Executive Director’s Recommendation
Commission Meeting: October 5, 2017

PROJECT
Dwight D. Eisenhower Memorial Modification
National Mall and Memorial Parks
Bound by Independence Avenue, 4th, and 6th Streets, SW, and by the Lyndon B. Johnson – U.S. Department of Education Headquarters Building Washington, DC

SUBMITTED BY
United States Department of the Interior
National Park Service on behalf of the Dwight D. Eisenhower Memorial Commission

REVIEW AUTHORITY
Commemorative Works per 40 U.S.C. § 8905

PROJECT SUMMARY
The National Park Service (NPS), on behalf of the Dwight D. Eisenhower Memorial Commission (EMC), has submitted revised preliminary and final site and building plans for the Dwight D. Eisenhower Memorial Modification. Congress authorized the memorial under P.L. 106-79, enacted October 25, 1999, as amended. The memorial is located in Southwest Washington, DC on a four-acre site at the intersection of Maryland and Independence Avenues, between 4th and 6th Streets, immediately to the north of the Lyndon Baines Johnson (LBJ) Building U.S. Department of Education Headquarters. The Commission originally approved the final site and building plans for the Eisenhower Memorial at its July 9, 2015 meeting. As a result of further consultation with the Eisenhower family, the Commission provided comments on a revised concept design on February 2, 2017. At the time, the revised concept included three key modifications that altered the thematic context and narrative of the memorial: revising the art on the tapestry from a composite view of Abilene, Kansas to a contemporary peacetime aerial image of the beach at Normandy, France; relocating the young Eisenhower statue from the center of the memorial core to the LBJ pedestrian promenade, between the memorial and the Department of Education Building; and removing four canopy trees from the previously approved landscape plan to open up views of the revised tapestry.

On May 18, 2017 the applicant installed a three-panel tapestry mockup at the National Building Museum. The mockup was available for consulting parties and the Commission of Fine Arts review. Based on previous comments from the Commission and other stakeholders regarding the legibility and transparency of the tapestry, and after further study of the mockup, the design team concluded that a graphic approach to the Normandy landscape with higher contrast would improve the image clarity against the backdrop of the LBJ building. The applicant has revised the tapestry
art from a photograph of the Normandy coastline to a more abstract drawing of the Normandy cliffs, focusing on the iconic Pointe du Hoc at the center of the composition. The design refinements also include the relocation of the statue of Eisenhower as a young man from the LBJ promenade, which is located behind the tapestry, to the memorial foreground at the entry plaza on the northwest corner of the site, near the intersection of Independence Avenue and 6th Street, SW. The sculptor has refined the pose of the life-sized young Eisenhower figure, which is now seated on a 30-inch high limestone podium looking toward the memorial. A new six-foot tall by fifteen-foot long inscription wall, similar to other limestone blocks within the memorial core, is adjacent to the statue along the south edge of the plaza. An excerpt from Eisenhower’s 1945 Abilene Homecoming Speech is carved into the wall.

The landscape design retains four proposed large trees adjacent to the memorial core that had been removed from the revised concept design, and revises the species of the central tree, located in front of the memorial core from London Plane to Bur Oak to give the central grove of trees a stronger character and presence and match the adjacent tree species. Additionally, an existing street tree originally proposed to remain on 6th Street, SW will be replaced with Swamp White Oak due to poor health. This tree species is consistent with the other proposed street trees along the west edge of the memorial.

**KEY INFORMATION**

- On February 2, 2017, the Commission commented favorably on a revised concept design for the Eisenhower Memorial. With its comments, the Commission found that the overall placement, scale, and assembly of the primary memorial elements had not significantly changed since the 2015 final approval; and that the revised memorial design concept continued to satisfy the site selection design principles adopted by the Commission in 2006.
- In February 2017, the Commission requested additional visual studies and a mock-up of the revised tapestry on-site; a revised lighting plan; and additional Section 106 consultation. The Commission expressed concerns regarding the transparency and proportion of the tapestry image and the new location of the young Eisenhower sculpture.
- The key changes since the revised concept approval are revising the tapestry art with a more abstract drawing of the cliffs of Normandy; relocating the young Eisenhower sculpture from the LBJ promenade to the northwest entry plaza, refining the sculpture pose and configuration; adding a new inscription wall with the Abilene Homecoming Speech near the relocated sculpture; and retaining four large trees previously considered for removal.
- The subject of the new tapestry design is still the Normandy coastline, featuring Pointe du Hoc at the center of the composition. However, the image is now an interpretive line drawing rather than a photo montage. The design team has eliminated the sky, focused on the landscape in the foreground, and added some shaded accents on the vertical face of the cliffs. The revised image is now centered within the frame of the tapestry.
- Twenty percent of the tapestry panels have no linework other than the base structural grid of the panel, which provides one hundred percent transparency. The current tapestry image has an average opacity of 17 percent. The previous tapestry had an average opacity of 55 percent.
• The U.S. Commission of Fine Arts (CFA) approved the revised final design for the memorial conditioned upon further refinement of the tapestry on September 20, 2017. CFA found that the artistic design solution for the tapestry was appropriate, and achieved a balance between photographic realism and abstraction. They noted that the gestural quality of the drawing conveyed emotion through line, tone, and contrast.

• The design team has provided two tapestry aesthetic mockups since the NCPC revised concept review. The first one was installed on May 18, 2017 at the National Building Museum grounds and the second one was installed on September 20, 2017 in front of the LBJ Building. Both mockups were available for CFA and consulting parties review. The latest mockup of the revised art will be available in the morning prior to the Commission meeting.

• In accordance with Stipulation 11 of the Section 106 Memorandum of Agreement (MOA), NPS issued an updated final determination of effect on September 7, 2017. NPS determined that the design changes would not result in any new adverse effects or intensify any previously identified adverse effects on historic properties.

• The DC State Historic Preservation Officer reviewed the latest mockup and concurred with NPS’s final determination of effect on September 20, 2017, noting that although the tapestry would be clearly visible in front of the Department of Education Building, a significant number of individual panels would be blank, thus allowing the elevation of the National Register of Historic Places-listed building to remain fully legible.

• In April 2014, NCPC engaged experts from the National Institute of Standards and Technology, the United States Department of Defense, and the Smithsonian Institution to assist in evaluating the results of the applicant’s numerous tapestry durability tests. Based on the evaluation performed by this third party, the Commission found that the results of the durability tests conducted by the applicant showed the tapestry materials and panel welds to be resistant to corrosion and mechanically sound. The revised art does not alter the tapestry material, fabrication methods or durability. Therefore, the test results remain valid.

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**RECOMMENDATION**

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

**Confirms** that the revised preliminary and final plans continue to satisfy the site selection design principles adopted by the Commission.

**Notes** that the applicant has modified the tapestry image to address the Commission’s comments regarding the level of transparency and overall proportion of the image on the tapestry. The applicant provided additional visual studies and a mockup on-site as requested by the Commission.

**Finds** that the tapestry image preserves views to and from the Lyndon Baines Johnson Building U.S. Department of Education Headquarters.
Finds that the revised image does not alter the tapestry material, panel welds or fabrication methods. Therefore, the durability standards, maintenance and operational protocols remain consistent with previous test results included in the Tapestry Engineering and Technical Data Summary, volumes one and two dated February 2014, and the Tapestry Technical Data Supplemental Submission, dated June 2015.

Notes that the young Eisenhower sculpture has been relocated from the Lyndon Baines Johnson (LBJ) Promenade, behind the tapestry, to the memorial foreground as requested by the Commission.

Supports the retention of the four canopy trees previously considered for removal because they strengthen the notion of a memorial within a park, frame the Maryland Avenue viewshed, and provide shade.

Notes that the applicant has responded to the Commission’s requests by providing an updated lighting plan; and conducting additional Section 106 consultation.

PROJECT REVIEW TIMELINE

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<tr>
<th>Previous actions</th>
<th>September 7, 2006 – Approval of memorial site and design principles.</th>
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<td>February 3, 2011 – Approval of comments on three concept design alternatives.</td>
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<td>October 6, 2011 – Information presentation on proposed design.</td>
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<td>April 3, 2014 – Disapproval of preliminary site and building plans on the account of the proposed scale and configuration of the tapestries and inconsistency with three design principles.</td>
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<td>September 4, 2014 – Information presentation on proposed revised preliminary design.</td>
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<td>October 2, 2014 – Approval of revised preliminary site and building plans including the Memorial Information Center.</td>
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<td>November 6, 2014 – Information presentation on lighting, perimeter security, and pedestrian circulation.</td>
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<td>July 9, 2015 – Approval of final site and building plans for the Dwight D. Eisenhower Memorial.</td>
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<td>July 9, 2015 – Approval of transfer of jurisdiction of Maryland Avenue between 4th and 6th Streets, SW along with portions of the sidewalk along 4th Street, 6th Street, and Independence Avenue, SW to the National Park Service in order to create a unified site for the Dwight D. Eisenhower Memorial. Approval of comments to the Council of the District of Columbia on the proposed closing of Maryland Avenue between 4th and 6th Street, SW (NCPC file No. 7684).</td>
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<td>February 2, 2017 – Approval of comments on revised concept design.</td>
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PROJECT ANALYSIS

Executive Summary

Staff’s analysis of the revised preliminary and final plans for the Dwight D. Eisenhower Memorial builds upon the recommendation presented during revised concept review in February 2017 as well as final approval in July 2015. The main portion of this report focuses on the modifications made since the Commission’s revised concept review and how the applicant has responded to the Commission’s comments as well as comments from other stakeholders. The analysis also includes a brief review of the project’s consistency with NCPC’s adopted site selection design principles, the project’s conformance with the National Capital Planning Act and the Commemorative Works Act. The current design addresses previous commission concerns. Therefore, staff recommends that the Commission approve the preliminary and final site and building plans for the Dwight D. Eisenhower Memorial Modification.

Analysis

Previous Commission Comments
On February 2, 2017, the Commission commented favorably on a revised concept design for the Eisenhower Memorial. At the time, the applicant proposed three modifications since the Commission’s 2015 approval of final site and building plans for the Dwight D. Eisenhower. The proposed modifications included:
1. Revising the image on the tapestry from a landscape scene of Abilene, Kansas (Eisenhower’s hometown) to a contemporary peacetime aerial image of the Normandy coast, France, from the sea looking towards the land, with Pointe Du Hoc at the center, depicting Omaha and Utah beaches on each side, in remembrance of the sacrifices of D-Day;
2. Relocating the statue of young Eisenhower from the overlook at the center of the memorial to the LBJ Promenade near the Department of Education entrance; and
3. Removing four canopy trees adjacent to the memorial core to increase the views of the revised tapestry image from the approved planting plan.

The Commission provided two findings and requested additional information before preliminary and final review. The Commission found the overall placement, scale and assembly of the primary memorial elements had not significantly changed since the July 2015 final approval, including the stainless steel tapestry and supporting colonnade, freestanding columns, memorial core, landscaping, and information center. In addition, the Commission found that the revised memorial design concept continued to satisfy the seven site selection design principles adopted by the Commission in September 2006. The Commission requested the following information:
• Additional visual studies and a mockup of the revised tapestry on-site addressing any impacts on the LBJ Building through the tapestry, the memorial itself and surrounding context.
• A revised lighting plan that considered the relocated young Eisenhower sculpture.
• Additional Section 106 consultation to ensure that the proposed design changes would not intensify adverse effects.

During the meeting, the Commission’s concerns focused on the proportion and transparency of the tapestry image, and the new location of the young Eisenhower statue. They did not find the arguments for these changes very compelling and requested more information regarding these changes. Specifically, the Commission provided the following comments:

1) The Commission questioned the ability to read and recognize the coastline of Normandy and distinguish between the water, land, and sky from the presentation materials. They noted that the majority of the coast falls within the lower part of the tapestry resulting in an image that is largely composed by clouds. As a result, the horizon line would not be legible especially since it sits below the tree canopy of the site. They noted that by lowering the horizon line from the original Kansas landscape image, the image gained transparency by adding a lot of sky, but compromised coherence. They recommended raising the horizon line. They also noted that the image seemed forced and stretched to fit the 447-foot long canvas size, and recommended to further study the image proportion and composition in relationship to the size of the tapestry.

2) The Commission raised concerns about removing the young Eisenhower sculpture from a central location at the memorial core to the LBJ promenade, behind the tapestry, where it could no longer be seen. At the time, the young Eisenhower sculpture was not visible from Maryland Avenue, as the sculpture was seated on a low (3-foot-tall) pedestal behind the memorial core. The Commission was not convinced with the new location of the young Eisenhower statue. There were still outstanding questions of why it could not be located at a more visible location, perhaps at one of the corners of the site, and what would happen if GSA decided to sell the Department of Education building and redevelop the site in the future and the proposed children’s art work programming on the LBJ promenade changes overtime. This location also created circulation conflicts with the proposed outdoor seating and gathering areas along the promenade. They suggested that the applicant continue to study a more prominent location in the memorial foreground.

Design Review Summary
Since the February 2017 revised concept, the applicant installed a three-panel mockup of the revised tapestry with the Normandy design on May 18, 2017, in conjunction with the Commission of Fine Arts (CFA) meeting at the National Building Museum’s east parking lot. In accordance with Stipulation 11 of the Section 106 Memorandum of Agreement (MOA), the tapestry mockup was available for signatories, invited signatories, and consulting parties. Concurrently, CFA reviewed a revised final submission, taking no action due to continuing concerns with the
development of the revisions to the memorial's design, including the proportion and transparency of the tapestry image, removal of four large trees, and the location of the young Eisenhower. CFA requested that a second, larger mock-up be provided on-site, in front of the Department of Education Building and recommended the team continue to refine the image and the fabrication methods of the tapestry to improve the image clarity. Similarly, the SHPO expressed concerns about the tapestry mockup and was unable to make a determination regarding the potential for new or intensified adverse effects until they had an opportunity to review the mockup at the Eisenhower Memorial site.

Responses to Previous Commission Comments
Based on previous comments from the Commission and other stakeholders, and after further study of the May 18, 2017 tapestry mockup, the design team concluded that a graphic approach to the Normandy landscape with higher contrast would be more successful for improving image clarity against the backdrop of the Lyndon B. Johnson building. The applicant has made the following design refinements:

1. Revised Tapestry
2. Relocated Young Eisenhower Sculpture and New Inscription Wall with Abilene Homecoming Speech
3. Retained four added trees previously proposed for removal
4. Updated Lighting Plan

1. Revised Tapestry
Last February, the Commission requested additional visual studies and a mock-up of the revised tapestry that address any impacts to the Lyndon B. Johnson Department of Education Headquarters including views of the building through the tapestry, the memorial itself, and surrounding context.

The applicant has provided additional visual studies of the memorial with the revised tapestry, including an aerial view of the memorial physical model, a view from the center of the memorial core, and a view looking south at the northwest entry plaza. The applicant has also provided night views of Maryland Avenue towards the Capitol, memorial core, and northwest entry plaza. In addition, the applicant provided an aesthetic mockup of the revised tapestry in front of the LBJ Building on September 20, 2017. The progress mockup consisted of two panels, showing different density approaches: a denser panel (more opaque) and a lighter panel (more transparent). Although, the final result will include a combination of light and dark panels, the simplified linework achieves higher transparency levels by eliminating the sky. It allows reciprocal views of the LBJ building. The design team has also addressed the Commission’s concerns regarding the tapestry image proportion and level of transparency; focusing on the landscape foreground and enlarging the Pointe du Hoc cliffs.

The proposed tapestry remains approximately 447 feet long by 60 feet wide 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 20 feet 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.
The tapestry itself is composed of approximately 596 panels, each panel measures three feet in width by fifteen feet in vertical length.

The following summarizes how the applicant addressed previous Commission comments regarding the proportion and transparency of the tapestry image.

**Proportion:** The Commission questioned the ability to read and recognize the coastline of Normandy and distinguish between the water, land, and sky from the presentation materials. They noted that the majority of the coast falls within the lower part of the tapestry resulting in an image that is largely composed by clouds. They recommended raising the horizon line. They also noted that the image seemed forced and stretched to fit the 447-foot long canvas size, and recommended to further study the image proportion and composition in relationship to the size of the tapestry.

In response to the Commission’s comments, the image is now centered within the frame of the tapestry, and fits the tapestry proportionally, leaving blank spaces around the frame. The image now focusses on the landscape instead of the water and sky. The landscape fades away around the east, west and south edges of the tapestry.

**Transparency:** Early in the design process, the design team established maximum opacity levels for engineering purposes for the 2011 tapestry mockup of the Kansas Landscape. These conservative values were developed for a wind tunnel test for the structural design of the cable net and columns, with the expectation that the real density levels would be less than these maximum values. The 60-foot tall tapestry was divided into three approximately equal horizontal sections. The opacity on the tapestry ranged from approximately 95 percent solid along the bottom of the image, transitioning to about 50 percent open in the middle and at the top about 20 percent opaque.

The February 2017 revised tapestry with the Normandy image followed similar transparency levels. According to the estimated densities diagram, the transparency levels of the tapestry were maintained from the previous Kansas Landscape to ensure views to the LBJ Building and retain the building’s identity. In general, both tapestries were more transparent towards the sky and denser at the bottom.

The current tapestry image has a graphic linework with some shaded accents on the vertical face of the cliffs and is more open and transparent. The applicant has indicated that 20 percent of the panels will be blank, without any linework other than the base structural grid of the panel, which will be 100 percent transparent. This is due to the elimination of the sky, and the way the cliffs and water fade on the edges of the tapestry, providing a floating effect. The design team has provided an opacity level diagram for comparison purposes, showing a similar conservative approach from the original tapestry design. The diagram shows that the 60-foot tall tapestry is divided into three approximately equal sections. The maximum opacity levels range from 10 percent opaque at the bottom to 30 percent opaque in the middle and 10 percent opaque at the top. Overall, the tapestry has equal transparency levels at the upper and lower sections, and is denser in the middle.

When comparing the current estimated density levels to the previous Kansas Landscape image, staff finds the following:
• The top section of the previous image provided the greatest transparency levels, with 20 percent opaque. The top section of the current image provides 10 percent opacity. The top portion of the current image is more transparent.
• The middle section of the previous image was 50 percent opaque. The middle section of the current image, which represents the densest area of the image, is now 30 percent opaque. The middle section of the current image is more transparent.
• The lower section of the previous image provided the least level of transparency with 95 percent opacity. The lower section of the current image is now 10 percent opaque, which significantly improves transparency levels. The top and bottom portions are now more transparent.

As shown in the opacity diagrams shown in page 22 in the attached powerpoint, overall, the revised tapestry will be more transparent than the previous Kansas landscape and will not block reciprocal views to and from the LBJ building. The simplification of the linework and the lack of sky and clouds contributes to the transparency levels.

During the September 20, 2017 mockup review, NCPC staff accessed the LBJ Building third floor offices, and confirmed that the revised tapestry maintains an adequate level of transparency from the LBJ building looking out into the memorial site and surrounding buildings. The tapestry allows views to the exterior through the voids and shaded areas from the interior of the LBJ building. Similarly, looking from the memorial site, staff found that the LBJ building façade is visible through the tapestry and maintains a strong urban presence.

Based on the analysis presented above, staff notes that the applicant has modified the tapestry image to address the Commission’s comments regarding level of transparency and the overall proportion of the image on the tapestry. The applicant provided additional visual studies and a mockup on-site as requested by the Commission. Staff also finds that the image preserves views to and from the Lyndon Baines Johnson Building U.S. Department of Education Headquarters.

2. Relocated Young Eisenhower Sculpture and New Inscription Wall
As mentioned in the previous Commission’s comments section above, during the February 2017 concept review, the Commission expressed concerns about removing the young Eisenhower sculpture from the center of the memorial to a less visible and prominent location at the LBJ promenade, behind the tapestry. The design team has further refined the statue of Eisenhower as a young man in response to previous Commission comments.

Eisenhower’s legacy has a strong relationship to the context of this precinct. The National Air and Space Museum (NASM), the Federal Aviation Administration Building (FAA), the US Department of Education building, and the US Department of Health and Human Services building all have ties to Eisenhower’s achievements. These strong thematic relationships were a contributing factor in the 2006 site selection process. The applicant considered this relationships in order to select a location for the young Eisenhower sculpture.
The applicant considered two other locations for the Young Eisenhower statue, including a central location at the intersection of the Memorial Overlook and the LBJ Promenade near the top of west the ramp, and another option on the LBJ promenade, near the entry to the LBJ Department of Education. Based on previous Commission comments, the statue is now located at the northwest plaza entrance into the memorial, this location balances the southeastern side of the memorial with the Information Center. The artist has refined the sculpture pose, with the figure seated on a 30” high podium to provide a sense of intimacy as visitors enter the site and allow them to walk around the sculpture. The design team introduced an inscription wall with an excerpt from the Homecoming speech that Eisenhower gave upon his return to Abilene in 1945. In this speech, Eisenhower references his strong connection with his hometown of Abilene, Kansas. According to the submission materials, the sculpture showing the Kansas youth and the Abilene Homecoming inscription encourages visitors entering the memorial to connect with Eisenhower’s personal story as an American story.

The new design for the Young Eisenhower sculpture and Abilene Homecoming Inscription wall has resulted in moving two benches from the south edge of the northwest entry plaza to the eastern edge of this plaza. The total number of benches remains the same as the 2015 approved design. There are 35 benches on the project. Each bench is ten feet long.

The location of the sculpture and new inscription wall complements the memorial thematic organization and chronological events during Eisenhower’s life. The west side of the memorial is devoted to honoring Eisenhower’s career as a military officer, and includes the General Eisenhower Element to the west of the memorial core and the General Eisenhower Commemorative Column in the northwest corner of the site.

The location of the young Eisenhower sculpture near the General Eisenhower Column, which commemorates the Supreme Allied Commander and includes a bronze symbol mounted at eye level depicting the 5-star General Insignia, strengthens the symbolic narrative and sense of place of the west plaza. It also announces the entrance into the memorial park, similar to the way in which the Continuum sculpture, located across Independence Avenue on axis with 6th Street, announces the NASM’s south entrance. The location of sculptural elements along the west side is consistent with the surrounding context. The Delta Solar sculpture, located on the west end of the NASM grounds, acts as the portal to the National Mall. Lastly, given the pedestrian circulation patterns along Independence Avenue and 7th Street and the proximity to the L’Enfant metro station, more visitors will arrive from the west side of the memorial.

The new six-foot tall by fifteen-foot long inscription wall plays an important role framing the southern edge of the plaza. The intermediate height of the wall reinforces the transition from human scale of the young Eisenhower sculpture to the larger memorial elements, such as the adjacent monumental column. Therefore, staff finds that the placement of the young Eisenhower sculpture and related inscription wall at the entry plaza on the northwest corner of the site complements the memorial elements and thematic organization; relates to the surrounding context; provides a relevant setting for this key memorial piece; and creates a sense of arrival.
Staff notes that the young Eisenhower sculpture has been relocated from the Lyndon Baines Johnson (LBJ) Promenade, behind the tapestry, to the memorial foreground as requested by the Commission.

3. Retained four added trees previously proposed for removal
The landscape planting plan has returned to the previously approved 2015 design. In February 2017, the team proposed the removal of four trees adjacent to the Memorial core to increase views to the tapestry. The tree removal has been reconsidered, and is no longer being proposed. The current design proposes a species revision at the memorial core center tree from a London Plane to a Bur Oak to give the central grove of trees a stronger character and presence. Additionally, an existing street tree originally proposed to remain on Sixth Street, SW, is being replaced with a Swamp White Oak in the current design to match the other proposed street trees along the west edge of the memorial. The existing tree is being removed from the project due to the poor health.

In its January 23, 2017 meeting, CFA did not support the proposed removal of the four canopy trees from the design, commenting that this removal would reduce shade for visitors to the Memorial while not appreciably improving the perception of the tapestry. During the February 2017 concept review, NCPC staff noted in the staff report that the removal of four canopy trees would affect the urban tree canopy and shade along the proposed public space; however the impact would not be significant. In addition, staff found that the overall landscape design continued to respect the alignment of trees and frame the Maryland Avenue cartway, framing the Capitol vista. Maintaining the trees will contribute to this shaded oasis along Independence Avenue and improve the visitor experience. Therefore, staff supports the retention of the four canopy trees previously considered for removal because they strengthen the notion of a memorial within a park, frame the Maryland Avenue viewshed and provide shade.

4. Updated Lighting Plan
In February 2017, the Commission requested a revised lighting plan consistent with the overall lighting design for the memorial that considers the relocated young Eisenhower sculpture and its associated inscription wall. The lighting plan is the same as the previously approved design with the addition of lighting for the sculpture of Eisenhower as a young man and the new inscription wall at the Northwest Entry Plaza. The applicant has provided updated lighting plans, a perspective night view of the memorial core, and a rendering of the Homecoming Speech Inscription Wall and the figure of Eisenhower as a young man looking south.

The applicant proposes to illuminate the sculpture of Eisenhower as a youth with a single projector designed to focus on the statue. The Homecoming Speech inscription wall will have linear uplighting at the base of the wall similar to the Memorial core inscription walls.

Lastly, the Commission requested the applicant conduct additional Section 106 consultation to ensure that the proposed design changes would not result in new or intensified adverse effects to historic properties. This topic is discussed in more detail in the National Historic Preservation Act section. Therefore, staff notes that the applicant has responded to the Commission’s requests by providing an updated lighting plan; and conducting additional Section 106 consultation.
2006 Site Selection Design Principles
In 2006, at the time NCPC approved the site for the memorial, the Commission adopted the following design principles to preserve and enhance the unique character of this site and establish a new green space within the context of L’Enfant’s plan for Washington DC:

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.

Fulfillment of the design principles were required as mitigation in the Finding of No Significant Impact for NCPC’s approval of the site. As included in the February 2017 staff report, the overall placement, scale and assembly of the primary memorial elements have not significantly changed since the 2015 final approval, including the stainless steel tapestry and supporting colonnade, freestanding columns, memorial core, landscaping, and information center. As such, staff confirms that the revised preliminary and final plans continue to satisfy the site selection design principles adopted by the Commission.

CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

Comprehensive Plan for the National Capital

The Dwight D. Eisenhower Memorial Modification is consistent with the policies in the Federal Elements of the Comprehensive Plan for the National Capital. In particular, the project meets the objectives of the Urban Design; Federal Environment; Historic Preservation; Visitors and Commemoration; and Parks and Open Space Elements.

As noted in previous recommendations, the Historic Preservation Element encourages the placement of memorials along L’Enfant avenues 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 two freestanding columns that have replaced the previously proposed east and west tapestries have reduced the impacts on the L’Enfant Plan. The number of memorial elements that encroach into the Maryland Avenue right-of-way and viewshed has been minimized when compared to earlier designs for the memorial. The western end of the tapestry and eastern freestanding column remain
The revised preliminary and final plans remain consistent with the Comprehensive Plan.

**Memorials and Museums Master Plan**

Since the overall placement, scale and assembly of the primary memorial elements have not significantly changed since final approval, our earlier determination remains valid, and the revised preliminary and final plans continue to be consistent with the 2M Plan. As noted in the July 2015 and October 2014 staff recommendations, elimination of the east and west tapestries 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. Additionally, the 2M Plan promotes a memorial on this site that allows for public gatherings as well as a commemorative reflection. The use of the two freestanding columns defines the perimeter of the park space within the larger site and surrounding urban environment. The overall result is a memorial core contained within a park. The final design successfully balances the establishment of 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 revised plan does not affect the notion of a memorial within a park and continues to allow both public gatherings as well as a commemorative reflection.

**National Historic Preservation Act**

Both NCPC and NPS have an independent responsibility under Section 106 of the National Historic Preservation Act. NPS and NCPC consulted with the District of Columbia State Historic Preservation Officer (DC SHPO) and several other consulting parties through the Section 106 process. Collectively, they determined that the undertaking 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, the Advisory Council on Historic Preservation (ACHP), and the Eisenhower Memorial Commission (EMC) entered into a Memorandum of Agreement (MOA) on March 1, 2012 for five years pursuant to Section 106 of the National Historic Preservation Act in order to address the adverse effects that would result from the establishment of the Eisenhower Memorial. On March 1, 2017, the MOA expired pursuant to its duration provision, resulting in the reissuance of a new MOA for a period of five years beginning on May 3, 2017.

Following the Commission’s preliminary approval, NPS continued consultation under Section 106 of the National Historic Preservation Act in accordance with the MOA. NPS held a Section 106 meeting December 9th, 2014 for signatories and consulting parties. Following this consultation, NPS circulated their final determination of effect on the final design for the project. NPS issued a Final Determination of Effect, per Stipulation 11 of the MOA, on May 8, 2015. In the final determination of effect, NPS concluded that “no new or intensified adverse effects on historic properties would result from the final design for the memorial.” The DC SHPO concurred with
NPS’ final determination of effect and noted that the adverse effects had been minimized sufficiently to achieve the goals of the Section 106 process.

In order to fulfill the design consultation stipulations included in the MOA, at its February, 2017 meeting, the Commission requested that the applicant conduct additional Section 106 consultation to ensure that the proposed design changes would not result in new or intensified adverse effects to historic properties. In accordance with Stipulation 11 of the MOA, NPS issued a second final determination of effect on May 5, 2017 based on recent design changes. At the time, NPS determined that these changes would not result in new adverse effects or intensify the previously identified adverse effects to historic properties. NPS circulated its final determination of effect on May 8, 2017 and a revised tapestry mockup was available on May 18, 2017 at the National Building Museum’s east parking lot for the signatories, invited signatories, and consulting parties.

The DC SHPO provided a comment letter on May 19, 2017 noting that the Department of Education Building was recently listed in the National Register of Historic Places, and given CFA’s concerns, the SHPO needed to make certain that they understood how the proposed tapestry revisions would affect the historic building. Therefore, they were unable to make a meaningful and informed determination regarding the potential for new or intensified adverse effects until they had an opportunity to review a second mockup at the Eisenhower Memorial site, as requested by CFA during the May 18, 2017 meeting.

On September 7, 2017 NPS circulated a third final determination of effect based on the preliminary and final design modifications. NPS concluded that the tapestry would be as transparent as the previously approved design of the Kansas Landscape. The DC SHPO reviewed a revised tapestry mockup and concurred with NPS’s final determination of effect on September 20, 2017, noting that although the tapestry would be clearly visible in front of the Department of Education Building, a significant number of individual panels would be blank, thus allowing the elevation of the National Register of Historic Places-listed building to remain fully legible. NPS received one comment from an unaffiliated individual that is part of the Company of Military Historians related to the artistic interpretation of the tapestry. This comment was not specifically related to the basis of the final determination of effect.

**National Environmental Policy Act**

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) in September 2011, which analyzed three design alternatives and a no action alternative. The EA prepared for the memorial design tiers off of the project’s June 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 by way of public meetings and its Planning, Environment, and Public Comment (PEPC) 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. NCPC’s FONSI incorporated these design principles as required mitigation. In October 2014 with its preliminary approval the Commission found that an action to approve the memorial design would not cause significant impacts to the human environment based upon the content of the two EAs prepared for the project, and the finding that the memorial design satisfied the required mitigation contained in the 2006 Site Selection FONSI. With the final approval for the project, in July 2015, the Commission confirmed that the action to approve the final plans would not have a significant impact on the human environment.

**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. In October 2014, the Commission found the preliminary plans for the memorial to be consistent with the purposes of the National Capital Planning Act. In July 2015, the Commission found that the final plans remained consistent as the adverse effects on the L’Enfant Plan had been minimized as the extent to which memorial elements encroaching on the Maryland Avenue right-of-way had been reduced. As noted in previous staff reports, the final plans emphasized the horizontal orientation of the viewshed along Maryland Avenue and staff recognized that there was a balance between establishing a Presidential memorial on the site and recognizing its historic setting. The scale and configuration of the main memorial elements have not significantly changed since the 2015 final approval; therefore, the project remains consistent with the National Capital Planning Act.

**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, material, landscape features, museums, site-specific guidelines and donor contributions.

NCPC has provided comments on concept designs (February 2011) and reviewed preliminary plans for the memorial in April 2014 and October 2014. NCPC approved the final plans in July 2015, and provided comments on a revised concept design in February 2017. The following description summarizes the comments regarding compliance with the CWA throughout the review process.

As part of the April 2014 initial preliminary submission package, the applicant provided a compilation of engineering data related to the tapestry dated February 5, 2014, which consisted of two volumes:

- **Volume 1: Tapestry Overview and Engineering Summary**
- **Volume 2: Tapestry Technical Data Summary**

With its April 2014 preliminary review comments, the Commission noted that the CWA required that NCPC, CFA, and the Secretary of the Interior be guided by a specific set of decision criteria when considering design proposals, including whether a commemorative work will be built of durable materials.

In addition, the Commission noted that due to the untested complexity of the tapestry, and to ensure that its actions were consistent with its responsibilities under the CWA, NCPC engaged experts from National Institute of Standards and Technology (NIST), the United States Department of Defense (DoD), and the Smithsonian Institution (SI) to assist in evaluating the results of the applicant’s numerous durability tests. Lastly, the Commission found that the results of the durability tests showed that the stainless steel alloy proposed for the tapestry panels exhibited resistance to corrosion and the proposed tapestry panel welds were likely to be mechanically sound, and therefore, the proposed tapestry materials and fabrication methods met the CWA durability criteria.

The Commission requested that by final review stage the applicant demonstrated that the tapestry material and welds continued to reach the same durability standards as fabrication methods were further refined. The Commission also requested the recommended maintenance regimen, including cleaning, would not cause weld failure if carried out properly. Finally, the Commission requested

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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 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 operational protocols that would be employed to avoid danger to the public during instances where snow and ice has accumulated on the tapestries.

During the October 2014 revised preliminary review, the Commission found that the project successfully met each of the specific decision criteria enumerated in the CWA, 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 showed the tapestry materials and panel welds to be resistant to corrosion and mechanically sound. The Commission also noted its prior request that at the final review stage the applicant address the concerns regarding the tapestry material and welds durability, maintenance, cleaning and operational protocols to avoid danger to the public during instances where snow and ice has accumulated on the tapestries.

In response to previous Commission’s request, the applicant provided a Tapestry Technical Data Supplemental Submission, dated June 5, 2015 during final review stage. At the July 2015 final review, the Commission noted that the applicant had demonstrated that the tapestry material and welds would continue to meet the durability criteria enumerated in the CWA; and that the applicant had submitted a maintenance plan, including operational protocols, that addressed such matters as cleaning the tapestry and public safety concerns when snow and ice accumulate on it.

The revised tapestry image continues to meet the criteria of the CWA. The tapestry fabrication methods for durability, maintenance and operational protocols outlined in the Tapestry Engineering and Technical Data Summary, and Supplemental Submission which was provided to NCPC as part of the 2014 and 2015 preliminary and final reviews remain applicable regardless of the image design change. The revised art does not alter these established fabrication methods.

Notes that the revised tapestry image does not alter the tapestry materials, panel welds or fabrication methods. Therefore, the durability standards, maintenance and operational protocols remain consistent with the analysis included in the Eisenhower Memorial Tapestry Engineering and Technical Data Summary dated February 2014 and the Tapestry Technical Data Supplemental Submission, dated June 2015.

CONSULTATION

National Capital Memorials Advisory Committee (NCMAC)

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 13, 2017 meeting. The Committee forwarded the proposed revised preliminary and final site and building plans to the Commission with the statement that the proposal has been coordinated with all participating agencies, except for the SHPO. The SHPO noted that their coordination could occur until the final review required by the project Memorandum of Agreement was completed – specifically, the review of the revised tapestry mockup, which was held on September 2017. The participating agencies were: NCPC; the District of Columbia Office of Planning; the State Historic Preservation Officer; the District of Columbia Department of Transportation; the District Department of Energy and Environment; the General Services Administration; the National Park Service and the Washington Metropolitan Area Transit Authority.

As mentioned in the July 2015 staff report, the site is composed of three parts controlled by three separate entities: Maryland Avenue right-of-way is under the jurisdiction of the District of Columbia Government. 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.

During the May 10, 2017 Coordinating Committee meeting, DDOT raised concerns about transferring jurisdiction of sidewalk areas along Independence Avenue, 4th and 6th Streets, SW from DDOT to NPS for the purpose of constructing and operating the Eisenhower Memorial. At its July 9, 2015, concurrently with the Eisenhower Memorial final approval, the Commission provided comments on the closure of Maryland Avenue between 4th and 6th Street, SW to the District of Columbia Council (NCPC File No. 7684). In addition the Commission approved the transfer of jurisdiction of a portion of Maryland Avenue between 4th and 6th Streets, SW along with portions of 4th, 6th Streets and Independence Avenue, SW to NPS in order to create a unified site for the Eisenhower Memorial that would be managed by NPS.

DDOT and NPS are currently developing an agreement on the conditions of the transfer and management of the sidewalk space. The District and NPS agree to the following stipulations, which are still in progress:

- The transfer of jurisdiction would not take effect until the NPS issues a permit for construction of the Memorial. If for some reason the Memorial is not actually constructed then the original rights-of-way would revert to the jurisdiction of the District.
- The transferred sidewalk areas will be reconstructed in accordance with streetscape standards established for Independence Avenue.
- Cooperate on any future proposed changes to the Independence Avenue SW cartway, including transfers of jurisdiction back to the District over portions of the sidewalk.
- NPS may, through the issuance of right-of-way permits, authorize utility infrastructure not otherwise relocated as a result of the project.
• The District will retain the right to install parking meters in the sidewalk areas of 4th Street, S.W., 6th Street, S.W., and Independence Avenue, S.W. and will have access to repair and maintain those meters as may be necessary.

• The District will own all streetlights, either existing and retained or newly installed, within the sidewalk areas of the Transfer Property. The lights will be connected to District-owned electrical lines and the District will be responsible for the electric bills. The District will retain the right to access, maintain, and repair the streetlights.

The outcome of this agreement will not change the design, as the memorial streetscape design will follow DDOT sidewalk design standards. The applicant has submitted documents to DDOT and DCRA and coordination is ongoing. Once NCPC has approved the project, the applicant will apply for a public space permit. NCPC approval is required by the CWA to formally move the project into construction stage.

GSA has indicated that they will dispose the triangular plaza located immediately to the north of the LBJ Building to NPS prior to construction of the memorial. GSA will retain control of a 50-foot buffer area along the north façade of the LBJ Building. GSA has already declared the parcel excess, and is in receipt of the NPS expression of Federal interest for the property. GSA will transfer custody and accountability to NPS. Following construction, NPS will be responsible for the long-term operation and maintenance of the memorial.

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

The U.S. Commission of Fine Arts (CFA) reviewed the project pursuant to the Commemorative Works Act and approved the revised final plans on September 20, 2017. Prior to its revised final approval, CFA reviewed the revised concept in two occasions: May 18 and January 23, 2017.

The applicant submitted a revised final submission to the Commission of Fine Arts (CFA) for its May 2017 meeting. CFA had the opportunity to inspect a mockup of a small portion of the tapestry at the National Building Museum's east parking lot. Although, CFA reaffirmed its previous approval for the tapestry art substitution during concept design, CFA did not take further action due to continuing concerns with the overall development of the revisions to the memorial's design. CFA had originally approved the final plans on June 18, 2015. Before its final approval, CFA reviewed the previous concept on the following occasions: January 2011, September 2011, July 2013, November 2013, February 2014, October 2014, November 2014, February 2015, March 2015, April 2015, and May 2015.

**ONLINE REFERENCE**

The following supporting documents for this project are available online:

• Submission Package

Prepared by Vivian Lee
09/28/2017
LETTER FROM SUSAN EISENHOWER AND POWERPOINT (ATTACHED)
Chairman Bryant and NCPC Commissioners,

On behalf of the Eisenhower family, I want to express our support for these recent design modifications made to the tapestry image by the Gehry team. The striking new image with its artistic rendering of the Normandy coastline in peacetime will serve as a meaningful memorial to Eisenhower’s leadership, and the sacrifices made by the Allied forces in the liberation of Europe. It will also be a reminder of the peace that was secured during his presidency. We hope with these recent modifications that the project will proceed to construction.

Thank you all very much for your work in making this tribute a reality.

Susan Eisenhower
NCPC File # 6694
Eisenhower Memorial Modification

Bound by Independence Avenue, 4th, and 6th Streets, SW and by the Lyndon B. Johnson Department of Education Headquarters Building

Washington, DC

National Park Service on behalf of the Dwight D. Eisenhower Memorial Commission

Revised Preliminary and Final
Current Design: Aerial View of the Revised Tapestry Image
Current Design: Memorial Tapestry

PROPOSED ART FOR THE TAPESTRY

PROPOSED ART FOR THE TAPESTRY WITH PANELS SHOWING MOCKUP LOCATION

EISENHOWER MEMORIAL
Gehry Partners • AECOM Joint Venture
View of Tapestry from Center of Memorial Core
Northwest Entry Plaza

Looking South at Homecoming Inscription on Wall and Sculpture of Young Eisenhower
BECAUSE NO MAN IS REALLY A MAN WHO HAS LOST OUT OF HIMSELF ALL OF THE BOY, I WANT TO SPEAK FIRST OF THE DREAMS OF A BAREFOOT BOY. FREQUENTLY, THEY ARE TO BE OF A STREET CAR CONDUCTOR OR HE SEES HIMSELF AS THE TOWN POLICEMAN, ABOVE ALL HE MAY REACH TO A POSITION OF LOCOMOTIVE ENGINEER, BUT ALWAYS IN HIS DREAMS IS THAT DAY WHEN HE FINALLY COMES HOME. COMES HOME TO A WELCOME FROM HIS OWN HOME TOWN. BECAUSE TODAY THAT DREAM OF MINE OF 45 YEARS OR MORE AGO HAS BEEN REALIZED BEYOND THE WILDEST STRETCHES OF MY OWN IMAGINATION, I COME HERE, FIRST, TO THANK YOU, TO SAY THE PROUDEST THING I CAN CLAIM IS THAT I AM FROM ABILENE.

HOMECOMING SPEECH, ABILENE, KANSAS · JUNE 22, 1945
**Lighting Plan**

**UPDATED LIGHTING KEY PLAN**

- 14" APPROACHING WALKWAY POLE WITH DOWNLIGHTS
- 30'-6" MEMORIAL CORE ART LIGHTING POLE WITH FRAMING PROJECTION
- 30'-6" MEMORIAL CORE LIGHTING POLE WITH DOWNLIGHTS
- 14" LBJ PROMENADE POLE WITH DOWNLIGHTS
- STREET LIGHTING TWIN POLE
- STREET LIGHTING SINGLE HEAD POLE
- SUPPORT BUILDING EXTERIOR CANOPY DOWNLIGHTING
- SUPPORT BUILDING EXTERIOR WALL SCONCES
- MEMORIAL OVERLOOK DOWNLIGHTING
- LBJ BUILDING CANOPY DOWNLIGHTING
- FRAMING PROJECTOR
- BENCH LIGHTING
- MEMORIAL BLOCK TRENCH LIGHTING
- TAPESTRY UPLIGHTING
- RAMP RAIL LIGHTING
- **STEP LIGHTING**
Night View of Maryland Avenue Towards Capitol
Night View of the Memorial Core
Homecoming Speech inscription wall and the figure of Eisenhower as a young man looking south
2011 Concept - Tapestry Mockup at LBJ Building

Looking south to the LBJ Building

Looking north to the NASM from LBJ Building
Current Tapestry Mockup at LBJ Building

Looking south to the LBJ Building

Looking north to the NASM from LBJ Building