



Executive Director's Recommendation

Commission Meeting: October 2, 2014

PROJECT Dwight D. Eisenhower Memorial National Mall and Memorial Parks Bound by Independence Avenue, 4th Street, and 6th Streets, SW, and by the Lyndon B. Johnson - Department of Education Headquarters Building Washington, DC	NCPC FILE NUMBER 6694 NCPC MAP FILE NUMBER 1.71(73.10)44008 APPLICANT'S REQUEST Preliminary approval of site and building plans
SUBMITTED BY United States Department of the Interior National Park Service on behalf of the Dwight D. Eisenhower Memorial Commission	PROPOSED ACTION Approve with comments ACTION ITEM TYPE Staff Presentation
REVIEW AUTHORITY Approval per 40 U.S.C. 8903, 40 U.S.C. § 8905, 40 U.S.C. 8711(a), and 40 U.S.C. 8722(b)(1) and (d)	

PROJECT SUMMARY

The National Park Service, on behalf of the Dwight D. Eisenhower Memorial Commission, has submitted revised preliminary site and building plans for the Dwight D. Eisenhower Memorial. The project is located on a four-acre site in Southwest Washington, DC. The project includes sections of Maryland Avenue, SW and is adjacent to Independence Avenue, SW, both prominent L'Enfant streets, and is in close proximity to the U.S. Capitol, National Mall, federal headquarters, national museums, and other commemorative works. The overarching design concept of the memorial continues to be based upon the notion of a commemorative object within a temple, similar to how the Lincoln Memorial is organized, that establishes a layered experience that transitions visitors through a series of defined spaces that move from the busy urban surroundings, through active and passive park spaces, and finally into an intimate commemorative core where the story of President Eisenhower unfolds.

A centrally located memorial core containing limestone bas-relief blocks, free-standing bronze sculpture, and quotations will commemorate Dwight D. Eisenhower's legacy and his role in American history as a Military General and as President of the United States. As a backdrop to the core, a large-scale stainless steel tapestry, supported by a monumental colonnade, is proposed along the southern edge of the site. The tapestry is approximately 80 feet high and 447 feet in length. The columns that support the tapestry are approximately 10 feet in diameter and 80 feet high. As proposed, the tapestry serves both functional and commemorative purposes. Functionally, the tapestry and supporting colonnade are used to define the southern edge of the memorial and provide visual separation from the Lyndon B. Johnson Department of Education Building. As a commemorative element, the tapestry will depict landscape scenery of Abilene, Kansas,

Eisenhower's hometown, and is meant to honor Eisenhower's Midwestern core values of strength, modesty, and integrity.

The revised design eliminates the previously proposed east and west tapestries and replaces each with a singular freestanding column – two columns total. The freestanding columns are the same diameter and height as those supporting the tapestry, and are placed in alignment with each other, and with the end columns of the south tapestry approximately 155 feet to the north. The placement of the columns and their relationship to the ends of the south tapestry is intended to help define a park space within the larger site and surrounding precinct.

The landscape design of the memorial reinforces the tapestry imagery through plant materials that are characteristic of the Kansas plains. The memorial ground plane includes groomed lawn along the historic Maryland Avenue cartway, and slightly taller grasses throughout the rest of site. Several types of canopy and understory trees are arranged in clusters throughout the site to frame the Maryland Avenue viewshed and views of the memorial core and tapestry. Visitor services will be located in a one-story information center placed in the southeast corner of the site. The building has a footprint of approximately 2,400 square feet and will contain restrooms, a bookstore, and an NPS ranger contact station. Paved entry plazas at the northeast and northwest corners of the site will receive visitors and direct them along walkways through the park space and towards the memorial core. The threshold into the memorial core will be delineated through the use of paving materials that differ from the walkways.

Finally, a new pedestrian promenade is proposed between the memorial and the Department of Education Building. The promenade, to be known as LBJ Promenade, will serve as a new entry forecourt to the Department of Education Building and provide outdoor seating, exhibit areas, and a memorial overlook that can accommodate gatherings of various sizes.

KEY INFORMATION

The recommendation is based upon an analysis of the memorial project's consistency with the purposes, and specific criteria, of the National Capital Planning Act and the Commemorative Works Act (CWA), seven design principles adopted by NCPC as part of the site selection process (listed below), and other relevant NCPC plans and policies. In developing the recommendation, staff focused on ensuring a commemorative work that prominently features the legacy of President Eisenhower in a manner consistent with the applicant's overarching design concept, and within a public space that is integrated into the urban fabric, relates to its surrounding context, and protects the integrity of historic resources by minimizing impacts as much as possible. By virtue of its prominent, urban location within the L'Enfant City, the design of this four-acre project must serve a dual role. As a memorial the project must effectively serve the commemorative experience and enrich the knowledge visitors have of President Eisenhower's legacy. In addition, the project must function as an active public space that contributes to the city's public realm, the day-to-day activities of surrounding uses, and the needs of workers, visitors and residents.

During the environmental and historic preservation review processes for the memorial's site selection, seven design principles were developed in consultation with cooperating agencies:

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

NCPC's site approval action was conditioned upon the memorial design satisfying these design principles. The principles were also incorporated as required mitigation in the Finding of No Significant Impact issued by NCPC for its action to approve the memorial site. Therefore, any action by the Commission to approve a preliminary memorial design must be done concurrently with the Commission finding that the design satisfies the seven design principles.

In April 2014, the Commission disapproved the preliminary plans for the memorial project on the basis that the scale and configuration of the proposed stainless steel tapestries rendered the project inconsistent with three of the seven design principles (#1, 4, and 6). In addition, the Commission found that the proposed memorial design was inconsistent with the purposes of the National Capital Planning Act and the CWA. As part of its April 2014 action, the Commission found the materials and fabrication of the memorial tapestry met the CWA requirement that a commemorative work be constructed of durable materials suitable to the outdoor environment. This finding was based upon the results of several rounds of corrosion testing on the chosen tapestry stainless steel alloy and mechanical strength and fatigue testing on tapestry weld samples that were completed by the applicant.

RECOMMENDATION

The Commission:

Approves the revised preliminary site and building plans for the Dwight D. Eisenhower Memorial.

Finds the revised preliminary memorial design to be consistent with the purposes of the National Capital Planning Act and the Commemorative Works Act

Finds that as a result of the modifications made to the project following the Commission's April 2014 review, the revised preliminary memorial design satisfies NCPC's adopted site selection design principles.

Notes that in accordance with the National Environmental Policy Act the Commission **finds** that the Commission's action to approve the revised preliminary memorial design will not have a significant impact on the human environment. The Commission makes this finding relying upon the two environmental assessments prepared for the project; the revisions made to the memorial design since completion of the assessments; and the Commission's finding that the revised preliminary memorial design satisfies NCPC's adopted design principles, which are required mitigation in NCPC's Finding of No Significant Impact for site approval.

Notes that the revised preliminary design continues to include a Memorial Information Center. The Commission's April 2014 action included a provision stating that this element should be removed from the site due to its inconsistency with specific site guidelines set forth in the Memorials and Museums Master Plan.

Notes the Commission's April 2014 comments on pedestrian circulation, perimeter security, and lighting have not yet been addressed by the applicant.

Notes that this is still a preliminary design and the project will continue to evolve as the applicant continues through the design review process and advances the memorial design toward final; and therefore, **recommends** that as the applicant further develops and refines the revised preliminary design it continue to explore ways to:

- Strengthen the overall concept of the memorial as a "layered experience" consisting of a memorial core within a park within a surrounding urban landscape.
- Enhance the openness of the Maryland Avenue right-of-way / viewshed.
- Improve the symbolic and physical relationship between the memorial and the Department of Education Building.

Requests the applicant to continue working with staff and return to the Commission prior to submitting for final review to report on additional modifications made to the preliminary memorial design, including changes that incorporate NCPC's previous comments on pedestrian circulation, perimeter security, and lighting, and respond to any additional comments from NCPC, the U.S. Commission of Fine Arts, and Section 106 consulting parties.

Commemorative Works Act decision criteria:

Finds that the project successfully meets each of the specific decision criteria enumerated in the Commemorative Works Act, including the requirement that a commemorative work be built of durable materials suitable to the outdoor environment, **noting** the Commission's April 2014 finding that the results of the durability tests conducted by the applicant show the tapestry materials and panel welds to be resistant to corrosion and mechanically sound.

Notes the Commission's prior request that at the final review stage the applicant demonstrate the following:

- The tapestry material and welds continue to reach the same durability standards as fabrication methods are further refined.
- The recommended maintenance regimen, including cleaning, will not cause weld failure if carried out properly.
- The operational protocols that will be employed to avoid danger to the public during instances where snow and ice has accumulated on the tapestries.

Notes that the Commemorative Works Act currently prohibits acknowledgment of donor contributions in any manner as part of a commemorative work or its site, and that the information provided by the applicant to date does not appear to contain any form of donor recognition.

PROJECT REVIEW TIMELINE

Previous actions	<ul style="list-style-type: none">• September 2006 – Approval of memorial site with adopted set of design principles• February 2011 – Review and comment on three concept design alternatives• October 2011 – Information presentation on proposed design• April 2014 – Disapproval of preliminary site and building plans• September 2014 - Information presentation on proposed revised preliminary design
Remaining actions (anticipated)	<ul style="list-style-type: none">• Approval of final site and building plans• Approval of any related transfers of jurisdiction (<i>to be processed before or together with final approval</i>)• Review of any related street closings (<i>to be processed before or together with final approval</i>)

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September 29, 2014

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I. PROJECT DESCRIPTION

Site



Figure 1: Aerial image of memorial site and surrounding context

The memorial site encompasses approximately four acres of land within the Southwest quadrant of Washington, DC. The site is located one block south of the National Mall and is bound by Independence Avenue on the north, 4th Street on the east, and 6th Street on west, and the Lyndon B. Johnson, Department of Education Building (LBJ Building) on the south. In addition to the LBJ Building, the site is surrounded by several other federal office buildings and cultural facilities. These include the Smithsonian National Air and Space Museum to the north, the historic Wilbur J. Cohen Building that is home to the Voice of America (VOA) to the east, and the Wilbur Wright Building, headquarters of the Federal Aviation Administration (FAA), to the west. The site is also in close proximity to the U.S. Capitol (Figure 1). Of note, these buildings house agencies that directly relate to Dwight D. Eisenhower's legacy, an important consideration for the applicant initially choosing the site for the memorial.



Figure 2: Memorial site existing conditions

Currently, the site is composed of three parts controlled by three separate entities. The historic [160'] Maryland Avenue right-of-way bisects the site and encompasses approximately two acres of land area. The United States Government owns the right-of-way with administrative jurisdiction held by the District of Columbia Government. As currently configured, Maryland Avenue does not follow its historic alignment with the U.S. Capitol, but rather has been realigned to form a midblock intersection with Independence Avenue with a one-way spur leading to 4th Street. Approximately 70 parking spaces exist within the right-of-way on-street and within a small surface parking lot (Figure 2).

To the north of the Maryland Avenue right-of-way is an approximately one-half acre area controlled by the National Park Service (NPS). This area currently contains a community garden and small exercise facility. The remaining 1.5 acres of the site located south of Maryland Avenue is controlled by the United States General Services Administration (GSA) and features a hardscape plaza that was constructed with the LBJ Building as the building's entry forecourt. The plaza is sparsely vegetated and contains a sunken courtyard that exists to provide natural light to the Department of Education's basement-level. Overall the site is approximately 70% paved and 30% green space.

Prior to construction of the memorial, all portions of the site will be transferred to NPS with the exception of a 50-foot buffer area along the north façade of the LBJ Building which will remain in GSA control. Following construction, NPS will be responsible for the long-term operation and maintenance of the memorial.

Background

At its September 7, 2006 meeting, the Commission approved the site for the memorial provided that the applicant design the memorial to meet seven design principles that are discussed in detail later in this report. The design principles were developed in consultation with cooperating agencies during the environmental and historic preservation review processes for site selection. Along with being a condition of NCPC's site approval action, the design principles were incorporated as required mitigation in the Commission's Finding of No Significant Impact (FONSI) issued for site selection.

At its February 2011 meeting, the Commission provided comments on three concept design alternatives. In general, the Commission supported the applicant's modern and innovative approach to commemorate President Dwight D. Eisenhower, including the possible use of the woven stainless steel tapestries, but found each of the alternatives to not yet satisfy the 2006 design principles. Specifically, regarding the concept alternative that has since evolved into the current memorial design (Figure 3), the Commission found that only two of the design principles had been satisfied. In its action, the Commission noted that the design principles must be met to: 1) mitigate otherwise potentially significant environmental impacts caused by the use of the site for a commemorative work, and 2) better relate the memorial to its surroundings.

In October 2011, the applicant provided the Commission with an information presentation on modifications made to the



Figure 3: Memorial site plan (February 2011)



Figure 4: Memorial site plan (October 2011)



Figure 5: Memorial site plan (April 2014)

memorial design since NCPC's concept review (Figure 4). Commissioners were supportive of the changes that had been made to the design since their concept review, and were encouraged by the progress that had been made in the design of the proposed stainless steel tapestries. Commissioners commented on the very large scale of the design, and on impacts this could have on the view along Maryland Avenue and on the visitor / pedestrian experience. In order to resolve some of the issues of scale and visual impact, the Commission suggested that the applicant consider reducing the diameter and/or height of the columns and relaxing the rigid geometry of the tapestry configuration to help the memorial better relate to its surrounding context.

In April 2014, the Commission disapproved the preliminary site and building plans for the memorial on account of the scale and configuration of the tapestries (Figure 5). While noting its continued support for a modern and innovative approach to commemorating Dwight D. Eisenhower, including the possible use of the stainless steel tapestries, the Commission found the project inconsistent with the purposes of the National Capital Planning Act, the Commemorative Works Act, and three of the seven design principles. The Commission also requested the applicant to address specific planning issues related to pedestrian circulation, perimeter security, lighting, and public space. In addition, the Commission stated that the memorial information center should be removed from the site due to its inconsistency with specific site guidelines set forth in NCPC's Memorials and Museums Master Plan (2M Plan). Finally, the Commission found that the results of several durability tests conducted by the applicant demonstrated that the proposed tapestry materials and fabrication methods met the Commemorative Works Act durability criteria.

Proposal

The National Park Service (NPS), on behalf of the Dwight D. Eisenhower Memorial Commission (EMC), has submitted revised preliminary site and building plans for the Dwight D. Eisenhower Memorial. The revisions made to the design are in response to the issues raised in NCPC's April 2014 review of the project. The memorial design remains composed of several large-scale commemorative elements including bas-relief sculpture blocks, freestanding sculpture, speech excerpts and quotations, and stainless steel tapestry; freestanding columns; a robust landscape design; and a one-story information center. In addition, the design includes a new pedestrian promenade, LBJ Promenade, which will distinguish the memorial from the LBJ Building and serve as a new entry forecourt to the Department of Education (Figure 6).

The overarching concept of the memorial is to commemorate Dwight D. Eisenhower's monumental achievements as a military general and 34th President of the United States within a setting that also honors the humble way in which he approached these roles using the set of Midwestern values he acquired during his upbringing in Abilene, Kansas. The applicant's execution of the overarching concept seeks to establish a layered experience that transitions visitors, through a series of defined spaces, from the busy urban surroundings, through active and passive park spaces, into an intimate commemorative core where the story of President Eisenhower unfolds.

To create the layered experience, the applicant has drawn inspiration from the temple-like organization of the Lincoln Memorial, and envisions the Eisenhower Memorial as a

commemorative object placed within an open air temple. In the case of the Lincoln Memorial, the temple structure creates a unique setting that is separate from the surrounding, open expanse of the National Mall. Its monumental colonnade marks a point of transition from the surroundings to the commemorative core. Within the core, a statue of President Lincoln sits flanked by well-known quotations and speech excerpts. Upon arriving at the steps of the Lincoln Memorial, visitors experience a layered transition from the expansive landscape surroundings to the intimate commemorative core as they traverse the east plaza and monumental steps. Upon reaching the top of the steps, visitors arrive at the monumental colonnade that surrounds the commemorative core. The colonnade serves as a threshold where upon crossing visitors leave the open expanse of the Mall and begin the commemorative experience.

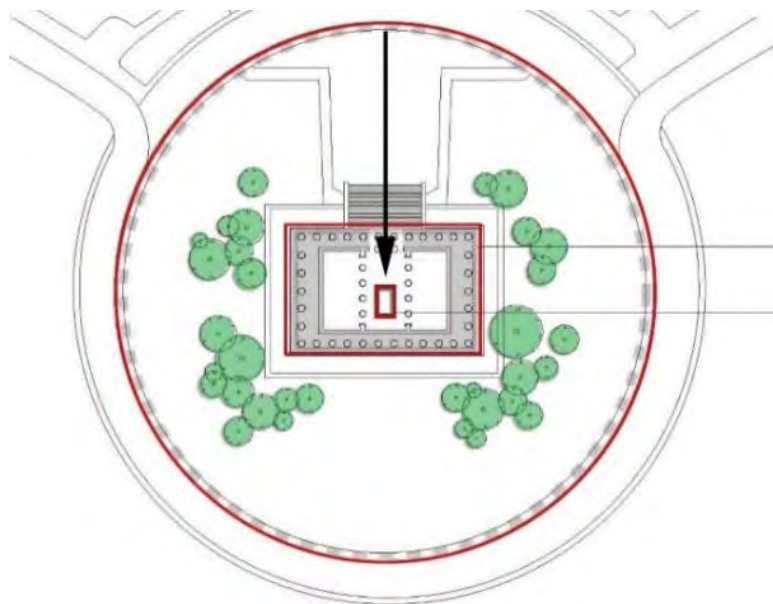


Figure 6: Diagram of Lincoln Memorial organization



Figure 7: Diagram of Eisenhower Memorial organization

Similar to the Lincoln Memorial, the Eisenhower Memorial is organized as an object within a temple within a surrounding precinct. The applicant is proposing a memorial core containing the primary commemorative elements that honor President Eisenhower's legacy. The memorial core is the innermost layer of the proposed design and is where the commemorative experience occurs. To mark the significance of this space within the larger site, special paving and a central grove of trees will establish the core as an intimate space that has a purpose and function that is distinguished from the rest of the site. Beyond the memorial core is a park space and robust tree canopy that is now defined by a single, large-scale stainless steel tapestry supported by a colonnade along the southern edge of the site, and two freestanding columns to the north. The perimeter that is established by the tapestry and freestanding columns is intended to serve as the threshold between the park space and the busy surroundings of the urban environment. As discussed below, the tapestry also serves an integral commemorative role.

According to the applicant, the colonnade and freestanding columns are “similar in proportion to those in the Lincoln Memorial creating a sense of scale in keeping with other presidential monuments.” Each of the commemorative elements of the memorial design as well as other components such as the landscape, information center, lighting, and signage are further described below.

Memorial core

On axis with the LBJ Building entrances, the memorial core continues to contain a combination of freestanding sculpture, bas relief blocks, and engraved quotations and speech excerpts to commemorate Eisenhower’s military and Presidential achievements. This area is set apart from the rest of the site through the use of special paving that will define the limits of the commemorative core. Large trees set in pavement will also help define the core from the rest of the surrounding landscape. The freestanding sculpture will be cast bronze and measure approximately 8 – 10 feet in height. The sculptural relief blocks will consist of limestone and measure approximately 15 feet high. In addition, a 9 ½ foot high limestone lintel block containing an Eisenhower quotation is proposed atop each relief block.



To commemorate his military achievements, a sculpture of General Eisenhower speaking to members of the 101st Airborne Division before D-Day is proposed in front of a bas relief depicting the landing on the beach of Normandy, France on June 6, 1944. The back of the relief block will include an excerpt from General Eisenhower’s Guildhall Address.



To commemorate his Presidential legacy, a solitary freestanding sculpture of President Eisenhower is proposed in front of a bas relief scene of the signing of the Civil Rights Act of 1957. The back of the relief block will include two excerpts from President Eisenhower’s inaugural speeches which highlight his focus on the importance of foreign policy.

Figure 8: Site plan and rendering of memorial core

A sculpture of Eisenhower as a young man is proposed along the southern edge of the memorial core. The statue is intended to create a connection between the landscape imagery of Abilene, Kansas, Eisenhower’s hometown, and the elements within the

memorial core commemorating Eisenhower's future accomplishments. Inspiration for this sculpture comes from a quote taken from Eisenhower's homecoming speech following the end of his presidency in which he reflected upon his achievements in life and the lifelong pride he held in being from Abilene, Kansas. According to the applicant, the proposed composition of the memorial core, with the statue of young Eisenhower, set against the backdrop of the Kansas landscape will invite visitors to share in Eisenhower's personal, lifelong journey.

Tapestry and Freestanding Columns

Since NCPC's April 2014 review, the applicant has made substantial modifications to the scale and configuration of the proposed tapestries. Previously, three large-scale tapestries were proposed to frame the site on the south, east, and west sides with generally open views into the site from Independence Avenue (Figure 9). The revised preliminary memorial design only includes the stainless steel tapestry along the southern edge of the site. The revised design eliminates the previously proposed east and west tapestries and replaces each one with a singular freestanding column – two columns total (Figures 10 and 11).



Figure 9: Previous preliminary design showing east and west tapestries (looking southwest)

The proposed south tapestry remains approximately 447 feet long, supported by columns that are approximately 80 feet tall and 10 feet in diameter. The tapestry is centered on the LBJ Building approximately 71 feet from the building's north façade. The bottom of the tapestry is raised above the ground plane to allow pedestrian passage underneath with the top of the tapestry aligned with the first cornice line of the LBJ Building, approximately 80 feet above grade. According to the applicant, functionally the tapestry is intended to help define the southern edge of the site and provide a degree of visual separation from the LBJ Building. The tapestry holds commemorative

value as well. Landscape scenery of Abilene, Kansas, Eisenhower's hometown, is proposed for the tapestry and honors Eisenhower's Midwestern core values of strength, modesty, and integrity.



Figure 10: Revised preliminary design showing south tapestry and freestanding columns (looking south)



Figure 11: Revised preliminary design showing south tapestry and freestanding columns (looking southwest)

In response to concerns raised by the Commission regarding the impact of the project on views along Maryland and Independence Avenues, and the relationship to adjacent buildings, the applicant has eliminated the previously proposed east and west tapestries and replaced each with a single freestanding column – two columns total – that are similar in proportion to the columns supporting the proposed tapestry. The columns are placed in alignment with each other, and with the end columns of the south tapestry approximately 155 feet to the north. The placement of the

freestanding columns and their relationship to the ends of the south tapestry defines the perimeter of a park space within the larger site and urban precinct. The perimeter establishes a threshold into the contemplative park space within which visitors can enjoy the memorial, and marks the beginning of the visitor's transition towards the commemorative core. The placement of the columns relative to the tapestry is also intended to delineate a volume of space, and establish a scale, that is expressive of a Presidential memorial while allowing the adjacent buildings to define the edges of the site and maintain their thematic relationship to the memorial (Figure 11).

Landscape design



Figure 12: Memorial entrance plaza from 4th Street and Independence Avenue



Figure 13: View towards east tapestry from the memorial core

The memorial landscape plan is unchanged from what was previously proposed in April 2014, with the exception of some minor modifications to walkways. The landscape plan introduces a substantial amount of new green space and is intended to reinforce the commemorative message of the memorial by complementing the Kansas landscape scenery depicted on the tapestry proposed along the southern edge of the site. According to the applicant, the entire landscape design is developed as a natural and physical extension of the imagery depicted on the tapestry.

The primary memorial access points continue to be located at the northeast and northwest corners where paved entry plazas with planters and integrated seating and signage will receive visitors and serve as transition areas between the urban surroundings and the memorial. The proposed freestanding columns located near the entry plazas mark the threshold into the contemplative memorial park space and beginning of the approach walkways that will lead visitors toward the memorial core. Minor modifications have been made to the approach walkways to

accommodate the placement of the proposed freestanding columns. The walkways maintain site lines to the memorial core and south tapestry and have staggered, orthogonal edges to form social gathering areas that contain seating. The entry plazas and approach walkways will share the same paving material and patterns that will be different than the paving within the memorial core. The use of different paving materials is intended to delineate the commemorative core from the surrounding memorial park space.

Overall, the intent of the landscape plan is to establish a micro-climate that is both sunny and shaded and reminiscent of the landscape found around Abilene, Kansas. The ground plane continues to be treated simply with a groomed lawn along the 50-foot Maryland Avenue cartway and a more casual, un-groomed lawn throughout the remainder of the site. The proposed tree canopy is made up of a layered arrangement of informal groves that relate to the informal Kansas landscape depicted on the tapestry. The groves will consist of a palette of larger canopy trees and smaller understory trees planted at varying stages of maturity. The tree species selected complement each other and will consist of a number of specimens that are particular to Kansas though suitable to the Washington, DC microclimate. Generally, the larger canopy trees will consist of Hackberry, Oak, London Plane, and Serviceberry. Understory trees will consist of Dogwood, Ironwood, Redbud, and Hornbeam.



Figure 14: View toward U.S. Capitol from Maryland Avenue



Figure 15: View toward memorial core from Maryland Avenue

The informal groves will help soften the strict geometry of the surrounding precinct, tapestry, and the rectilinear volume of space defined by the tapestry and freestanding columns. They will also define the primary open spaces of the site along Maryland Avenue and within the memorial core. Along Maryland Avenue, an allee of trees is proposed to frame the view towards the U.S. Capitol. Voids along the allee have been purposefully introduced to balance the informal setting of the groves and the desire to frame views toward the memorial core.

Information center

The revised preliminary memorial design continues to include a small, one-story information center in the southeast corner of the site along 4th Street, SW. The design of the building remains unchanged with a footprint of approximately 2,400 square feet. The building is intended to serve the maintenance and interpretive needs of the NPS through a basement level storage area and a ranger contact station. The information center will also contain visitor services such as restrooms and a bookstore.

LBJ Promenade

The revised preliminary design maintains the proposed pedestrian promenade between the memorial and the LBJ Building, referred to as LBJ Promenade. The promenade is intended to create a distinct zone separate from the memorial that recognizes the formal entrance to the Department of Education, and serves as a transition area into the memorial similar to the entry plazas proposed at the northeast and northwest corners. It is also intended to serve as a “fourth frame” that defines the southern edge of the memorial given the absence of a functional street along this side of the site.

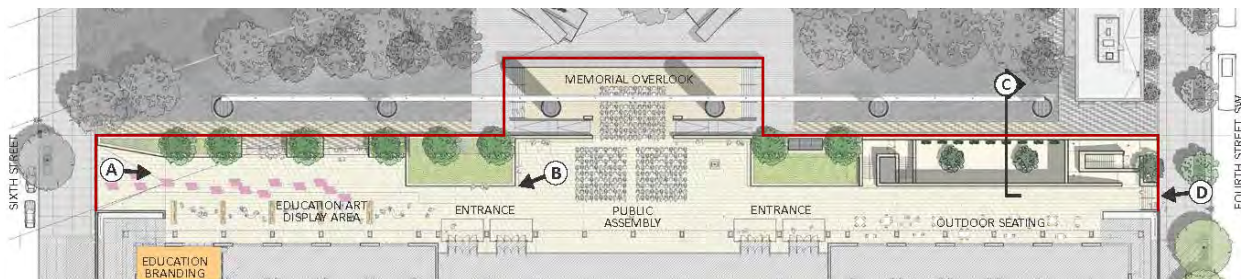


Figure 16: Plan for LBJ Promenade (showing security barrier line in red)

The design of LBJ Promenade remains consistent with what was previously proposed in April 2014. The promenade is broken into three areas that have specific purposes. On the west end of the promenade is an area that is designed to provide permanent exterior exhibit space for the Department of Education to display information about its mission or curate children’s artwork as part of the programming of this area. The east end of LBJ Promenade, adjacent to the existing Department of Education cafeteria, will provide opportunities for outdoor seating. Finally, the center portion of the promenade, which is set apart from the east and west areas by two large planters, provides access to the LBJ Building entrances and is designed as an open area that can be used for gatherings. This area extends further north than the rest of the promenade to create a memorial overlook. A set of stairways and ramps on either side of the overlook allow visitors to transition down into the memorial core.

LBJ Promenade will also serve a security function, providing a 50-foot security buffer between the north façade of the LBJ Building and the memorial. Much of the security barrier has been integrated into the north retaining wall of the promenade. Bollards are proposed at the east and west ends of the promenade, across the stairways adjacent to the exhibit area, and at the base of the stairways and ramps leading from the overlook to the memorial core.

Lighting

As part of its April 2014 action, the Commission requested the applicant to modify the design to address the issue of lighting. The Commission noted that as a commemorative work located within the urban fabric of the city, the design of the memorial lighting should be informed by lighting at other similarly situated public spaces and must not diminish the nighttime prominence of the U.S. Capitol Building along the Maryland Avenue viewshed. Since the previous review, the applicant has primarily focused on addressing the Commission's concerns regarding the scale and configuration of the proposed tapestries. Upon resolution of these significant issues, the applicant states that it will turn its attention to addressing the issues / concerns related to memorial lighting and its relationship to the U.S. Capitol Building.

Signage

Specific location and design information on the proposed memorial signage was included in the applicant's previous preliminary design submission. The current revised preliminary memorial design remains consistent with the previous information.

II. PROJECT ANALYSIS/CONFORMANCE

Executive Summary

Based upon an analysis of the memorial design's consistency with the purposes and specific criteria of the National Capital Planning Act and the Commemorative Works Act (CWA), NCPC's site selection design principles, and other relevant NCPC plans and policies, staff recommends approval of the revised preliminary site and building plans for the Dwight D. Eisenhower Memorial.

The revised preliminary memorial design continues to employ a modern and innovative approach to commemorating President Eisenhower. This overall approach is one that has been previously supported by staff and the Commission on multiple occasions. As a result of the modifications made to the design since April 2014, specifically the removal of the east and west tapestries, staff considers the revised proposal to be consistent with the purposes of the National Capital Planning Act and CWA. The revised preliminary design is a substantial improvement toward balancing the need to preserve the important historical and natural features of the National Capital, including the integrity of the comprehensive design of the L'Enfant and McMillan Plans, with the desire to develop the site at a scale that is reflective of a major Presidential memorial.

Furthermore, staff is recommending the Commission find that the project satisfies NCPC's adopted site selection design principles. Staff's analysis has determined that the revised design now satisfies the seven design principles. The removal of the east and west tapestries and the alignment of the proposed freestanding columns bring about substantial improvement in how the memorial relates to the views along Maryland and Independence Avenues, and to the adjacent buildings to the east and the west.

Since the project is still in its preliminary design phase, the project will continue to evolve as the applicant makes refinements and addresses outstanding planning issues and additional comments

received from the NCPC and the U.S. Commission of Fine Arts, both of which are reviewing this project pursuant to the Commemorative Works Act, and Section 106 consulting parties. During this process, opportunities may arise to strengthen the memorial's design concept and commemorative message, and improve how the memorial relates to Maryland Avenue and the LBJ Building. Furthermore, staff notes that the Commission's April 2014 comments on pedestrian circulation, perimeter security, and lighting have not been addressed by the applicant. The applicant has primarily focused on resolving the most significant issues previously raised by the Commission; specifically, resolving inconsistencies with NCPC's site selection design principles through modifications to the scale and configuration of the proposed tapestry and column elements. The applicant has informed staff of its intention to address the Commission's previous comments following resolution of the most significant design issues. Therefore, staff recommends that the Commission request the applicant to continue to work with staff and return to the Commission prior to submitting for final review to report on additional modifications made to the preliminary memorial design, including changes that incorporate NCPC's previous comments on pedestrian circulation, perimeter security, and lighting, and respond to any additional comments from NCPC, the U.S. Commission of Fine Arts, and Section 106 consulting parties.

As discussed in its April 2014 recommendation, staff has determined that the project meets specific decision criteria required under the CWA pertaining to the memorial's surroundings, location, durability, landscape features, and donor recognition. Regarding durability, as part of its April 2014 action the Commission found that tests conducted by the applicant showed that the stainless steel alloy proposed for the tapestry panels exhibited resistance to corrosion and the proposed tapestry panel welds are likely to be mechanically sound.

2006 Site Selection Design Principles

An important component of NCPC's review of the revised preliminary memorial design is the project's consistency with the 2006 site selection design principles that were adopted by the Commission as part of its 2006 site approval and included as required mitigation in NCPC's Finding of No Significant Impact (FONSI) for site selection. The design principles are as follows:

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

Staff finds that as a result of the modifications made to the project following the Commission's April 2014 review, the revised preliminary memorial design satisfies NCPC's adopted site

selection design principles. In its review of the previous preliminary memorial design, the Commission determined that four of the seven design principles had been satisfied (2, 3, 5, and 7), and three were not satisfied (1, 4, and 6). While focusing its analysis of the revised preliminary design on the three principles previously not satisfied, staff also confirmed that the revised design did not create any new inconsistencies with the principles that the Commission already deemed satisfied. In fact, some of the modifications made to the memorial design since April 2014 result in greater consistency with some of the satisfied principles. An analysis of the revised preliminary memorial design relative to each design principle follows.

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



With regard to the need to preserve reciprocal views along Maryland Avenue, the removal of the east and west tapestries and placement of the two freestanding columns result in a substantial improvement compared to previous design iterations reviewed by the Commission at the concept and previous preliminary stages (Figure 17).



Figure 17: Previously proposed views along Maryland Avenue looking toward the U.S. Capitol
(Top) February 2011 concept design, (Bottom) April 2014 preliminary design

As discussed in the April 2014 staff report, during site selection the Maryland Avenue cartway was identified as a development restriction zone, and that the remainder of the 160-foot right-of-way, the historic viewshed, needed to be treated sensitively with regard to the placement of memorial elements. The Commission found the previous preliminary design inconsistent with this principle due to the scale and configuration of the three proposed tapestries and the

extent to which they intruded into the Maryland Avenue right-of-way and narrowed the viewshed. In addition, the placement of elements within the viewshed should also be done in a manner that preserves the prevailing civic – *more horizontal* – character that is typical of the city's broader, more significant avenues which allows public buildings and commemorative works to be the dominant elements within these important view corridors.



As a result of the design modifications made since April 2014 and reduction of the elements' impact on reciprocal views, staff considers the revised preliminary design to satisfy this design principle. The elimination of the east and west tapestries reduces the extent to which large-scale memorial elements encroach into the Maryland Avenue right-of-way and viewshed. The elimination of these elements and placement of the west freestanding column on the edge of the

right-of-way preserves, to a greater extent, the openness of Maryland Avenue and the horizontal orientation of the viewshed (Figure 18). Although the revised design still has large-scale elements placed within the 160-foot right-of-way, specifically the western end of the tapestry and eastern freestanding column, the unobstructed view towards the Capitol has been increased from 95 feet to 135 feet, approximately 84% of the width of the right-of-way (Figure 19). Staff notes the substantial improvements gained through the elimination of the east and west tapestries and considers the current design a successful compromise between establishing a fitting scale for a Presidential memorial and respecting the site's historic context and unique constraints.

As this is still a preliminary design, the project will continue to evolve as the applicant makes refinements to address outstanding general planning issues, strengthen the overall concept and commemorative message of the memorial, and respond to any additional comments from NCPC, the U.S. Commission of Fine Arts, and Section 106 consulting parties. As refinements are made, staff recommends that the applicant continue to explore ways to further enhance the openness of the Maryland Avenue right-of-way / viewshed.

Enhance the nature of the site as one in a sequence of public spaces embellishing the Maryland Avenue vista AND Create a unified memorial site that integrates the disparate parcels into a meaningful and functional public gathering place that also unifies the surrounding precinct

While the Commission previously considered these two principles to be satisfied, the removal of the east and west tapestries further the extent to which the project will unify the surrounding precinct by opening up the east and west sides of the site to the adjacent streets and buildings thereby allowing them to play a more active role in defining the memorial and surrounding park. The use of the two freestanding columns, and their placement relative to the end columns of the south tapestry, is an effective means to defining the extent of the memorial park space and the memorial core.

Reflect L'Enfant Plan principles by shaping the memorial site as a separate and distinct public space that complements the Department of Education Headquarters and other surrounding buildings

In its review of the April 2014 preliminary design, the Commission found the project inconsistent with this principle based upon the effect the east and west tapestries had on the role of the buildings and streets on the east and west to define the site. The Commission also viewed the two side tapestries as diminishing the role of the urban park as a unifying element upon which the surrounding buildings relate and define. Finally, it was noted that the length of the south tapestry still overshadowed the LBJ Building with regard to views and its ability to define the memorial and surrounding park, both physically and thematically, especially when considered in combination with the range of image densities currently planned for the tapestries.

Staff finds the revised preliminary design now satisfies this design principle. The removal of the east and west tapestries, and placement of the two freestanding columns, open up views to the adjacent Wilbur Wright and Wilbur Cohen buildings, and allow the streets and buildings on the



Figure 20: Relationship of height and length of south tapestry to the LBJ Building



Figure 21: Diagram of south tapestry showing estimated image densities (in percent solid)

east and west to define the memorial and surrounding public space in much the same fashion as the National Air and Space Museum defines the site on the north. The placement of the freestanding columns and their spatial relationship to the end columns of the south tapestry is an effective means to define the memorial park space and site within the surrounding precinct, as well as establish a monumental scale for the memorial, while still allowing the adjacent buildings to provide definition and maintain their thematic relationship to the memorial. The removal of the east and west tapestries also improves the visibility of the LBJ Building from surrounding streets, though the majority of the building will still be screened by the south tapestry and supporting colonnade.

The proposed south tapestry remains consistent with regard to its height, length, and imagery. The tapestry is approximately 447 feet long, or approximately 80% of the length of the LBJ Building, and approximately 80 feet high (Figure 20). As discussed in the April 2014 staff report, the degree of transparency achieved for the tapestry contributes to whether the memorial reflects L'Enfant Plan principles and complements surrounding buildings. The tapestry will have a range of transparencies with the upper portions being primarily open and the lower portions being largely opaque (Figure 21). Taken together, the height, length, and transparency of the proposed tapestry will obscure a notable proportion of the LBJ Building, which could diminish the degree to which the building is perceived to define the memorial and surrounding park. As currently planned, the lower and middle portions of the tapestry are estimated to be 95% and 50% opaque, an average of approximately 73% (Figure 21). However, the bottom of the tapestry will be approximately 20 feet above grade to permit pedestrian passage below. This will also afford views of the ground floor of

the building from the memorial and adjacent streets. Views of the building's upper floors should also be fairly visible considering the top 20 feet of the tapestry is expected to be 80% transparent. Collectively, these two aspects of the tapestry design, and the unobstructed views of the east and

west ends of the LBJ Building, may be enough for the building to be perceived as actively defining the southern edge of the site.

As this is still a preliminary design, the project will continue to evolve as the applicant makes refinements to address outstanding planning issues, strengthen the overall concept and commemorative message of the memorial, and respond to any additional comments from NCPD, the U.S. Commission of Fine Arts and Section 106 consulting parties. As refinements are made, staff recommends that the applicant continue to explore ways to improve the symbolic and physical relationship between the memorial and the LBJ Building

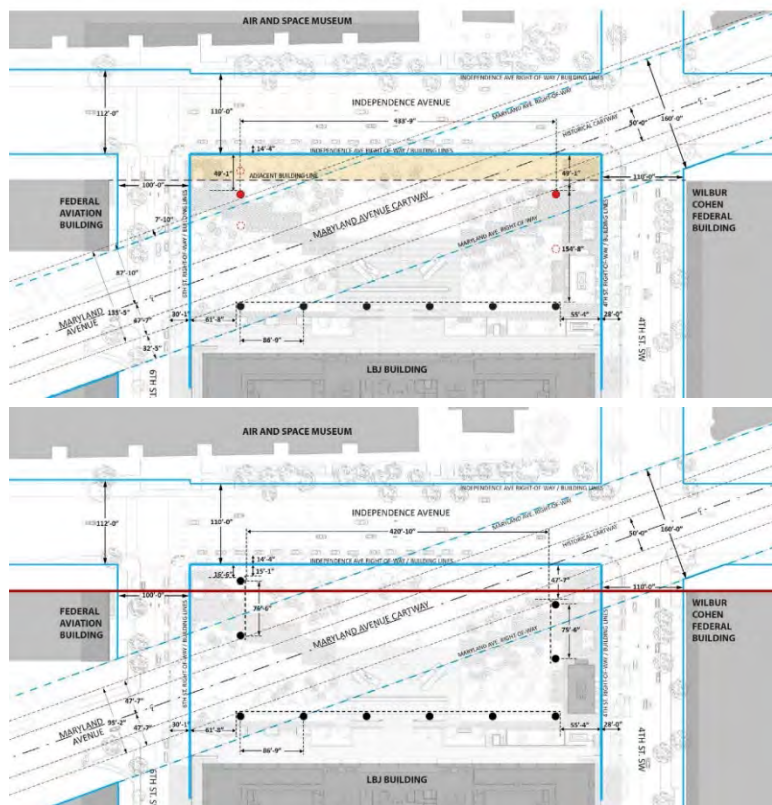


Figure 22: Comparison of previous and current preliminary memorial designs relative to the building line along Independence Avenue

Respect and complement the architecture of the surrounding precinct

The intention of this principle is to have a memorial that utilizes modern and innovative approaches in its design as well as in the way it commemorates Dwight D. Eisenhower. The revised preliminary design continues to meet this principle through the use of a modern material like stainless steel, and the highly-innovative development and use of the stainless steel tapestry as a commemorative element. The proposed design also continues to complement the surrounding precinct through the use of similar materials including limestone, granite, and concrete.

Respect the building lines of the surrounding rights-of-way and the alignment of trees along Maryland Avenue

The purpose of this principle is to provide guidance with regard to the appropriate placement of memorial elements on the site while taking into account constraints created by conditions that surround the site. While other principles address how the memorial relates architecturally to the surrounding context, this principle focuses on contextual relationships from the perspective of site planning. In April 2014, the Commission found the proposed memorial design inconsistent with

this design principle due to the previously proposed west tapestry extending beyond the building line established by the setbacks of the buildings to the east and west (Wilbur Cohen Building and Wilbur Wright Building), which resulted in a visual intrusion into the existing view along Independence Avenue, a primary approach to the memorial. The removal of the east and west tapestries and placement of the freestanding columns south of the aforementioned building line in the revised design resolves the visual intrusion along Independence Avenue (Figure 22). Staff finds the revised preliminary design consistent with this principles.

Incorporate significant green space into the design of the memorial

The memorial landscape plan is unchanged from what was previously proposed in April 2014 with the exception of some minor modifications to walkways to accommodate the proposed freestanding columns, and therefore, staff maintains that this principle is satisfied. The extensive use of trees and lawn will substantially increase the amount of green space on the site compared to existing conditions. In addition to the removal of a substantial amount of impervious surface, to be replaced with lawn and landscaped areas, the memorial will also increase the number and quality of trees, replacing immature or under-developed trees with a significantly more robust and mature tree canopy. According to information provided by the applicant, the memorial will increase the amount of green space by almost 1.8 acres across the four acre site.

National Capital Planning Act

The National Capital Planning Act established NCPC as the central planning agency for the federal government in the National Capital Region for purposes of preserving the important historical and natural features of the nation's capital. NCPC carries out this important mission partly through its mandate to develop, jointly with the Mayor of the District of Columbia, a Comprehensive Plan for the National Capital. In addition to various policies intended to protect and enhance parks, open space, and the natural environment, the Comprehensive Plan contains several policies intended to preserve historic and potentially historic resources. Several of these policies aim to protect the historic L'Enfant and McMillan Plans. Maryland Avenue, being the mirror reflection of Pennsylvania Avenue and on axis with the U.S. Capitol, is one of the most important avenues in both plans. Therefore, development of any kind along this corridor must be carried out carefully and in a manner that adheres to the principles that are inherent to the L'Enfant Plan which give Washington its iconic image.

Previously, the Commission found the project to be inconsistent with the purposes of the National Capital Planning Act as a result of the scale and configuration of the three proposed tapestries having a considerable impact on the Maryland Avenue right-of-way and the viewshed toward the U.S. Capitol, both contributing resources to the historic Plan of Washington. However, as a result of the removal of the east and west tapestries and placement of the two freestanding columns, these impacts have been mitigated and staff now considers the revised preliminary memorial design to be consistent with the purposes of the National Capital Planning Act. The elimination of the east and west tapestries reduces the extent to which large-scale memorial elements encroach into the Maryland Avenue right-of-way and viewshed, both contributing elements of the historic Plan of Washington. The elimination of these elements and placement of the west freestanding column on

the edge of the right-of-way preserves, to a greater extent, the openness of Maryland Avenue and the horizontal orientation of the viewshed. Although the revised design still has large-scale elements placed within the 160-foot right-of-way, specifically the western end of the tapestry and eastern freestanding column, the unobstructed view towards the Capitol has been increased from 95 feet to 135 feet. Staff notes the substantial improvements gained through the elimination of the east and west tapestries and considers the current design a more successful balance between establishing a fitting scale for a Presidential memorial and respecting the site's historic context and unique constraints.

As this is still a preliminary design, the project will continue to evolve as the applicant makes refinements to address outstanding planning issues, strengthen the overall concept and commemorative message of the memorial, and respond to any additional comments from NCPC, the U.S. Commission of Fine Arts, and Section 106 consulting parties. As refinements are made, staff recommends that the applicant continue to explore ways to further enhance the openness of the Maryland Avenue right-of-way / viewshed.

Commemorative Works Act

The purposes of the Commemorative Works Act (CWA) are to preserve the integrity of the comprehensive design of the L'Enfant and McMillan Plans for the Nation's Capital, to ensure the continued public use and enjoyment of open space in the District of Columbia, and to encourage the location of commemorative works within the urban fabric of the District of Columbia.

In addition to providing the regulatory framework by which commemorative works are located in the District of Columbia and its environs, which in part is intended to help ensure commemorative works are appropriately designed, constructed and located, the CWA also contains a set of decision criteria that must be used by the agencies involved in making decisions on commemorative works. Specifically, the Act requires that agencies be guided, 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 guidelines¹** - 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.

Regarding the purposes of the CWA, the memorial site is appropriately located within the urban fabric of the city and will contribute to the District of Columbia's system of public open space. Compared to the previous preliminary design, the current proposal has minimized impacts to the integrity of the L'Enfant and McMillan Plans to warrant preliminary approval. The elimination of the east and west tapestries and placement of the two freestanding columns result in a more open and horizontal viewshed along Maryland Avenue. Previously, the east and west tapestries narrowed the clear width of the viewshed from 160 feet to 95 feet which substantially reduced the perceived openness of the view and altered its general orientation. The revised preliminary design widens the viewshed to 135 feet and preserves the character defining openness and horizontal orientation of the view towards the U.S. Capitol; leaving the character defining setting of this important viewshed intact.

The project continues to be consistent with the CWA's specific decision criteria regarding surroundings, location, materials, landscape features, museums, and donor contributions. With regard to the requirement to protect open space, existing public use, and cultural and natural resources, the Commission previously considered the project's allocation of public gathering space versus space for commemorative reflection to be imbalanced and not well defined. However, the current proposal resolves this issue through the removal of the east and west tapestries. The removal of these large-scale elements draws more focus to the memorial core as the dedicated space for commemorative reflection with the area outside the core available for use as a public park.

Regarding durability, as part of its April 2014 action the Commission found that based on the results of the durability tests conducted by the applicant the 317L stainless steel alloy proposed for the tapestry panels exhibited resistance to corrosion, and the proposed tapestry panel welds are likely to be mechanically sound, and therefore, the proposed tapestry materials and fabrication methods meet the Commemorative Works Act durability criteria. In order to ensure that the corrosion and mechanical strength performance is sustained while the tapestry fabrication method continues to be refined, the Commission requested that the applicant submit the following documentation at subsequent reviews:

¹ The criterion pertaining to site-specific guidelines is not applicable to this project as NCPC and the Commission of Fine Arts opted not to develop mutually agreed upon guidelines. Rather, NCPC's adopted design principles were developed during site selection through the Section 106 process and included as required mitigation in the Commission's Finding of No Significant Impact, issued under the National Environmental Policy Act, for approval of the site. The Commission of Fine Arts supported the intent of NCPC's guidelines, particularly the importance of maintaining the historic view corridor of Maryland Avenue, but decided against using guidelines in favor of leaving it to the design team to fully consider the appropriate treatment of the site in developing a concept for review.

- The tapestry material and welds continue to reach the same durability standards as fabrication methods are further refined.
- The recommended maintenance regimen, including cleaning, will not cause weld failure if carried out properly.
- The operational protocols that will be employed to avoid danger to the public during instances where snow and ice has accumulated on the tapestries.

NCPC Plans and Policies

Comprehensive Plan for the National Capital

With respect to the location of the memorial, and the potential of the proposed design to provide environmentally sustainable benefits, the project is not inconsistent with the policies of the Parks and Open Spaces, Federal Environment, and Visitors Elements of the Comprehensive Plan for the National Capital.

Compared to the April 2014 preliminary memorial design, the current design has greater consistency with the policies of the Preservation and Historic Features Element, notably those pertaining to the protection of the historic L'Enfant Plan. The Comprehensive Plan encourages the placement of memorials along L'Enfant avenues such that they provide views and points of reference, and stresses doing so in a manner that protects historic views and vistas, the settings of historic properties, and the *openness of L'Enfant rights-of-way*. The policies place a heavy emphasis on protecting the integrity, form, and design of the L'Enfant Plan's system of streets and reservations from inappropriate new buildings and physical incursions.

The elimination of the east and west tapestries reduces the extent to which large-scale memorial elements encroach into the Maryland Avenue right-of-way and viewshed, both contributing elements of the historic Plan of Washington. The elimination of these elements and placement of the west freestanding column on the edge of the right-of-way preserves, to a greater extent, the openness of Maryland Avenue and the horizontal orientation of the viewshed. Although the revised design still has large-scale elements placed within the 160-foot right-of-way, specifically the western end of the tapestry and eastern freestanding column, the unobstructed view towards the Capitol has been increased from 95 feet to 135 feet. Staff notes the substantial improvements gained through the elimination of the east and west tapestries and considers the current design a more successful balance between establishing a fitting scale for a Presidential memorial and respecting the site's historic context and unique constraints. As this is still a preliminary design, the project will continue to evolve as the applicant makes refinements to address outstanding planning issues, strengthen the overall concept and commemorative message of the memorial, and respond to additional comments from the U.S. Commission of Fine Arts and Section 106 consulting parties. As refinements are made, staff recommends that the applicant continue to explore ways to further enhance the openness of the Maryland Avenue right-of-way / viewshed.

The Comprehensive Plan addresses the importance of maintaining the symbolic hierarchy of public buildings and spaces through the system of monumental avenues that is an integral component of the L'Enfant Plan. The Comprehensive Plan also addresses the importance of protecting the expression of this hierarchy at night through carefully designed exterior lighting.

The Comprehensive Plan encourages agencies to design exterior lighting in a manner that contributes to the capital's nighttime image and respects the established hierarchy among the symbols and features of the nation's capital. Previously, the Commission requested the applicant to modify the memorial design to address the issue of lighting. Since the April 2014 review, the applicant decided the best approach was to focus on modifying the proposed tapestry and column elements to resolve inconsistencies with the 2006 adopted design principles prior to developing a detailed lighting scheme. The applicant has indicated that as the design progresses it will work with NCPC staff to demonstrate that the design respects Washington's nighttime hierarchy and the visual prominence of the U.S. Capitol as the focal point in the Maryland Avenue view corridor. Staff notes that as the applicant begins to develop the memorial exterior lighting plan, extreme caution should be exercised with regard to the lighting of any memorial elements located within the historic Maryland Avenue right-of-way.

Memorials and Museums Master Plan

Overall, staff now finds the project to be not inconsistent with the 2M Plan. Elimination of the east and west tapestries has reduced the perceived mass and scale of the memorial in a manner that is more balanced with regard to the treatment of the Maryland Avenue viewshed. The unobstructed portion of the view towards the U.S. Capitol has been increased from 95 feet to 135 feet, approximately 84% of the width of the right-of-way, which preserves the openness of the viewshed and maintains the primary axial relationship along Maryland Avenue.

While the south tapestry design remains as it was proposed in April 2014, the removal of the east and west tapestries reduce the degree to which tapestry elements will overshadow, or block views of, the LBJ Building. The elimination of these two major elements will improve views toward the east and west ends of the building's north facade and increase its presence from within the memorial slightly. While the removal of the east and west tapestries has improved the relationship of the memorial to the LBJ Building, as discussed in the previous staff report, the proposed length and range of image transparencies of the south tapestry will continue to affect views of the LBJ Building. In addition, the south tapestry will still affect the building's physical and thematic role in shaping the visitor experience. As this is still a preliminary design, the project will continue to evolve as the applicant makes refinements to address outstanding planning issues, strengthen the overall concept and commemorative message of the memorial, and respond to additional comments from the U.S. Commission of Fine Arts and Section 106 consulting parties. As refinements are made, staff recommends that the applicant continue to explore ways to improve the symbolic and physical relationship between the memorial and the LBJ Building.

Additionally, the 2M Plan promotes a memorial plan that functions as a public use and gathering space as well as a commemorative work. Previously, staff noted that the scale and configuration of the tapestries gave the impression that the majority of the site was claimed for contemplative commemorative purposes leaving only a small portion of the site behind the east and west tapestries, and the area along LBJ Promenade, for public gatherings. The removal of the east and west tapestries opens up the site and creates a greater sense of a memorial within a park. The removal of these two elements draws greater focus on the memorial core and clarifies for visitors where the commemorative experience occurs, with the area outside the core functioning as a park

space defined by the freestanding columns as well as the surrounding buildings (Figure 23). Through the revised preliminary memorial design, the applicant has maintained the overarching concept of a layered experience that evolves across different thresholds from the memorial core to the surrounding park space, and then from the park space to the active urban surroundings. The revised preliminary design successfully balances the importance of establishing a memorial to President Dwight D. Eisenhower and the need to protect public open space in the District of Columbia by having this site also function as a public park. The removal of the east and west tapestries and placement of the freestanding columns opens up the site more to the surrounding precinct and designates a greater area for public open space.



Figure 23: View of park space looking toward memorial core

Although the Commission's April 2014 action included a provision stating that the Memorial Information Center should be removed from the site due to its inconsistency with specific site guidelines set forth in the 2M Plan, the revised preliminary memorial design continues to include this element. In its prior review, staff discussed the inconsistency of the Memorial Information Center with the 2M Plan design consideration addressing visitor services. The Plan states that amenities such

as parking and visitor services should not be located at this site and that the site is not appropriate for a building. Staff also provided the background for this inconsistency noting that it is a byproduct of the 2006 site selection process. In general, at the time of site selection the NPS had expressed a need for certain maintenance and visitor services to be provided on or near the site. The idea of locating some or all of these services within an adjacent building was considered but ultimately support for this faded due to security concerns as well as other factors. Therefore, a modest sized support building on the memorial site was deemed necessary. The environmental assessment prepared for site selection included the analysis of a 2,500 square foot visitor services building. This facility was included in the assessment as a potential programmatic need of the National Park Service. The Commission's Finding of No Significant Impact issued for approval of the site is based on the analysis contained in the environmental assessment and notes that the memorial would include a building not exceeding this size.

National Capital Urban Design and Security Plan Objectives and Policies

Overall, the project remains consistent with NCPC's *National Capital Urban Design and Security Plan Objectives and Policies*. The revised preliminary design still contains a relatively minor amount of physical perimeter security along LBJ Promenade to provide security to the Department

of Education. Much of the security barrier for LBJ Promenade is integrated into retaining walls along the north side. Pedestrian access points are secured by rows of bollards. No physical perimeter security elements are proposed for the memorial itself.

Previous staff reports raised questions regarding the absolute need for the proposed bollards, especially along the north side of the promenade given the elevation of LBJ Promenade, the distance from Independence Avenue, the placement of memorial elements, and the number of trees that will be planted on the site. In its April 2014 action, the Commission requested the applicant to work with staff to address the questions raised regarding the proposed physical perimeter security elements. No changes have been made to the design and placement of the proposed perimeter security elements since the Commission's April 2014 review. However, the applicant states that the design team has no objection to modifying the design but must work with GSA and the Department of Education to examine the feasibility of eliminating any proposed security elements. Following consultation with GSA and the Department of Education, the applicant will respond to the Commission's comment.

III. U.S. COMMISSION OF FINE ARTS REVIEW

The U.S. Commission of Fine Arts (CFA) is also reviewing this project pursuant to the Commemorative Works Act, and thus far has reviewed the project on five separate occasions: January 2011, September 2011, July 2013, November 2013, and February 2014. CFA has not yet reviewed the current memorial design. It is staff's understanding that the applicant may submit the revised preliminary memorial design for CFA review in October or November.

IV. COMPLIANCE

National Environmental Policy Act (NEPA)

To fulfill its obligation under the National Environmental Policy Act (NEPA), NPS, in association with EMC, completed the Dwight D. Eisenhower Memorial Design Environmental Assessment (EA) which analyzes three design alternatives and a no action alternative. The EA prepared for the memorial design tiers off of the project's 2006 Site Selection EA. NCPC also has an independent NEPA obligation resulting from its approval authority over the project, and thus was a cooperating agency in the preparation of the EA. GSA was also a cooperating agency. The EA analyzed each of the alternatives for impacts to the following environmental topic areas: cultural resources; including aesthetics, viewshed, archeological, and historic; hazardous materials and waste; park operations and management; soils; transportation systems; vegetation; visitor use and experience; and water resources.

The NPS solicited public input on the scope and content of the EA byway of public meetings and its Planning, Environment, and Public Comment website. The final EA was also made available for a 30-day public comment period from September 19, 2011, to October 19, 2011. On March 6, 2012, following review and consideration of the comments received, NPS issued a Finding of No Significant Impact (FONSI) for implementation of EA Alternative #3, Maryland Park/Tapestry alternative.

NCPC relied upon the Site Selection EA to issue its August 31, 2006, Finding of No Significant Impact which found approval of the memorial site would not significantly affect the human environment on the condition that the applicant design the memorial using the design principles developed by NCPC staff in consultation with NPS, DC SHPO, and other consulting parties. The FONSI incorporated these design principles as required mitigation. Therefore, in order for NCPC to take a formal approval action on the memorial design it must make another finding that the proposed design will not cause significant impacts to the human environment based upon the content of the two EAs prepared for the project, and only after finding that the memorial design satisfies the required mitigation contained in the 2006 Site Selection FONSI. Staff notes that such a finding is included in its recommendation to the Commission.

National Historic Preservation Act (NHPA)

Both NCPC and NPS have an independent responsibility under Section 106 of the National Historic Preservation Act. The National Park Service's undertaking is the issuance of the construction permit once the EMC has received final approvals from NCPC and the U.S. Commission of Fine Arts. NCPC's undertaking is the approval of the memorial site and design.

Through the Section 106 process, NPS and NCPC consulted with the District of Columbia State Historic Preservation Officer (DC SHPO) and several other consulting parties and determined that the undertakings would have an adverse effect on the L'Enfant and McMillan Plans, the National Mall, the LBJ Building and its northern plaza, the Wilbur Wright Federal Building, the National Air and Space Museum, and the Wilbur J. Cohen Building, which are listed or eligible for listing in the National Register of Historic Places. As a result of this determination, the NPS, NCPC, DC SHPO, and the Advisory Council on Historic Preservation entered into a Memorandum of Agreement (MOA). The MOA contains several mitigation measures that must be addressed in the memorial's final design. In addition, the MOA defines a process for additional consultation on certain aspects of the memorial design following NCPC's preliminary approval. These aspects include:

- Further development of the central core elements, including relief blocks, images, and text;
- Further development of the landscape treatment of the site, including green space, plazas, walkways, and elements included to recognize the historic alignment of Maryland Avenue;
- Night lighting;
- The design of the memorial support building;
- Further development of LBJ Promenade; and
- Changes made to the design in response to, or required by, NCPC's preliminary design review.

V. CONSULTATION

National Capital Memorials Advisory Committee

As required by the Commemorative Works Act, memorial sponsors must consult with the National Capital Memorials Advisory Committee (NCMAC) on the selection of alternative sites and design

concepts prior to submitting the project to NCPC and CFA for formal design review. In fulfillment of this requirement, EMC made an initial presentation of the memorial design to NCMAC at its April 21, 2010 meeting. Two additional presentations took place on February 16, 2011 and September 14, 2011.

Coordinating Committee

The Coordinating Committee reviewed the proposal at its September 10, 2014 meeting. The Committee forwarded the proposal to the Commission 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 State Historic Preservation Officer; the District of Columbia Fire and Emergency Medical Services, the General Services Administration; the National Park Service and the Washington Metropolitan Area Transit Authority.