



## Executive Director's Recommendation

Commission Meeting: December 3, 2015

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| <b>PROJECT</b><br><b>Proposed Site for the Gold Star Mothers National Monument</b><br>Washington, DC & Arlington, Virginia | <b>NCPC FILE NUMBER</b><br>7731                                      |
| <b>SUBMITTED BY</b><br>United States Department of Interior<br>National Park Service                                       | <b>NCPC MAP FILE NUMBER</b><br>00.00(73.10)44254                     |
| <b>REVIEW AUTHORITY</b><br>Per 40 U.S.C § 8905 and Public Law 112-239  | <b>APPLICANT'S REQUEST</b><br>Approval of comments on site selection |
|  | <b>PROPOSED ACTION</b><br>Approve comments as requested              |
|  | <b>ACTION ITEM TYPE</b><br>Staff Presentation                        |

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### PROJECT SUMMARY

Public Law 112-239 authorizes the establishment of a commemorative work honoring the sacrifices of mothers, and made by their sons and daughters, who, as members of the Armed Forces, made the ultimate sacrifice in defense of the United States, in accordance with the Commemorative Works Act (40 U.S.C. 8901 et seq.) (CWA). The CWA defines approval requirements related to the location, design, and construction of commemorative works in the District of Columbia and its environs. The National Capital Planning Commission (NCPC) and the US Commission of Fine Arts (CFA) approve site and design for new commemorative works.

The term "Gold Star Mothers" arose during World War I because families would place gold stars in their windows or on flags representing servicemen lost to war. Blue stars on flags would represent other family members fighting in the war. If the member died, a gold star replaced the blue star.

The National Park Service (NPS), on behalf of the Gold Star Mothers National Monument Foundation, submitted to NCPC the Site Selection Analysis of potential monument locations, which includes criteria for site selection and a study of three potential sites within the District of Columbia and its environs. Staff notes that a fourth site, Site (A), was dismissed as it has been designated for the National World War I Memorial. The three potential sites for the location of the monument include:

- Site (B): Belvedere south of Theodore Roosevelt Memorial Bridge
- Site (C): Niche located along Memorial Avenue
- Site (D): Area adjacent to Arlington National Cemetery Visitor Center

The Commission is not formally approving a location or monument design at this time. Rather, NCPC is submitting planning comments that weigh the advantages and disadvantages of locating the monument at each of the proposed sites. Moving forward, the monument sponsor will take NCPC's comments into account as it develops design concepts within a preferred location. Although it has yet to be designed, the monument is expected to be relatively modest in size and scale.

## KEY INFORMATION

- The CWA establishes requirements for building commemorative works on federal lands within the District of Columbia and its environs. It applies to lands under jurisdiction of the US Department of the Interior (DOI) and the US General Services Administration (GSA).
- In general, in accordance with the CWA, the key benchmarks for authorizing a new monument are summarized below:
  - (1) Congress authorizes each new monument purpose (subject) and a monument sponsor by separate federal law.
    - P.L. 112-239 authorizes the establishment of a commemorative work on eligible Federal land, including Area I or Area II, but excluding the Reserve.
  - (2) The sponsor consults with The National Capital Memorial Advisory Commission (NCMAC) on alternative sites and design concepts.
    - NCMAC commented favorably on Site (D) at its December 12, 2013 meeting.
  - (3) NCPC and CFA must each approve the site and design for new commemorative works.
    - The Site Selection Analysis of potential monument locations which is the subject of this EDR, is an early step towards these approvals.
    - CFA commented favorably on Site (D), subject to the review of the monument design, at its November 19, 2015 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 monuments and memorials.
- The design of the monument has yet to be fully determined. However, the monument is expected to be relatively modest in size and scale.
- In addition to the CWA site location criteria, the sponsor, along with NPS, has developed more refined site location criteria for this project. These criteria highlight the importance

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of locating the monument to support accessibility, accommodate gatherings and create opportunities for contemplation.

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## RECOMMENDATION

The Commission:

**Supports** selecting Site (D), the area adjacent to the Arlington National Cemetery Visitor Center, as the preferred location for the Gold Star Mothers Monument.

**Notes** that the size and location of Site (D) allows for a contemplative space; and further, the context of Arlington National Cemetery is a strong thematic connection to the proposed monument. Additionally, this location has potential for a visitor gathering space that will not impede existing circulation patterns or activities as noted with Sites (B) and (C).

**Recommends** that the sponsor develop a range of alternative design concepts for the monument within the area of Site (D), including variations in scale, material palette, placement and orientation. The next submission should reveal details about the physical relationship of the monument to the surrounding context and provide information about program needs at the site.

**Recommends** that NPS and the sponsor continue to coordinate with Arlington National Cemetery and the Department of the Army regarding Site (D), the location of existing utility lines and the design and placement of the proposed monument.

**Does not support** Site (B) due to its limited opportunity for contemplative space, inadequate accessibility and weak contextual connection to Arlington National Cemetery.

## PROJECT REVIEW TIMELINE

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|   |                                  |
|---|----------------------------------|
| <b>Remaining actions</b><br>(anticipated) | Approval of location and design. |
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## PROJECT ANALYSIS

### Executive Summary

NPS, on behalf of the Gold Star Mothers National Monument Foundation, has submitted the Site Selection Analysis of potential monument locations. The analysis identifies site selection criteria and three potential sites. Staff notes that Site (A) has been dismissed as it has been designated for the National World War I Memorial. Per Public Law 112-239, all of the sites are located on Federal land within Area I or Area II, excluding the Reserve. Of the three sites analyzed, Site (D)

best meets the CWA's guidance on siting commemorative works and the site selection criteria established by the NPS and Gold Star Mothers National Monument Foundation. Staff recommends **the Commission approve comments on the selection of Site (D), the area adjacent to the Arlington National Cemetery Visitor Center, as the location for the Gold Star Mothers Monument.**

### **Analysis**

Staff analyzed this project using guidance in the Commemorative Works Act (CWA), the Comprehensive Plan, and in consideration of the applicant's site selection criteria. A general principle set forth in the Comprehensive Plan is to protect and improve the open space character of the Monumental Core and the integrity of each memorial and park element. Further, the Comprehensive Plan includes policies to enhance the quality of the visitor experience to the Nation's Capital, particularly at major cultural sites, such as Arlington National Cemetery and the Monumental Core.

The CWA 40 U.S.C. 8905 includes decision criteria for site approval:

- Surroundings – to the maximum extent possible, a commemorative work shall be located in surroundings that are relevant to the subject of the work.
- Location – a commemorative work shall be located so that 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.

The NPS and Gold Star Mothers National Foundation have also established the following site selection criteria:

- In the District of Columbia or its environs, but not in the National Mall Reserve;
- In a context meaningful to Gold Star Mothers and Gold Star Families;
- Out of the overwhelming or distracting influence of other commemorative work(s);
- Without adverse impact on other commemorative work(s);
- Without adverse impact on historic resources;
- Convenient to existing tourist destinations;
- Able to accommodate groups of visitors;
- Able to provide a contemplative setting;
- Accessible by public transportation;
- Accessible to handicapped visitors and the elderly; and
- Able to provide shade.

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Staff supports the selection criteria proposed by the NPS and Gold Star Mothers National Monument Foundation. Staff particularly supports the criterion for a site to provide opportunities for contemplation and ease of access.

The Gold Star Mothers National Monument is anticipated to be a relatively modest commemorative work in scale. Staff therefore recommends the applicant develop several alternative concepts for the physical design of the monument, including variations in size, material palette, placement and orientation within the preferred site(s). The NPS and Gold Star Mothers National Monument Foundation have proposed three potential sites for the location of the monument. All sites are located on NPS property, and each site is analyzed according the criteria discussed above.

#### **Site A: Pershing Park**

This site was dismissed as it has been designated for the National World War I Memorial.

#### **Site B: Belvedere south of Theodore Roosevelt Memorial Bridge**

This site meets four of the five CWA site selection guidance and five of the eleven NPS site selection criteria. Site (B) is located at a belvedere along Rock Creek Parkway, adjacent to the Potomac River. It is immediately across from the confluence of several busy streets and active volleyball courts. The Kennedy Center is located north of the site and across the elevated Theodore Roosevelt Memorial Bridge. The site is comprised of a circular landscape island approximately 45 feet in diameter, separated from Rock Creek Park trail by a vehicle lay-by. The promontory which forms the belvedere is made up of a grassy area approximately 25 feet wide and 140 feet long. Two benches can be found on either side of the belvedere, facing the paved trail.

Of the three sites, this location holds the least opportunity for quiet and contemplation. The adjacent roadway and nearby active recreational uses do not lend themselves to peaceful reflection. Further, the site is not easily accessible for a variety of users and abilities. Although the lay-by could be utilized for vehicular drop-off and pick-up, this would directly intrude on the solemnity of the monument site. Street parking is located over 250 feet to the south of the site. Pedestrian access is provided along the Rock Creek Park trail, or through a complex network of paths that lead from the National Mall. Many of these require navigating the off-ramps and roadways connecting I-66, Rock Creek Parkway, Ohio Drive and Constitution Avenue. Foggy Bottom Metro Station is over a mile away.

The site provides some views of the Arlington National Cemetery grounds, located across the Potomac River. As such, the monument could have some relationship to the backdrop provided by the Cemetery, but its distance dilutes this connection. In addition, Rock Creek Park trail is heavily used by bicyclist and joggers, and may preclude the opportunity for a functional gathering space adjacent to the monument. The limited opportunity for contemplative space, inadequate accessibility and weak contextual connection to Arlington National Cemetery, make this a

challenging site for the proposed Gold Star Mothers monument. Therefore, staff does not support locating the monument at Site (B).

### **Site C: Niche along Memorial Avenue**

This site meets all five CWA site selection guidance and seven of the eleven NPS site selection criteria. Site (C) is located along Memorial Avenue, the primary entrance to Arlington National Cemetery formed by the axis connecting the Lincoln Memorial and Arlington House, designed by the architectural firm McKim, Mead and White. A series of niches occur along the avenue and are occupied by a variety of commemorative works, including the Seabees Memorial, the Armored Memorial, the United Spanish War Veterans Memorial, the monument to Admiral Richard Evelyn Byrd, the 101st Airborne Division Memorial, and the 4th Infantry (IVY) Division Monument. The Avenue terminates at the western end at the Women in Military Service for America Memorial. Under this option, the Gold Star Mothers monument would occupy a newly-created niche.

The niches along Memorial Avenue are typically 30 feet wide and 20 feet in depth. They are formed by creating a setback within the hedge line which defines the length of the avenue, with each niche located about 20 feet back from the sidewalk. The dominance of the Memorial Avenue axis and the recessed nature of the niches results in memorials which are viewed as a series of objects placed along the landscape of the corridor. No pedestrian connections are provided from each memorial to the sidewalk, and therefore, they must be viewed at a distance. Given this setting, staff believes it would be challenging to create a contemplative space in Site (C).

Site (C) is located in close proximity to the Arlington Cemetery Metro Station. Parking and bus service is also provided at the nearby Arlington National Cemetery Visitor Center. However, parking along Memorial Avenue is limited to NPS permit holders. As such, visitors to the proposed memorial should anticipate a short walk to the site. Limited accessible parking spaces are located near the Women in Military Service memorial.

The site's location within the context of Arlington National Cemetery provides a thematic connection to the proposed monument. Staff notes, however, that many of the memorials within the existing niches are dedicated to military service groups, which is somewhat thematically different than families of those in the service. Further, the site is relatively accessible by a variety of means. However, the nature of the established niche design creates a series of challenges that appear incompatible with the site selection criteria. In particular, the niche's location along the highly-traveled Memorial Avenue may not permit the creation of a contemplative space, and the setback does not accommodate a gathering space for visitors to engage the monument. Therefore, the limited opportunity for contemplative space and lack of gathering space make Site (C) a challenging site for the proposed Gold Star Mothers monument.

### **Site D: Near Arlington National Cemetery Visitor's Center**

This site meets all five of the CWA site selection guidance and all eleven of the NPS site selection criteria. Site (D) is an area of lawn and trees located immediately to the west of the existing Arlington National Cemetery Visitor Center. A tour bus and transit center is located directed to

the south. A heavily-used sidewalk passes through the site, connecting Schley Drive and the cemetery grounds to the west with the Visitor Center. The site is approximately two acres in size, measuring 190 feet deep and 450 feet wide.

Of the three sites, this location holds the best opportunity for quiet contemplation. The size of the site and setbacks from adjacent uses could permit both a monument and a gathering space for visitors. Site (D) is located near the Arlington Cemetery Metro Station, and parking and bus service is provided at the adjacent Visitor Center. The site's location within the context of Arlington National Cemetery also provides a strong thematic connection to the proposed monument. Staff therefore finds that the proposed site is adequate for a modest sized memorial and encourages the NPS to continue to evaluate the site for the future Gold Star Mothers National Monument.

At a future date, NPS will submit the monument design for approval. Staff recommends that the sponsor develop a range of alternative designs for Site (D) that include further detail regarding exact placement within the site, the relationship of the monument to surrounding site features and monument orientation. Given the expected modest scale of the monument, it will be important to understand how the work will be placed within the larger landscape in Site (D).

Staff further notes that additional coordination with Arlington National Cemetery and the Department of the Army will be necessary regarding Site (D). The ANC Real Property Master Plan indicates potential utility lines bisecting the western portion of Site (D). These should be further evaluated as alternative designs are developed. In addition, the proposed designs should carefully consider the surrounding context of the ANC.

## **CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE**

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

As noted above, the planning comments are designed to ensure that this projects meets basic goals of the Comprehensive Plan.

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

The 2001 Memorials and Museums Master Plan ("2M 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 area in and around Site (B) is identified in the 2M Plan as Candidate Site #6. The 2M Plan recommends the reconstruction of the I-66 interchange to support access to the site, which could be the location of a gateway feature.

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### **National Historic Preservation Act**

NCPC and NPS each have an independent responsibility to comply with Section 106 of the National Historic Preservation Act (NHPA). NPS initiated consultation with the District of Columbia and Virginia State Historic Preservation Officers (DC and VA SHPO) on November 10, 2015. Consultation will continue as the design phase of the project proceeds. NCPC will complete the requirements of Section 106 prior to the Commission's final approval of the design phase of the project.

### **National Environmental Policy Act**

NCPC and NPS will each have an independent responsibility to comply with the National Environmental Policy Act (NEPA); NCPC's responsibility stems from its approval authority over the site and design of the monument. With its current review and action, the Commission is providing comments on the alternative sites for the project. Final NEPA documentation is not required at this time, and NPS and NCPC are evaluating the appropriate level of NEPA documentation for the project. Final NEPA documentation will be completed prior to the Commission's action on the final site and design of the monument.

## **CONSULTATION**

### **Coordinating Committee**

The Coordinating Committee reviewed the proposal at its November 10, 2015 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 District of Columbia Department of Transportation, the General Services Administration; the National Park Service and the Washington Metropolitan Area Transit Authority.

### **US Commission of Fine Arts**

The US Commission of Fine Arts (CFA) reviewed the project at its November 19, 2015 meeting. The CFA supported the selection of Site (D), subject to the review of the monument design. The CFA acknowledged the difficulty of selecting a site without the monument design and anticipates reviewing the site and design together at the next submission.

### **National Capital Memorial Advisory Commission**

The National Capital Memorial Advisory Commission reviewed the project at its December 12, 2013 meeting. The NCMAC indicated that Site (B) would not provide a tangible connection to Arlington National Cemetery in the same manner as Site (C) or (D). The Commission further noted that the monument should be visible to cemetery visitors and that it appeared possible to design a memorial at Site (D) that would provide both visibility and a sense of enclosure and contemplation.

## **ONLINE REFERENCE**

The following supporting documents for this project are available online:

- Site Selection Analysis
- Public Law 112-239

Prepared by Matthew J.  
Flis 11/24/2015

## **POWERPOINT (ATTACHED)**

# Gold Star Mothers National Monument

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Submitted by the National Park Service

Site Selection Review

**Commission meeting date:** December 3, 2015

**NCPC review authority:** Commemorative Works Act (40 U.S.C. 8905) & Public Law 112-239

**Applicant request:** Approval of comments on site selection

**Delegated / consent / open / executive session:** Open

**NCPC Review Officer:** M. Flis

**NCPC File number:** 7731

### **Project summary:**

Congress authorized establishment of the Gold Star Mothers commemorative work in Public Law 112-239 on National Park Service land (Areas I or II). The Commemorative Works Act sets forth approval requirements related to the design and placement of the work. In accordance with the CWA, NCPC approves site and design for new commemorative works.

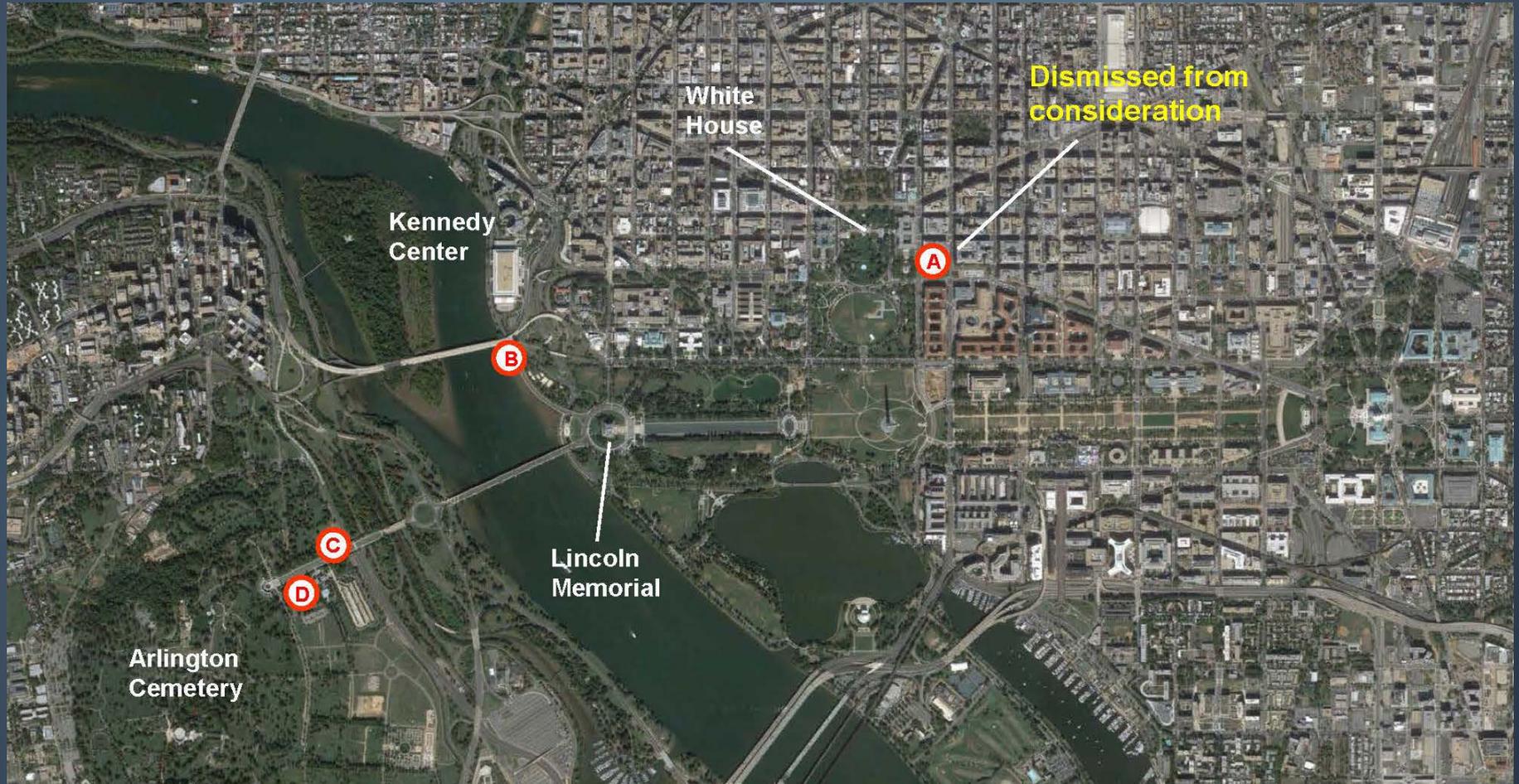
The National Park Service (Department of the Interior) on behalf of the Gold Star Mothers National Monument Foundation, is submitting a site analysis including four potential sites to the National Capital Planning Commission for review and comment. At their December 12, 2013 meeting, the National Capital Memorial Advisory Commission provided comments on the site study. On November 19, 2015 the U.S. Commission of Fine Arts will provide comments on the site study. These comments will be included in the record.

The four submitted sites include:

1. Pershing Park (now dismissed)
2. Belvedere near the Theodore Roosevelt Memorial Bridge
3. Niche along Memorial Avenue
4. Adjacent to Arlington National Cemetery Visitor Center

- Monument would honor those who died in defense of the United States. Term originated during World War I: A mother whose child had died in honorable military service while serving during the time of war was permitted to hang in their window a service flag with a gold star emblazoned on it.
- Construction of the monument will be sponsored by the Gold Star Mothers National Monument Foundation and maintained by the NPS

1. In the District of Columbia or its environs, but not in the National Mall Reserve
2. In a context meaningful to Gold Star Mothers and Gold Star Families
3. Out of the overwhelming or distracting influence of other commemorative works.
4. Without adverse impact on other commemorative work(s)
5. Without adverse impact on historic resources
6. Convenient to existing tourist destinations
7. Able to accommodate groups of visitors
8. Able to provide a contemplative setting
9. Accessible by public transportation
10. Accessible to handicapped visitors and the elderly
11. Able to provide shade

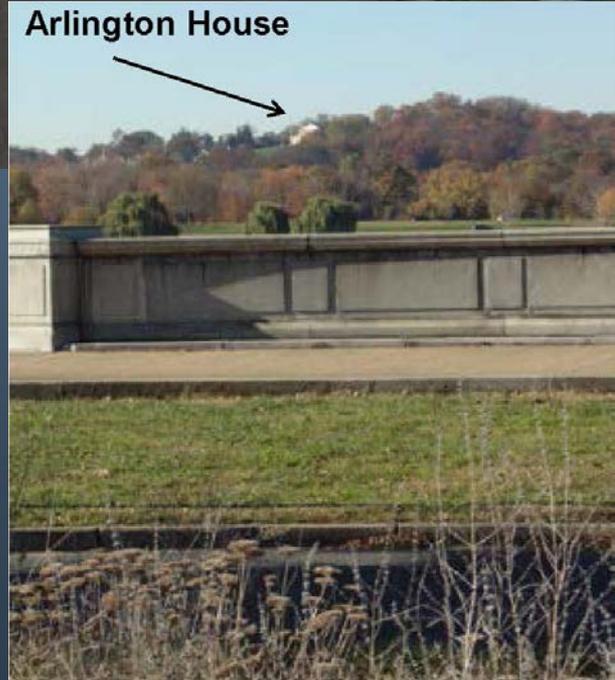


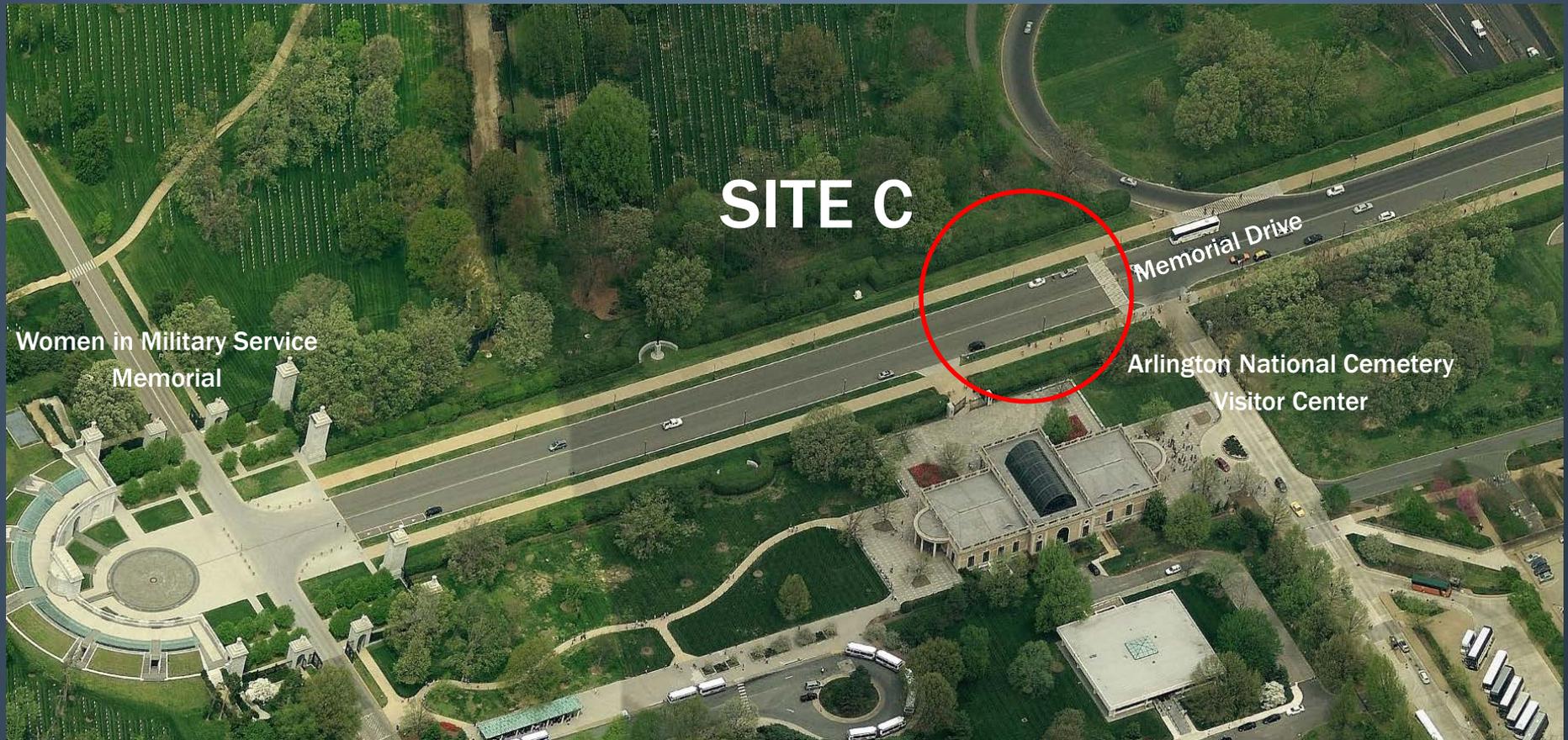


- Site A dismissed due to Congressional action designating the site for the World War I Memorial

# Site B: Belvedere Near Theodore Roosevelt Bridge









West view down Memorial Drive

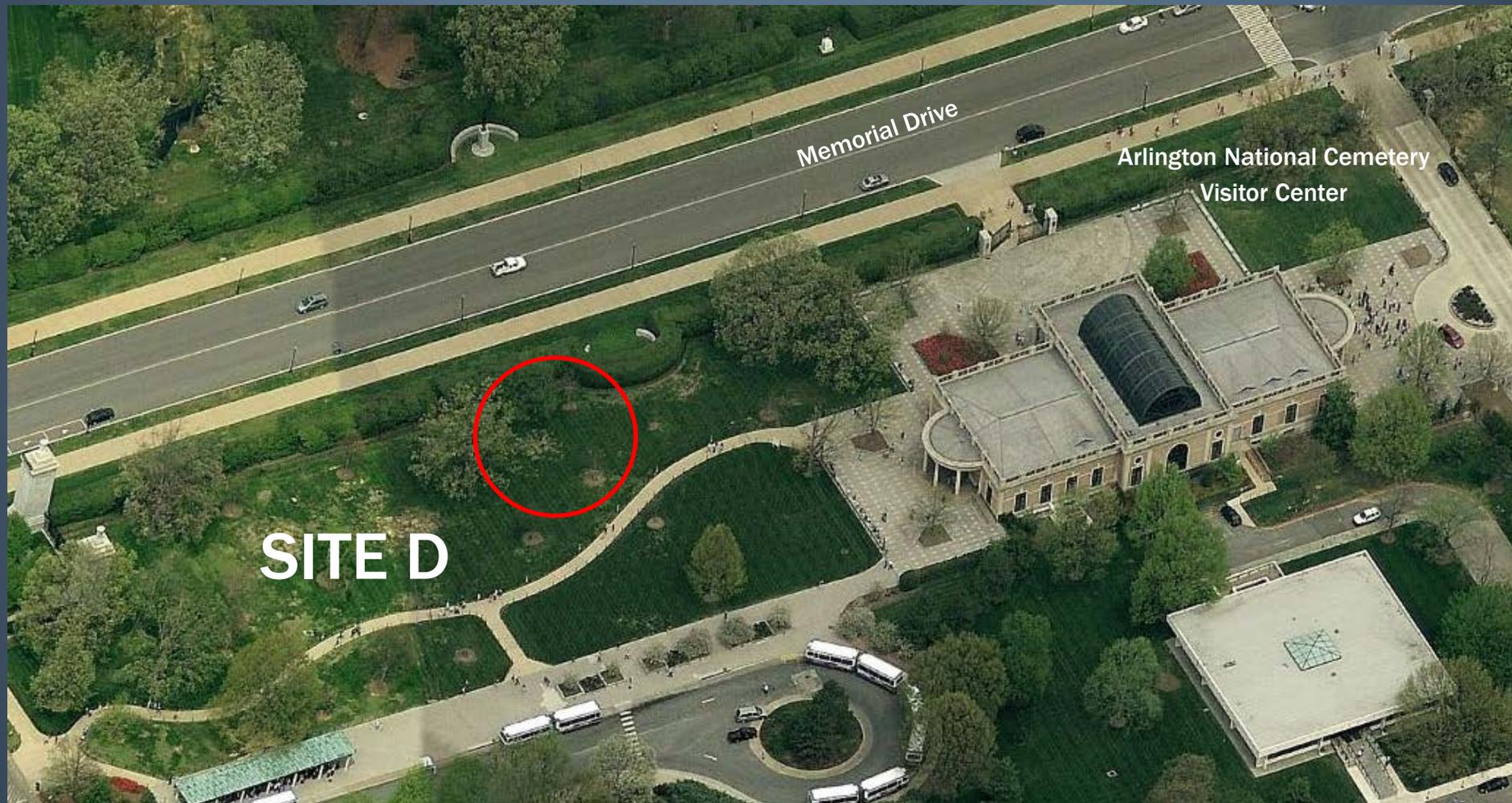


Example niche; Armored Forces Memorial



Example niche; National Seabees Memorial

# Site D: Adjacent to ANC Visitor Center





| B   | C  | D   | The location should be:  |
|-----|----|-----|--|
| 1   | 1  | 1   | In the District of Columbia or its environs, but not in the National Mall Reserve; |
| ☆ 2 | 2  | 2   | In a context meaningful to Gold Star Mothers and Gold Star Families;               |
| 3   | 3  | 3   | Out of the overwhelming or distracting influence of other commemorative work(s);   |
| 4   | 4  | ☆ 4 | Without adverse impact on other commemorative work(s);                             |
| 5   | 5  | 5   | Without adverse impact on historic resources;                                      |
| 6   | 6  | 6   | Convenient to existing tourist destinations;                                       |
| 7   | 7  | 7   | Able to accommodate groups of visitors;  |
| 8   | 8  | 8   | Able to provide a contemplative setting;   |
| 9   | 9  | 9   | Accessible by public transportation;   |
| 10  | 10 | 10  | Accessible to disabled visitors and the elderly; and,                              |
| 11  | 11 | 11  | Able to provide shade.   |

☆ *Compliance dependent on design*