

Note: At the December 5, 2019 meeting, the Commission amended the recommendations proposed in this EDR. The Commission Action reflects the Commission's approved comments on site selection.



## Executive Director's Recommendation

Commission Meeting: December 5, 2019

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**PROJECT**

**Emergency Medical Services Memorial**

**Site Selection**

Washington, DC

**NCPC FILE NUMBER**

8130

**NCPC MAP FILE NUMBER**

00:00(73.10)45030

**SUBMITTED BY**

United States Department of the Interior

National Park Service

**APPLICANT'S REQUEST**

Approval of comments on  
site selection

**REVIEW AUTHORITY**

Commemorative Works

per 40 U.S.C. § 8905

P.L 115 - 275

**PROPOSED ACTION**

Approve comments on  
site selection

**ACTION ITEM TYPE**

Staff Presentation

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### PROJECT SUMMARY

In 2018, Public Law 115-275 authorized the establishment of a commemorative work in Washington, DC honoring the commitment and service represented by emergency medical services, 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. National Capital Planning Commission (NCPC) and the U.S. Commission of Fine Arts (CFA) approve site and design for new commemorative works.

The National Park Service (NPS), in collaboration with the National Emergency Medical Services Memorial Foundation (Foundation), has submitted a Site Selection Study that identifies potential sites for the memorial and includes a series of criteria to evaluate the sites under consideration. The criteria include program suitability, thematic nexus, site prominence, transportation access, universal accessibility, tranquility, shade, infrastructure, and site availability. The applicant applied the criteria to 25 potential memorial sites (labeled from A – Y) – seventeen which were included in the Memorials and Museums Master Plan (2M Plan). The remaining eight sites are under the jurisdiction of NPS or the U.S. General Services Administration, the District of Columbia, or privately owned. After applying the criteria, the applicant identified three sites for further analysis.

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The three sites analyzed in the Site Selection Study include:

- **Site L** at the intersection of Massachusetts and New Jersey Avenues at G Street Northwest
- **Site U** a portion of the plaza in front of the U.S. Department of Health and Human Services (HHS) building at 3<sup>rd</sup> Street and Independence Avenue Southwest
- **Site W** at Maryland and Virginia Avenues, Southwest (Hancock Park between 7<sup>th</sup> and 9<sup>th</sup> Streets; 2M Plan Site #19).

The Commission is not formally approving a location or memorial design at this stage of the process. Rather, NCPC is submitting planning comments that weigh the opportunities and challenges of locating the memorial at each of the proposed sites. The NPS and Foundation will take NCPC's comments into account as well as those received from CFA and interested stakeholders as they work to narrow down the potential locations for the memorial and develop design concepts.

## 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 the jurisdiction of the US Department of the Interior (DOI) and the US General Services Administration (GSA).
- In general, in accordance with 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. 115-275 authorizes the establishment of a commemorative work on eligible Federal land, including Area II, but excluding Area I and the Reserve.
  - (2) The sponsor consults with the National Capital Memorial Advisory Commission (NCMAC) on alternative sites and design concepts.
    - At the September 24, 2019 NCMAC meeting, the Foundation and their consultants presented the Site Selection Study for comment. NCMAC determined no opposition to the proposed sites, noting that two sites (Site L and Site U) may be most suitable.

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(3) NCPC and CFA must each approve the site and design for new commemorative works.

- At the October 17<sup>th</sup>, 2019 CFA meeting, the Foundation and their consultants presented the Site Selection Study for comment. CFA expressed general support for the sites, with emphasis in favor of Site U on the north plaza of the Hubert H. Humphrey Building.

(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 has initiated a public comment period on the Site Selection Study that will run from November 15, 2019 to December 13, 2019.
  - NCPC is accepting this public comment period as initializing the NEPA scoping process for site selection to meet its own NEPA responsibility.
  - The Foundation envisions a memorial that is modest in scale that would occupy less than one acre. They would like the space to accommodate memorial services for up to 75 participants and serve as passive recreation.
  - Site L is along Massachusetts Avenue, directly across from the Victims of Communism Memorial and a few blocks from the Memorial to Victims of Ukrainian Manmade Famine-Genocide of 1932-1933, on a corridor where an international theme of commemoration is emerging.
  - Site U is under the jurisdiction of GSA and further coordination with GSA and the Department of Health and Human Services will be required if this site is carried forward.
  - Site W is partially located within Area I. The Area I boundary falls in line with Maryland Avenue and divides the proposed site in approximately half between Area I and Area II. Commemorations in Area I require additional authorization from Congress, which determines that the subject of the commemorative work is of preeminent historical and lasting significance to the United States.
    - The applicant has indicated they are primarily assessing land on the site within Area II. After receiving feedback from review agencies, they will evaluate the potential implications of the site, including the need for Area I authorization.
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## RECOMMENDATION

The Commission:

**Finds** that in order to make a recommendation on a site or sites to carry forward through the site selection and design review process, additional information is required regarding the memorial program and vision.

**Requests** the applicant to submit information on the memorial program including the following:

- Size and scale of the memorial;
- Anticipated type of memorial elements such as sculpture, landscaping, or other built elements;
- Need for gathering space, including the number of planned events; and,
- Vision statement that indicates the character and sentiment (somber, reflective, celebratory) the memorial will convey.

Site L – Intersection at Massachusetts and New Jersey Avenues

**Notes** that while the site is owned by NPS, it is essentially a traffic island surrounded by streets and slip lanes. While some pedestrian infrastructure exists, the site and surroundings would require improvements to be safely accessed by visitors.

**Notes** this site has been identified in the District of Columbia's *Downtown East Revitalization Plan* as an area adjacent to a proposed redevelopment site.

**Finds** that a modest memorial as proposed by the Foundation may complicate desired infrastructure improvements within the rights of way as outlined in the *Downtown East Revitalization* plan. Additional coordination with the District Department of Transportation would be required if Site L is pursued to ensure the memorial and any transportation improvements are integrated and compatible/complement one another.

**Finds** this site is located in close proximity to the Victims of Communism Memorial and the Memorial to Victims of Ukrainian Manmade Famine-Genocide of 1932-1933 along a corridor of Massachusetts Avenue where an international theme of commemoration is emerging. It is unclear how a memorial honoring the commitment and service represented by emergency medical services would relate to these established commemorative works.

Site U – Plaza in front of HHS Building

**Notes** that the Hubert H. Humphrey Building is under the jurisdiction of the U.S. General Services Administration and is the headquarters of the U.S. Department of Health and Human Services.

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Further consultation and coordination with GSA and HHS will be required if the plaza is selected for the EMS Memorial.

**Notes** that the Hubert H. Humphrey Building and plaza was designed by Marcel Breuer, a noted modernist architect who designed other Brutalist style buildings in Washington, DC and an evaluation of the historic significance of the building and plaza should be completed prior to significant design development work.

**Finds** that a memorial on the plaza will need to acknowledge and respond to the Brutalist building and Modernist design of the plaza.

**Notes** that the building and plaza fall fully within the 100-year floodplain. Additional environmental analysis should be completed to understand the impacts of placing a memorial at this site.

**Finds** this site to have the strongest thematic connection of the proposed alternatives, as Dwight D. Eisenhower established the agency that precedes the Department of Health and Human Services (HHS). HHS provides technical assistance and program services to emergency medical services professionals.

Site W – Intersection of Maryland and Virginia Avenues

**Notes** this site, Reservation 113, is identified in the *Memorials and Museums Master Plan* as a Prime Candidate Site (#19). This plan called for a memorial to create a civic space that could complement the nearby museums and other cultural sites on the National Mall. This plan envisioned a memorial that would take advantage of the view and axial relationship to the Capitol and 8<sup>th</sup> Street.

**Notes** that the *SW Ecodistrict Plan* recommends that design and programming of Reservation 113 to be a signature urban square and neighborhood park.

**Finds** that a modest memorial may not contribute towards the larger goals and vision for Reservation 113 established by the *Memorials and Museums Master Plan* and *SW Ecodistrict Plan*.

**Finds** the thematic connection of this site is limited and it would be challenging for a visitor to the memorial to understand the relationship to the Eisenhower Memorial and National Museum of the American Indian without interpretive assistance.

Site F – National Building Museum, 5<sup>th</sup> and F Streets, NW (west portion of building site)

**Notes** that this site was previously eliminated by the Foundation based on Program Suitability requirements. However, this site meets many of the Foundation's criteria, including size (approximately 0.3 acres, which already hosts a variety of events), and very strong thematic

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nexus as it is within 250 feet of both the National Law Enforcement Officers Memorial and National Fire Dog Monument, located at D.C. Engine 2.

**Notes** the applicant determined Site F to be too close to the National Law Enforcement Officers Memorial, possibly overwhelming the messaging of the National EMS Memorial, or making it difficult to distinguish.

**Finds** that a memorial to Emergency Medical Services could strengthen the narrative and meaning of the National Law Enforcement Officers Memorial and the National Fire Dog Monument, representing the third of the three sectors of public safety services (fire protection, law enforcement and emergency medical services).

**Requests** the Foundation continue to evaluate Site F as a potential location as the memorial program and concept designs are developed.

## PROJECT REVIEW TIMELINE

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<b>Previous actions</b>	– N/A
<b>Remaining actions</b> (anticipated)	– Approval of site location – Submittal of conceptual design

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## PROJECT ANALYSIS

### Executive Summary

NPS, on behalf of the National Emergency Medical Services Memorial Foundation, has submitted a Site Selection Study for potential memorial locations. The Commission supports the intent and assessment of the Site Selection Study as submitted, along with subsequent clarifications related to Program Suitability. However, without a clear understanding of the memorial program, material, design intent, and events, it is difficult to assess whether the “Program Suitability” criteria have been accurately analyzed. Further definition of the physical aspects of the memorial, including anticipated size, type (sculpture, landscape, plaza space, other), desired elements, and frequency of events is needed to best understand site needs and appropriateness. Therefore, staff recommends that **the Commission find that in order to make a recommendation on a site or sites to carry forward through the site selection and design review process, additional information is required regarding the memorial program and vision or inspiration.** Further staff

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recommends that the Commission **request the following: size and scale of the memorial; type of memorial elements such as sculpture, landscaping, or other built elements; need for gathering space including the number of planned events; and the vision statement that indicates the character and sentiment (somber, reflective, celebratory) the memorial will convey.**

### **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.

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 the National Emergency Medical Services Memorial 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 site adequate for physical memorial and special events;
- Avoiding encroachment or interference with existing memorials;
- Thematically connected to the memorial;
- Near other tourist destinations such as other memorials or visitor attractions;
- Easily seen by passersby;
- Accessible via public transportation;
- Accessible to pedestrians and visitors;
- Able to provide a tranquil environment for reflection and not in competition with noise, traffic or other distractions;
- Able to provide shade;
- Without major infrastructure improvements like roadway improvements or relocated utility lines; and

- Availability, and without known opposition to the placement of a memorial.

Staff generally supports the selection criteria proposed by the NPS and National Emergency Medical Services Memorial Foundation, however it is difficult to accurately assess site suitability without more detailed description of the program requirements.

The NPS and Emergency Medical Services Memorial Foundation have proposed three potential sites for the location of the monument. Two sites are located on NPS property, one on GSA property. One of the three sites is potentially within Area I designation. Each site is analyzed according to the criteria discussed above.

#### **Site L: Massachusetts and New Jersey Avenues at G Street NW**

This site is approximately 0.16 acres and is bordered by streets. The site is under the jurisdiction of NPS, and fits all the required criteria as determined by the applicant, however, is only partially suitable regarding nexus, prominence, tranquility and shade. **The site was not park space as outlined in the L'Enfant Plan, but rather has been shaped by surrounding transportation needs and does not provide a tranquil park setting.**

There are several trees and a sidewalk on this site, but it is unclear whether the trees would remain with a new memorial. The site is two blocks from the DC Fire and EMS Museum, and five blocks from the National Law Enforcement Officers Memorial, which provides some thematic relationship. However, directly across Massachusetts Avenue to the south is the Victims of Communism Memorial (dedicated in 2007), and one block east is the Ukrainian Manmade Famine-Genocide of 1932-1933 (dedicated in 2015). **Massachusetts Avenue is a corridor where an international theme of commemoration is emerging. It is unclear how a memorial honoring the commitment and service represented by emergency medical services would relate to these established commemorative works.**

To the north of this site is a surface parking lot which currently serves the U.S. Government Publishing Office. This parking area and surrounding streets have been identified in this District of Columbia's August 2019 *Downtown East Revitalization Plan* for future redevelopment, which would likely include the area of Site L. **The District's Office of Planning discouraged the siting of any memorial in this location as it would complicate desired infrastructure improvements within the rights of way.** DDOT aligned their comment with DCOP and requested that coordination occur with the agency if Site L is pursued.

Pedestrians have three access points to the site from Massachusetts Avenue, New Jersey Avenue and G Street NW, but two of these options require crossing multiple lanes of traffic on busy roadways. The Site Selection Study cites 6 points of access to the site, however 3 of these do not have existing crosswalks, and 2 of the 3 are protected with temporary jersey barriers that restrict access to the adjacent parking lot. **Infrastructure improvements would be required for pedestrian access at all the locations delineated.**

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**Site U: 3<sup>rd</sup> Street and Independence Avenue SW – Portion of Hubert H. Humphrey (Health and Human Services (Headquarters)) Building Plaza.**

As noted in the title description, this site would occupy approximately 0.17 acres of a total 0.73-acre plaza. Site U is under the jurisdiction of General Services Administration (GSA), requiring coordination with both GSA and Department of Health and Human Services (HHS) officials. The site satisfies all the preferred criteria, except for tranquility as it is along a busy road (Independence Avenue) and lacks shade. Shade is marked as an “Unknown” criterion as a main sewer trunk as well as Interstate 395 run beneath the plaza so planting capabilities would need further investigation. The applicant has proposed to site in the west portion of the plaza, with a potential focal point that aligns with nearby building setbacks. **The plaza and HHS building are entirely within the 100-year floodplain, and an environmental analysis should be completed to understand the impacts of placing a memorial on this site.**

The building has housed the Department of Health and Human Services (HHS) since its dedication, though the department as first known as U.S. Department of Health, Education and Welfare. HHS provides technical assistance and program services to help States, tribes, territories, and local communities prepare for, respond to, and rapidly recover from disasters and emergencies – the events that emergency medical services professionals respond to. The Department of Health, Education and Welfare was established under President Dwight D. Eisenhower in 1953 (department name changed in 1979). **HHS is the primary federal agency that addresses the provision of EMS by offering technical assistance, subject matter expertise, and program services. Staff finds this site to have the strongest thematic connection of the proposed alternatives.** The Dwight D. Eisenhower Memorial is currently under construction one block west of this site.

The plaza and building were dedicated in 1977, designed by architect Marcel Breuer, in association with his design partner Herbert Beckhard and the architectural firm of Nolen-Swinburne and Associates. The building is a low-rise Brutalist office building clad in precast concrete panels. The building is set back about 135 feet from Independence Avenue SW so that it does not compete or hide views of the Rayburn House Office Building up the hill and to the east. At the time of the dedication, a sculpture, “Historic Shorepoints I” by James Rosati was placed in the eastern portion of the plaza. The sculpture reflects both cubism and minimalist styles, which resulted from a collaboration between Breuer and Rosati on the artwork. **The architectural significance of both the plaza and building would require extensive collaboration between stakeholders and a sensitive approach to memorial design and context. Though the building is not yet 50 years old, it has been treated eligible for the National Register of Historic Places by GSA.**

**Site W: Maryland and Virginia Avenues SW between 7<sup>th</sup> and 9<sup>th</sup> Streets – Portion of Hancock Park (Reservation 113)**

As noted in the title description, this site would occupy approximately 0.29 acres of a total 1.0-acre park, specifically on the east edge of the park. Site W may be partially within the Area I designation of CWA, and the Foundation does not have congressional approval to locate within this area. The dividing line between Areas I & II following in line with Maryland Avenue, which

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divides the proposed site approximately in half. Area I authorization requires additional authorization from Congress, who recommend Area I if the subject of the commemorative work is determined to have preeminent historical and lasting significance to the United States. **The applicant has described their intent to occupy the portion of the site within Area II but is waiting for further review to determine final site extents.**

The site satisfies all the preferred criteria, though is less suitable in the thematic nexus and tranquility categories. **Relationships cited by the applicant exist to the east, with the Dwight D. Eisenhower Memorial (under construction), and the National Museum of the American Indian. Staff finds the connections are limited and the memorial would need interpretive assistance for a visitor to easily understand these relationships.**

The park is adjacent to a rail line, which is cause for noise and air quality concerns. This site is further away from typical visitor and tourist traffic but does experience daily commuter traffic. Additionally, the proposed area significantly slopes downward towards 7<sup>th</sup> Street, which may create challenges for memorial design.

This site is also a location identified in the Memorials and Museums Master Plan (2M Plan) as a “Prime Candidate Site” – Site #19. This designation means the site has symbolic prominence, visual linkages, and aesthetic quality and should be reserved for subjects of lasting historical and national importance. The 2M Plan notes this site is identified in the L’Enfant Plan as a significant urban square, which mirrors the square at the intersection of Pennsylvania Avenue and 8<sup>th</sup> Street (current site of the Navy Memorial). The plan also indicates that the approximate center of Hancock Park should be a major future focal point. **The proposed area for the memorial on the eastern side is inconsistent with this recommendation.**

The SW Ecodistrict Plan (NCPC, 2013) outlines the role this site (Reservation 113) plays as a “signature park at the center of a regional intermodal center”. **The plan recommends a future design and program of the space as a signature urban square and neighborhood park.** This Reservation and surrounding streets reflect the historic plan for the city of Washington and are listed as contributing elements in the National Register of Historic Places.

A master plan for Reservation 113 does not yet exist, other than what has been outlined within the abovementioned plans. **Without a more detailed master plan for the site that considers the surrounding context, it may be premature to locate a memorial on this site.**

#### **Site F: National Building Museum, 5<sup>th</sup> and F Streets NW – *Western side of building site***

Staff additionally recommends that the Commission request the Foundation evaluate Site F, which was in the original list of 25 sites outlined in the submitted Site Selection Study.

Site F was previously eliminated based on Program Suitability requirements. The total area is approximately 0.3 acres, which is within range of the other three sites deemed viable in terms of programmatic needs. Site F is under GSA jurisdiction.

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This site satisfies other outlined criteria, as there are several pedestrian access points and the site is very close to a Metro station (Judiciary Square). Several trees frame the greenspace to additionally provide shade. Regarding thematic nexus, this site is within 250 feet of both the National Law Enforcement Officers Memorial as well as D.C. Engine 2, which hosts the National Fire Dog Monument. These memorials exemplify public safety services, of which EMS is a part of. **A memorial to emergency medical services could strengthen the narrative and meaning of each of the memorials.**

**Site F was determined by the Foundation to be too close to the National Law Enforcement Officers Memorial, potentially overwhelming the National EMS Memorial, or diminishing the public's ability to distinguish between the public safety services.**

**Staff recommends that NPS and the Foundation continue to evaluate Site F as a potential location as the memorial program and concept designs are developed.**

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

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

This project conforms to elements of the *Comprehensive Plan for the National Capital*.

Particularly, the vision for a passive recreation space in addition to the commemoration is consistent with policies in the Visitors and Commemoration element and the Open Space element.

However, Site (W) does not establish desired focal points or axial views which is not consistent with policies within the Urban Design element or within the Historic Preservation element.

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

The 2001 *Memorials and Museums Master Plan* ("2M Plan") identified 100 potential sites for future memorials throughout the city. These sites are based on an urban design framework of symbolic and natural elements rooted in the original plans for the city. The 2M Plan includes analysis related to site conditions and neighborhood context for each identified location. Reservation 113 is identified as a Prime Candidate Site (#19) in this plan, and the proposed memorial location is largely not compliant with the analysis for the selected site because the plan specifically outlines the need for a center focal point that reflects the historic streets and land. The proposed site is within the total area; further exploration of this site may reveal the need for Area I authorization.

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## **SW Ecodistrict Plan**

The *SW Ecodistrict Plan: A Vision for a More Sustainable Future* is a long range, comprehensive approach to transform a 110-acre, isolated federal precinct into a well-connected, mixed-use neighborhood, workplace, and cultural destination linking the National Mall and the southwest waterfront. The plan proposes district-scale practices to achieve greater environmental or energy and water management efficiency and performance. Public and park spaces are prominently featured as places to showcase sustainability measures, improve cultural and civic spaces, and promote increased quality of life. The 15-block study area includes Reservation 113 (Site W) as critical to the neighborhood framework and developing the civic realm. The *SW Ecodistrict Plan* recommends the design and programming of Reservation 113 as a signature urban square and neighborhood park. As a master plan of the space has not yet been undertaken, a modest memorial may not contribute towards the redevelopment of Reservation 113 as envisioned in the Plan.

## **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 Historic Preservation Officers (DC SHPO) on October 17, 2019. Consultation will continue as the project proceeds. NCPC will complete the requirements of Section 106 prior to the Commission's final approval of the site selection.

## **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 memorial. With its current review, the Commission is providing comments on the alternative sites for the project and requesting additional information NPS released the Site Selection Study for public comment from November 15, 2019 to December 13, 2019, which will initiate the NEPA scoping process for NCPC's review purposes.

## **CONSULTATION**

### **National Capital Memorial Advisory Commission (NCMAC)**

At the September 24, 2019 NCMAC meeting the Foundation and their consultants presented the Site Selection Study for comment. NCMAC determined no opposition to the proposed sites, noting that two sites (Site L & Site U) may be most suitable.

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### **Coordinating Committee**

The Coordinating Committee reviewed the proposal at its October 16, 2019 meeting. The participating agencies were NCPC; National Park Service; US General Services Administration (GSA); Washington Metropolitan Area Transit Authority (WMATA); District of Columbia Office of Planning (DCOP); District Department of Transportation (DDOT); District of Columbia State Historic Preservation Officer, and the District Department of Energy and Environment.

GSA representatives commented on the potential challenge Site U would propose for the memorial, and that coordination would be required between NPS, GSA, as well as representatives from HHS. The representative from DCOP noted that Site L has been identified in a recent plan (*Downtown East Revitalization – August 2019*) as an area adjacent to a proposed redevelopment site and a memorial at this location would complicate desired infrastructure improvements within the rights of way. DDOT aligned their comment with DCOP and requested that coordination occur with the agency if Site L is pursued.

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

At the October 17, 2109 CFA meeting the Foundation and their consultants presented the Site Selection Study for comment. The Commission expressed general support for the sites, with emphasis in favor of Site U on the north plaza of the Hubert H. Humphrey Building.

### **ONLINE REFERENCE**

The following supporting documents for this project are available online at [www.ncpc.gov](http://www.ncpc.gov):

- Submission Package

Prepared by Johanna McCrehan  
11/29/2019

### **POWERPOINT (ATTACHED)**