and a single streetlight occupy the planting strip. In between the sidewalks the site is open except for two approximately 36" and 15" caliper deciduous trees and a recently

planted 2" caliper tree. A traffic signal control box sits next to the sidewalk at the site's northeast corner.



*Figure 4: Reservation 727 - Looking north along the Louisiana Avenue sidewalk*



*Figure 5: Reservation 727- Looking south along the Louisiana Avenue sidewalk*

**Site Background:** Historically, the triangular site and Louisiana Avenue did not exist until the 20th century. The L'Enfant Plan did show 1<sup>st</sup> and C Streets but not Louisiana Avenue or Union Station. Prior to the 1930s, this area was developed with residential homes and shops. With the movement of Union Station off the National Mall and the 1902 McMillan Plan recommending an additional connection to Union Station from Constitution Avenue, the site and the area surrounding was modified. A 1928 NCPC plan for the Mall, Capitol Grounds and Union Station Plaza determined the reconfiguration of the 1<sup>st</sup> and C Street neighborhood and alignment of Louisiana Avenue. Existing structures at 1st and C were demolished and the existing grade substantially raised, with fill comprised of debris from building demolition. The proposed memorial site was created when Louisiana Avenue was completed in the 1930s.

Staff Comments:

Staff finds that the proposed memorial site is adequate for a modest size memorial and encourages the NPS to continue to evaluate the site for the future Peace Corps Memorial. The site is located about 400 feet north of Constitution Avenue. It is close and convenient to the Monumental Core and its historically significant national monuments, memorials and spaces. In winter months when the trees are leafless, the Commemorative site would be visible from Constitution Avenue. The site is in close proximity to the U.S. Capitol Building and Capitol Grounds, the Peace Monument, other memorials and the Mall.

In addition the site is in close proximity to Union Station, a multi-modal, regional transportation hub. On blocks northeast and northwest of the site, particularly along New Jersey Avenue and North Capitol Street, are major tourist and convention hotels, plus numerous cafes and restaurants. All these destinations in immediate neighborhood attract domestic and foreign visitors and generate increased north-south pedestrian movement in the vicinity of the site. There is continual pedestrian activity in the neighborhood on weekends.

If the NPS and PCCF moves forward with this site for the Memorial, the following comments should be evaluated:

As noted earlier the site includes multiple large trees, in both the open triangle area and a planting strip along Louisiana Avenue, and staff requests that the NPS evaluate the health of the trees and if determined to be healthy that the memorial design retention the trees. The design and construct of the memorial will need to be done in such a way that is sensitive to the tree roots and requirements of the trees for water.

Given the site's location adjacent to commercial uses, staff sees an opportunity for the site to provide public amenities to be used by office workers, people visiting the Memorial, as well as pedestrians passing by. Currently, the site is void of site furniture and staff recommends that in the design the Memorial provide seating opportunities.

Green space at the site is providing important areas for tree growth and for stormwater management and staff recommends retention of as much green space as possible on the site.

In addition, the Memorial design should include low impact development (LID) stormwater management to meet the federal and local stormwater management standards.



Figure 6: Trees on Reservation 727

Pursuant to Public Law 104-333 Section 514, the Architect of the Capitol (AOC) transferred jurisdiction of the site in 1996 but retained jurisdiction over the Louisiana Avenue, NW sidewalk. Staff requests that the NPS and PCCF coordinate with the AOC on potential memorial designs and any impact the designs may have on the Louisiana Avenue sidewalk. Staff has discussed the project with the AOC staff, which noted that the AOC has sidewalk design standards that will need to be taken into account if any changes are proposed for the sidewalk and they expressed an interest in maintaining the street trees that are within the planting area. NPS and PCCF should update the AOC regularly on the project.

### ***Reservations 31 – NCPC 2M Plan Site 44 (north)***

Site Area: 0.33 acres

#### Surrounding Streets:

The triangular park is bounded on the west by one-way southbound 19<sup>th</sup> Street, NW, on the south by Pennsylvania Avenue, NW, on east by one-way northbound 18<sup>th</sup> Street, NW and on the north by one-way eastbound H Street, NW.

#### Adjacent Land Uses:

The surrounding uses are commercial and institutional in nature. The White House Complex is located two blocks southeast of the site. Other institutions in the Foggy Bottom neighborhood include: the George Washington University, the Department of State, the Institute of Peace, the World Bank, the International Monetary Fund, the National Academy of Scientists, and the Red Cross. The Farragut North, Farragut West and Foggy Bottom Metro stations are a few blocks away.

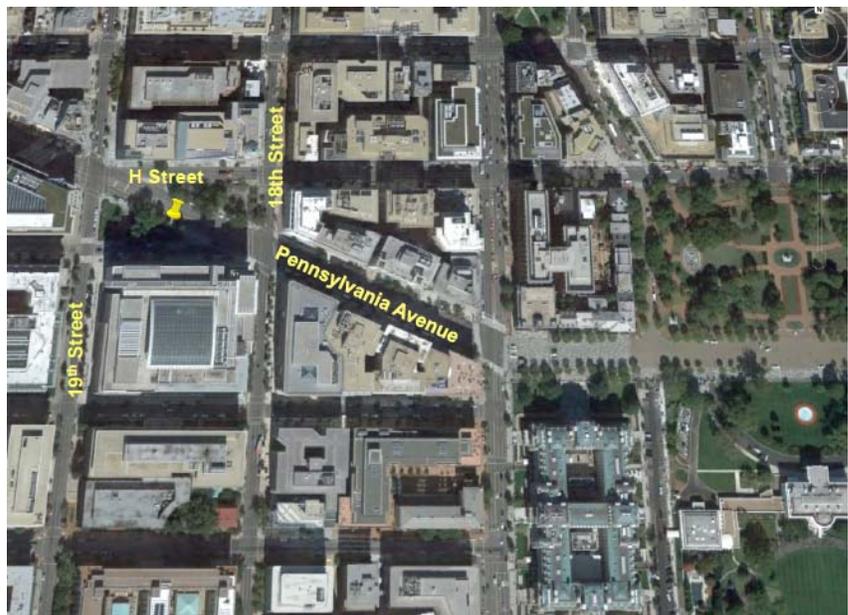
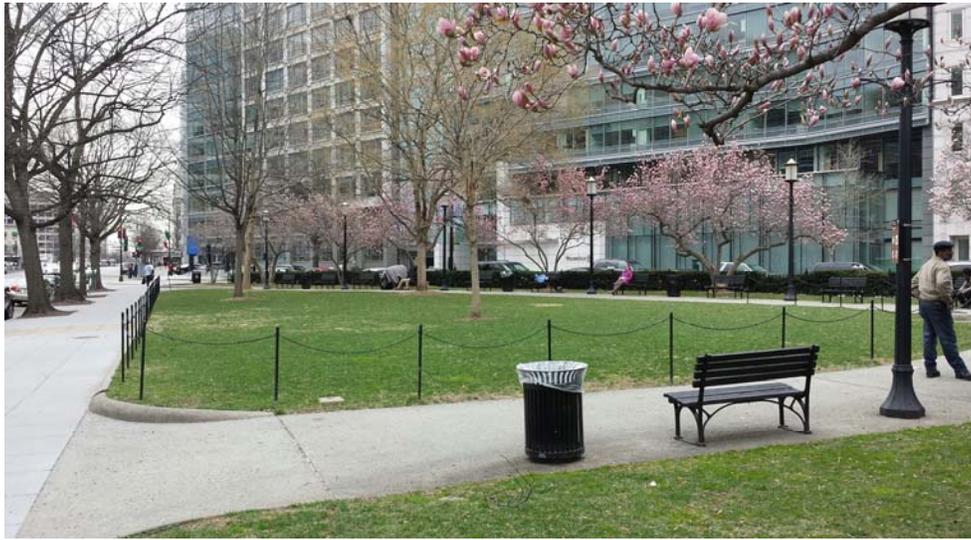


Figure 7: Reservation 31 and 30 Location

Existing Conditions: The park elements include: curbed walkways, small paved terrace areas, benches, evergreen shrubbery and several mature deciduous trees.



*Figure 8: Reservation 31 - Looking north*



*Figure 9: Reservation 31 - Looking south*

Staff Comments:

Staff has reviewed the information submitted by the applicant regarding Reservation 31 and has visited the site; the site seems to have strong thematic ties to the Peace Corps and the institutional uses in the Foggy Bottom area of the city. As noted earlier, the site is surrounded by institutional uses that have international ties, such as the Red Cross; the World Bank; the Peace Institute; the State Department and a few embassies north of the site. In addition, the Peace Corps offices are located at L and 20<sup>th</sup> Streets, NW.

If the NPS and PCCF moves forward with this site for the Memorial, the following comments should be evaluated:

The Golden Triangle Business Improvement District (BID) is currently evaluating potential streetscape and public space improvements along Pennsylvania Avenue, NW from 17<sup>th</sup> Street, NW to Washington Circle, and we recommend that the NPS and PCCF work with the Golden Triangle BID on incorporating the memorial into the design.

Given that the site is in an area with limited green space, the site is often used by office workers to eat outside and to sit and relax; the proposed memorial design should also include passive recreation opportunities for the office workers that surround the site, such as benches and trash receptacles.

The site was dedicated to Edward R. Murrow in 1979 by the Secretary of the Interior and includes a plaque in the northeast corner of the site. The site was identified in the 2M Plan, which noted that any memorial that was constructed on the site should include “ancillary interpretive media on the lives of [this] historic [figure].”

Staff would also like to note that the current design of the site dates to the 1930’s and if this site is selected for the memorial the applicant will need to work with the DC SHPO and interested parties to create a design that will be sensitive to the historic fabric.

***Reservations 30– NCPC 2M Plan Site 44 (south)***

Site Area: 0.33 acres

Surrounding Streets: Reservation 30 is bounded on the west by one-way southbound 19<sup>th</sup> Street, NW and on the south by one-way westbound I Street, NW, with Pennsylvania Avenue, NW forming the site's north boundary.

Adjacent Land Uses: Same as reservation 31, the uses around Reservation 30 are commercial and institutional in nature. The modernist World Bank headquarters building occupies the entire south side of I street and overlooks the site. The White House Complex is located two blocks southeast of the site. Other institutions in the West End area include: the George Washington University, the Department of State, the Institute of Peace, the World Bank, the International Monetary Fund, the National Academy of Scientists, and the Red Cross. The Farragut North, Farragut West and Foggy Bottom Metro stations are a few blocks away.



*Figure 10: Reservation 30 existing conditions*

Existing Conditions: The park elements include: curbed walkways, small paved terrace areas, benches, evergreen shrubbery and several mature deciduous trees. World Bank employees and

workers from other nearby office buildings eat lunch and relax in this park during favorable weekday weather.

Staff Comments:

While Reservation 30 has the same nexus as Reservation 31, due to the existing infrastructure on the site and the use of the site adjacent to the World Bank Building, staff is recommending that the NPS and PCCF remove Reservation 30 from further consideration. Staff notes that the existing infrastructure such as the site furniture, landscaping, and decorative fencing was newly updated on the site and is in better condition than the infrastructure at Reservation 31.

***Rock Creek Park Site – NCPC 2M Plan Site 46***

Site Area: One acre

Surrounding Streets: Bounded on the west by the narrow Rock Creek Parkway; on the south by Pennsylvania Avenue NW; on the north by M Street; and on the east by 26th Street. M Street and Pennsylvania Avenue are heavily traveled from the West End neighborhood to Georgetown.

Adjacent Land Uses: Office and apartment buildings surround the site on the east and south side. The west side, Georgetown is separated from the site due to a valley and the Rock Creek Parkway. The Foggy Bottom Metro station is a four-block walk away, to the southeast.

Existing Conditions: The site is mainly an open undeveloped area. Street trees line the site on 26<sup>th</sup> Street and Pennsylvania Avenue. On the west side, the site slopes down to the Rock Creek Parkway and is vegetative. A few benches are on the perimeter of the site and face the interior. The site offers good visual exposure to and from the surrounding avenue and streets.

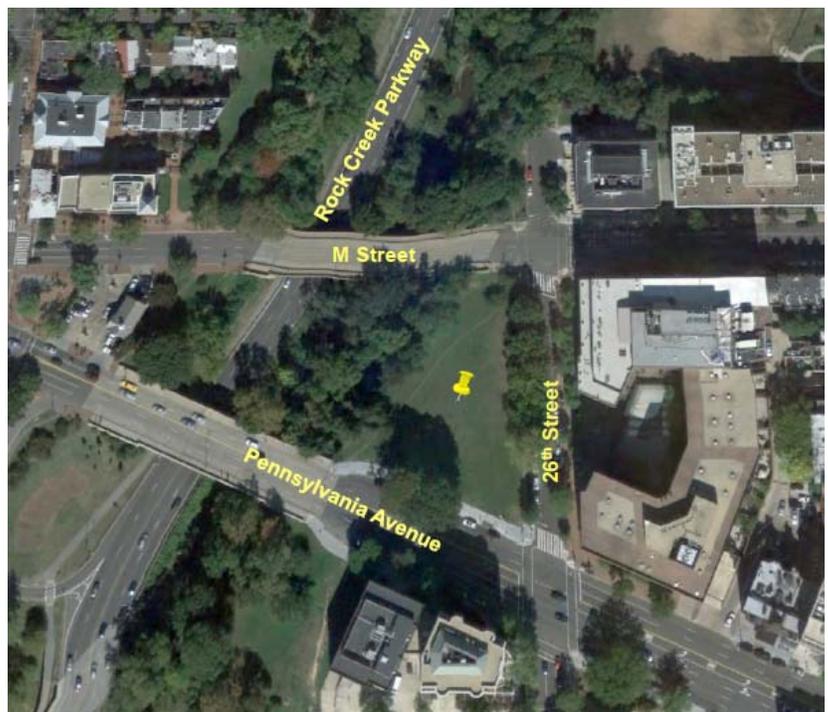


Figure 11: Rock Creek Park site location



Figure 12: Existing conditions of the Rock Creek Park Site

### Staff Comments:

Staff sees some merit for putting the Peace Corps Memorial on a site that is in between two universities and close to students that could be inspired by the memorial to volunteer and serve. However, placing an appropriate commemorative on this large, one-acre site would necessitate building a relatively large-scale work and substantial landscape development. This seems to differ from the intent of the PCCF to build a modest sized memorial and the PCCF has indicated that the site may entail a budget and construction scope requiring much more funding than the PCCF's projected budget anticipates and beyond its fundraising capability. Staff recommends that the Commission discourage the applicant from continuing to peruse the site for the Peace Corps Memorial.

### **Comprehensive Plan for the National Capital**

The proposal and recommended process for consultation and design development are consistent with the Comprehensive Plan. The following policies apply:

#### Parks and Open Space Element

- Maintain small urban parks primarily as historic parks and designed landscapes with fountains, monuments, memorials, tree cover, and other features of civic art (Policy #2, Page 109).
- Site memorials in monumental designed landscape parks in compliance with the *Memorials and Museums Master Plan* (Policy #3, Page 109).

#### Preservation and Historic Features Element

- Plan carefully for appropriate uses and compatible design in and near the monumental core to reinforce and enhance its special role in the image of the nation's capital. (Policy #2, Page 161)
- Protect and enhance the vistas and views, both natural and designed that are an integral part of the national capital's image. (Policy #5, Page 161).
- Develop the monumental core in accordance with the principles of the *Legacy Plan* and the policies of the *Memorials and Museums Master Plan*. The National Mall's historic open

space and monumental character should be respected and preserved for the benefit of future generations. (Policy #1, Page 166).

- Promote continuity in the historic design framework of the nation's capital by protecting and enhancing the elements, views, and principles of the L'Enfant Plan. (Policy #2, Page 166).

### **Memorials and Museums Master Plan**

The 2001 Memorials and Museums Master Plan 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 Memorials and Museums Master Plan includes analysis related to site conditions and neighborhood context for each identified location. Since 2001, six 2M Plan sites have been selected for new memorials. The 2M Plan includes all the sites proposed and the proposal is not inconsistent with the design considerations relating to the alternative sites.

### **CapitalSpace**

Of the six big ideas of the CapitalSpace Plan is to transform small parks into successful public spaces. The proposed memorial sites meet the goals of the CapitalSpace Plan to revitalize an underutilized small urban park.

### **National Environmental Policy Act (NEPA)**

Pursuant to the National Environmental Policy Act (NEPA), the NPS, in cooperation with NCPC, is undertaking an Environmental Assessment (EA) to analyze potential environmental impacts from the memorial project. A scoping meeting to identify potential alternatives and topic areas for consideration regarding the proposed sites was held on October 23, 2014 and the public comment period ran from October 8, 2014 to November 18, 2014. Additional scoping will be undertaken for design once the sites are narrowed down.

The NPS provided NCPC staff the comments submitted by the public during the public scoping period. The NPS received comments from individuals and from the Advisory Neighborhood Commission (ANC) 6C. The public individual comments generally supported the creation of the memorial. Some offered design comments that NPS should carry forward in the scoping for the memorial design. Other comments supported the sites presented and did not propose any different sites to be analyzed.

Regarding the comments raised by the ANC, the letter noted the ANC opposition to placing the Peace Corps Memorial on Reservation 727 (the Louisiana Avenue site) for the following reasons:

- The ANC notes that Capitol Hill has been losing pocket parks throughout the neighborhood and that the parks were intended to be used by the residential community for passive recreation.
- The ANC is concerned about the existing trees on the site that could be negatively impacted by the construction of the Memorial and the hardscape features of the design.

- Lastly, the ANC noted it was difficult to approve the Peace Corps Memorial for the Louisiana Avenue site without a design.

If the NPS and PCCF choose to move forward with the Louisiana Avenue site, the applicant will need to coordinate with the ANC on a potential design. As noted earlier, any design should include amenities to allow for passive recreation; retention of as much green space as possible; and ensure the design is sensitive to the trees on the site.

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. 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.

In addition, 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 commensurate with 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)**

Pursuant to Section 106 of the National Historic Preservation Act, the NPS initiated consultation with the District of Columbia State Historic Preservation Office (DC SHPO) on the potential memorial. On November 14, 2014, the NPS, the project sponsor, and NCPC met with the DC SHPO representative to discuss the proposed memorial sites and to discuss any concerns; as a follow up the DC SHPO prepared a letter with initial comments on the alternative sites. The DC SHPO noted that "there appears to be no compelling reason to eliminate any of the sites from further consideration based solely upon the potential to result in "adverse effects" on historic properties." The DC SHPO further noted that:

- The Rock Creek Park site may have archaeological resources due to its proximity to the Rock Creek watershed;
- Reservations 30 and 31 are characterized by historically significant landscape features such as fencing, fountains, quarter round curbs and related elements and that these factors will need to be evaluate in the design in order to avoid adverse impacts; and
- Reservation 727 is the most visible site due to its proximity to the U.S. Capitol and other national monuments and that a potential design would need be sensitive to the context.

## **III. CONSULTATION**

### **Coordinating Committee**

The Coordinating Committee reviewed the proposal at its November 12, 2014 meeting. The Committee forwarded the potential sites to the Commission with the statement that the proposal has been coordinated with all participating agencies. The participating agencies were: NCPC; the District of Columbia Office of Planning; the District Department of Transportation; the General Services Administration (GSA); the NPS; and the Washington Metropolitan Area Transit Authority. Although not in attendance the representative for the DC SHPO concurred in the coordination of this proposal pending the completion on any Section 106 matters.

### **U.S. Commission of Fine Arts**

The U.S. Commission of Fine Arts (CFA) reviewed the potential sites at its November 20, 2014 meeting. The official letter from CFA has not gone out yet but the Commission gave strong support to the PCCF's intent to build a small memorial and had no concerns with the alternative sites presented.

### **National Memorial Advisory Council**

The National Memorial Advisory Council (NMAC) reviewed the four potential sites at its May 6, 2014 meeting and provided general comments on the PCCF's site selection study. Representatives of the following agencies participated on NMAC that meeting: the NPS; the American Battle Monuments Commission; CFA; the Department of Defense (DoD); NCPC; AOC; GSA; and the

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Advisory Council on Historic Preservation (as an observing agency). Overall, the representatives on NMAC expressed support for the Peace Corps to be commemorated and for PCCF's intention to construct a small modest memorial on a smaller site. The following are comments that were stated:

- The Advisory Council representative requested that NMAC not pick a site in order for the alternative sites to be analyzed by the NEPA and Section 106 process and allow for public engagement. The Advisory Council also commented that the sites (Reservation 30 and 31) seemed to make the most sense thematically.
- The CFA representative expressed appreciation for the PCCF for only picking sites that are smaller in scale.
- The GSA representative noted that the Louisiana Avenue site allowed for memorials with an international ties to be distributed throughout the city allowing visitors to explore different neighborhoods. The Louisiana site also allowed for accidental foot traffic.
- The AOC and NPCP representatives had no concerns with the sites selected for analysis and felt the PCCF evaluated an adequate number of sites. NCPC noted that one of the sites was named for Edward R. Murrow and the questioned if a memorial could still go on the site; NPS stated it was something they would look into.
- Similar to other comments, the DoD representative supported the creation of the Peace Corps Memorial and the intent for the memorial to be modest in size and low in cost. The DoD had no concerns with the alternative sites.