



Executive Director's Recommendation

Commission Meeting: November 7, 2019

PROJECT Second Division Memorial Modification President's Park Constitution Avenue, NW & 17th Street, NW Washington, DC	NCPC FILE NUMBER 8120 NCPC MAP FILE NUMBER 1.31(73.10)45017
SUBMITTED BY United States Department of the Interior National Park Service	APPLICANT'S REQUEST Approval of comments on concept plans
REVIEW AUTHORITY Commemorative Works Act per 40 U.S.C. § 8905	PROPOSED ACTION Approve comments on concept plans ACTION ITEM TYPE Staff Presentation

PROJECT SUMMARY

The National Park Service (NPS), in cooperation with the Second Indianhead Division Association Memorials Foundation, has submitted concept plans for proposed modifications to the Second Division Memorial, which is located in the southwest corner of President's Park on the Ellipse near Constitution Avenue and Seventeenth Street, NW in Washington, DC. The memorial currently honors the service members who lost their lives in the service of the Second Division of the United States Army during World War I, World War II, and the Korean War.

The current design includes an eighteen-foot-high sculpture of a hand grasping a flaming sword that guards an architectural frame of granite. Panels with inscriptions recognize particular campaigns. The Second Division Memorial was dedicated on July 18, 1936. On August 15, 1957, Congress authorized an addition to the memorial to honor the Second Division members lost in World War II and the Korean War. On August 13, 2018, Congress authorized a modification to the memorial under the provisions of the Commemorative Works Act, to allow for recognition of soldiers who lost their lives while serving in Korea on the Demilitarized Zone from 1965-1991, Iraq from 2003-2010, and Afghanistan from 2009-2013. The modifications will include additional space for commemorating the Division's fallen in future conflicts. The memorial will not include names of individuals.

The applicant has submitted four options (A through D) for the memorial modification that include two new stone plinths that accommodate panels for future inscriptions. The applicant's preferred approach is Option D. Other proposed improvements include accessibility upgrades in compliance with the Architectural Barriers Act and Section 504 of the Rehabilitation Act. The applicant has submitted two options for new pathways to the memorial. The Second Division Memorial and President's Park South are managed by the National Park Service as part of the National Park

System. The memorial sponsor, the Second Indianhead Division Association Memorials Foundation, will fund the memorial modification.

KEY INFORMATION

- The Second Division Memorial is located in the southwest corner of President's Park on the Ellipse near Constitution Avenue and Seventeenth Street, NW, south of the White House.
- The memorial was originally constructed in 1936 to honor those of the Second Army Division who gave their lives in World War I. It was designed by renowned sculptor James Earle Fraser and architect John Russell Pope.
- An addition was completed in 1962 by architects Otto Eggers and Daniel Higgins. Matching inscribed granite wing walls were added on either side of the central panel to honor the men of the Second Division who died in World War II and the Korean War.
- On August 13, 2018, Congress authorized a modification to the memorial under the provisions of the Commemorative Works Act, to allow for recognition of soldiers who lost their lives while serving in Korea on the Demilitarized Zone from 1965-1991, Iraq from 2003-2010, and Afghanistan from 2009-2013 (Public Law 115-91, Section 352 as amended through Public Law 115-232).
- The memorial recognizes specific military campaigns and does not include the names of individuals.
- The memorial is architecturally and historically significant as a commemoration and is a contributing structure to the National Mall Historic District, listed in the National Register of Historic Places.
- The applicant has submitted four design options for the memorial expansion (A-D), and two design options for new paths to the memorial (linear/direct and curvilinear).
- The memorial includes a series of low steps and sits in the middle of a lawn panel. As such, it is not directly accessible by those of all abilities.
- In addition to the expansion, the applicant proposes to upgrade access to the memorial.

RECOMMENDATION

The Commission:

Notes the original memorial included the central panel with sculpture and architectural frame, and it was later expanded with two wing walls that share similar material and treatments.

Notes the memorial will be expanded to include the names of specific campaigns, but not individual names.

Finds Options A, B, and C do not alter the footprint of the memorial. Each includes the addition of two new stone plinths in varying sizes and locations. However, the locations of the new plinths

create “pinch points” for pedestrian circulation and do not allow sufficient space for gathering within the memorial platform. The original memorial elements would be altered in these options.

Supports Option D as the preferred approach, even though it alters the memorial design, because the addition is consistent with the previous approaches to the memorial’s expansion; does not create “pinch points” for pedestrian movement; reinforces the front of the memorial; and creates a gathering area within the memorial for visitors and small ceremonies.

Notes that due to existing steps and a lack of walkway to the site, the memorial is not currently accessible to those of all abilities.

Supports re-grading the site to allow for direct, level access to the memorial from the side panels, while retaining the more ceremonial steps at the center of the memorial platform (Option D1).

Regarding the pathway design:

Finds the open grassy field is a character-defining feature that is important to the setting of the memorial, and therefore a linear path is not appropriate as it would alter this setting.

Notes the curvilinear path has a form similar to many of the secondary paths within President’s Park South, and this alignment would preserve the setting of the memorial within the lawn, but the wide arc of the path may lead to pedestrians cutting across the lawn.

Recommends evaluating a pathway option that accesses the memorial from the side panels, but where at least one leg of the pathway is more directly connected to Constitution Avenue to preclude pedestrians from cutting across the lawn.

PROJECT REVIEW TIMELINE

Previous actions	- None
Remaining actions (anticipated)	– Review of Preliminary and Final Site Development Plans

PROJECT ANALYSIS

Executive Summary

The applicant has submitted four options (A through D) for the memorial modification that include two new stone plinths that accommodate panels for future inscriptions. Options A, B, and C each proposed new plinths within the existing footprint of the memorial, while Option D includes a

more substation modification that alters the footprint of the memorial. The applicant's preferred alternative is Option D. Two options for a new pathway and approach to the memorial are also included for review.

Analysis

The Second Division Memorial, which is located in the southwest corner of President's Park on the Ellipse near Constitution Avenue and Seventeenth Street, NW in Washington, DC. The memorial currently honors the service members who lost their lives in the service of the Second Division of the United States Army during World War I, World War II, and the Korean War. The current design includes an eighteen-foot-high sculpture of a hand grasping a flaming sword that guards an architectural frame of granite. Panels with inscriptions recognize specific campaigns.

The memorial was dedicated on July 18, 1936. On August 15, 1957, Congress authorized an addition to the memorial to honor the Second Division members lost in World War II and the Korean War. That expansion resulted in two granite wing walls that were added on either side of the original memorial. The expansion is similar in architectural style and materials to the original memorial, creating a seamless design. On August 13, 2018, Congress authorized a modification to the memorial under the provisions of the Commemorative Works Act, to allow for recognition of soldiers who lost their lives while serving in Korea on the Demilitarized Zone from 1965-1991, Iraq from 2003-2010, and Afghanistan from 2009-2013. The modifications will include additional space for commemorating the Division's fallen in future conflicts. The memorial will not include names of individuals.

Memorial Expansion

The applicant has submitted four options (A through D) for the memorial modification that include two new stone plinths that accommodate panels for future inscriptions. Options A, B, and C each proposed new plinths within the existing footprint of the memorial, while Option D includes a more substation modification that alters the footprint of the memorial. Each option is described in more detail below:

- *Option A* places the two new plinths to frame the original central zone of the memorial. The plinth size matches the stone platform panels found on the ground (5'-8-3/4" by 2'-9"), and the height is limited to the height of the wing walls without the coping stone (3'-3"). This option is the most minimal of the proposed changes, and the landscape surrounding the memorial would not be affected.
- *Option B* is identical to Option A, except the stone plinths include a coping stone (8") on top to match the coping height found on the wing walls. Like Option A, the landscape surrounding the memorial would not be altered.
- *Option C* again places two new plinths in a manner that emphasizes the central zone of the memorial. However, in this option, the plinths are shifted outward toward the flagpoles. The plinths are larger (5'-8-3/4" by 4'-10-3/4") in width than Options A and B, providing

additional surface area for inscriptions. A coping stone is also provided, matching the height of the wing walls. The landscape surrounding the memorial would not be affected.

- *Option D* does not alter the existing memorial fabric. However, the central part of the platform is extended to the south and two new stone plinths (7'-9" by 4'-10-3/4") are proposed to frame the panel. The height of the proposed plinths matches the wing walls without the coping stone. This option maintains the hierarchy of the memorial but provides more surface area for inscriptions. The platform extension also creates a more functional space for visitors.

Options A, B, and C are similar in that they do not alter the footprint of the memorial. Each includes the addition of two new stone plinths in varying sizes and locations. However, the locations of the new plinths are concerning because they create "pinch points" for pedestrian circulation. The space between the plinths and existing memorial walls measures 2'-9". Typical routes for pedestrian movement should be greater than 3'-0". Further, the introduction of the new plinths into the existing memorial platform does not allow for sufficient space for gathering within the memorial itself.

Option D does expand the footprint of the memorial. However, the approach is additive instead of altering the existing memorial fabric. This approach is also consistent with how the memorial has been expanded in the past. Option D allows for a gathering space in the memorial, and also helps reinforce the frontality of the original design. Most importantly, Option D does not create the same pedestrian "pinch-points" described in Option A, B, and C. As such, staff recommends the **Commission supports Option D as the preferred approach, even though it alters the memorial design, because the addition is consistent with the previous approaches to the memorial's expansion; does not create "pinch points" for pedestrian movement; reinforces the frontality of the memorial; and creates a gathering area within the memorial for visitors and small ceremonies.**

Accessibility Improvements

The memorial includes a series of low steps and sits in the middle of a lawn panel. As such, it is not directly accessible by those of all abilities, particularly those in wheelchairs. Three options to provide access to the memorial platform were explored, to include re-grading the area in front of the memorial to eliminate the need for steps. The re-grading could eliminate all steps (Option D3), just the middle steps (Option D2), or just the side steps (Option D1). The central steps are important both architecturally and ceremonially. As such, retaining these central steps while allowing at-grade access from the site side panels appears to be the best solution. As such, staff recommends the **Commission supports re-grading the site to allow for direct, level access to the memorial from the side panels, while retaining the more ceremonial steps at the center of the memorial platform (Option D1).**

Finally, as noted previously, the existing memorial is located in a grassy lawn without a paved connection to the surrounding sidewalk network. The applicant has submitted two different

pathway options that would allow for an accessible route to the memorial. These options consider the desire lines of pedestrian as well as the setting of the memorial, and how it is viewed. The first option is a single, direct linear connection from Constitution Avenue to the memorial. In this option, the setting of the memorial would change as viewed from the south. The open grassy field is a character-defining feature that is important to the setting of the memorial. As such, a linear path is not appropriate as it would alter this setting.

The second option is a curved walkway that links the memorial with Constitution Avenue on both ends of the path. In this case, the curvilinear path has a form similar to many of the secondary paths within President's Park South, and this alignment would preserve the setting of the memorial within the lawn. However, the wide arc of the path may lead to pedestrians cutting across the grass to find a more direct route to the memorial. Therefore, staff suggest the **Commission recommend evaluating a pathway option that accesses the memorial from the side panels, but where at least one leg of the pathway is more directly connected to Constitution Avenue to preclude pedestrians from cutting across the lawn.**

CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

Comprehensive Plan for the National Capital

As noted above, the planning and design comments are designed to ensure the proposal meets basic goals of the Comprehensive Plan.

Commemorative Works Act

The Commemorative Works Act (CWA) contains a set of foundational level decision criteria that NCPC is required to use when considering site and design proposals for commemorative works. Specifically, the CWA states that in considering site and design proposals, NCPC shall be guided by a number of criteria, including surroundings, location, material, landscape features, and site specific guidelines. In this instance, the proposal is a memorial expansion.

National Historic Preservation Act

NCPC and NPS each have an independent responsibility to comply with Section 106 of the National Historic Preservation Act (NHPA). The Section 106 consultation process should be initiated with concept review. NPS initiated consultation with the DC SHPO on August 28, 2019, and held the first consulting parties meeting on October 15, 2019. NCPC will complete the requirements of Section 106 prior to the Commission's final approval of the project.

National Environmental Policy Act

NCPC and NPS will each have an independent responsibility to comply with the National Environmental Policy Act (NEPA). Due to the limited nature of the expansion and associated

improvements, NPS in considering the use of a categorical exclusion for the project. NCPC will complete the requirements of NEPA prior to the Commission's final approval of the project.

CONSULTATION

Coordinating Committee

The Coordinating Committee reviewed the proposal at its October 16, 2019 meeting. Without objection, the Committee forwarded the proposed comments on site selection to the Commission with the statement that the proposal has been coordinated with all participating agencies. The District of Columbia State Historic Preservation Office (DC SHPO) noted that their coordination is conditioned upon satisfactory completion of the Section 106 review process. The participating agencies were: NCPC; the District of Columbia Office of Planning; the District Department of Transportation; the District Department of Energy and Environment; the DC SHPO; the General Services Administration; and the Washington Metropolitan Area Transit Authority.

U.S. Commission of Fine Arts

The U.S. Commission of Fine Arts reviewed the proposed memorial modification at their October 17, 2019 meeting, and endorsed the applicant's preferred approach. A copy of the action is attached.

ONLINE REFERENCE

The following supporting documents for this project are available online at www.ncpc.gov:

- Project Synopsis
- Submission Package

Prepared by Matthew Flis
10/29/2019

ATTACHMENTS

- Powerpoint
- Commission of Fine Arts Letter

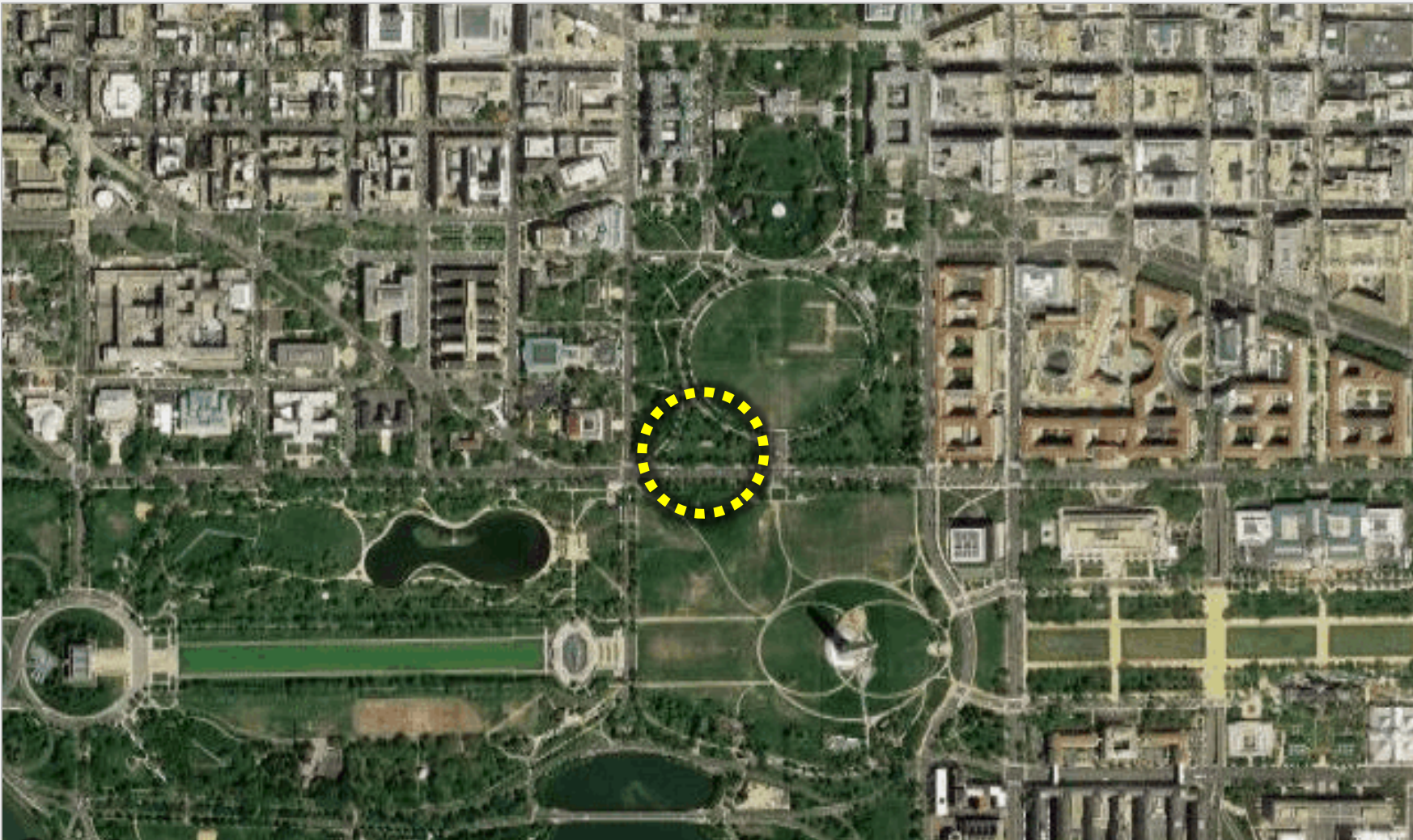
Second Division Memorial Modification

Constitution Ave NW & 17th St NW, Washington DC

Approval of Comments on Concept Design

United States Department of the Interior

Site Location



Location Map

Project Report

Description of Agency/Mission: The NPS is the applicant submitting the proposed project on behalf of the Second Indianhead Division Association Memorial Foundation. The Association is a non-profit 501 (c)(3) organization.

Description of Project Area: The Project Area surrounds the Second Indianhead Division Memorial, located within the open lawn at the southwest corner of the Ellipse facing Constitution Ave NW. The area extends from the landscaping behind the memorial to the sidewalk along Constitution Ave NW, representing the maximum extent of area potentially effected by the modification project and accessible path options.

Schedule: Completion Fall 2021

Project Cost Estimate: \$900,000

Public Engagement: Public outreach will occur through the NEPA and Section 106 processes, as well as opportunities to raise issues or concerns at NCPC or the U.S. Commission of Fine Arts. Coordination with the local community, including the relevant ANC and District agencies, will occur through the Section 106 consultation process.

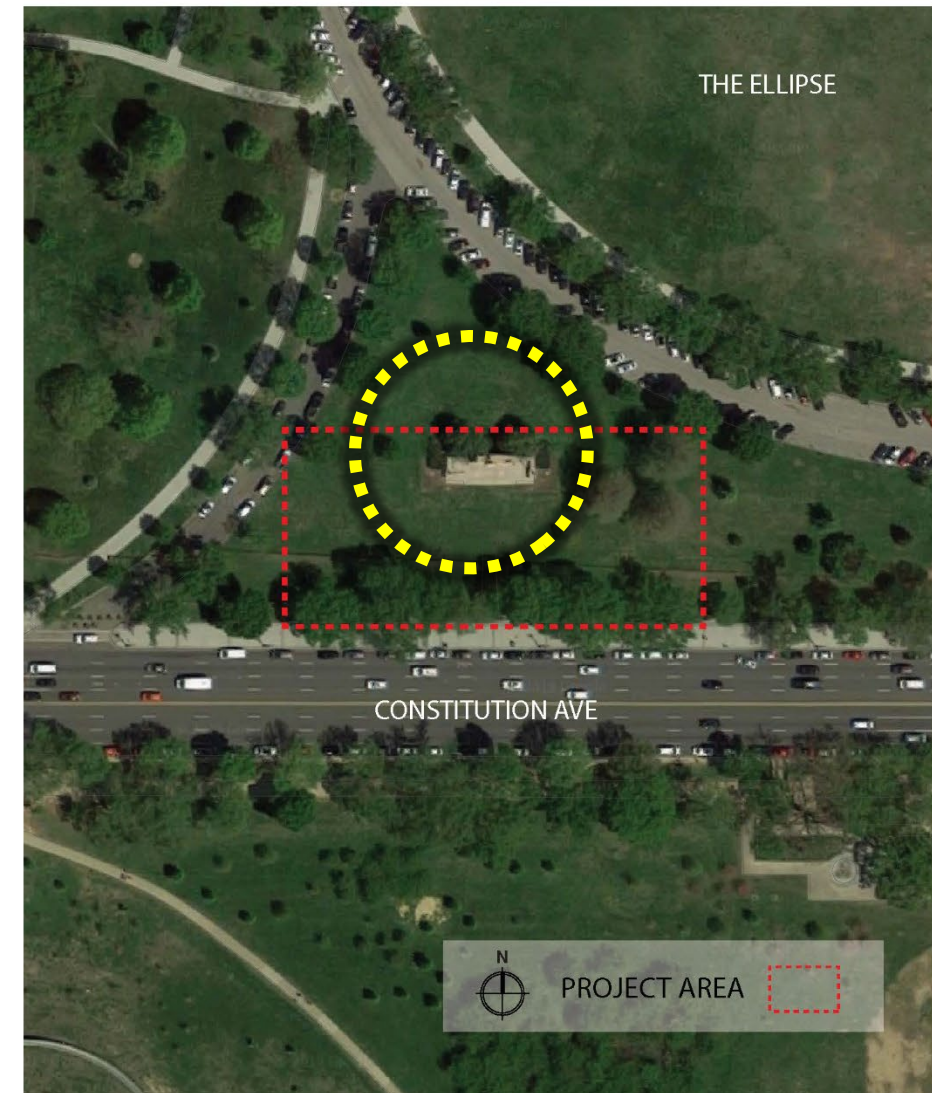
Coordination with Federal, State, and Local Jurisdictions: The NPS is submitting the project for concept review at CFA and NCPC. Additionally, the NPS has initiated Section 106 consultation with the DC SHPO and is hosting a Section 106 consulting parties meeting on October 15, 2019 that is open to relevant stakeholders and the public.

Historic Preservation and Natural Resources:

The NPS will adhere to the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (Section 106). The NPS is currently developing design concepts and is determining the appropriate level of NEPA compliance. The project will likely fall under a categorical exclusion for NEPA. Both the NEPA and Section 106 planning processes are anticipated to be completed by spring 2020. The NPS initiated consultation with the DC SHPO on August 28, 2019. The NPS will hold a Section 106 consulting parties meeting on October 15, 2019. The Second Division Memorial is listed as a contributing object in the National Mall Historic District nomination.

Flooding: The proposed project will not address the Second Division Memorial's resiliency to flood impacts. The modification is to the existing memorial.

Stormwater Management: Based on Federal requirements, stormwater review is triggered if there is land disturbance equal to or more than 5,000 square feet. All options proposed for the modification of the memorial will disturb less than 5,000 square feet and will not increase the stormwater runoff or impact the floodplain. The proposed extension of the memorial, as shown in Option D, would contribute an additional 291 square feet of paved surface area. The curvilinear accessible pathway option would measure 3,716 square feet and the rectilinear pathway option would measure 1,521 square feet.



Existing Conditions



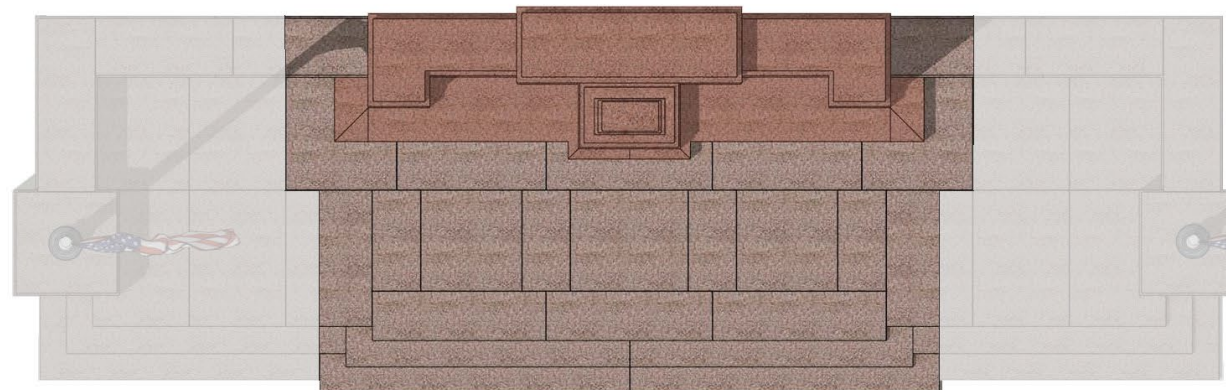
Memorial History - 1936

MEMORIAL CHRONOLOGY - ORIGINAL ELEVATION AND PLAN

ORIGINAL MEMORIAL, 1936



SOUTH ELEVATION - NTS

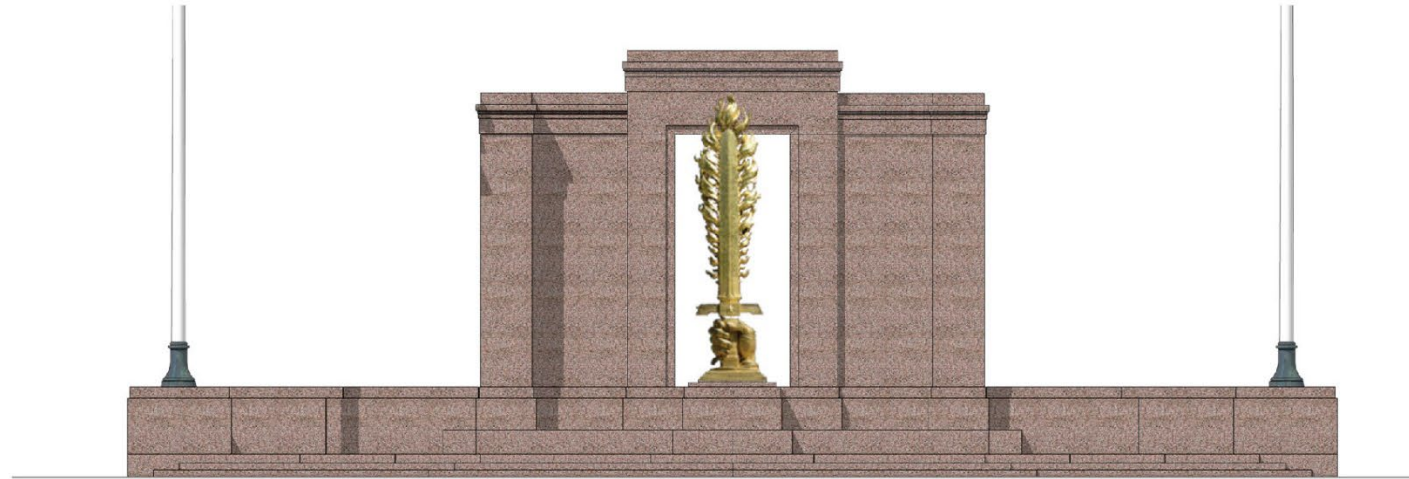


PLAN VIEW - NTS

Memorial History - 1962

MEMORIAL CHRONOLOGY - ADDITION TO ELEVATION AND PLAN

MEMORIAL ADDITION, 1962

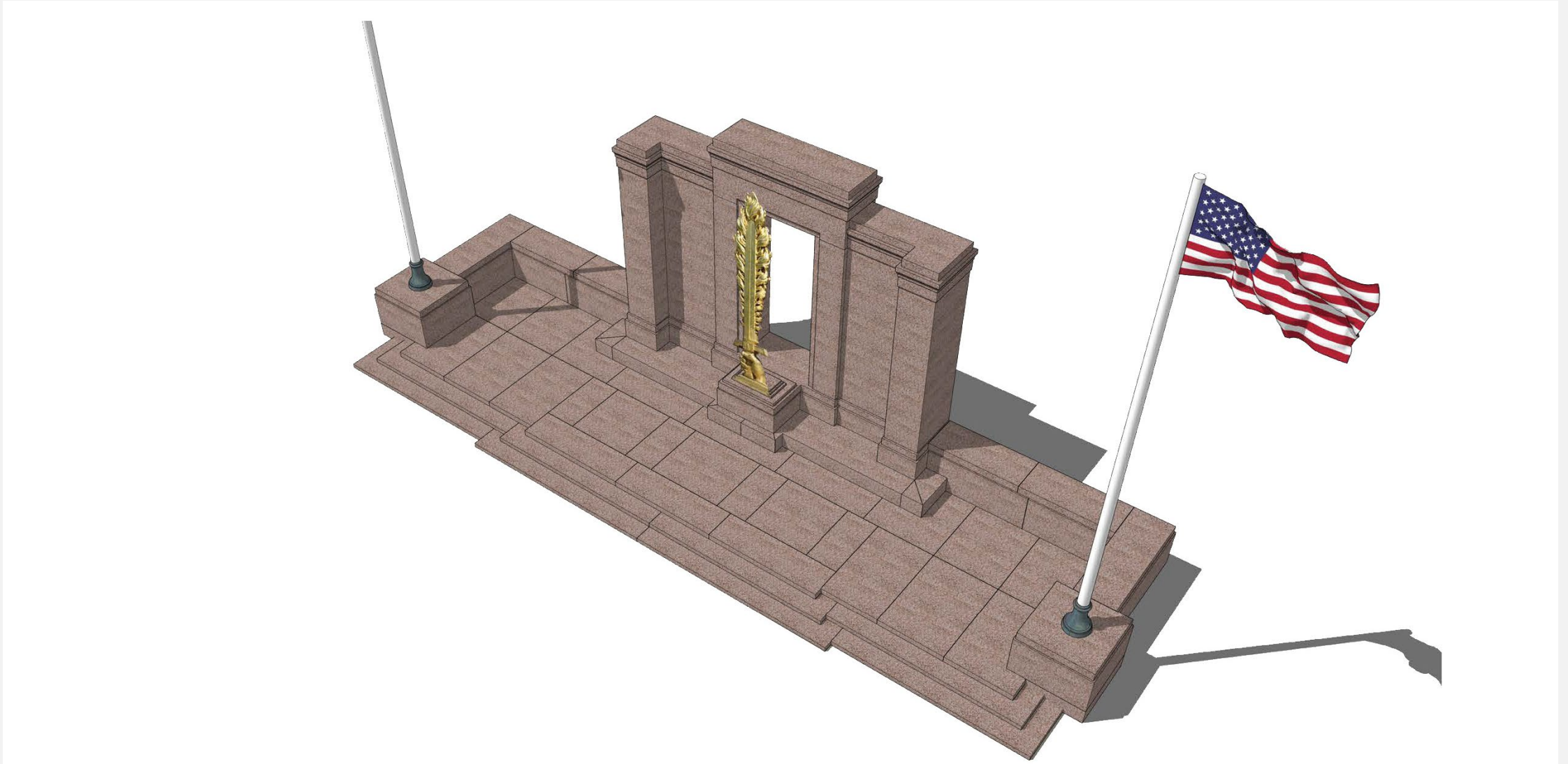


SOUTH ELEVATION - NTS

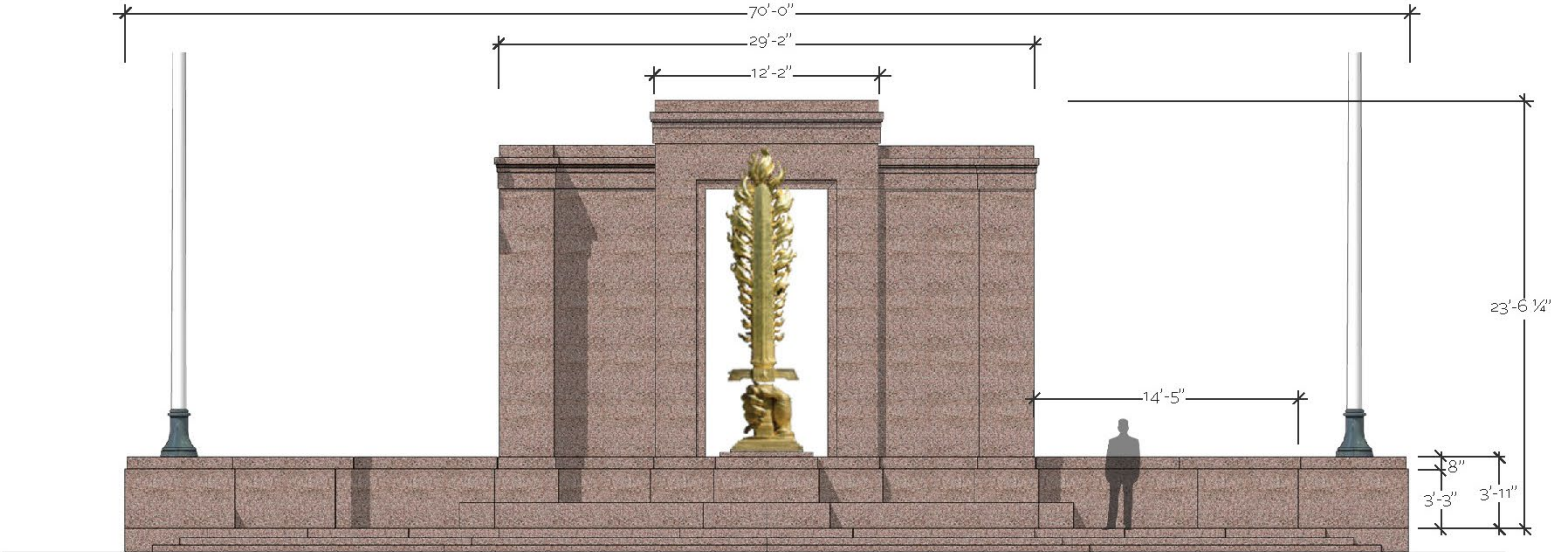


PLAN VIEW - NTS

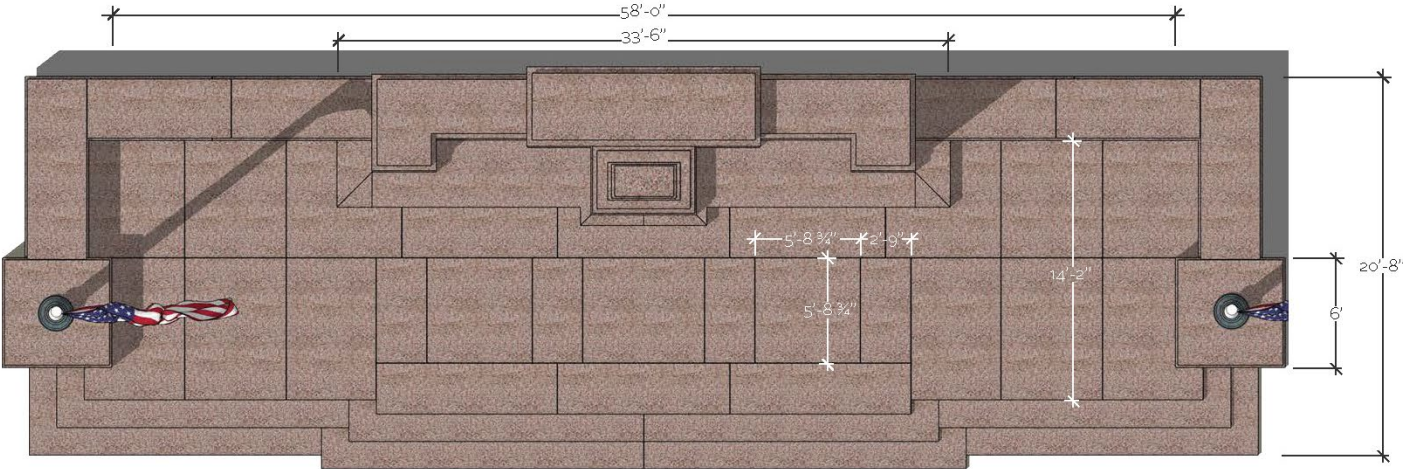
Existing Memorial Perspective



Existing Memorial Elevation and Plan



SOUTH ELEVATION - NTS

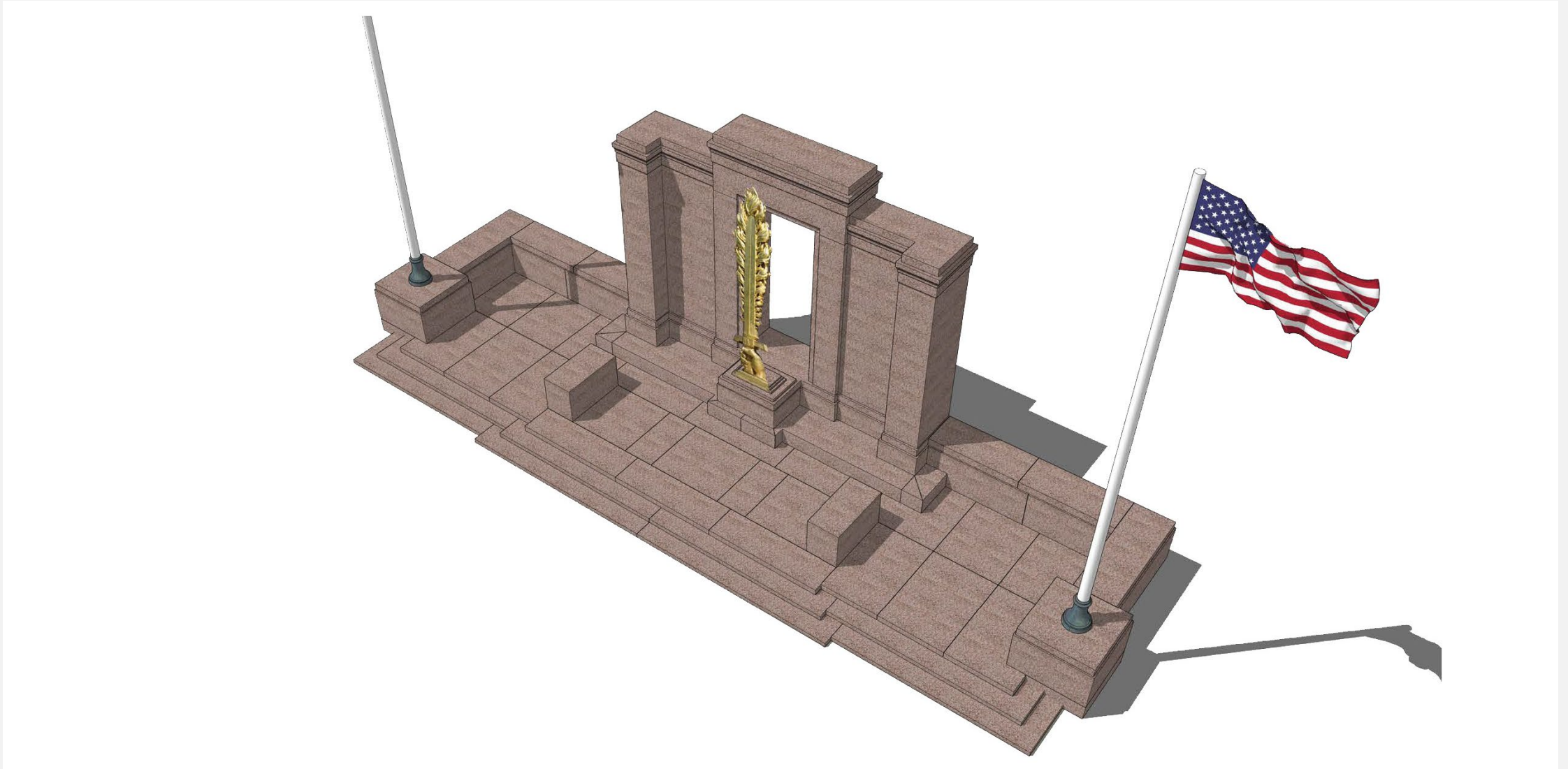


PLAN VIEW - NTS

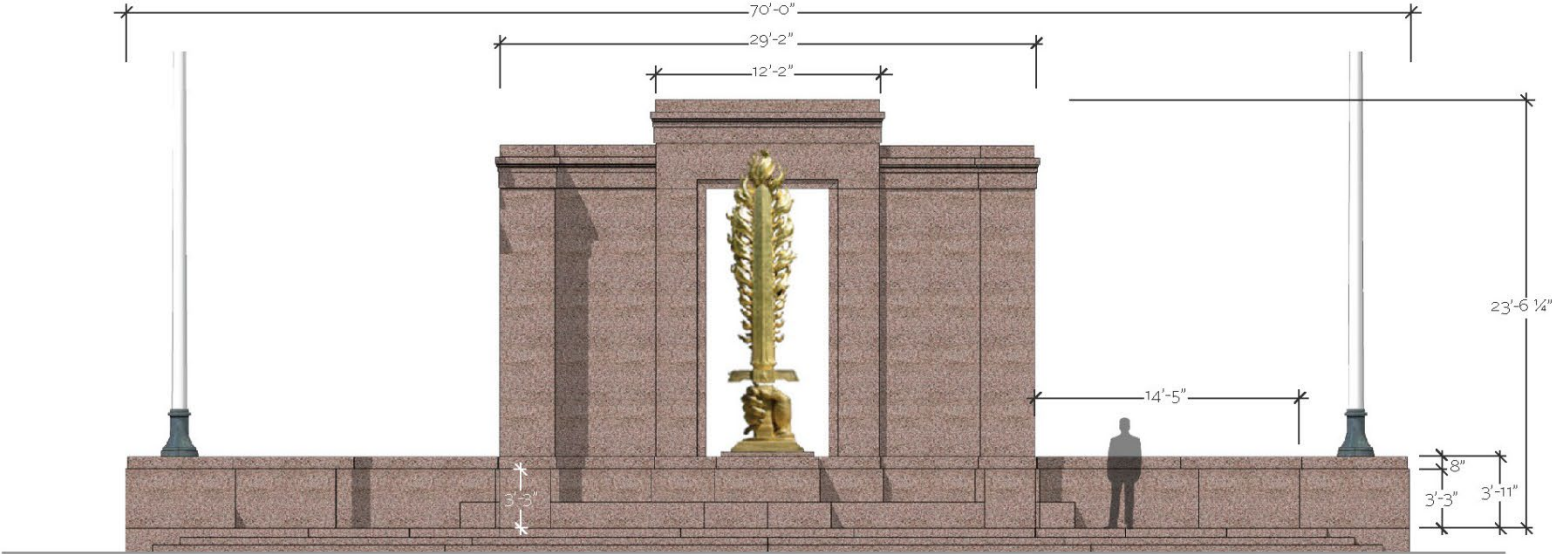
Option A

This option maintains the design integrity of the existing memorial while providing two granite plinths strategically placed in line with the central panel. The placement of these granite blocks emphasizes the three zones articulated in the original design of the memorial. Their size matches the stone platform panel on which they sit, and their height is limited to the height of the wing walls without the coping stone. This option is a minimalist design approach with limited intervention, however, the free-standing stone plinths provide multiple surfaces for inscription. The landscape surrounding the memorial would not be affected.

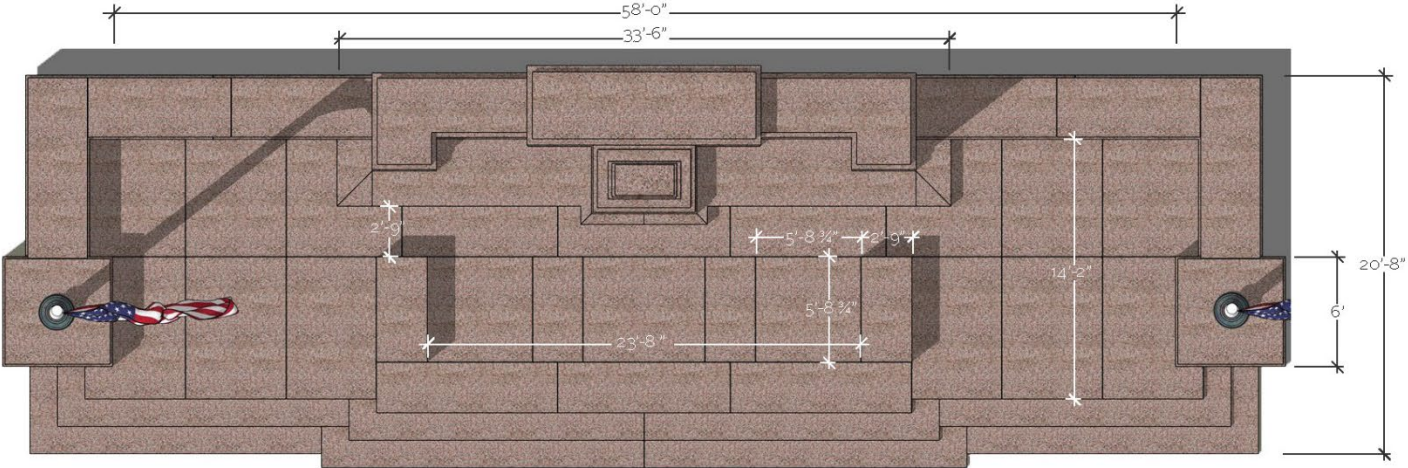
Option A - Perspective



Option A – Plan and Elevation

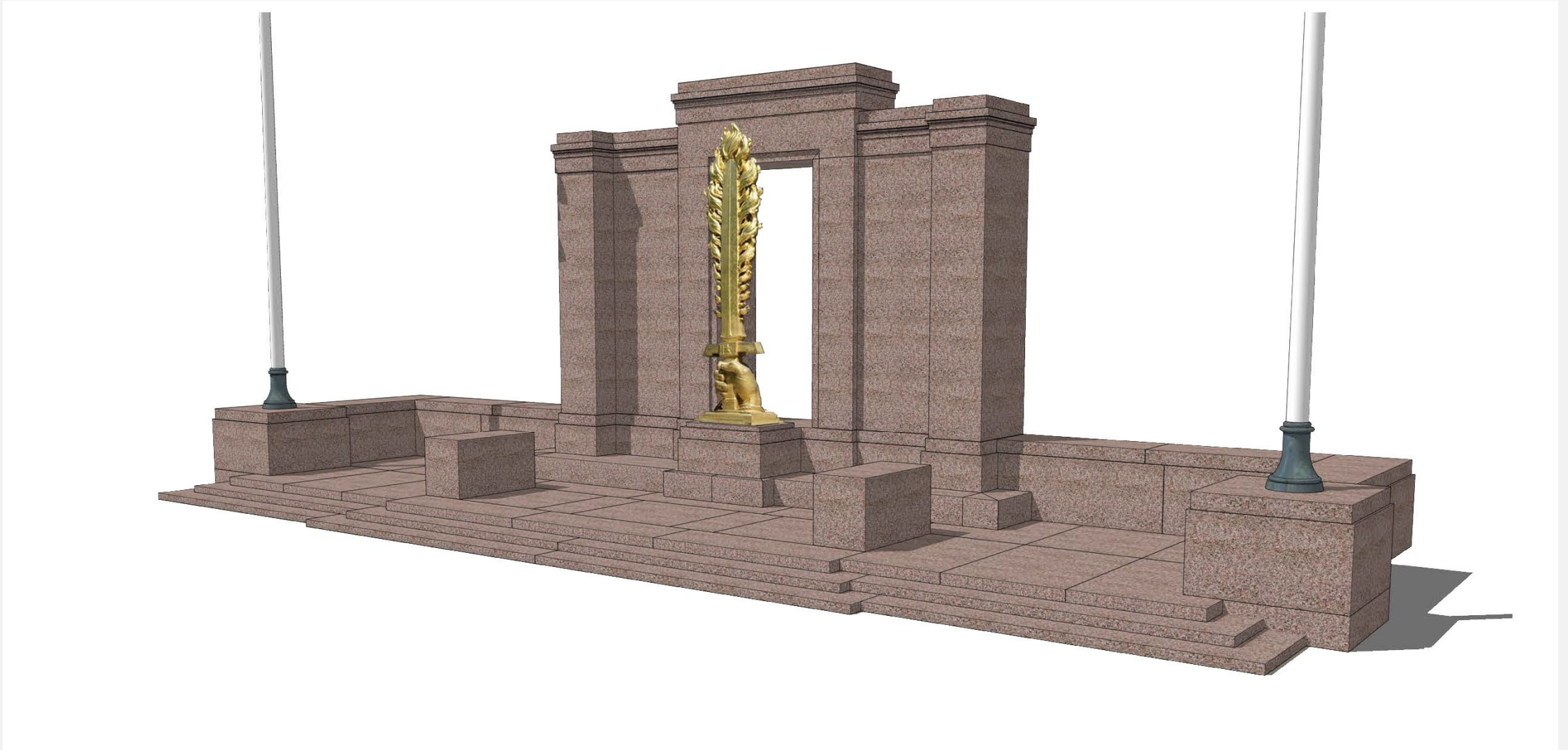


SOUTH ELEVATION - NTS



PLAN VIEW - NTS

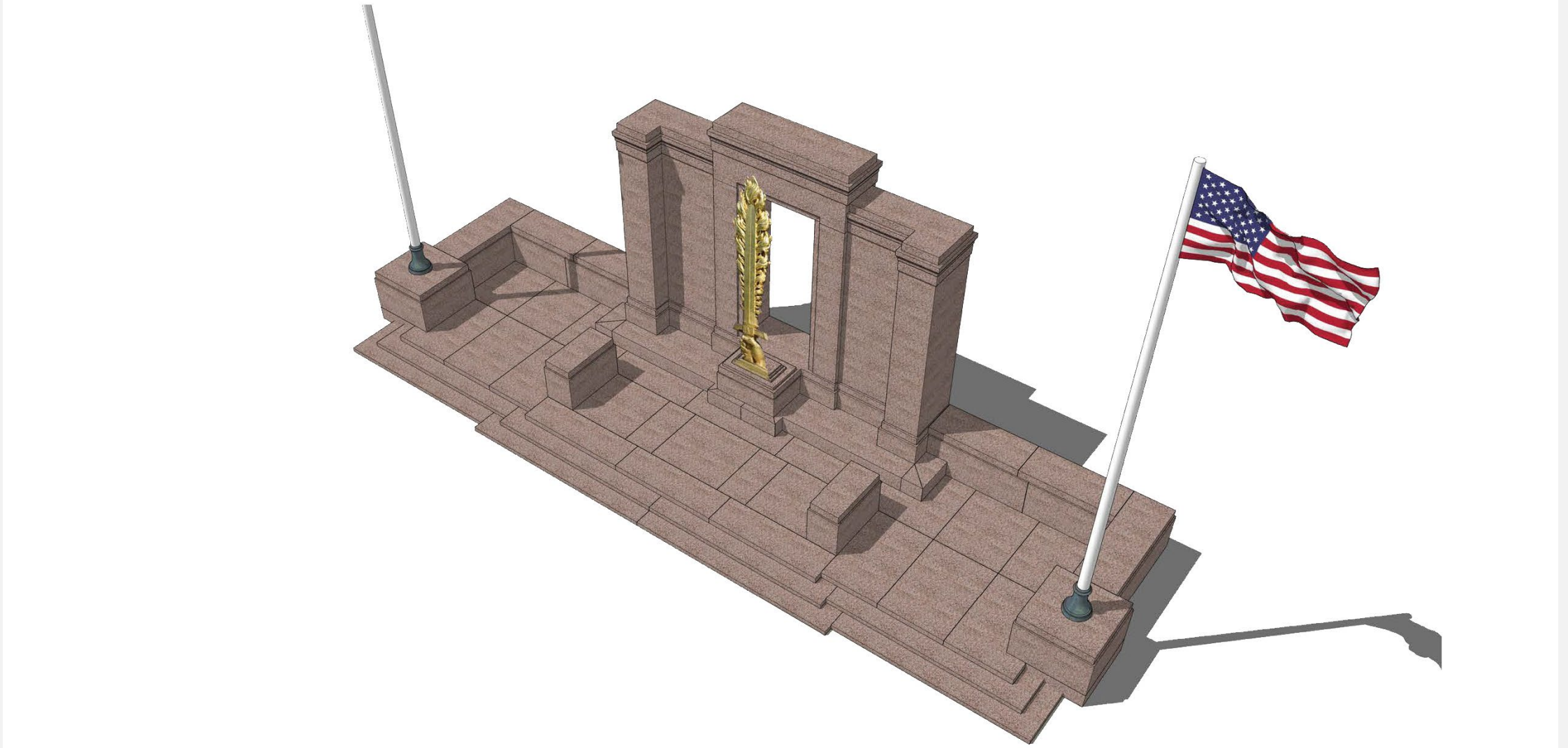
Option A - Perspective



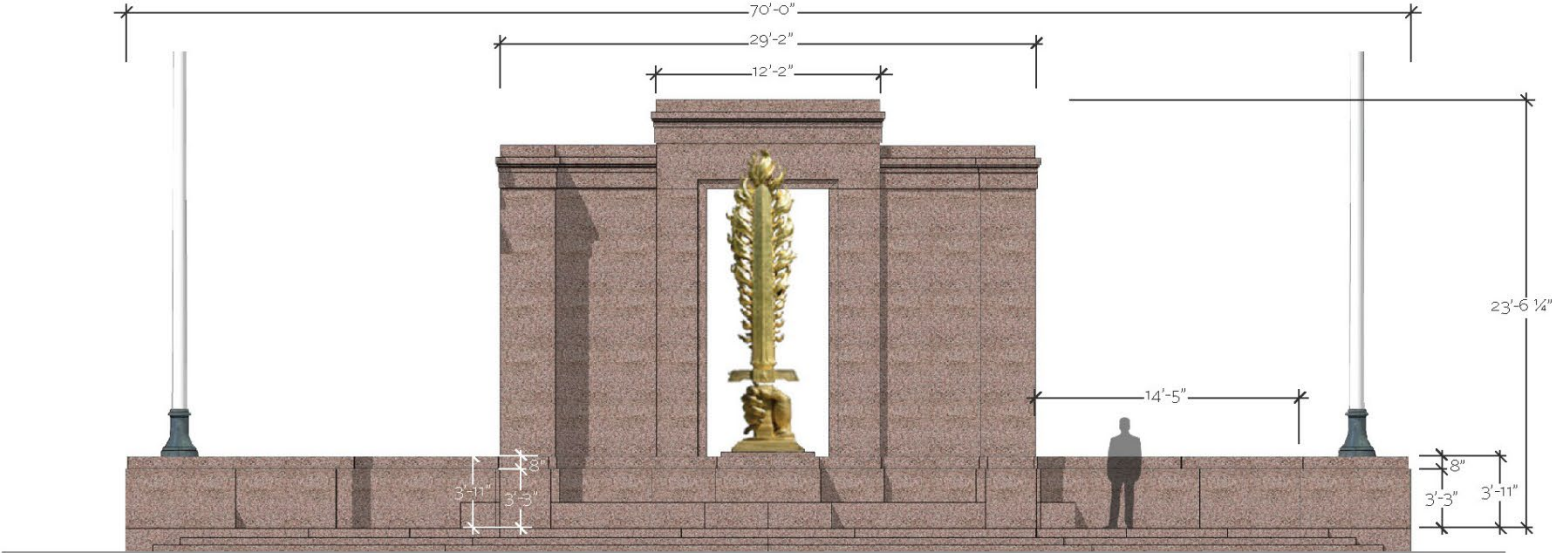
Option B

Like Option A, this design concept emphasizes the three zones of the existing memorial while increasing the height of the plinth stones to match the height of the wing walls including the coping stone. This option maintains the hierarchy established in Option A but provides more surface area for inscriptions. The landscape surrounding the memorial would not be affected.

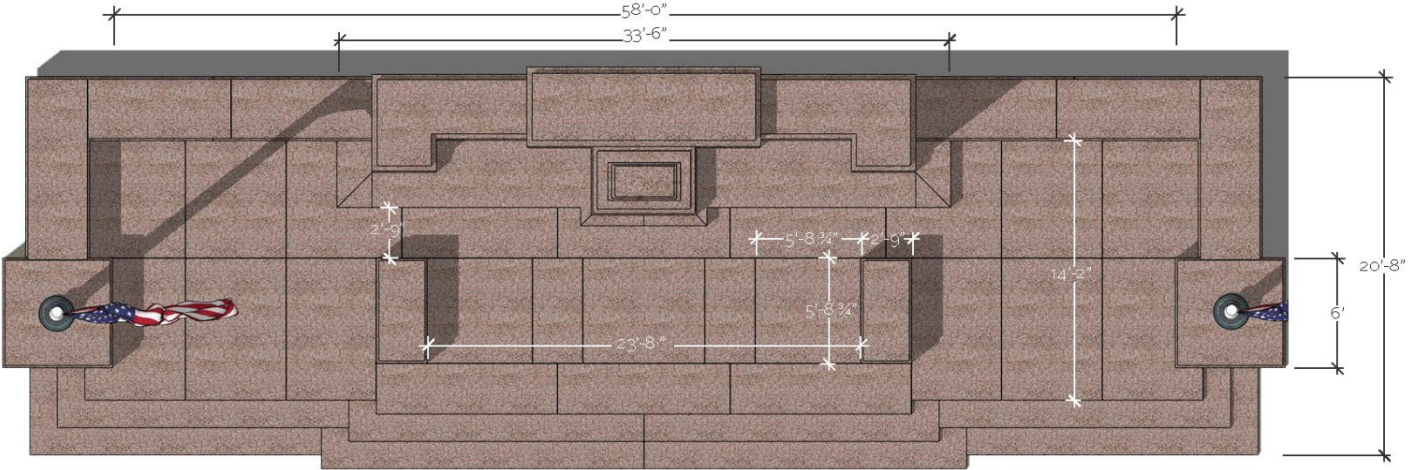
Option B - Perspective



Option B – Plan and Elevation



SOUTH ELEVATION - NTS



PLAN VIEW - NTS

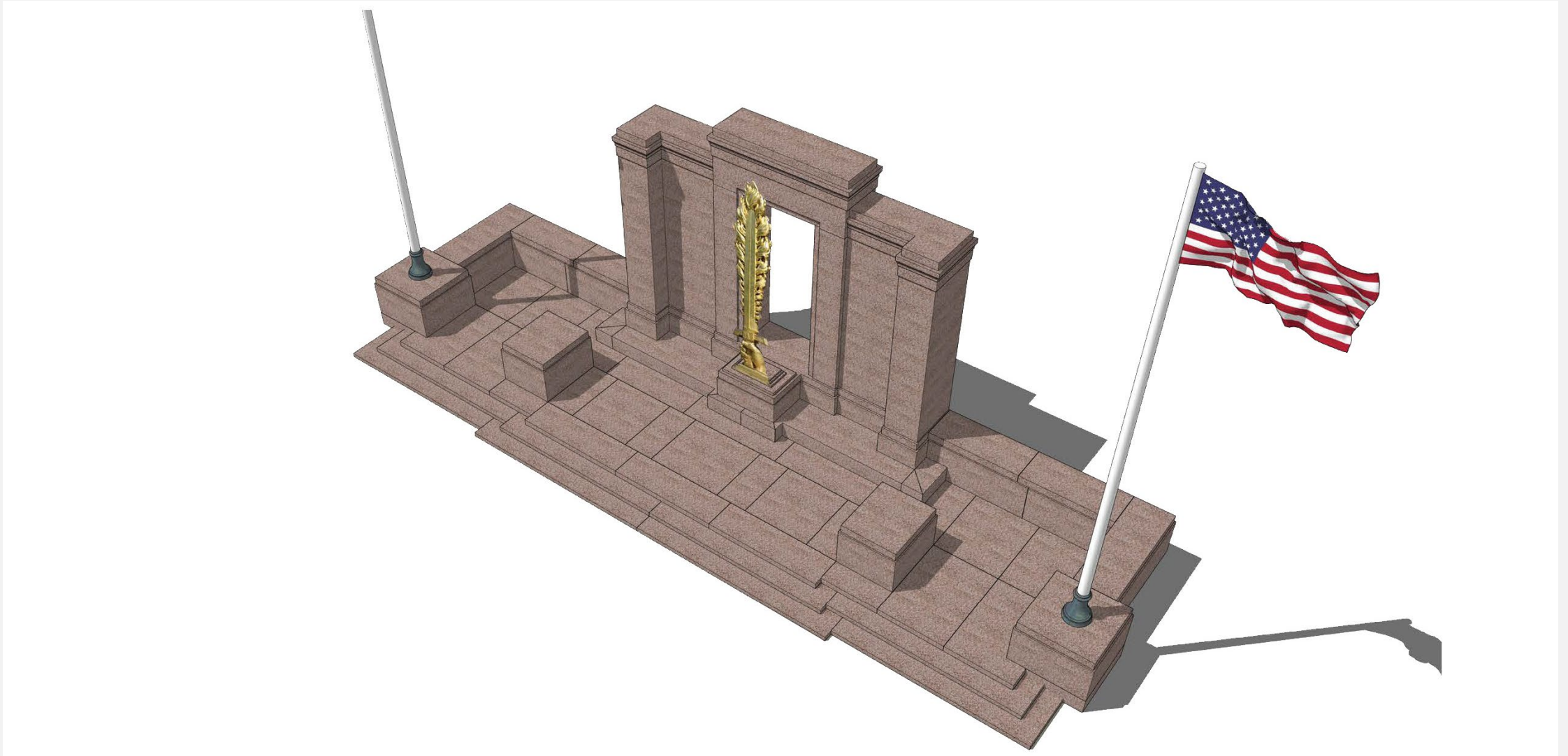
Option B - Perspective



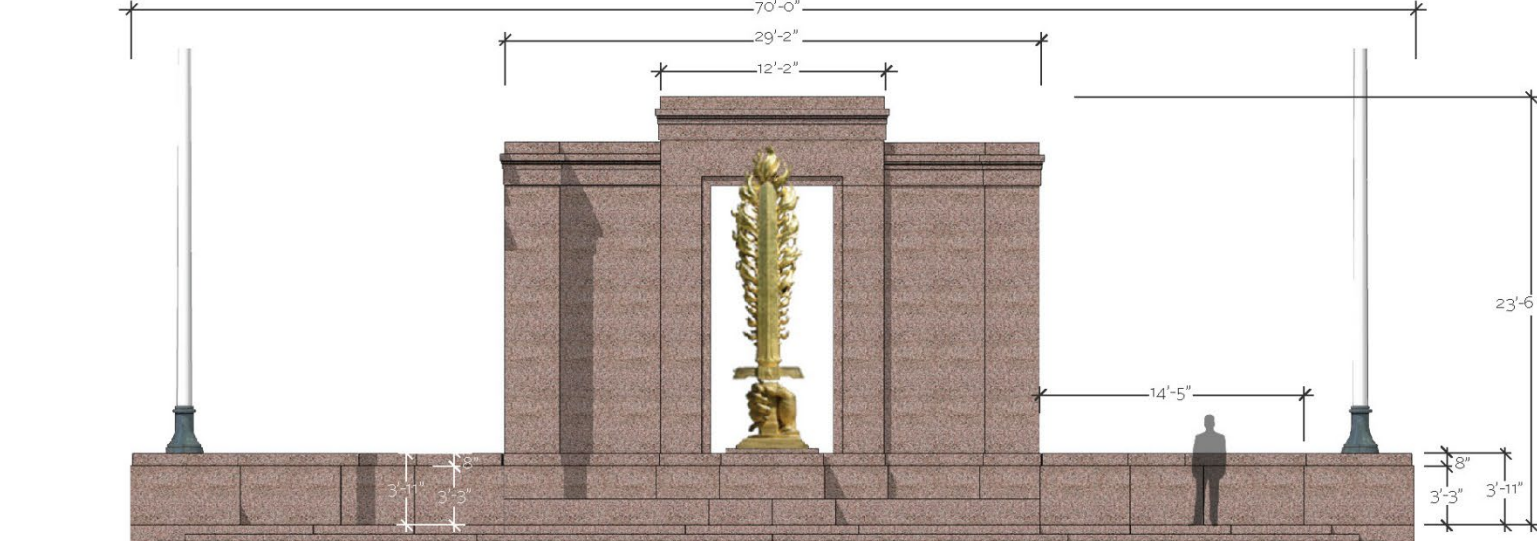
Option C

This option maintains the design integrity of the memorial by continuing to emphasize the three zones. However, the plinth stones are aligned with the point where the wing walls meet the central tripartite panel, creating a narrower space between the plinths and the wing walls, especially at the flagpole pedestals. The size of the plinth stones matches the larger stone platform panel on which they sit, and, like Option B, their height is the same level as the wing walls including the coping stone. This option provides more surface area for inscriptions but lacks the sense of proportion and hierarchy between the wing walls and the plinths. The landscape surrounding the memorial would not be affected.

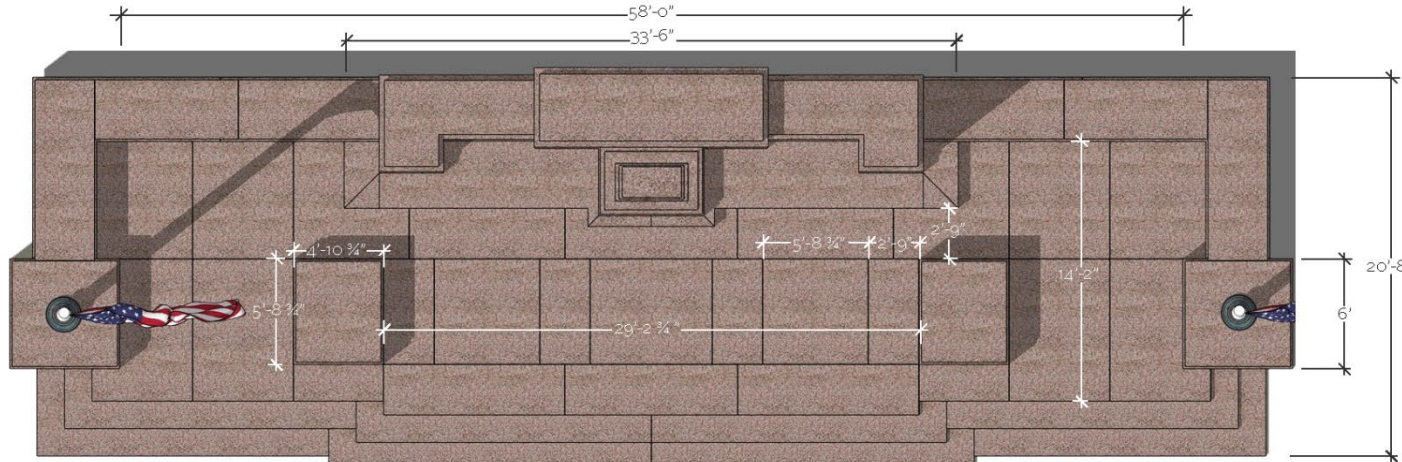
Option C - Perspective



Option C – Plan and Elevation

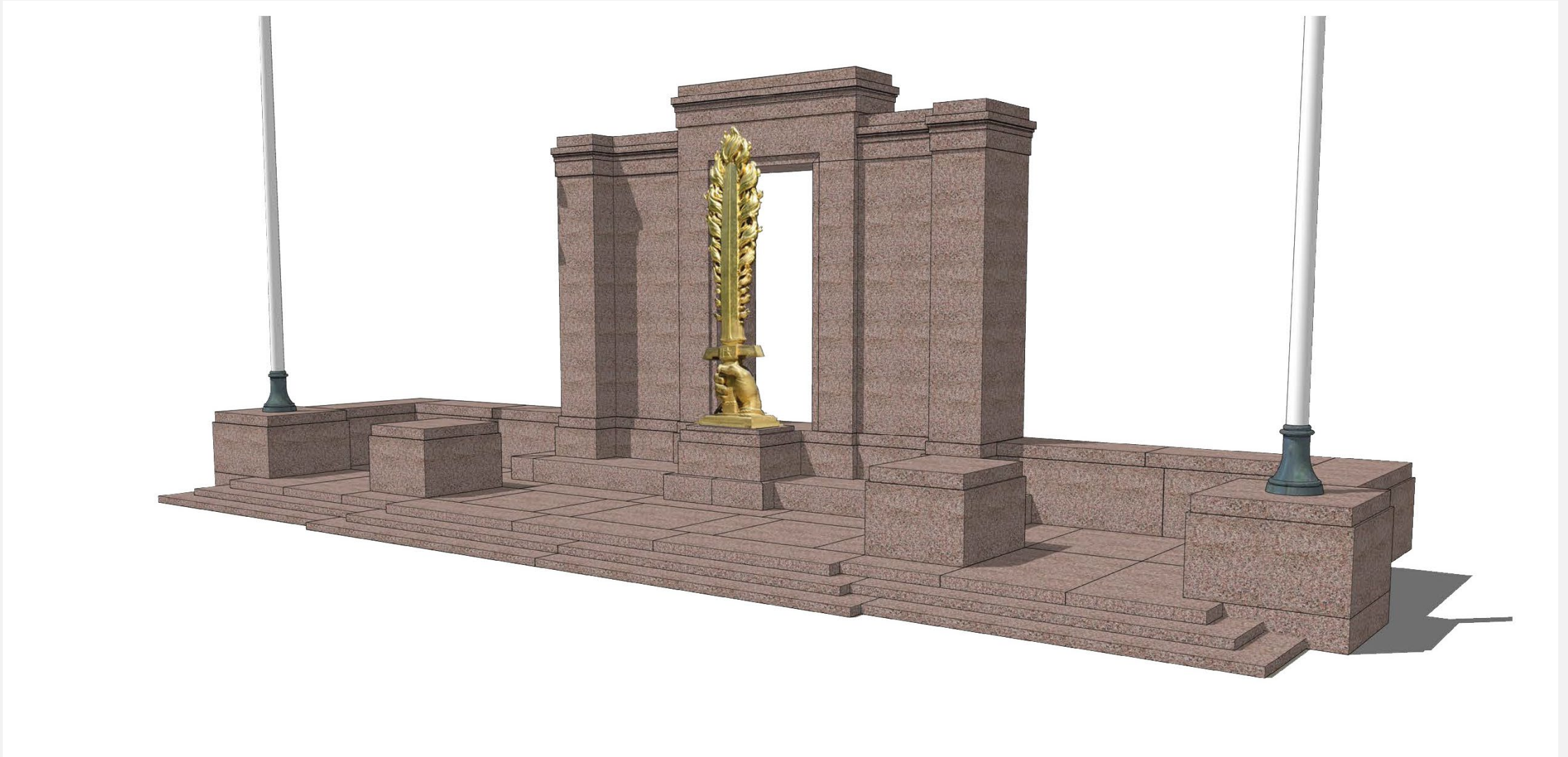


SOUTH ELEVATION - NTS



PLAN VIEW - NTS

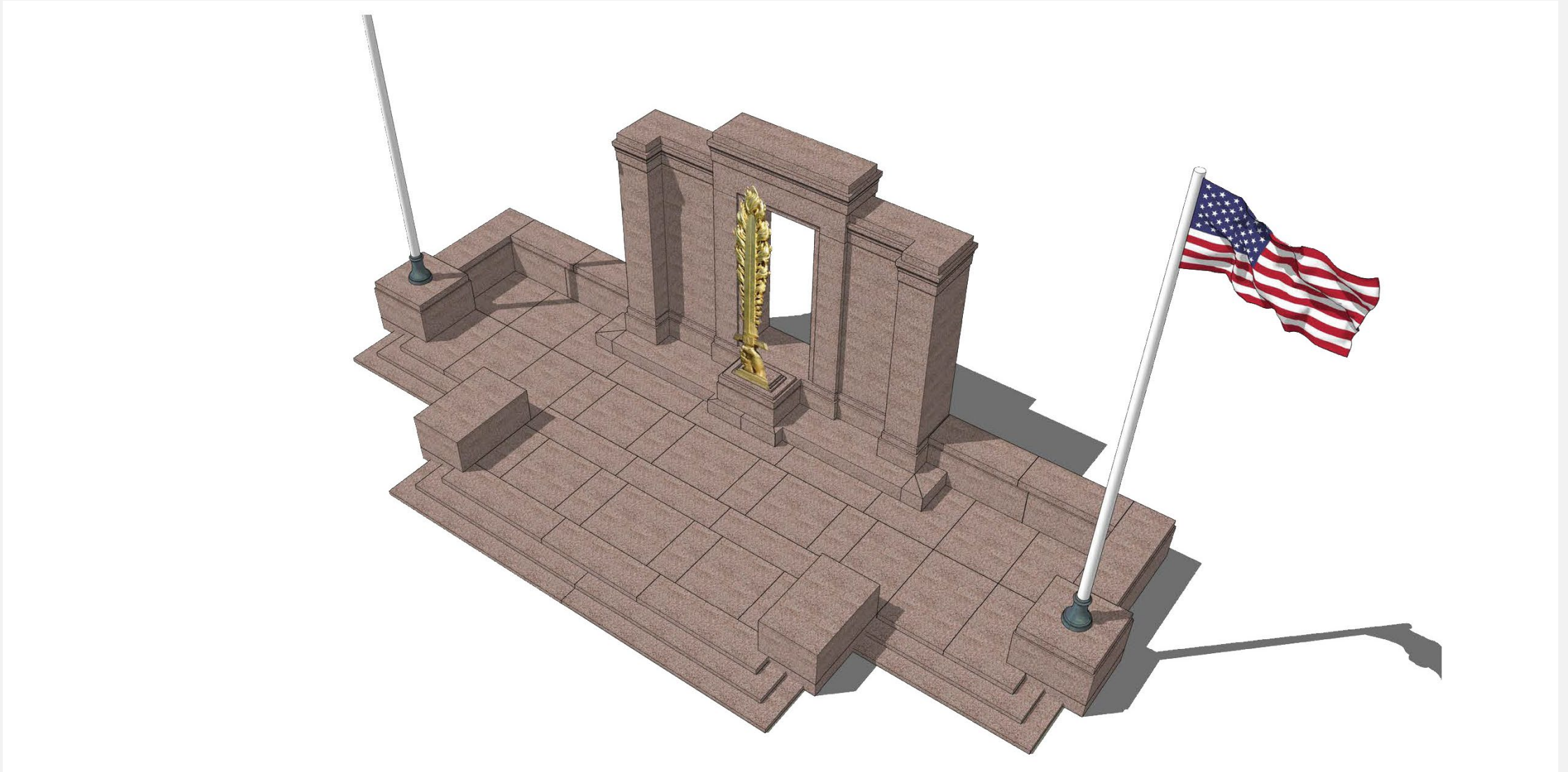
Option C - Perspective



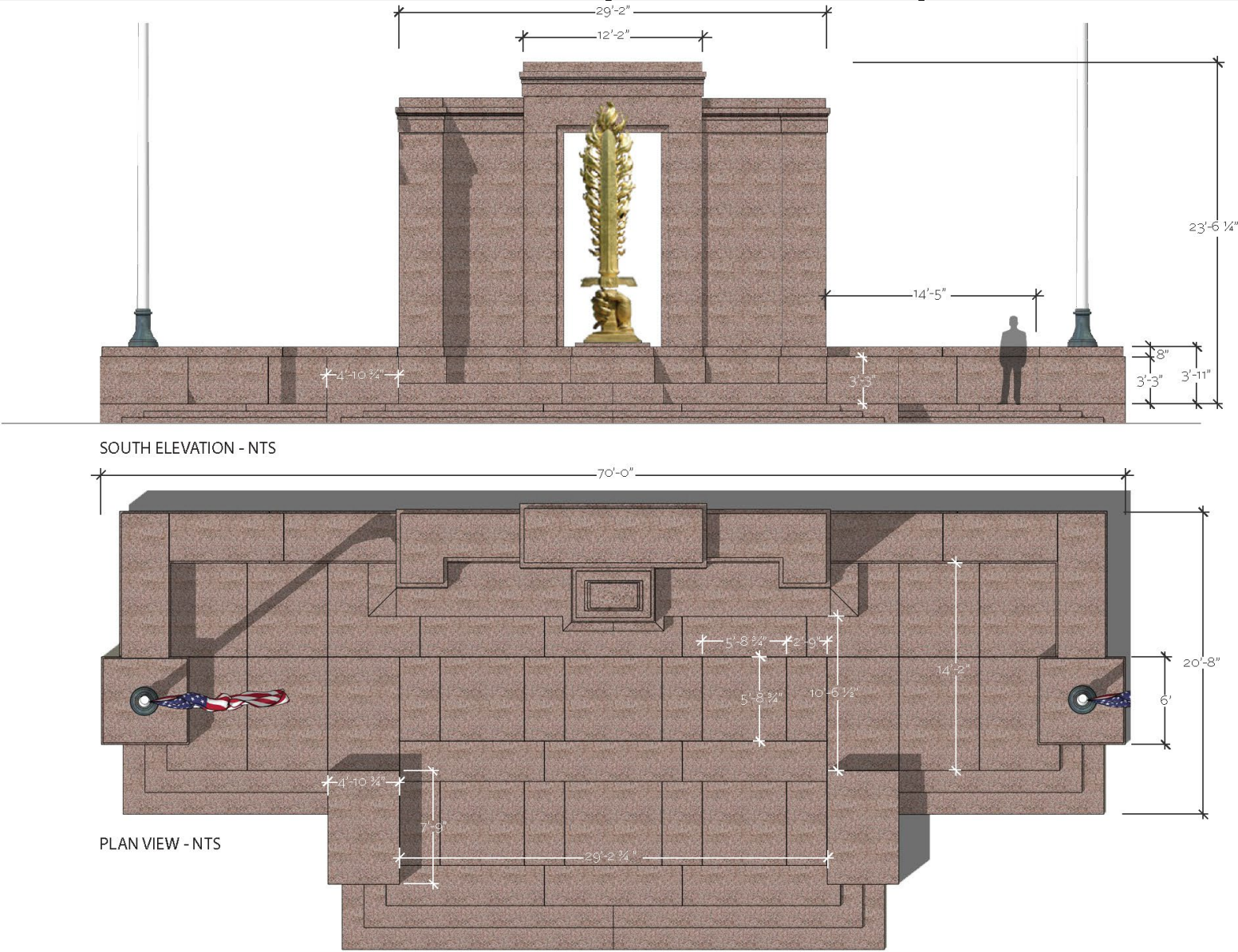
Option D – Preferred

This option maintains the design integrity of the memorial by emphasizing the three zones. However, the central part of the platform is extended and distinguished by two stone plinths aligned with the point where the wing walls meet the central tripartite panel. The height of the plinth matches the wing walls without the coping stone. This option maintains the hierarchy as established in Options A and B, provides more surface area for inscriptions, and meets the full purpose and need of the project by extending the platform of the memorial, creating a welcoming space for visitors and an enlarged space to accommodate public ceremonies. In addition, this option would provide an opportunity to make the memorial accessible for all visitors. Accessibility concepts and accessible paths are also proposed for this option. Option D would affect the existing landscape and planting beds in front of the memorial. The 1975 NPS Landscape Development Plan for the memorial calls for floral displays to be placed around the base of the monument, which may be recreated following the memorial modification

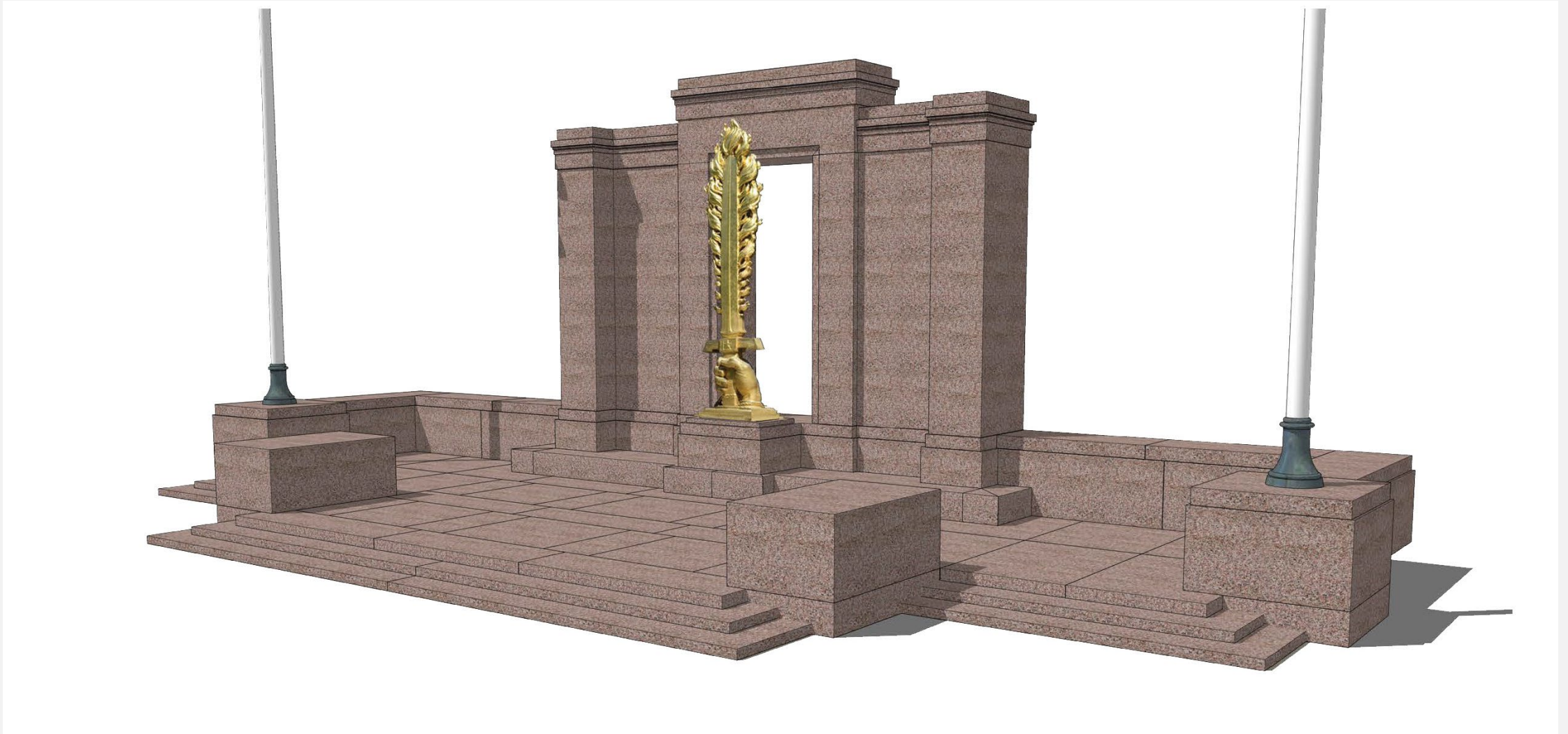
Option D – Perspective (Preferred)



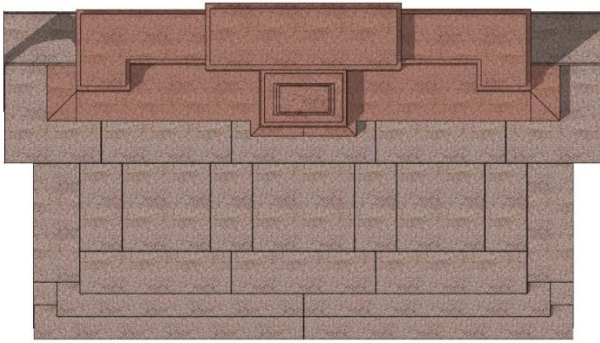
Option D – Plan and Elevation (Preferred)



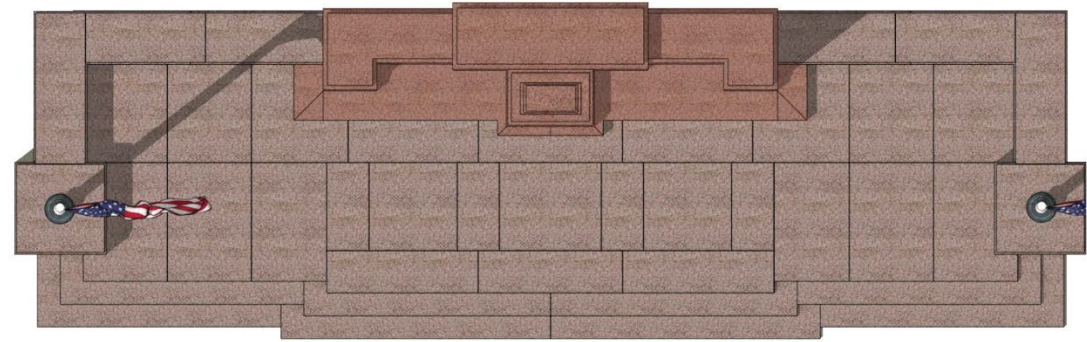
Option D – Perspective (Preferred)



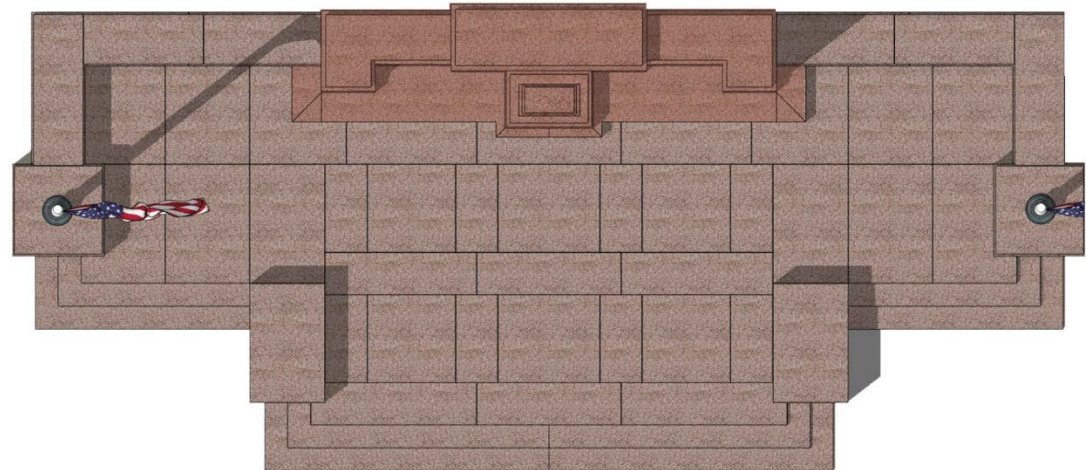
Option D – Expansion Chronology



ORIGINAL MEMORIAL

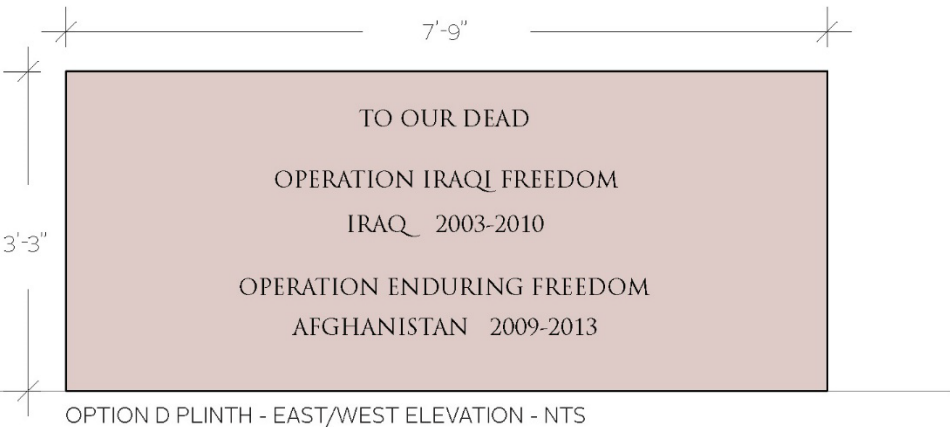
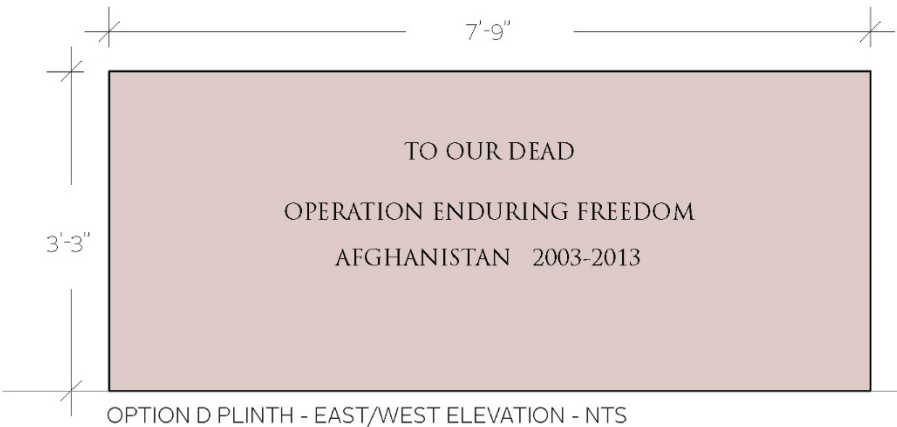
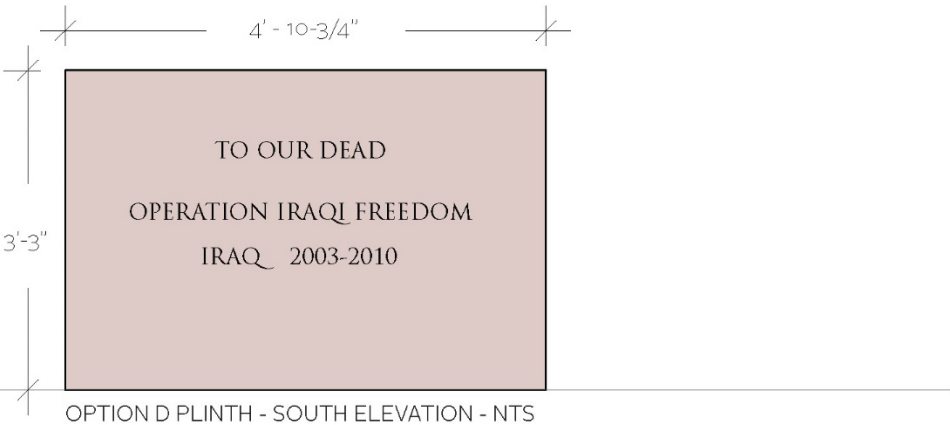
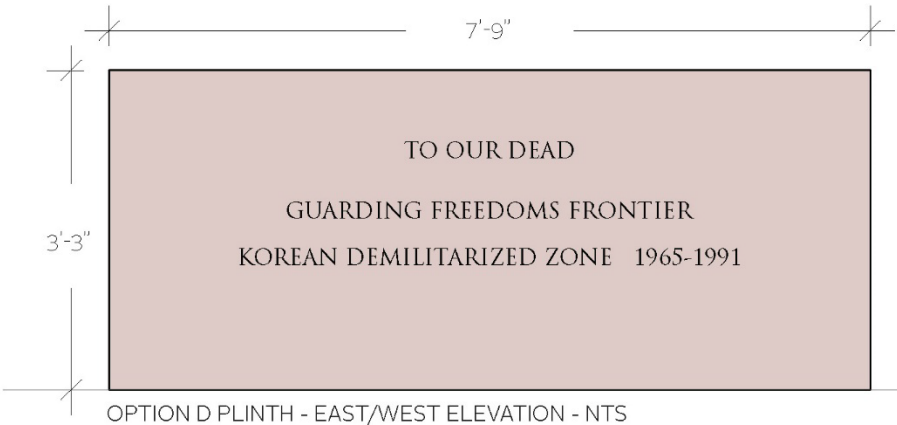


CURRENT MEMORIAL ADDITION

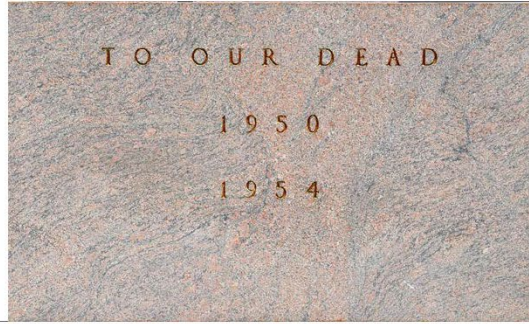


PROPOSED EXPANSION

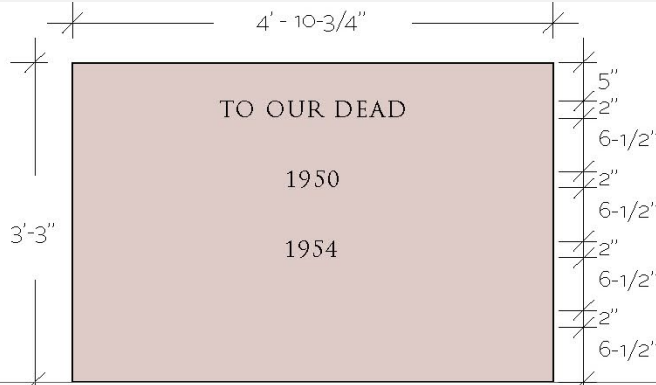
Option D – Plinth Concepts



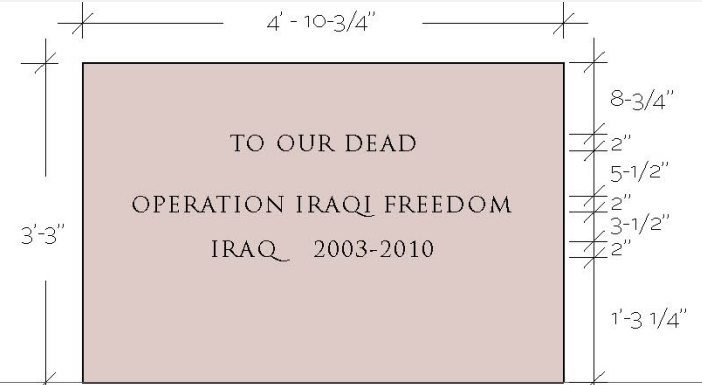
Option D – Plinth Concepts



EXISTING INSCRIPTION PHOTO



ELEVATION REPLICATING EXISTING INSCRIPTION

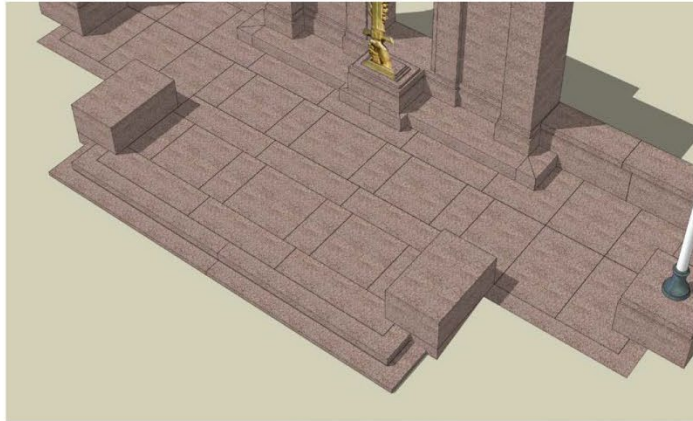


ELEVATION DEMONSTRATING PROPOSED INSCRIPTION

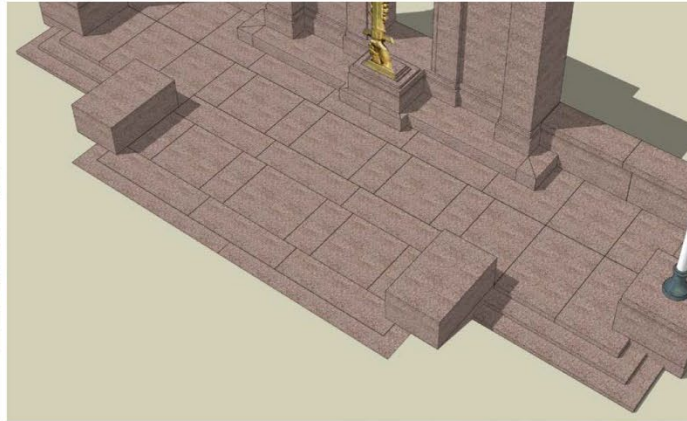
EXISTING INSCRIPTION REFERENCE IMAGES



Accessibility Approaches – Option D



OPTION D1



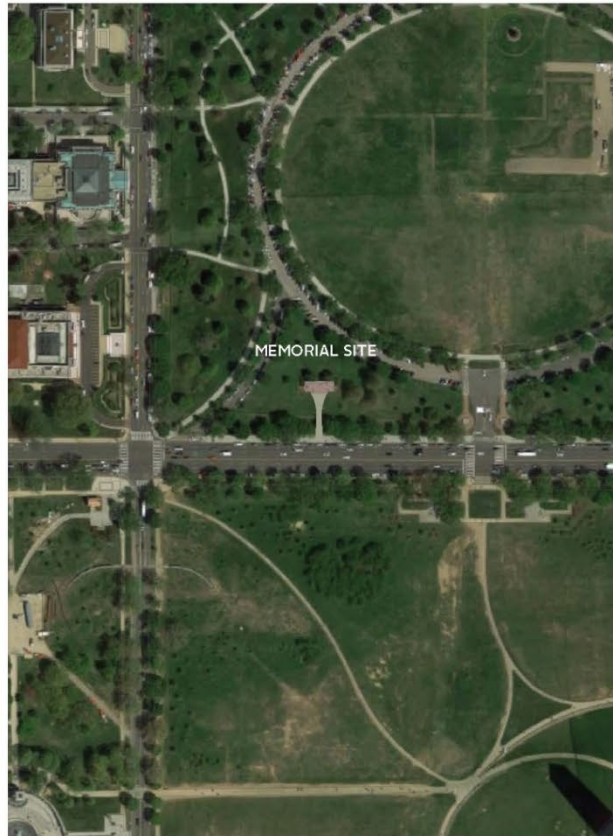
OPTION D2



OPTION D3

Memorial Access – Linear Approach

ACCESSIBILITY CONCEPTS



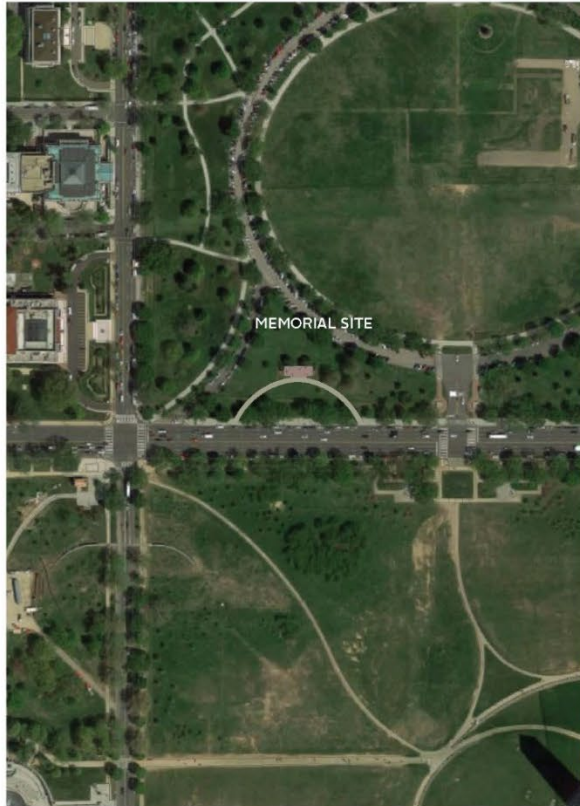
LINEAR ACCESSIBLE PATH SITE PLAN



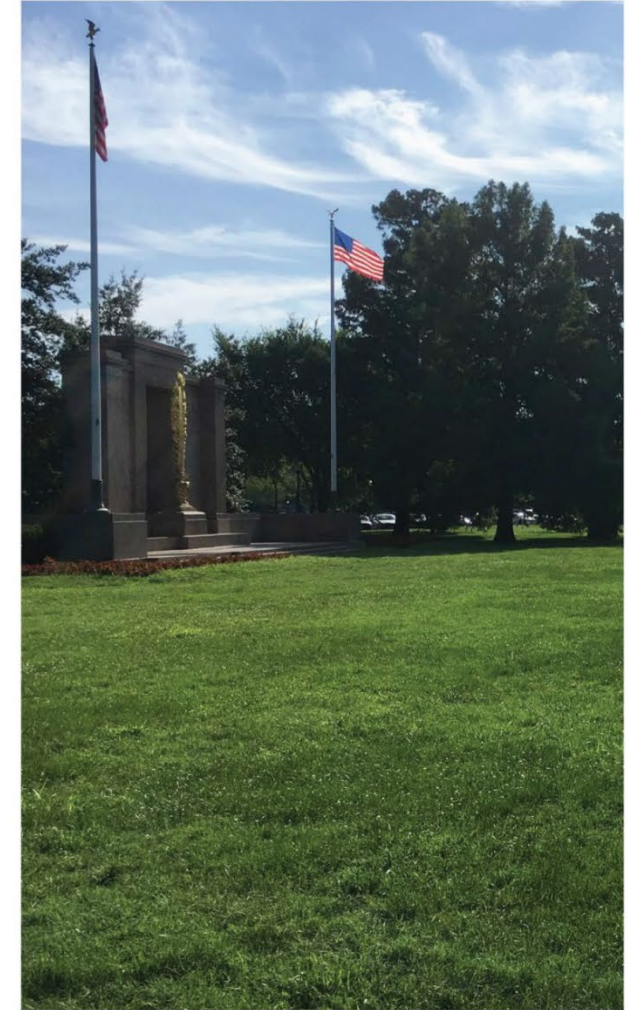
LINEAR APPROACH

Memorial Access – Curvilinear Approach

ACCESSIBILITY CONCEPTS



CURVILINEAR ACCESSIBLE PATH SITE PLAN



CURVILINEAR APPROACH

Existing Sidewalks and Materials

ACCESSIBILITY CONCEPTS



EXISTING SIDEWALK ADJACENT TO MEMORIAL SITE



ADJACENT CURVILINEAR PATH

U.S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

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24 October 2019

Dear Ms. Mendelson-Ielmini:

In its meeting of 17 October, the Commission of Fine Arts reviewed a concept submission for alterations to the Second Division Memorial, located on the south side of the Ellipse at Constitution Avenue, NW. The Commission expressed appreciation for the design team's thoughtful analysis, approving Option D-1 and providing comments for the development of the design.

The Commission members found that Option D-1—which extends the memorial's raised platform southward to accommodate two new stone plinths, reproduces the existing central stepped approach, and provides barrier-free access to the platform—would appropriately integrate the new addition within the historic memorial and its 1960s expansion. For the refinement of the design, they advised pursuing a subtle differentiation of the new paving from the existing, an approach which they characterized as successful in the earlier extension. They recommended further study of the configuration and grading of the proposed curvilinear walkway from Constitution Avenue, suggesting that the widely arcing path could be slightly asymmetrical in response to the context and character of the Ellipse; they also suggested elimination of the existing flower beds as the landscape design is developed.

The Commission looks forward to further review of this prominent project. Please coordinate the next submission with the staff which, as always, is available to assist you.

Sincerely,



Thomas E. Luebke, FAIA
Secretary

Lisa Mendelson-Ielmini, Acting Director
Region 1—National Capital Area
National Park Service
1100 Ohio Drive, SW
Washington, DC 20242

cc: Hany Hassan, Beyer Blinder Belle