



Executive Director's Recommendation

Commission Meeting: October 3, 2019

PROJECT National World War I Memorial Pershing Park Pennsylvania Avenue between 14th and 15th Streets, NW Washington, DC	NCPC FILE NUMBER 7682
SUBMITTED BY United States Department of the Interior National Park Service	NCPC MAP FILE NUMBER 1.23(73.10)44997
REVIEW AUTHORITY Commemorative Works per 40 U.S.C. § 8905 and Public Law 113-291	APPLICANT'S REQUEST Approve final site development plans
	PROPOSED ACTION Approve final site development plans with comments
	ACTION ITEM TYPE Staff Presentation

PROJECT SUMMARY

The National Park Service (NPS), in collaboration with the World War I Centennial Commission (WWICC), has submitted final site development plans for the National World War I Memorial. WWICC is the project sponsor of the Memorial in accordance with Public Law 112-272, and is responsible for planning, developing, and executing programs, projects, and activities to commemorate the centennial of World War I through 2018. The Commission provided comments on the concept design in November 2016, July 2017 and October 2018. In February 2019, the Commission approved the preliminary site development plans, with remarks to be addressed with the final review. The memorial design has been updated to address the Commission's comments.

Title 30, Section 3091 of the National Defense Authorization Act of 2015 (Pub. Law 113-291) designates Pershing Park in downtown Washington, DC, along with the Liberty Memorial in Kansas City, as national World War I memorials. The Act further authorizes the WWICC to honor the service of members of the United States Armed Forces in World War I. A two-stage competition was held to select a memorial designer. Stage I included an open call for design concepts that was completed in August 2015. The competition jury selected five finalists to continue to Stage II, and NCPC heard an information presentation on these finalists in December 2015. The winning design, "The Weight of Sacrifice," was selected by WWICC in early 2016. One of the most critical components of the design was a commemorative wall with bas-relief sculpture expressing the war experience. Since that time, the sponsor has continued to develop the proposed design, with the wall remaining the primary commemorative element. The integration of the commemorative wall into the existing fabric of Pershing Park has been a point of significant discussion throughout the process.

KEY INFORMATION

- The Commemorative Works Act (CWA) establishes requirements for building commemorative works on federal lands within the District of Columbia and its environs. It applies to lands under jurisdiction of the US Department of the Interior (DOI) and the US General Services Administration (GSA).
- Public Law 113-291 designates Pershing Park in downtown Washington, DC, along with the Liberty Memorial in Kansas City, as national World War I memorials. The Act further authorizes the WWICC to honor the service of members of the United States Armed Forces in World War I.
- Pershing Park is located within the 1974 Pennsylvania Avenue Development Corporation (PADC) Plan area. The Plan called for a public open space at the site to serve as a transition between the more formal landscape of President's Park and the hardscape of Freedom Plaza.
- Pershing Park is also located within the Pennsylvania Avenue National Historic Site (NHS).
- Pershing Park is a work of the landscape architect M. Paul Friedberg, and the park has been determined individually eligible for listing in the National Register of Historic Places.
- The Commission provided comments on the concept plans for the memorial in November 2016, July 2017 and October 2018. The preliminary site development plans were approved with comments in February 2019.
- The Commission of Fine Arts (CFA) reviewed the proposed memorial in February and May 2018, and approved the concept design at its July 2018 meeting, including the freestanding memorial wall. The CFA approved the final design for the memorial in September 2019.
- Pursuant to the CWA, NCPC, CFA, and the DOI must each approve the design for the new commemorative work.

RECOMMENDATION

The Commission:

Approves the final site development plans for the National World War I Memorial, in Washington, DC, including a freestanding wall with integrated fountain, and a plaza with pool, scrim, and "island" walkway. The west face of the wall includes an inscription, while the east face consists of a cantilevered sculpture.

Finds the design has been revised to reflect the Commission's comments at preliminary review, to include an appropriate lighting approach, simplified signage, and material selections for the pool and walkway.

Finds that the project successfully meets the specific decision criteria enumerated in the Commemorative Works Act.

Commends the World War I Centennial Commission for the thoughtfulness and depth of the interpretive program, and the integration of traditional and contemporary approaches within the memorial and park setting.

Finds that in accordance with the National Environmental Policy Act, NCPC's action to approve the final memorial design will not have a significant impact on the human environment. The Commission makes this finding relying upon the environmental assessment prepared for the project by the National Park Service, along with the National Capital Planning Commission as cooperating agency.

Notes that a Memorandum of Agreement has been prepared pursuant to Section 106 of the National Historic Preservation Act, and that mitigation and minimization measures are included to address adverse effects on cultural landscapes resulting from the project, to include a National Historic Register Nomination, documentation of the existing site, and Modernist Landscapes Context study.

Finds the memorial and enhanced park space is a positive addition to the Pennsylvania Avenue corridor and further, the World War I Centennial Commission can be an important partner to enhance the Avenue through programming, events, and other activities that engage visitors, residents and the general public.

PROJECT REVIEW TIMELINE

Previous actions	December 2015 – Information Presentation on five finalists November 2016 – Review of Concept Plans July 2017 – Review of Revised Concept Plans October 2018 – Review of Revised Concept Plan February 2019 – Approval of Preliminary Site Development Plans
Remaining actions (anticipated)	– None

PROJECT ANALYSIS

The Commission approved the preliminary site development plans for the memorial and park in February 2019, with additional comments to be addressed with the final submission. Requests included the development of a lighting approach, simplified signage, and material selections for the pool and walkway. The applicant has continued to refine the design in response to Commission comments, as well as feedback from NPS and the Commission of Fine Arts. Overall, staff believes the memorial and park design has been further improved. As such, staff recommends the **Commission approve the final site development plans for the National World War I Memorial in Washington, DC, including a freestanding wall with integrated fountain, and a plaza with pool, scrim, and "island" walkway. The west face of the freestanding wall includes an inscription, while the east face consists of a cantilevered sculpture.** And further, the **Commission finds the design has been revised to reflect the Commission's comments at preliminary review, to include an appropriate lighting approach, simplified signage, and material selections for the pool and walkway.**

Analysis

The park and memorial design has changed substantially since the competition winner was selected in 2016. Since that time, the proposal has focused on restoring and rehabilitating much of the original park design, while incorporating changes necessary to accommodate the memorial program and enhance the functionality of the site. Overall, the applicant seeks to improve the park and staff believes this will be beneficial to the Pennsylvania Avenue corridor and the surrounding area. As such, staff recommends the **Commission find the memorial and enhanced park space is a positive addition to the Pennsylvania Avenue corridor and further, the World War I Centennial Commission can be an important partner to enhance the Avenue through programming, events, and other activities that engage visitors, residents and the general public.**

Memorial Wall and Lighting

Consistent with the previous review, the memorial wall is a stand-alone element that is located within the western end of the pool. The original park waterfall will be removed and the western terrace steps are expanded to fill that space. The freestanding wall includes a sculptural narrative on the eastern face and a water feature and inscription on the western face. The freestanding wall integrates a water feature at the base, consistent the Commission's earlier comments.

The western face of the wall includes a monolithic granite finish that is reminiscent of the existing site fountain. A continuous flow of water over the wall will provide sound and movement, while a quote will be provided on the wall that will reference the search for peace. Planters in the terrace facing the wall have also been adjusted to allow the space to function for gathering and contemplation.

Previously, the Commission requested the applicant include a lighting scheme for the memorial that addresses both sides of the wall. In response, the applicant has provided a plans and details regarding the lighting approach throughout the site. In general, lighting will be used to illuminate pedestrian circulation at safe levels, without overwhelming the site. Directional lighting will also illuminate the memorial wall, creating an opportunity for nighttime viewing that is different from the daytime experience. Other elements, such as the flagpole, will also be lit. Overall, staff finds the lighting approach appropriate to the memorial and site, in a manner that is compatible with the memorial's surroundings or setting within Pennsylvania Avenue.

Pool and Walkway

The proposed design restores the central plaza and pool and adds a pedestrian path that would allow visitors to circulate in front of the commemorative wall. The "island" approach includes a central platform in the middle of the pool, with a single pedestrian connection to the plaza. The center of the platform includes a scrim of water that is shallow in depth, while the area around the platform retains deeper water, similar to the original pool design. This design allows the deeper water to encircle the platform and reinforce the footprint of the original pool. The Commission previously expressed support for this design as it reinforces the edge of the original pool and appears as a deliberate and contemporary insertion into the historic park fabric.

Given the amount of hardscape, particularly when the scrim is not in use, the Commission recommended the applicant consider different paving types and colors to help differentiate the scrim area and pedestrian circulation, and to help minimize solar heat gain and reflectivity given the lack of shade. In response, the design has been updated to include two different materials for the pool and walkway. For the scrim and pool, a darker Coldspring granite will be used, while a lighter Academy granite will be used with the walkway and curb. The revised design is consistent with the Commission's request. The two materials help visually break up the paving areas, and the different colors help distinguish the walkway areas from the pool and scrim.

Signage and Landscape

In past reviews, the Commission had commented about the need to improve the corner approaches to the site. The Commission expressed support for simple, horizontal signage integrated into the hardscape, along with accent plantings. The applicant has further developed a planting plan that improves the entry experience, using a variety of distinct and colorful plantings that will help highlight the entry points. Overall, the landscape plan builds upon the original Oehme, van Sweden approach which creates a lush, layered landscape for the site. Consistent with the Commission's feedback, simple, low-scale signage is also proposed at the corner entries that will read "World War I Memorial."

Security features have also been integrated as necessary into the plan. These include simple bollards at key locations, and reinforced planters along Pennsylvania Avenue North. In general, staff finds the features unobtrusive while meeting the security needs of the site.

Other Interpretive Elements

The Commission had previously indicated that commemorative elements should largely be limited to the memorial wall, kiosk (belvedere) area, and existing Pershing Memorial to highlight their importance and to allow for other types of park uses within the site. The belvedere area is proposed to be used for orientation and interpretation. A tactile model will be provided nearby to support visitors of all abilities. In general, staff supports the use of the belvedere for this purpose, as its centralized location affords direct views of the commemorative wall and Pershing Memorial, creating an appropriate location to understand the entire site. In addition, a flagstaff and inscription are proposed at the western side of the site, north of the memorial wall. Other limited inscriptions are proposed for the planters along Pennsylvania Avenue. These additional commemorative elements are integrated into other components of the park and therefore do not appear to overwhelm the park experience. Staff notes that the applicant also proposes to integrate digital information into the park through the use of “information poppies” with “QR” codes. These would allow visitors to use their smart phones to access online information regarding various aspects of the war and the memorial.

Staff has greatly appreciated the thoughtfulness and careful attention paid by the applicants in developing the interpretive elements, ranging from the selection of figures for the wall sculpture to the identification of quotations that reflect other aspects of the event. The exploration and explanation of the many facets of World War I have enhanced the quality of the commemorative experience, and will be a benefit to those who visit the memorial. As such, staff recommends the **Commission commends the World War I Centennial Commission for the thoughtfulness and depth of the interpretive program, and the integration of traditional and contemporary means within the memorial and park setting.**

CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

Comprehensive Plan for the National Capital

As noted above, the proposed design meets basic goals of the Comprehensive Plan. The policies particularly applicable to the memorial design include those related to Visitors and Commemoration, Historic Preservation, and Parks and Open Space.

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, and landscape features. Overall, the final design responds to these criteria as it protects open space, responds to and enhances the existing context, and is designed to include materials and a landscape palette that will endure.

Therefore, staff recommends the **Commission finds that the project successfully meets the specific decision criteria enumerated in the Commemorative Works Act.**

Memorials and Museums Master Plan

The 2001 Memorials and Museums Master Plan (“2M Plan”) provides guidance regarding the placement of future commemorative works. In particular, the Plan seeks to reinforce the historic urban design features of the city, minimize intrusion on existing memorials, and reduce adverse environmental and transportation impacts and enhance positive economic and other effects on local neighborhoods. The Plan states that memorials, when properly placed and sensitively designed, can provide a source of community identity and pride, while bolstering revitalization efforts.

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 Office (DC SHPO) on May 1, 2015. A determination of eligibility (DOE) for Pershing Park was completed and found the park eligible for listing in the National Register of Historic Places. In addition to the initial scoping meeting, Section 106 consultation meetings were held on December 16, 2015; September 21, 2016; February 9, 2017; June 28, 2017; February 13, 2018; November 5, 2018 ; and February 25, 2019 to provide opportunities for the Consulting Parties to comment on historic preservation concerns.

Following the preparation of an assessment of effects, a Memorandum of Agreement (MOA) among NPS, THE DC SHPO, NCPC and the Advisory Council on Historic Preservation was prepared and finalized on April 10, 2019 to conclude the Section 106 process. The MOA identifies mitigation and minimization measures to address adverse effects on cultural landscapes resulting from the project, including the preparation of a National Historic Register Nomination, documenting the existing site, and development of Modernist Landscapes Context study. In addition, the WWICC and NPS shall prepare interpretative materials covering the development and history of the World War I Memorial site, including the M. Paul Friedberg design, for use at the site as part of physical improvements and as part of an on-line database with the District of Columbia Office of Planning. Historical interpretation will also be incorporated into the memorial site before it is opened to the public. Finally, the WWICC will obtain a stock of new 8” x 8” PADC custom pavers and provide them to the NPS to assist in ongoing replacement and maintenance of the Pennsylvania Avenue National Historic Site. The new stock shall include up to 300 new pavers.

National Environmental Policy Act

NCPC and NPS each have an independent responsibility to comply with the National Environmental Policy Act (NEPA). NCPC’s responsibility stems from its approval authority over the site and design of the monument. A public scoping meeting was held on May 20, 2015 to discuss the memorial authorization and site characteristics. NPS prepared an Environmental

Assessment (EA) to identify alternatives and assess the potential impacts of the proposed memorial. NCPC was a cooperating agency for purposes of the EA, and NCPC staff provided scoping comments on June 2, 2015. A draft Environmental Assessment (EA) was released on December 17, 2018 for a public review period that ended on February 20, 2019.

Under NEPA, the Council on Environmental Quality (CEQ) regulations, and NCPC Environmental Policies and Procedures, an EA is sufficient and an Environmental Impact Statement need not be prepared if the EA supports the finding that the major federal action will not significantly affect the human environment. The EA for this project was prepared in accordance with this standard.

As described in the EA, the selected alternative (the proposed design) has the potential for adverse impacts on cultural landscapes. However, no significant impacts were identified. Implementing the selected alternative will result in detectable long-term adverse impacts on cultural landscapes. Changes to the site's spatial organization, omnidirectional views, built features (including water features), vegetation, and small-scale built features, will result in detectable long-term adverse impacts on Pershing Park, and therefore the Pennsylvania Avenue, NW - White House to the Capitol - Cultural Landscape. The selected alternative will replace the existing cascade fountain with a freestanding commemorative sculpture fountain, place a central island walkway across the pool basin, remove steps and planters, replace vegetation, and remove trash cans. In order to mitigate potential impacts on cultural landscapes, a Memorandum of Agreement (MOA) was developed pursuant to Section 106 of the NHPA, as described previously. The MOA includes specific measures, including design review, as well as minimization and mitigation strategies.

Per the EA analysis and conclusions, staff therefore recommends the **Commission find that in accordance with the National Environmental Policy Act, NCPC's action to approve the final memorial design will not have a significant impact on the human environment. The Commission makes this finding relying upon the environmental assessment prepared for the project by the National Park Service, along with the National Capital Planning Commission as cooperating agency.**

Commission of Fine Arts

The Commission of Fine Arts (CFA) approved the concept design at its July 2018 meeting, including the freestanding memorial wall. Additional CFA reviews have been held to review various elements and details of the sculpture and site. CFA granted final approval for the design on September 19, 2019. A copy of the CFA action is attached.

Coordinating Committee

The Coordinating Committee reviewed the proposed plans at their September 11, 2019 meeting. Without objection, the Committee forwarded the proposed comments on concept plans to the Commission with the statement that the proposal has been coordinated with all participating agencies. The participating agencies included the National Park Service, General Services Administration, District Department of Transportation; the District Office of Planning; the District

Office of Energy and Environment; the Washington Metropolitan Area Transit Authority; and the District of Columbia State Historic Preservation Office (DC SHPO).

ONLINE REFERENCE

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

- Submission Package
- Draft Finding of No Significant Impact (FONSI)

Prepared by Matthew Flis
09/26/19

ATTACHMENTS

- Powerpoint
- Commission of Fine Arts Letter

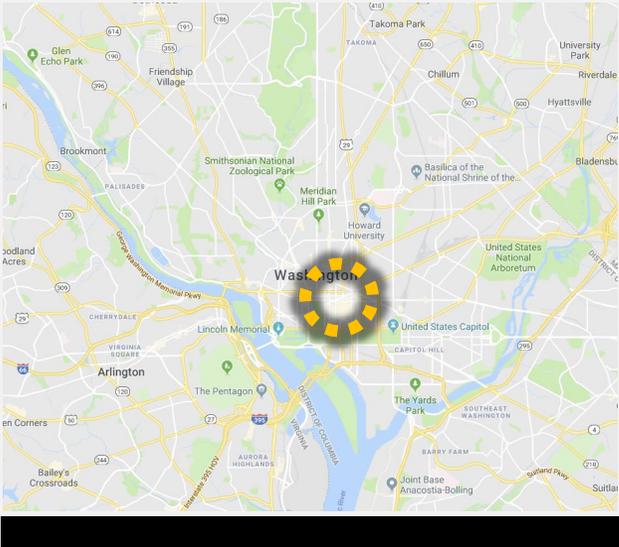
National World War I Memorial

Pershing Park, Washington, DC

Final Review of Site and Memorial Plans

National Park Service

Site Location



Location Map

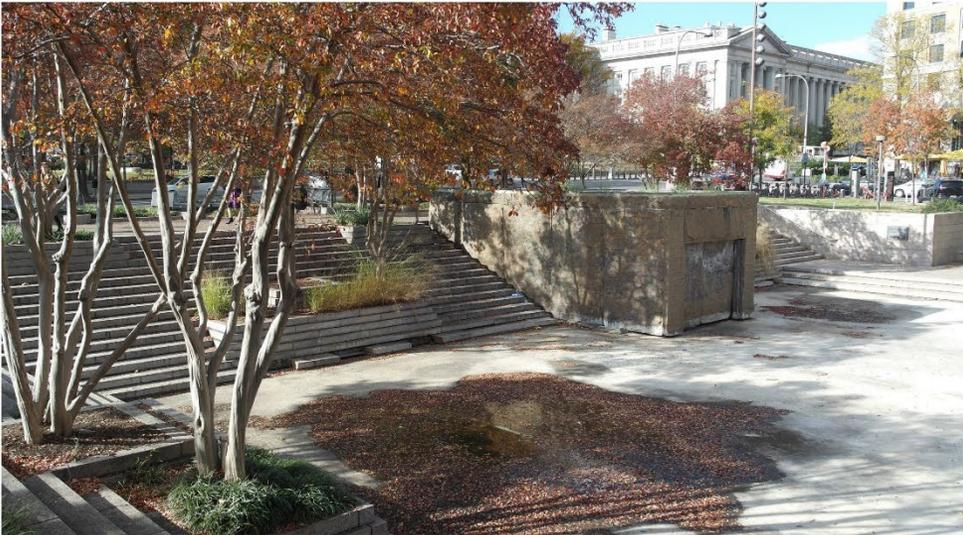
Existing Site Plan



Existing Conditions



Existing Conditions



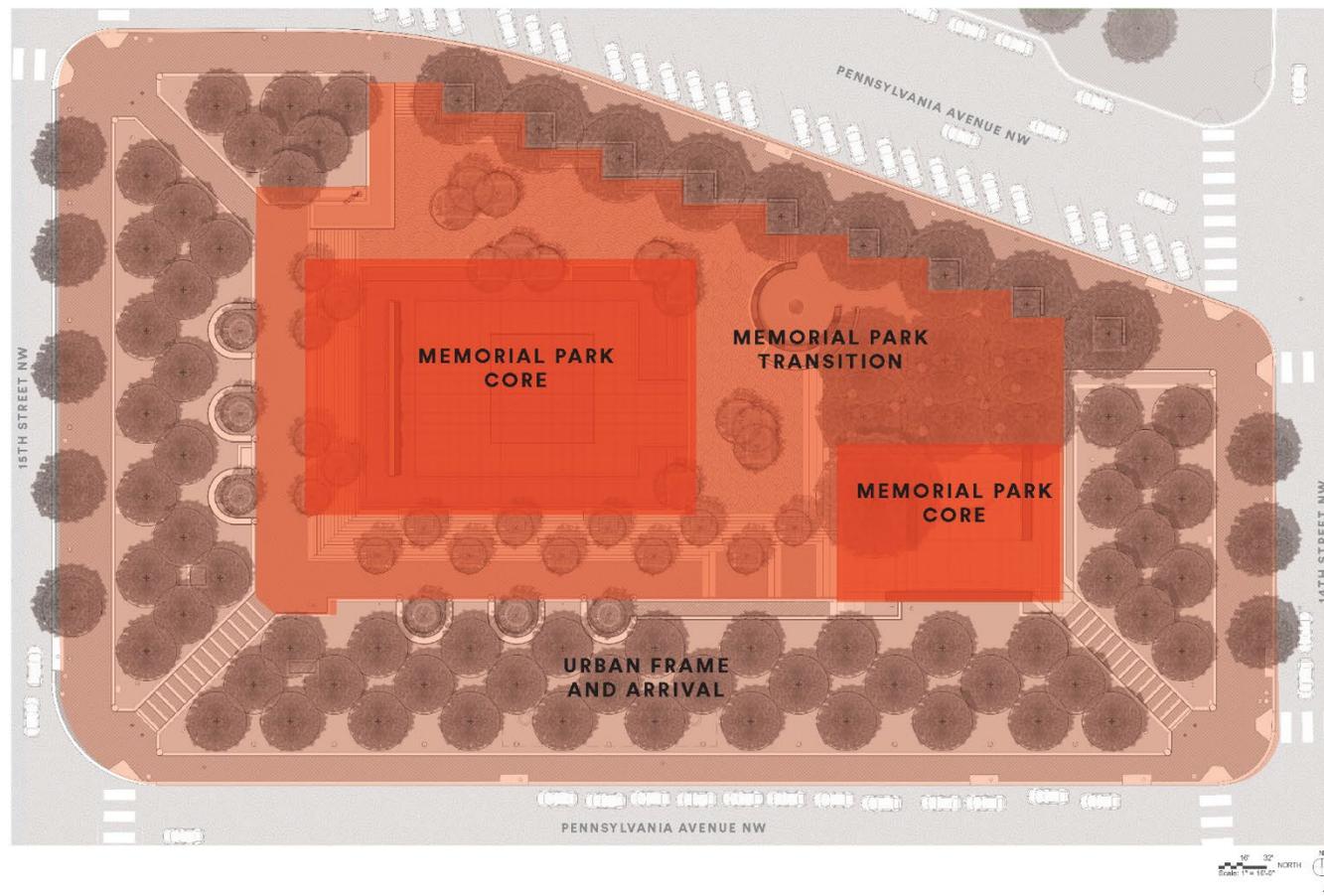
Existing Conditions



Memorial Overview

ORGANIZING FRAMEWORK: MEMORIAL PARK LAYERS

- Take advantage of the existing layered park framework to transition from the surrounding urban context into the memorial core
- Maintain the spatial organization of the existing triad of focal points within the park
- Maintain the qualities of the successful urban oasis with sheltering berms, lush plantings, a peaceful fountain, perimeter seating opportunities and terraced seating overlooking the central memorial / park space



Memorial Park Overview

BALANCING TWO WORKS OF ART

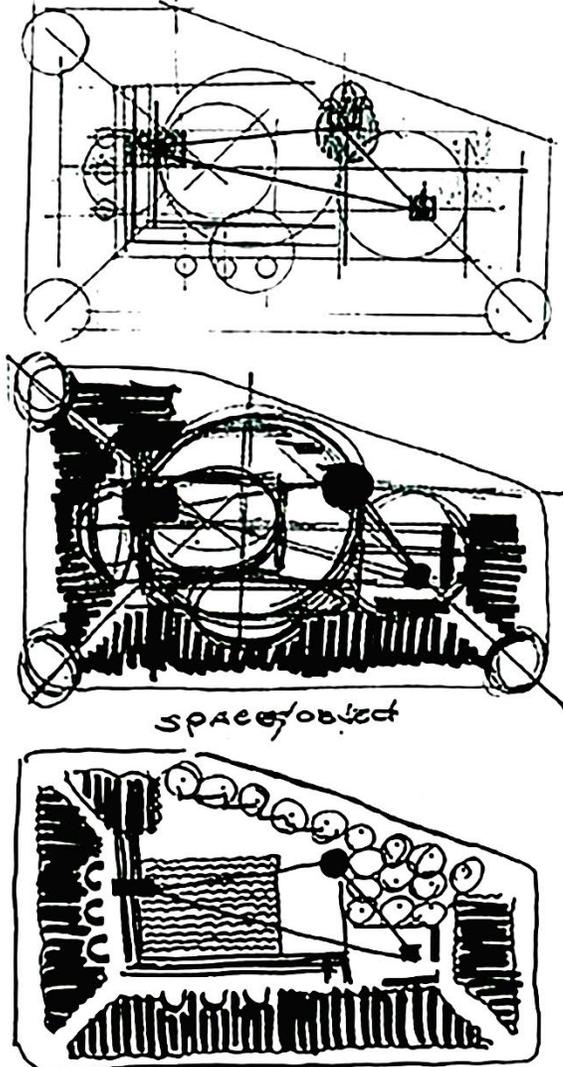
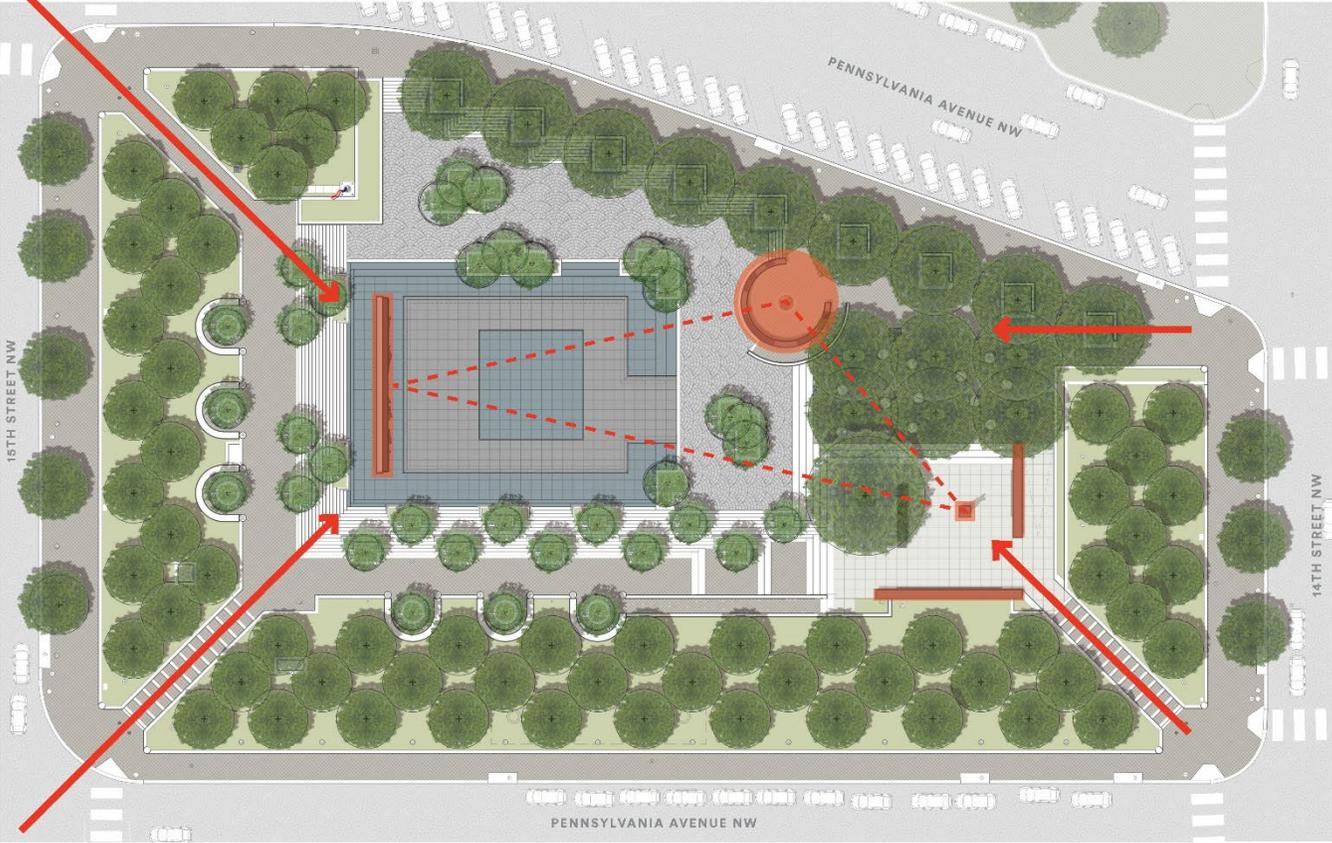


Photo Credit: "Pershing Park," *Process Architecture* 82, 1989, 77"



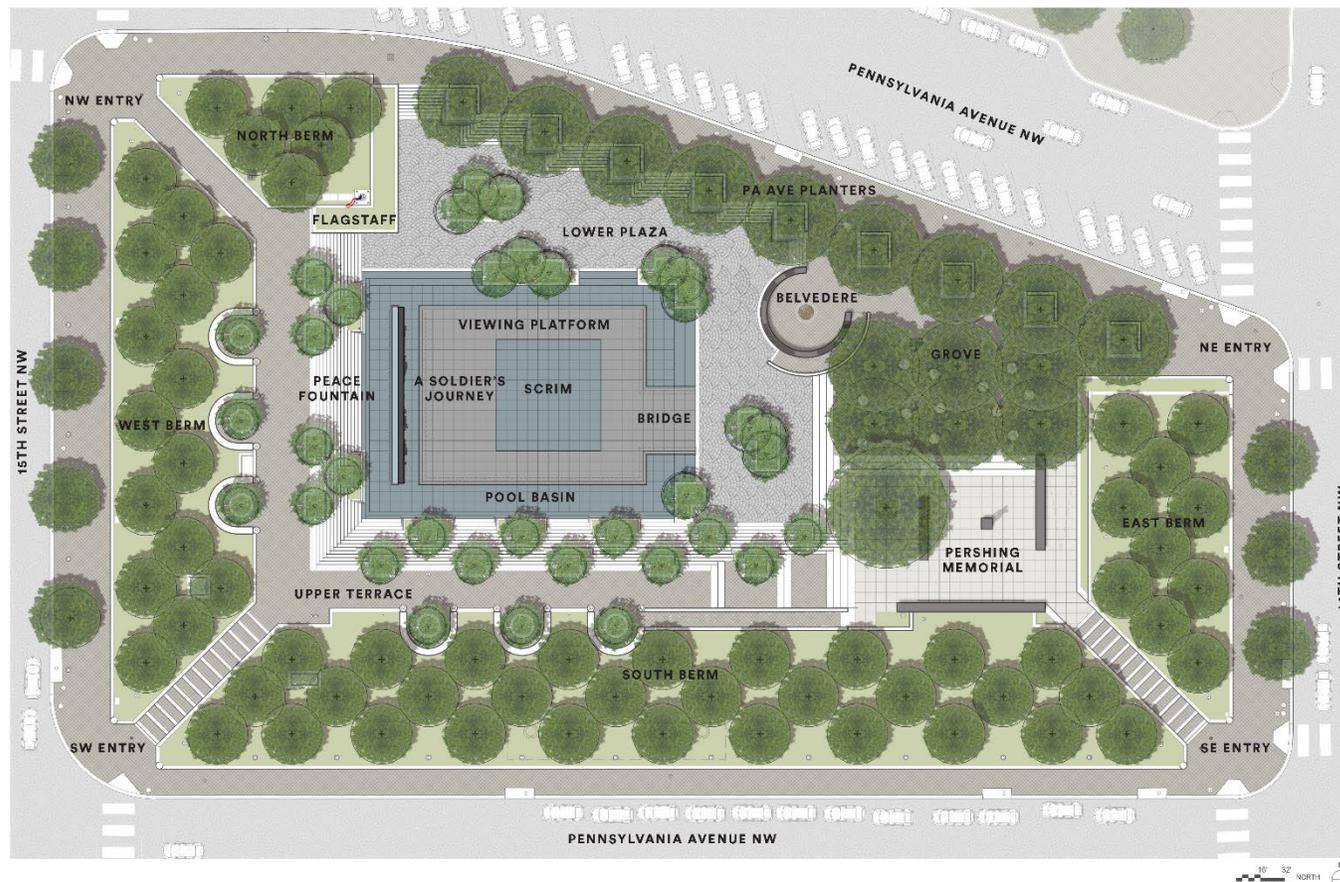
Scale 1" = 16'-0" NORTH

Memorial Park Overview

MEMORIAL PARK DESIGN: AS OF JULY 2019

PROJECT GOALS

- Balance the goals of the National World War I Memorial and those of a culturally significant urban park
- Design a well-integrated park-and-memorial that facilitates a variety of park uses, and that harmonizes with the surrounding urban context
- Establish a memorial with weight and gravity commensurate with that of the war memorials on the Mall
- Place the memorial as the central or focal feature of the overall design while maintaining the qualities of the existing focal feature of the park
- Convey the significance of World War I as an event in U.S. and world history
- Convey the scale of American sacrifice, which exceeded that of all our nation's wars other than the Civil War and World War II
- Create the most opportunity to preserve and restore existing features of the park
- Provide tiers of interpretation that allow visitors to experience the memorial park at their desired level



Proposed Program

MEMORIAL PARK PROGRAM

- Memorial Engagement
- Memorial Seating
- Park Seating
- Memorial Exhibit
- Tented Event / Event Seating

TYPICAL DAY



SEMI-ANNUAL / BI-ANNUAL EVENTS



MEMORIAL EVENT



Proposed Program – Interpretive Framework



1st Tier Commemorative Features



- ① PERSHING MEMORIAL (THE GREAT MAN)
- ② A SOLDIER'S JOURNEY (EVERY MAN)
- ③ THE PEACE FOUNTAIN (SEARCH FOR PEACE)

Existing Pershing Memorial

EXISTING PERSHING MEMORIAL



Sculpture Fountain – A Soldier's Journey

A SOLDIER'S JOURNEY



25

Sculpture Scale

A SOLDIER'S JOURNEY: SCALE

Approved Sculpture Scale from April 2019 CFA:

6'-6" Figure Height

59'-4" Total Sculpture Fountain Length

58'-4 Bronze Sculpture

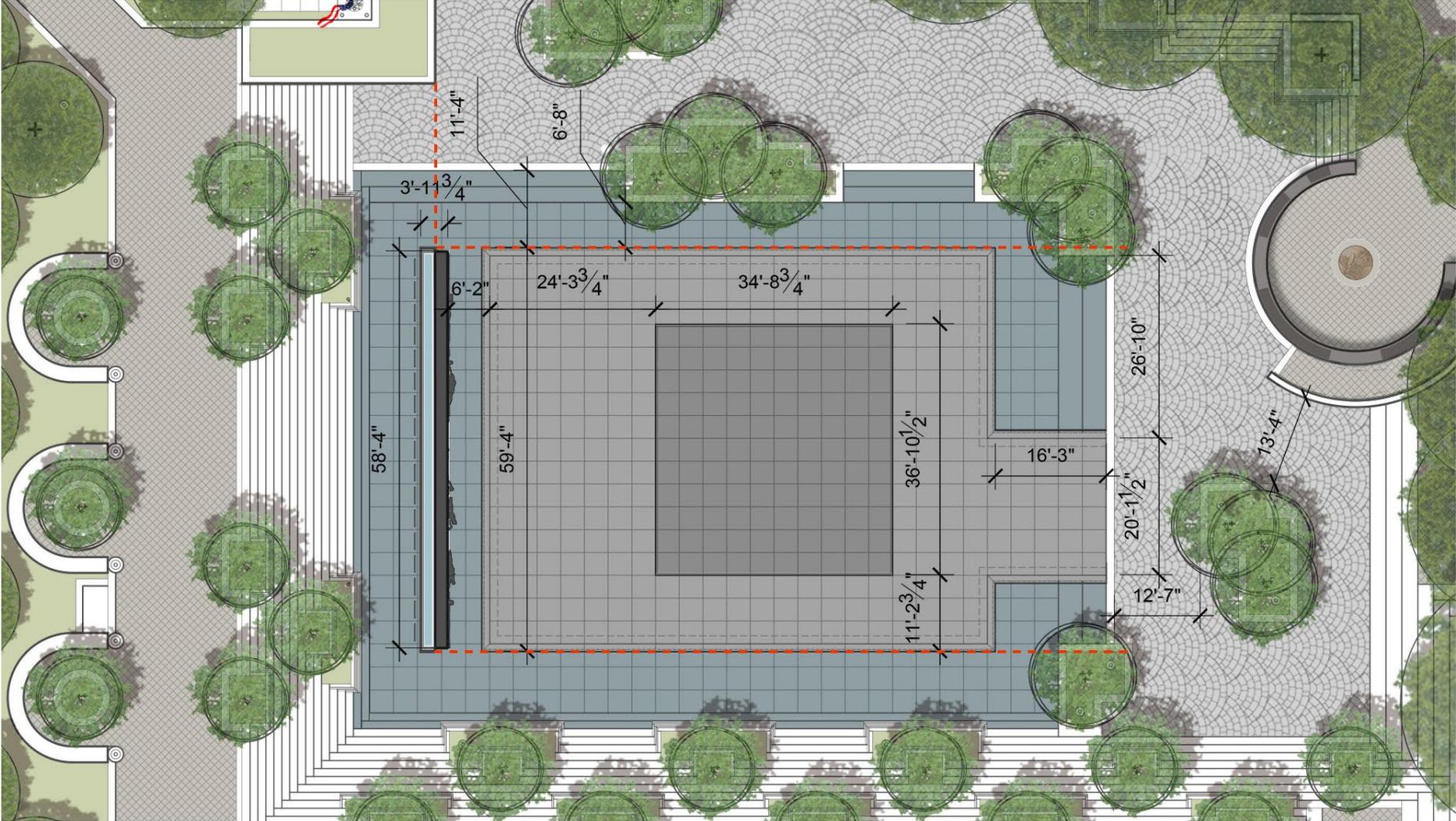
Please Note:

The scale figures (shown at 5'-6 1/2") represent the median height of the average U.S. male (5'-9") and female (5'-4").



Platform Configuration

A SOLDIER'S JOURNEY: SITE CONTEXT



Peace Fountain

PEACE FOUNTAIN



28

Sculpture Fountain

SCULPTURE FOUNTAIN



29

1st Tier Commemorative Features – Sculpture Fountain

SCULPTURE FOUNTAIN: DETAILING AND MATERIALS



**CARNELIAN GRANITE
(THERMAL FINISH)**

**ALL EXPOSED
STONE SURFACES
OTHER THAN WEST
CASCADE**



**CARNELIAN GRANITE
(CORDUROY FINISH)**

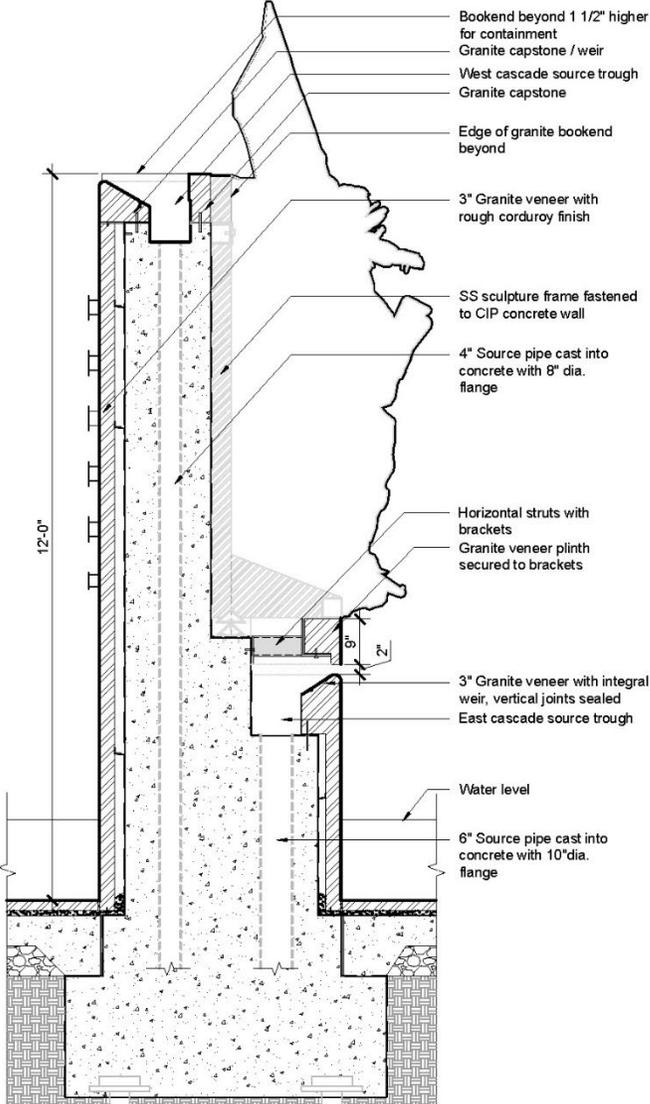
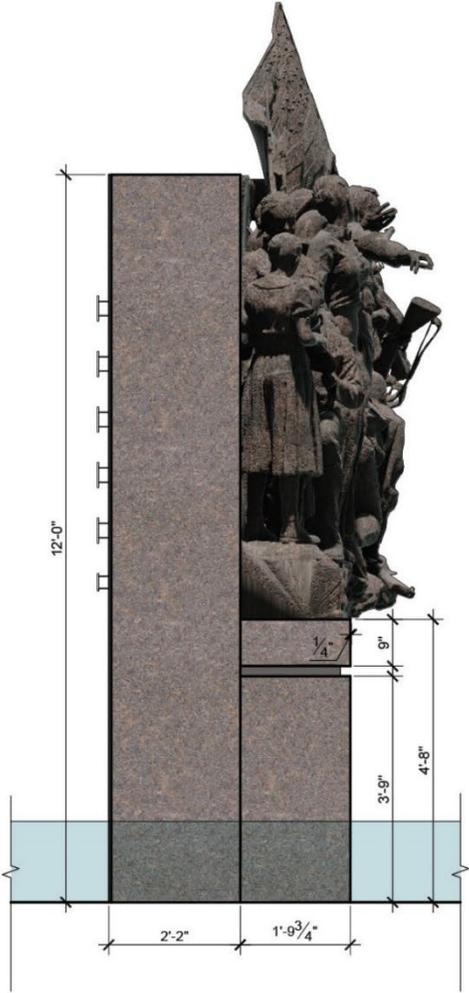
**ONLY AT WEST
CASCADE**



**CAST ANODIZED
ALUMINUM LETTERS
(DARK BRONZE
FINISH)**

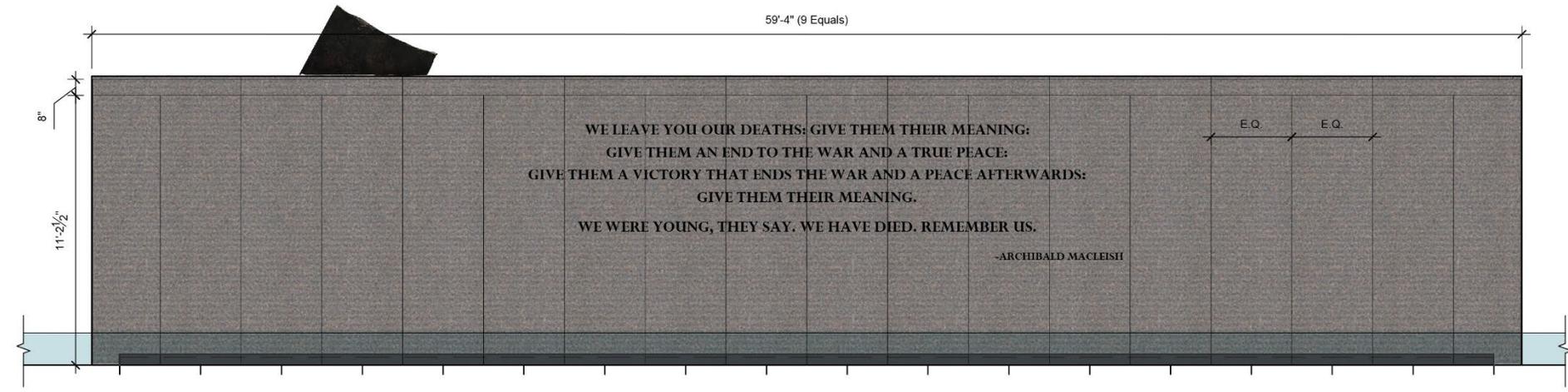
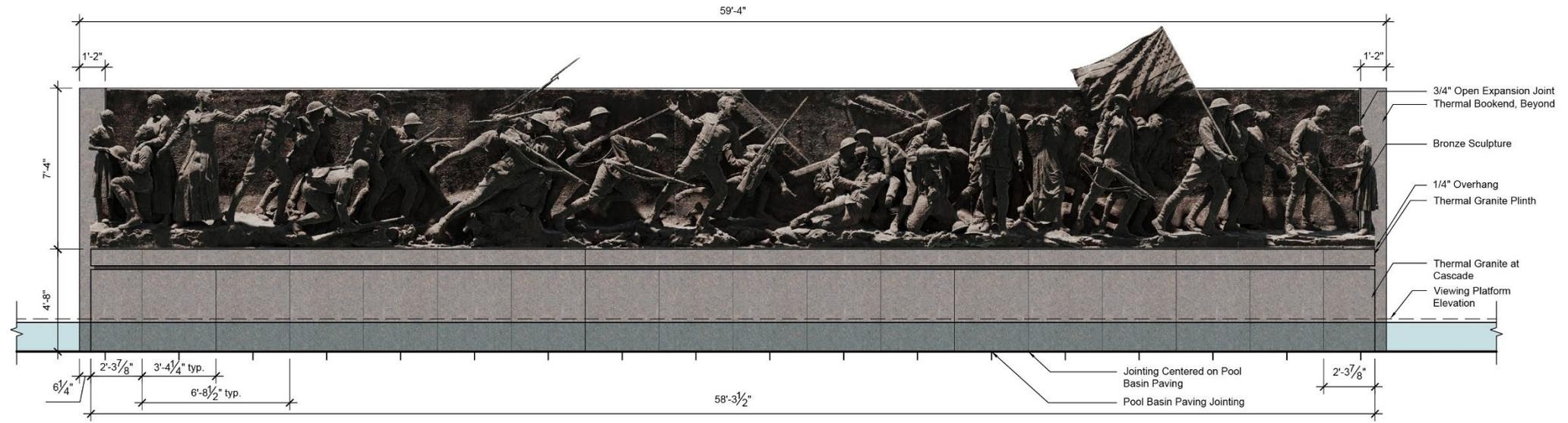


**BRONZE
(HAND WORKED WITH
DARK PATINA)**

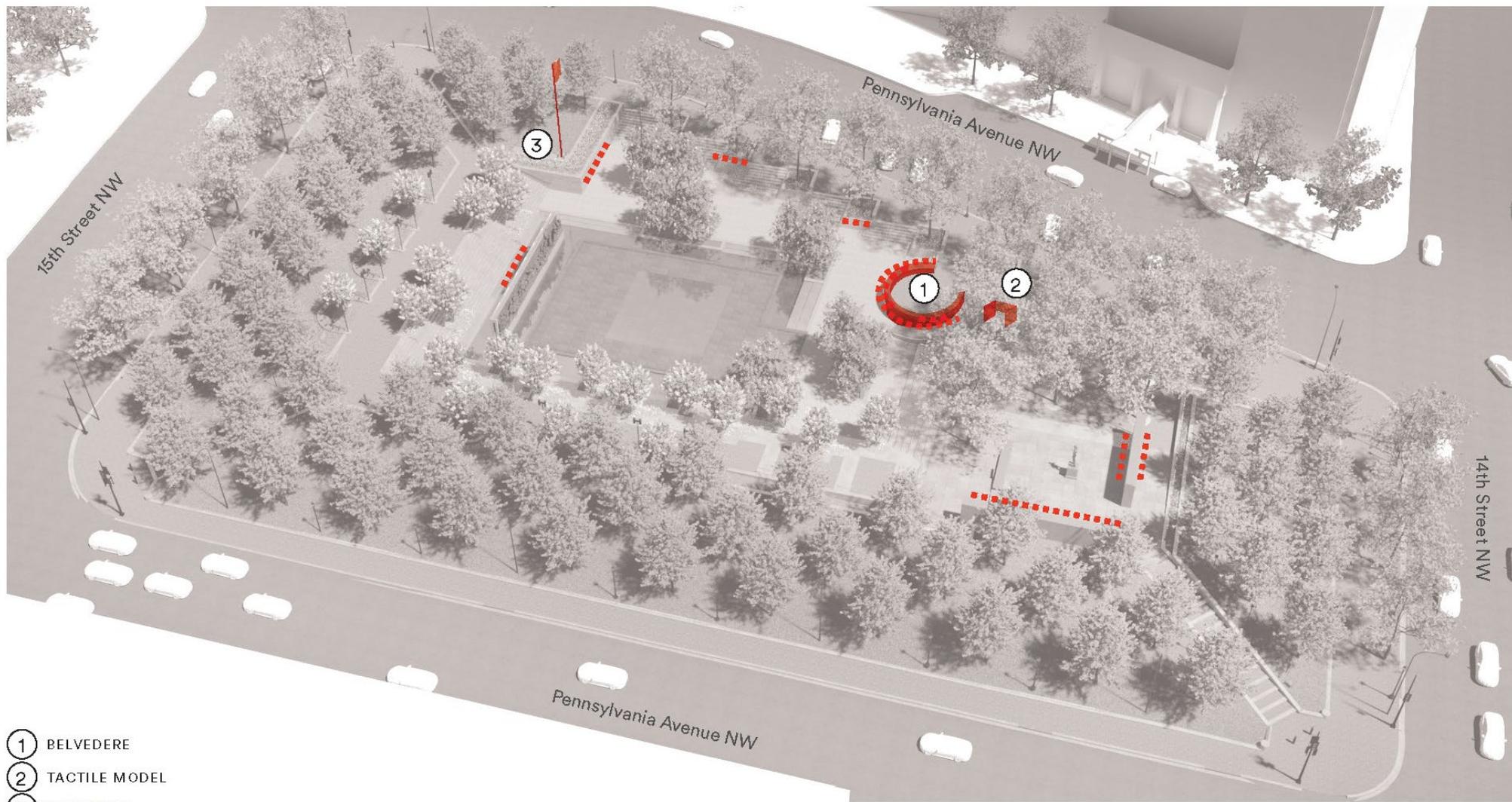


1st Tier Commemorative Features – Sculpture Fountain

SCULPTURE FOUNTAIN: DETAILING AND MATERIALS



2nd Tier Commemorative Features



- ① BELVEDERE
- ② TACTILE MODEL
- ③ FLAGSTAFF
- INSCRIPTIONS

2nd Tier Commemorative Features - Belvedere

BELVEDERE



CAMBRAI - SOMME DEFENSIVE - LYS - AISNE - MONTDIDIER-NOYON - CHAMPAGNE-MARNE - AISNE-MARNE - SOMME OFFENSIVE - OISE-AISNE - YPRES-LYS - ST MIHIEL - MEUSE-ARGONNE - VITTORIO VENETO - SIBERIA - NORTH RUSSIA - ATLANTIC CONVOYS - WESTERN ATLANTIC - NORTH SEA - MEDITERRANEAN

2nd Tier Commemorative Features - Belvedere

BELVEDERE



35

2nd Tier Commemorative Features - Belvedere

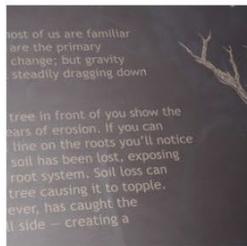
BELVEDERE: DETAILING AND MATERIALS



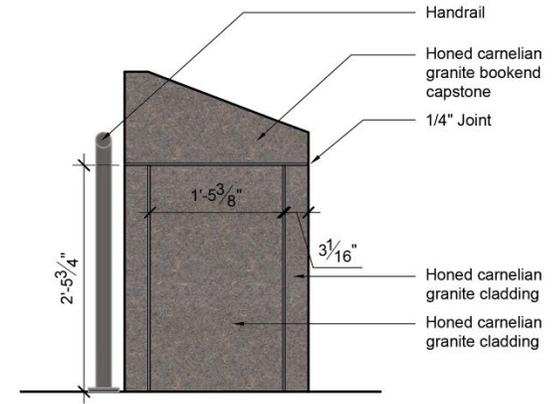
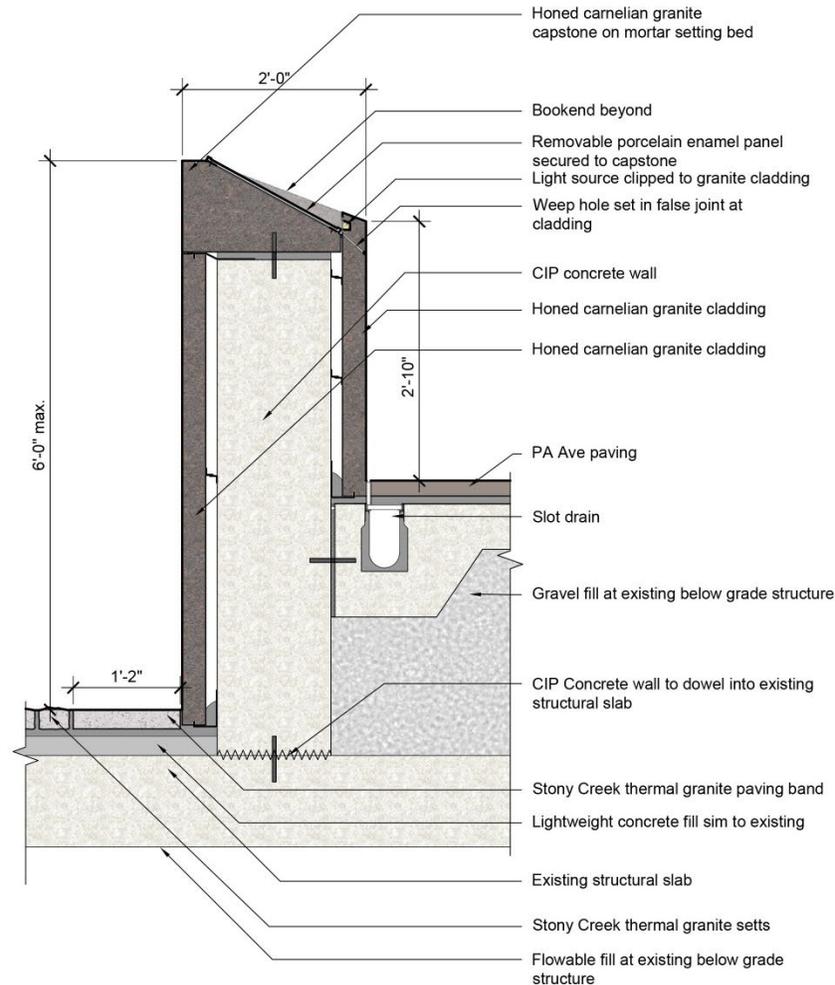
**CARNELIAN GRANITE
(HONED FINISH)**



**ANODIZED
ALUMINUM
(MEDIUM BRONZE
FINISH)**



**PORCELAIN ENAMEL
(DARK GRAY
BACKGROUND WITH
LIGHT TEXT)**



2nd Tier Commemorative Features

INSCRIPTIONS: EXISTING PERSHING MEMORIAL



COMMEMORATIVE WEST FACE

JOHN J. PERSHING
GENERAL OF THE ARMIES

EAST FACE

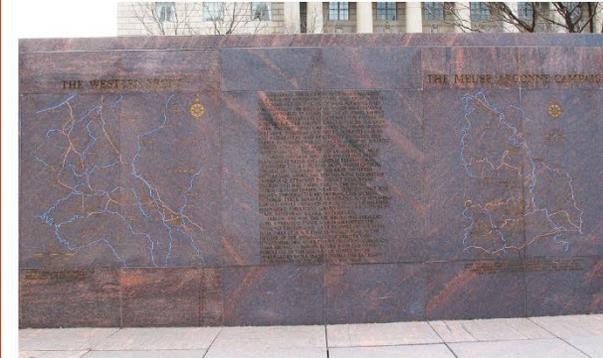
IN THEIR DEVOTION, THEIR VALOR, AND IN THE LOYAL FULFILLMENT OF THEIR OBLIGATIONS, THE OFFICERS AND MEN OF THE AMERICAN EXPEDITIONARY FORCES HAVE LEFT A HERITAGE OF WHICH THOSE WHO FOLLOW MAY EVER BE PROUD.

- General Pershing

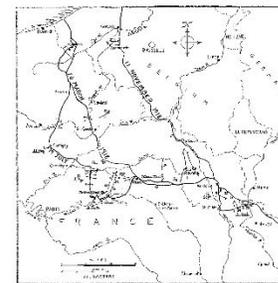


For south Pershing Wall text, see appendix

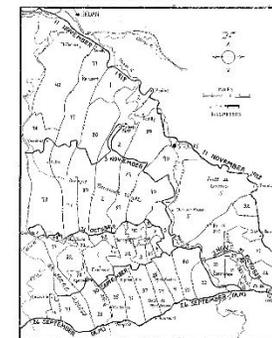
INTERPRETIVE



THE WESTERN FRONT



THE MEUSE-ARGONNE CAMPAIGN



2nd Tier Commemorative Features

INSCRIPTIONS: PEACE FOUNTAIN



Search for Peace Quotation Content:

WE LEAVE YOU OUR DEATHS: GIVE THEM THEIR MEANING:
GIVE THEM AN END TO THE WAR AND A TRUE PEACE:
GIVE THEM A VICTORY THAT ENDS WAR AND A PEACE AFTERWARDS:
GIVE THEM THEIR MEANING.

WE WERE YOUNG, THEY SAY. WE HAVE DIED. REMEMBER US.

- ARCHIBALD MACLEISH

2nd Tier Commemorative Features

INSCRIPTIONS: NORTH BERM



2nd Tier Commemorative Features

INSCRIPTIONS: PA AVE PLANTERS



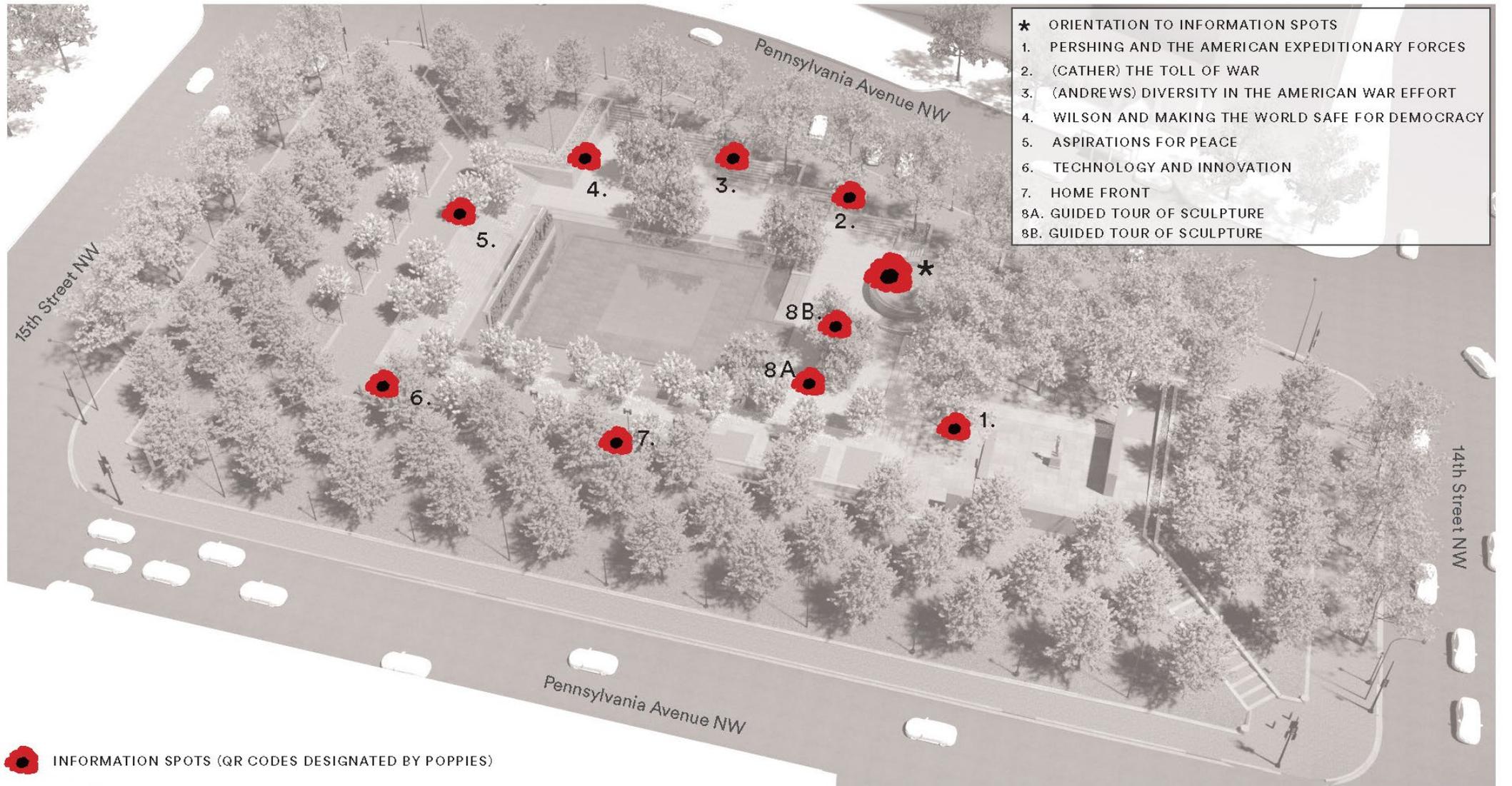
42

2nd Tier Commemorative Features

FLAGSTAFF



3rd Tier Commemorative Features



3rd Tier Commemorative Features

INFORMATION POPPIES



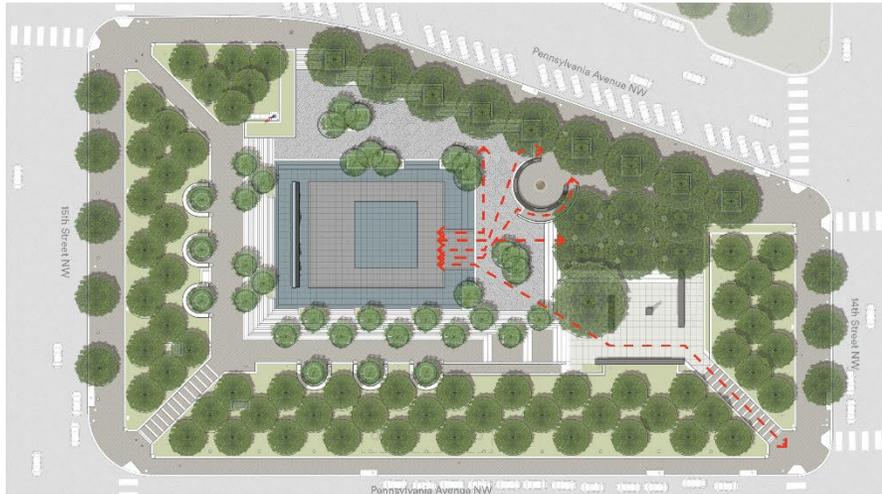
Anodized aluminum poppy medallion secured to anodized aluminum post set in planting (medium bronze finish)



Poppy medallion engraved into stone on stone clad walls and planter terraces

Walkway / Platform

SUPPORTING ELEMENTS VIEWING PLATFORM



Walkway / Platform Details

SUPPORTING ELEMENTS

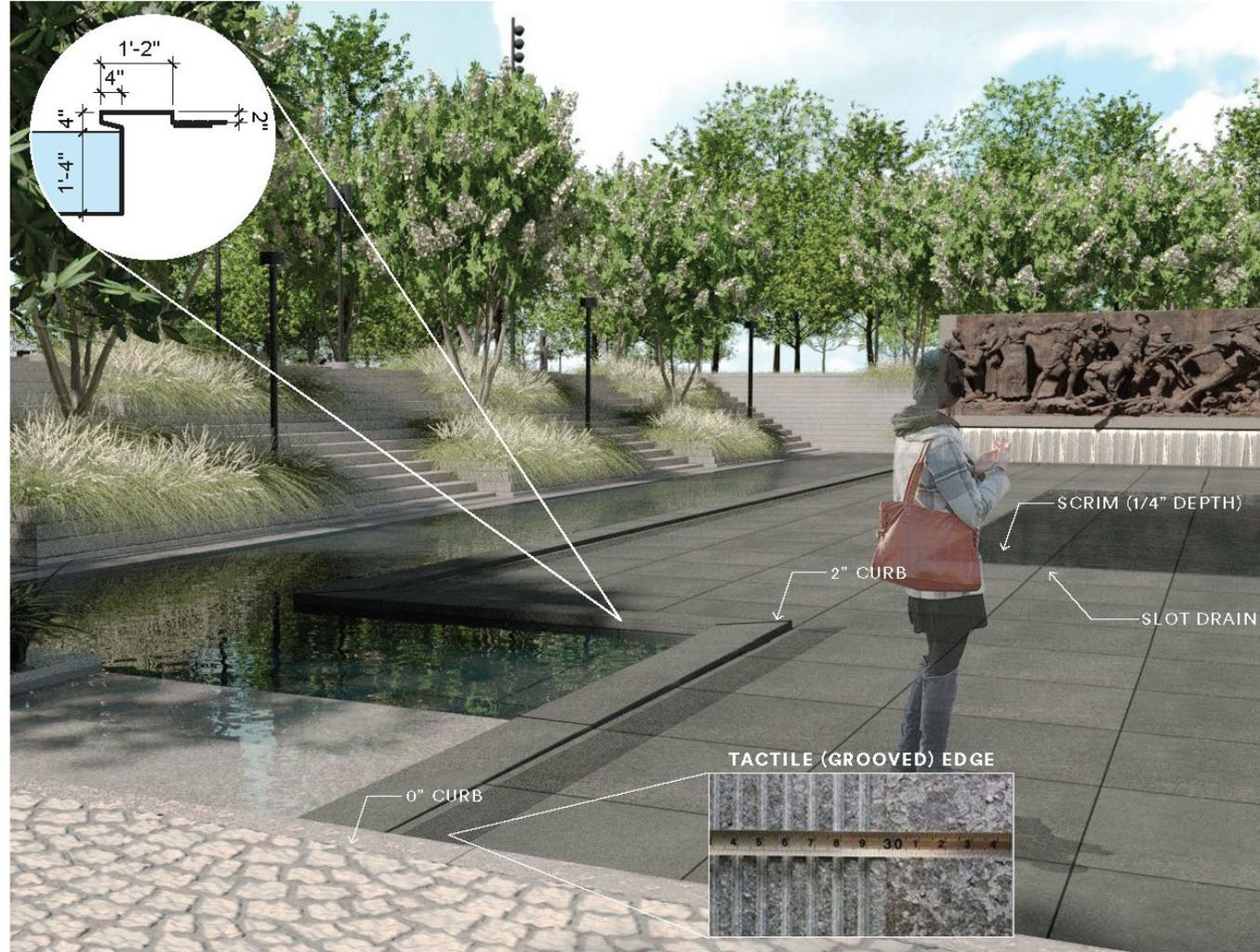
VIEWING PLATFORM: DETAILING AND MATERIALITY



**ACADEMY BLACK
GRANITE
(THERMAL FINISH)**
WALKWAY AND CURB



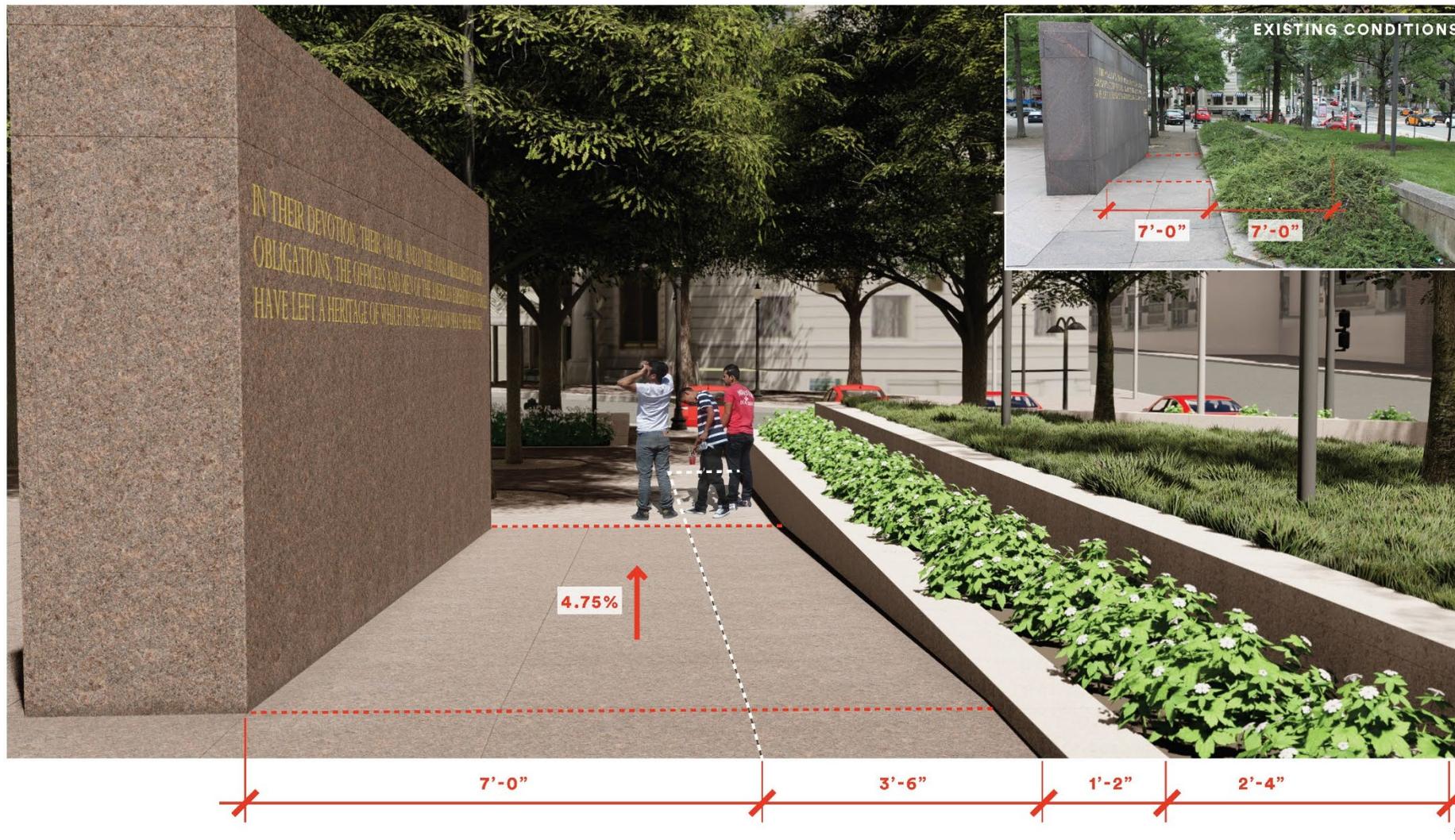
**COLDSRING BLACK
GRANITE
(THERMAL FINISH)**
SCRIM AND POOL
BASIN



Accessibility Improvements – East Walk

SUPPORTING ELEMENTS

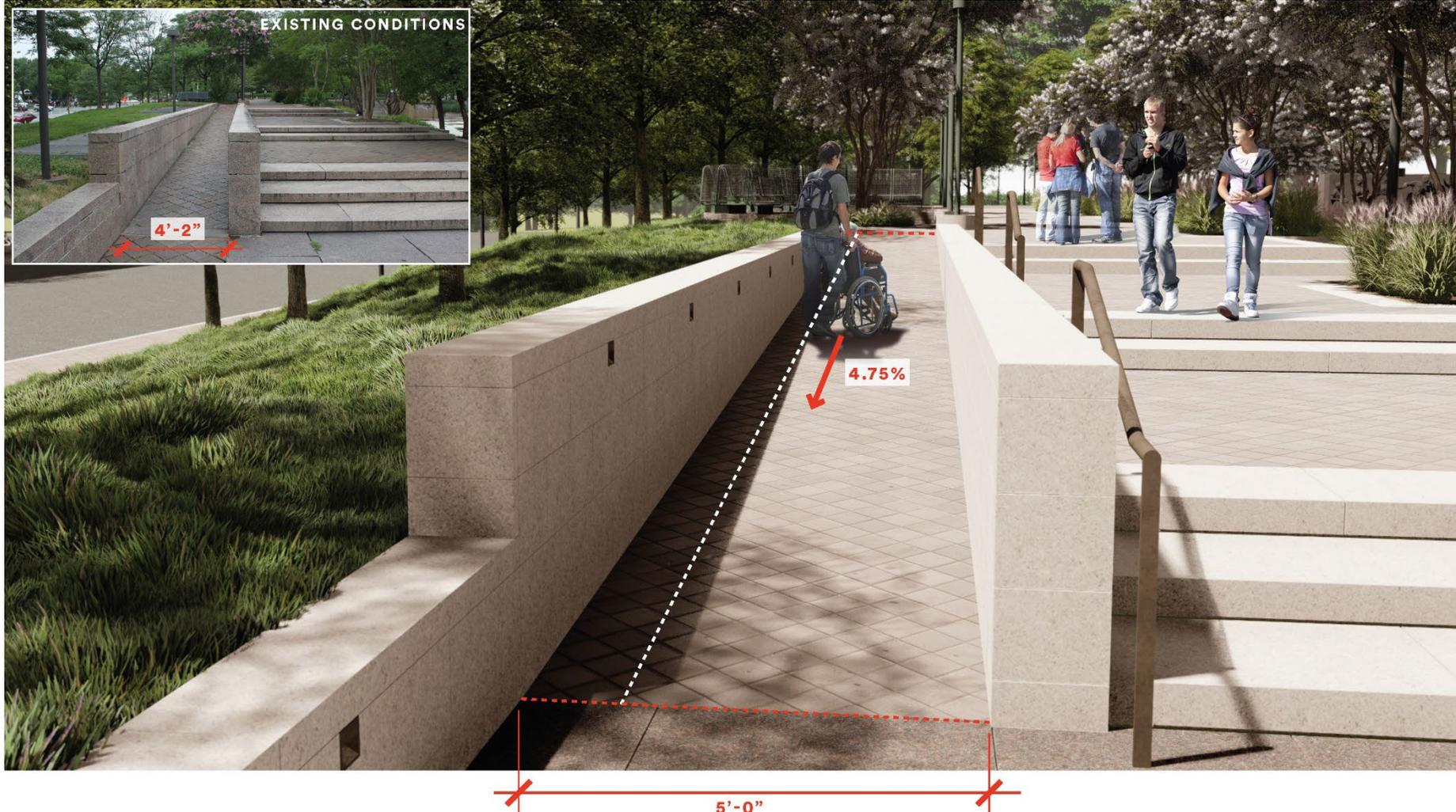
ACCESS IMPROVEMENTS: EAST SLOPED WALK



Accessibility Improvements – South Walk

SUPPORTING ELEMENTS

ACCESS IMPROVEMENTS: SOUTH SLOPED WALK

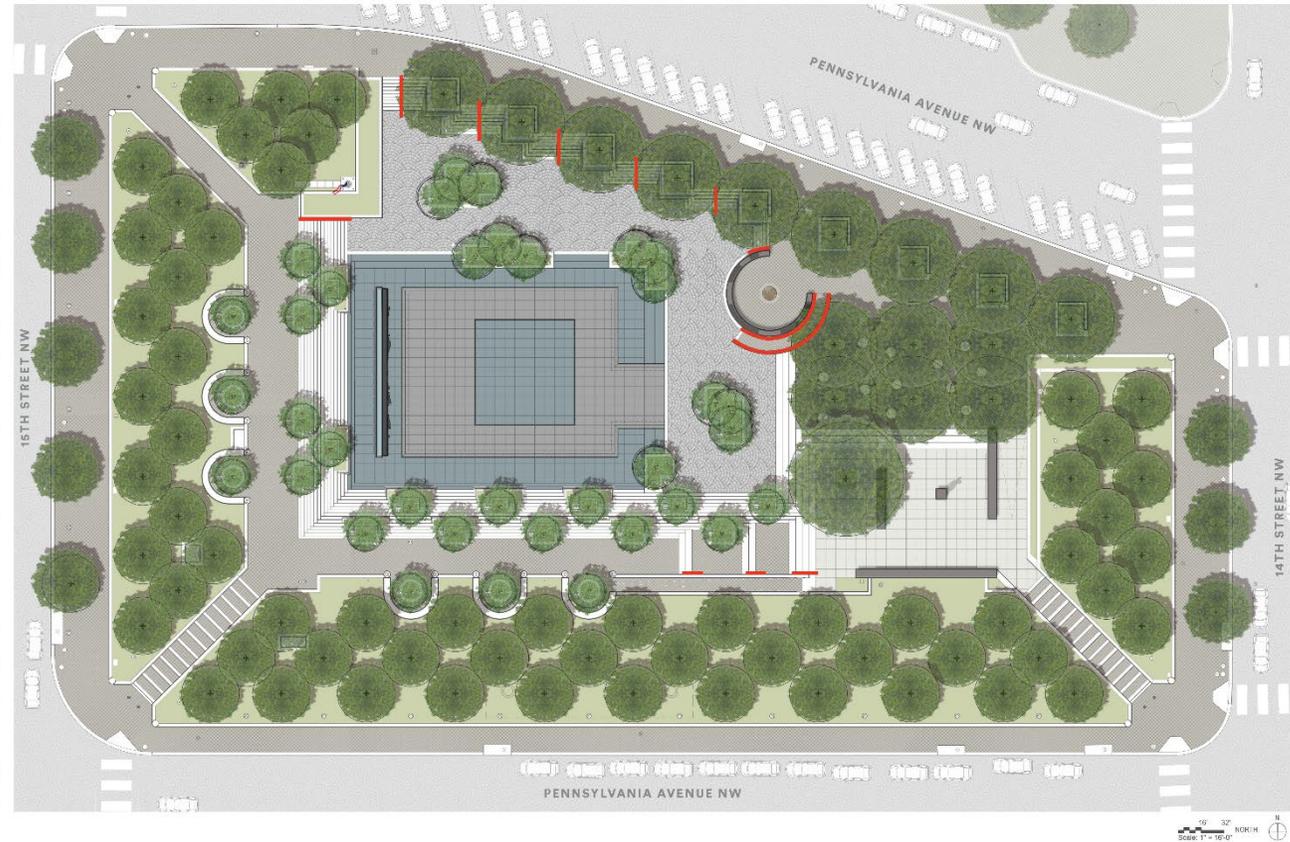


Accessibility Improvements - Handrails

SUPPORTING ELEMENTS

ACCESS IMPROVEMENTS: SITE HANDRAILS

Missing handrails on site are to be reinstated to support accessible movement across the site. All handrails are anodized aluminum with a medium bronze finish.



Wayside Elements

SUPPORTING ELEMENTS

PARK HISTORY WAYSIDE



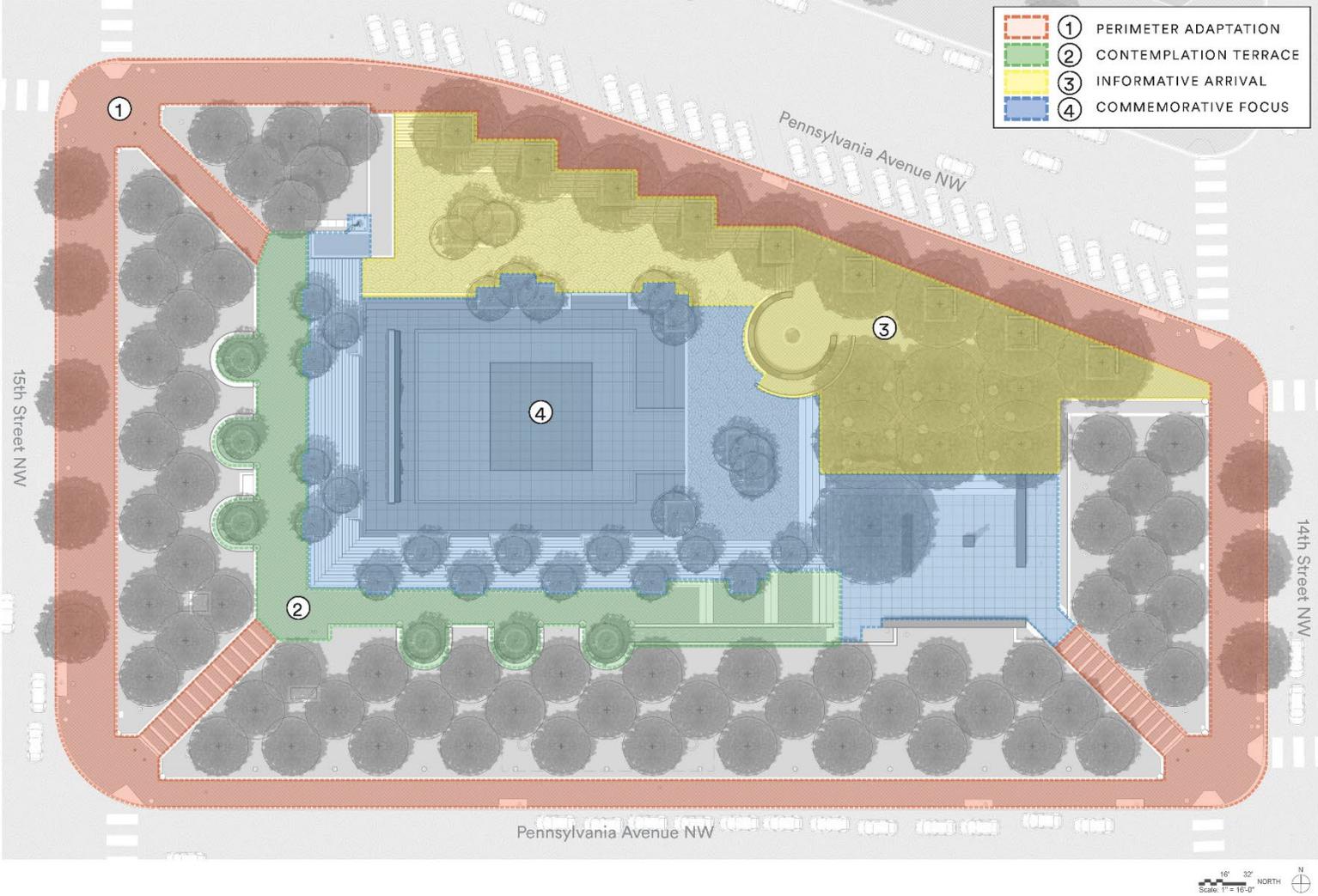
53

Lighting Strategy

SUPPORTING ELEMENTS

LIGHTING: STRATEGY

Visitors filter into the park through layers and zones of light which adapt the visitor from the surrounding brightly lit urban context to the more quietly lit landscape. Within this soft landscape lighting are the commemorative elements (both existing and proposed) which emerge from the quiet park lighting with feature illumination, bringing the focus of the nighttime visitor onto the commemorative works.



Lighting Strategy

SUPPORTING ELEMENTS

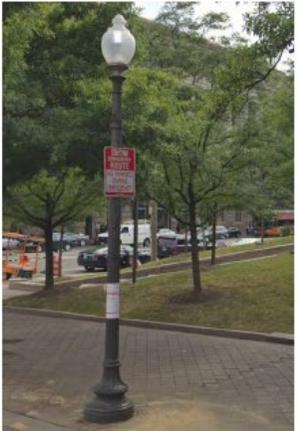
LIGHTING: PERIMETER ADAPTATION

Sidewalk and street lighting in this layer tie the site into the urban street grid, allowing for a transition from the high brightness light levels of the city to the softer glow of the memorial park.

Washington Globe fixtures remain along the streetscapes and are added along the south and west edges of the park. Washington Globe fixtures with finials remain along Pennsylvania Avenue. Existing roadway fixtures remain with minor adjustments in location to reduce their impact on site entrances. Existing circulation fixtures are refurbished and utilized for general site lighting.



EXISTING CIRCULATION FIXTURES



WASHINGTON GLOBE



WASHINGTON GLOBE WITH FINIAL



EXISTING ROADWAY COBRA POLES



Lighting Strategy

SUPPORTING ELEMENTS

LIGHTING: CONTEMPLATION TERRACE

This zone of lower brightness carries visitors into the site while shielding the commemorative works from the adjacent urban glare.

The Simes Double Slot fixtures at the roundels provide downward focused path lighting while continuing the existing spatial organization previously provided by the multi-globe fixtures. Wall lights along the sloped walk illuminate the accessible routes through the site.



SIMES DOUBLE SLOT POLE



LUCIFER STEALTH WALL MOUNTED STEP LIGHTS



Lighting Strategy

SUPPORTING ELEMENTS

LIGHTING: COMMEMORATIVE FOCUS

In this layer, the commemorative works emerge from the subtle park lighting to pull the focus of the visitor to the memorial elements while providing a contemplative atmosphere, fully sheltered from the surrounding city lights.

Two accent lighting poles provide focused lighting at strategic angles to illuminate the Soldier's Journey sculpture and provide depth through highlight and shadow. The northern pole is tucked within the lower plaza planter to minimize its impact upon the site and the southern pole is set along the upper terrace, centered on the planters. On the west face, at the Peace Fountain, a linear fixture is set below the water level to illuminate the cascading water. Two additional focus light fixtures add a highlight to the quote. At the Pershing memorial, two accent lighting poles are set diagonally to the Pershing Statue to provide highlight and shadow upon his figure. Two linear in-grade fixtures graze the existing walls allowing visitors to read the inscriptions during the evening hours. Linear strip lighting under the Pershing bench provides an inviting glow to the space. At the flagstaff, 4 uplights illuminate the flag above.



POLE ACCENT LIGHTS



CASCADE UPLIGHTING



CASCADE ACCENT LIGHTS



PERSHING WALL IN-GRADE UPLIGHTS



UNDERBENCH LIGHTING



FLAGSTAFF UPLIGHTING



Lighting Strategy



Entry Signage and Security Elements

SUPPORTING ELEMENTS
ENTRY SIGNAGE AND SECURITY MEASURES



Entry Signage

SUPPORTING ELEMENTS

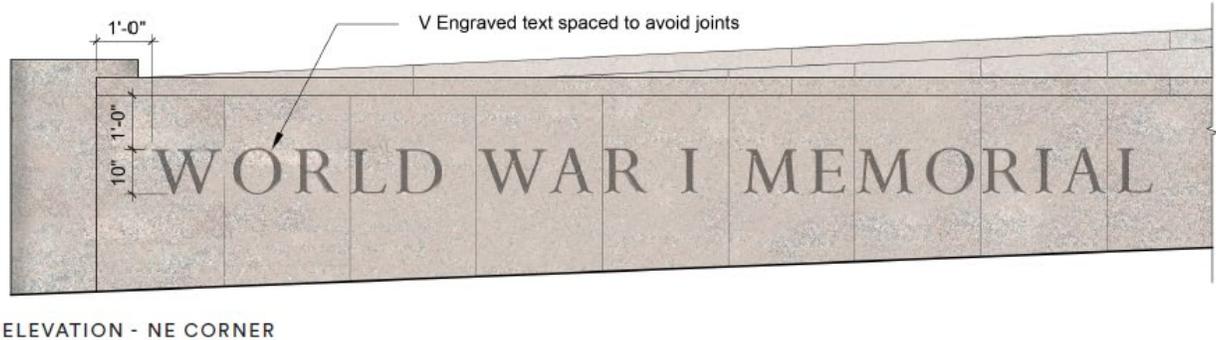
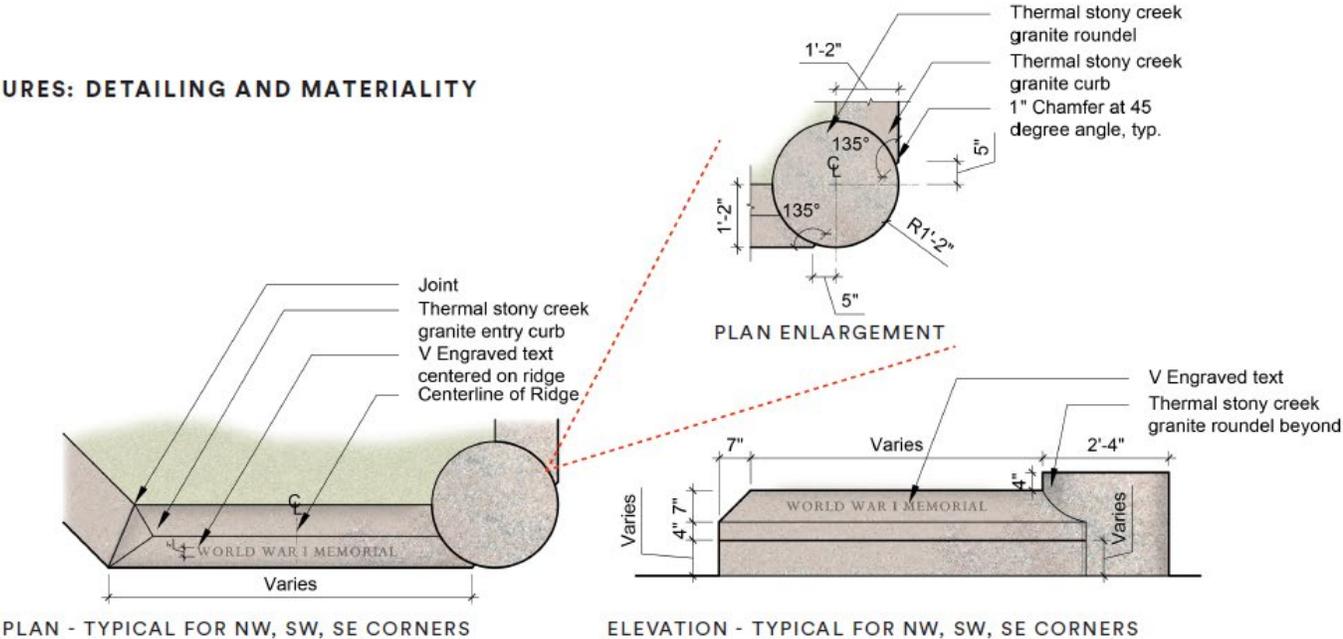
ENTRY SIGNAGE AND SECURITY MEASURES: DETAILING AND MATERIALITY



STONY CREEK
(THERMAL FINISH)



2" DEEP V ENGRAVED
TEXT WITH MEDIUM
IN-PAINTED SHADOW



Security Elements

SUPPORTING ELEMENTS

SECURITY MEASURES

- Continuation of the existing PA Avenue benches and planters
- Chevron form adds strength and can be designed with a deep footer to deter vehicles
- Works from a security standpoint to protect the grove from errant vehicles
- In character with the existing park
- Means of differentiating new planters requested by SHPO at June 11th meeting; stone has been texturized to accommodate this request



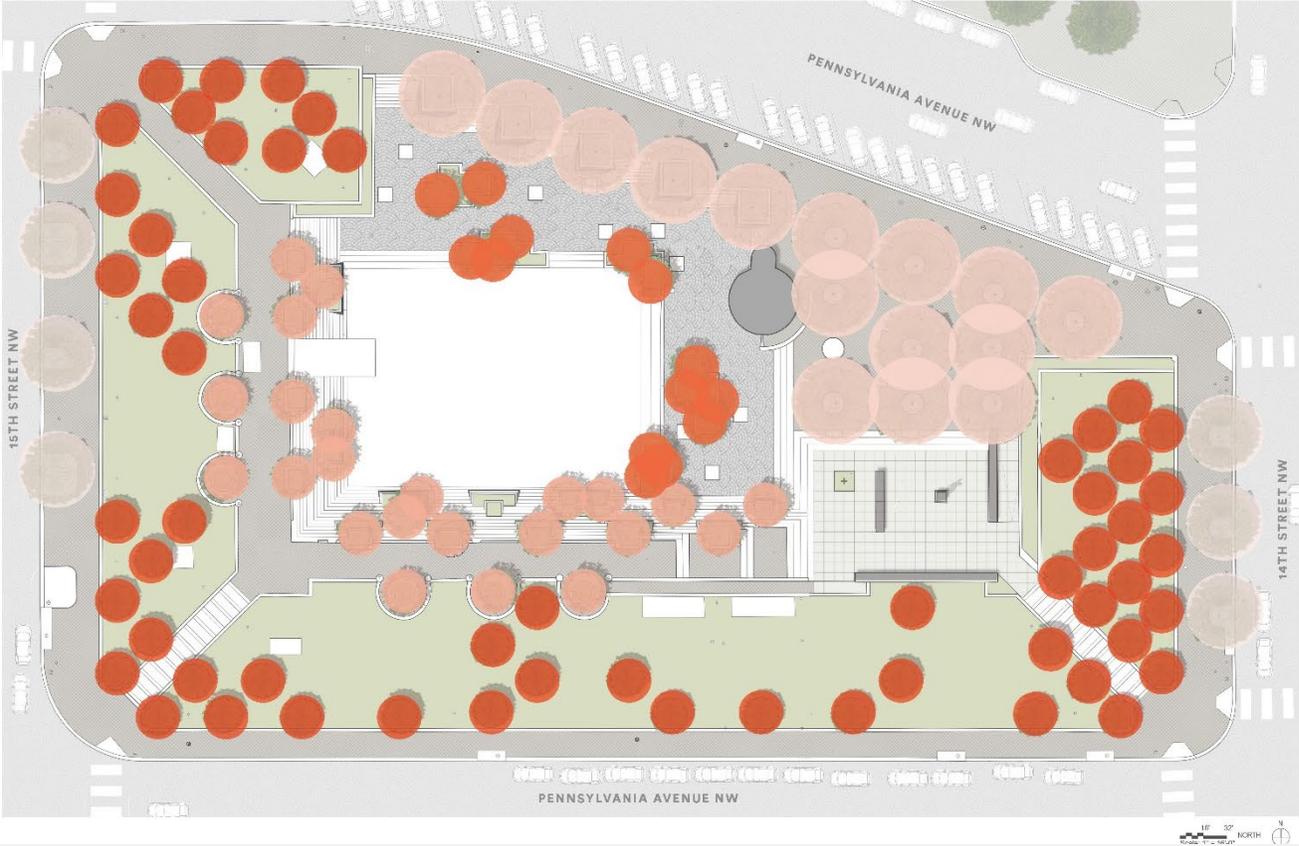
56

Existing Canopy

PLANTING

EXISTING CANOPY

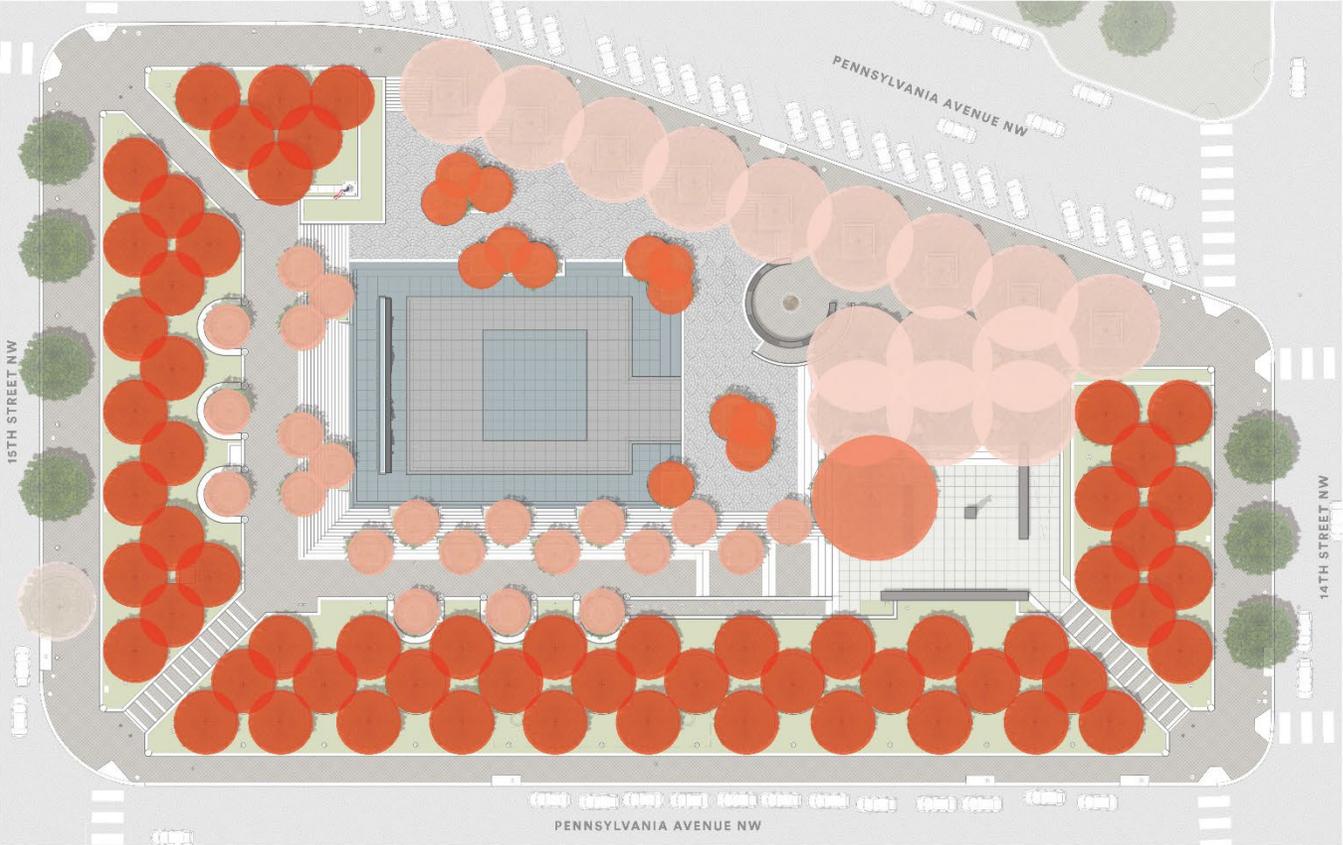
-  Berm Trees:
Thornless Honey Locust
Gleditsia tricanthos inermis
-  Lower Plaza Planters:
Sweetbay Magnolia
Magnolia virginiana
-  Specimen Tree:
Jefferson Elm (Disease Resistant)
Ulmus americana 'Jefferson'
-  Terrace Planters:
White Crepe Myrtle
Lagerstroemia indica x fauriei 'Natchez'
-  PA Ave / Grove Trees:
Willow Oak
Quercus phellos
-  Street Trees:
Northern Red Oak
Quercus rubra



Proposed Canopy

PLANTING PROPOSED CANOPY

-  Berm Trees:
Thornless Honey Locust
Gleditsia tricanthos inermis
-  Lower Plaza Planters:
Sweetbay Magnolia
Magnolia virginiana
-  Specimen Tree:
Jefferson Elm (Disease Resistant)
Ulmus americana 'Jefferson'
-  Terrace Planters:
White Crepe Myrtle
Lagerstroemia indica x fauriei 'Natchez'
-  PA Ave Trees:
Willow Oak
Quercus phellos
-  Street Trees:
Northern Red Oak
Quercus rubra



Proposed Canopy

PLANTING

PROPOSED CANOPY

Berm Trees:
Quantity of trees in the grid to be reduced from 95 to 61 to allow more soil per tree. Soils will also be remediated to support overall tree health and longevity. Trees to be replaced in kind.

Lower Plaza Planters:
The existing river birch in the lower plaza are replaced with a white flowering magnolia which has a stronger structure and more formal character.

Specimen Tree:
A disease resistant elm is brought in to replace the missing specimen tree at the Pershing Memorial.

Terrace Planters:
The pink crepe myrtles are replaced with a white flowering variety to support a landscape of solemnity and remembrance.

PA Ave / Grove Trees:
Existing trees replaced in kind and soil volumes connected between the planters with structural soil to support overall health and longevity.

Street Trees:
Missing street tree replaced in kind.



Berm Trees:
Thornless Honey Locust | *Gleditsia tricanthos inermis*



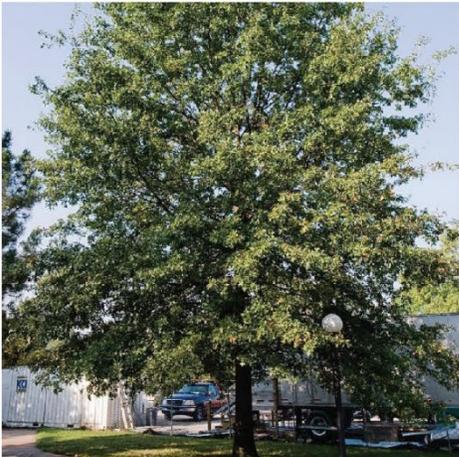
Lower Plaza Planters:
Sweetbay Magnolia | *Magnolia virginiana*



Specimen Tree:
Jefferson Elm (Disease Resistant) | *Ulmus americana 'Jefferson'*



Terrace Planters:
White Crepe Myrtle | *Lagerstroemia indica x fauriei 'Natchez'*



PA Ave / Grove Trees:
Willow Oak | *Quercus phellos*



Street Trees:
Northern Red Oak | *Quercus rubra*

Understory Palette

PLANTING

UNDERSTORY: OVERALL PALETTE



Carex pensylvanica /
Pennsylvania Sedge



Papaver orientale | Red Poppies



Liriope muscari 'Monroe's
White' | White Liriope



Galanthus | Snowdrops



Astilbe x arendsii 'Deutschland' /
White Astilbe



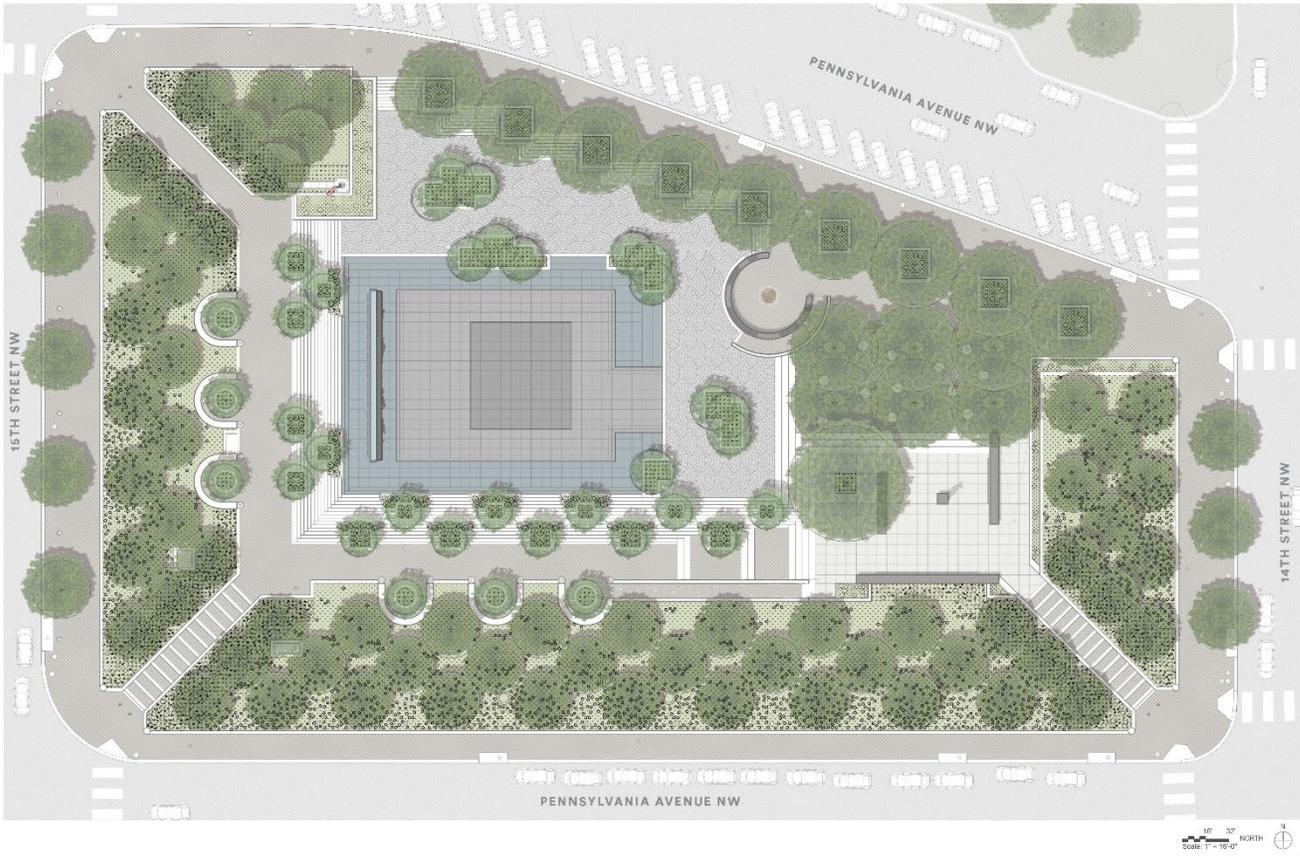
Pennisetum Alopecuroides /
Fountain Grass



Astilbe x arendsii 'Deutschland' /
White Astilbe

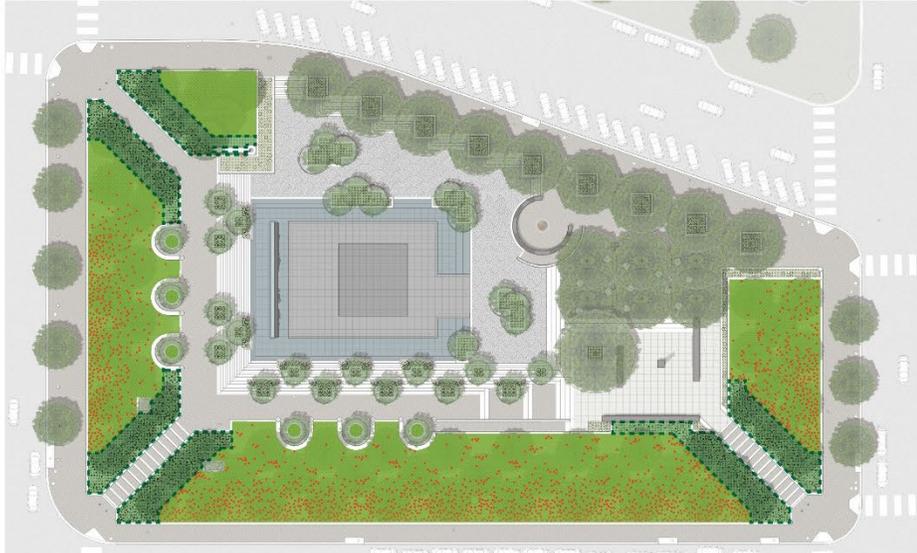


Anemone hupehensis var.
japonica 'Honorine Jobert'



Berm Plantings - Understory

PLANTING
UNDERSTORY: BERMS



Year Round: Carpet
Carex pensylvanica | Pennsylvania Sedge



Early Summer: Ephemeral Accent
Papaver orientale | Red Poppies



Early Summer: Entry Planting
Astilbe x arendsii 'Deutschland' | White Astilbe



Late Summer / Early Fall: Entry Planting
Liriope muscari 'Monroe's White' | White Liriope

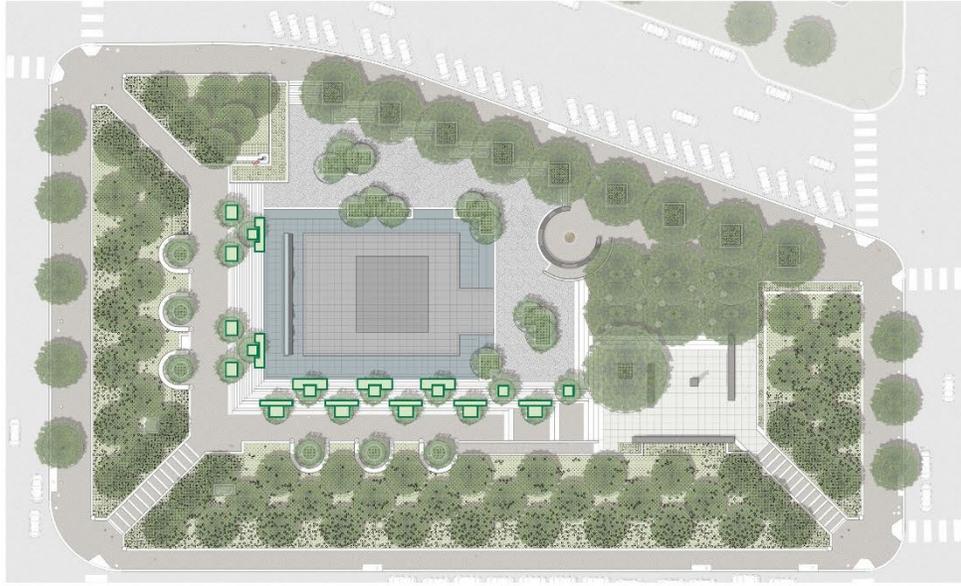


Winter / Early Spring: Ephemeral Accent within Carex Carpet
Galanthus | Snowdrops

Terrace Planters

PLANTING

UNDERSTORY: TERRACE PLANTERS



Pennisetum Alopecuroides
Fountain Grass



Original Intent



Proposed

Lower Plaza Planters

PLANTING

UNDERSTORY: LOWER PLAZA PLANTERS



Species:
Liriope muscari 'Monroe's White' | White Liriope



Existing

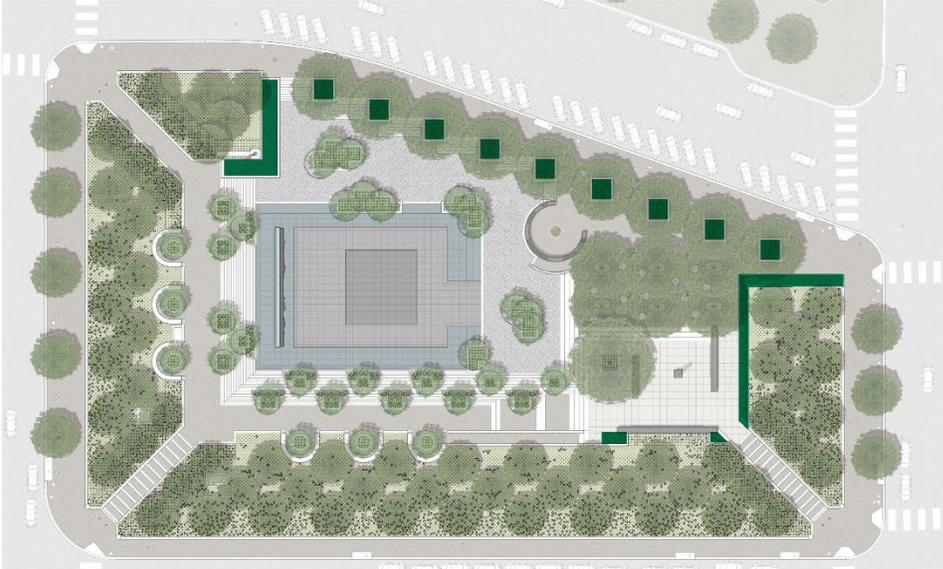


Proposed

Pennsylvania Avenue Planters

PLANTING

UNDERSTORY: PA AVE PLANTERS



Species:
Asarum splendens | Asian Ginger



Species:
Anemone hupehensis var. *japonica*
'Honorine Jobert' | Japanese Anemone



Existing



Proposed

Other Information

NATURAL RESOURCES

As identified in EA:

- Reduction of trees on site was dismissed from further analysis given the size and urban context of the project area
- Landscaping plan adheres to planting strategies and framework to perpetuate historic landscape design

ENERGY AND SUSTAINABILITY

Reduction of energy use and incorporation of sustainable design elements has been addressed in the project in various ways:

- Lighting fixtures will include LED lamps to limit energy usage
- Rainwater harvesting will be used to primarily supply the landscape irrigation
- Increase in tree canopy will work to mitigate solar heat island effects

STORMWATER MANAGEMENT

The project is currently undergoing review with DOEE to approve its stormwater management strategy. The design team provided a limit of disturbance plan to DOEE to establish its stormwater management requirements. In order to achieve the requirements, the project design includes an underground cistern that will capture rainwater and once treated, it will be recycled for use to irrigate the landscaping.



NATIONAL WORLD WAR I MEMORIAL

Washington, DC

October 3, 2019

Finding of No Significant Impact

Pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA), the Council on Environmental Quality Regulations (40 CFR, Parts 1500-1508), and the National Capital Planning Commission's NEPA Regulations, I have evaluated the final site development plans for the National World War I Memorial, located at Pershing Park in Washington, DC, as shown on NCPC Map File No. 1.23(73.10)44997; and the National World War I Memorial Environmental Assessment (EA) prepared by the National Park Service (NPS) along with the National Capital Planning Commission (NCPC) as a cooperating agency. I concur with the Finding of No Significant Impact (FONSI) prepared by NPS and signed on April 10, 2019. Based on the foregoing, I have determined that the selected Alternative B: Action Alternative with the Freestanding Sculpture Option and Island Walkway Option, will not have a significant impact on the human environment.

Purpose and Need

The purpose of the World War I Memorial is to further honor the service members of the U.S. Armed Forces in World War I by enhancing the General John J. Pershing Commemorative Work as a national World War I Memorial by constructing appropriate sculptural and commemorative elements, including landscaping as provided within Public Law 113-291. The Memorial is needed to fulfill the Congressional mandate for the establishment of a national World War I Memorial at Pershing Park.

Proposed Action

The proposed action includes removing the existing cascade fountain and kiosk and adding a commemorative sculpture that includes a fountain, a walkway through the pool, and an elevated interpretive area, referred to as the belvedere. In addition, the existing circular metal and plastic kiosk will be removed and accessibility through the site will be improved. Vegetation and hardscape will be modified, replaced or removed in certain areas. New or enhanced interpretive elements will also be included.

Selected Alternative

Alternative B: Action Alternative with the Freestanding Sculpture Option and Island Walkway Option, has been identified as the preferred alternative. The Action Alternative would retain the site's existing circulation framework and access with minor modifications to improve universal accessibility. The four corners of the site and the length of Pennsylvania Avenue, NW along the north side of the site would continue to provide access into the interior of the site. The width of the accessible ramp connecting to the south side of the upper terrace would be widened to the south to meet code requirements. The width of the accessible ramp connecting with the tree grove along Pennsylvania Avenue NW would be widened to the east. The length of the ramp would also be extended, and the slope would be reduced to meet code requirements for accessibility. The Action Alternative would retain the General Pershing Commemorative Work in its current condition and location. The statue of General John J. Pershing would continue to be flanked by the two granite walls to the south and east and a bench to the west.

The existing cascade fountain would be removed, and a new, freestanding 56.5-foot long commemorative sculpture fountain would be inserted into the pool between its western edge and a proposed walkway. The eastern face of the commemorative sculpture would include a high relief sculpture with a fountain below, while the western face would include an etched quotation and a full height cascade fountain. Water would flow from the top of the sculpture fountain and cascade over the west face down to the pool to generate a sound and a cooling effect in a manner consistent with the original design of the historic fountain. The semi-circular seating to the west of the walkway would remain in place.

The Action Alternative calls for modifications to the existing pool basin to accommodate a walkway through the water, which would allow visitors to view the commemorative sculpture fountain more closely. The basin's existing concrete material would be replaced by dark granite. An island-shaped walkway would extend along the southern, northern, and western portions of the pool with a central entry point at the east side of the pool. The tree planters at the eastern edge of the pool and one tree planter to the east of the pool on the lower plaza would be modified to accommodate the walkway. The walkway would enclose a scrim of water, 0.25 inches in depth, and set to be coplanar with the walkway itself. The exterior perimeter of the pool basin, along the pool edges would contain water at a depth of approximately 16 inches.

The rows of honey locust trees within the east, south, and west berms would be replaced. The proposed planting plan would retain the gridded planting arrangement of the honey locust trees shown in the Oehme van Sweden planting plan, but the total number of trees would be reduced by approximately 34 trees to provide larger soil volumes for each tree. The lawn on the berms would be replaced with understory plantings similar in character to the plants specified in the original Oehme van Sweden planting plan. Pennsylvania sedge and red poppies will be planted on the south berm and the southern portions of the east and west berms. White astilbe, white liriopse, and snowdrops would be planted in the berm areas adjacent to the northwest, southwest, and southeast

entrances to the site. Pink crape myrtles in the alcoves along the elevated walks would be replaced with white crape myrtles. The total number of crape myrtles would be retained.

New willow oaks would replace in-kind the existing Pennsylvania Avenue street trees that are in poor condition. With the exception of one tree, which would be removed and not replaced, willow oaks located at the northeast corner of the park would also be replaced in-kind as needed. The total number of willow oaks would be retained. Willow oaks in planters with English Ivy ground cover located along Pennsylvania Avenue would be replaced in-kind as needed; the number of willow oaks would be retained. The existing planter understory would be replaced with Asian ginger and Japanese anemone.

White crape myrtles would replace pink crape myrtles with ground cover at their bases; a fountain grass understory would replace the existing ground cover within the terrace step planters. Sweetbay magnolias with a white liriopce understory would replace the river birches in planters throughout the lower plaza. In both cases, the Action Alternative proposes to reduce the number of trees in order to provide larger soil volumes for each tree. The total number of trees at these locations would be reduced from the Oehme van Sweden planting plan by approximately 12 trees.

The existing 14th Street NW and 15th Street NW northern red oak street trees would be replaced in-kind. One missing northern red oak from the site's original canopy would be restored. The site of the missing copper beech at the General Pershing Commemorative Work would be replaced with a Jefferson elm. Native and naturalized grasses and perennial flowering plants would be replaced in-kind or with plants of similar ornamental characteristics as described above. The soils would be amended within the planting areas, including planters to improve the long-term viability of the trees.

The Action Alternative proposes to replace the circular metal and plastic kiosk with an elevated interpretive overlook (referred to as the belvedere), which would offer a semi-enclosed area from which to view the park. The design would remove the elevator form associated with the kiosk, remove and replace the existing wall with a larger footprint to accommodate an accessible ramp, and install a new stone cap. The Bex Eagle would remain in its current location. The Action Alternative also calls for the removal of the granite trash enclosures and replacement of the drinking fountains.

A flagstaff would be placed in the northwest berm, near the edge of the existing wall bordering the amphitheater-style steps. The face of the eastern existing wall of the northwest berm would include an etched quotation. A door would be added to the southern wall of the northwest berm to provide access to below grade spaces. The eastern and southern edges of the northwest berm would be elevated to accommodate access to below grade spaces.

The project would follow applicable stormwater requirements listed in the District of Columbia's 2013 Rule on Stormwater Management and Soil Erosion and Sediment Control and the federal Energy Independence and Security Act (EISA). The memorial will include stormwater management, soil erosion, and sediment controls.

Other Alternatives Evaluated

The EA analyzed a No-Action Alternative along with the Action Alternative for the proposed national World War I Memorial. The No-Action Alternative provided a basis for comparing the management direction and environmental consequences of the other alternatives. Other alternatives considered but dismissed during the planning process are described in detail in Appendix A of the EA.

Standard for Evaluation

Under NEPA, the Council on Environmental Quality (CEQ) regulations, and NCPC Environmental Policies and Procedures, an EA is sufficient and an Environmental Impact Statement need not be prepared if the EA supports the finding that the major federal action will not significantly affect the human environment. The EA for this project was prepared in accordance with this standard.

Potential Impacts

As described in the EA, the selected alternative has the potential for adverse impacts on cultural landscapes; however, no significant impacts were identified. Implementing the selected alternative will result in detectable long-term adverse impacts on cultural landscapes. Changes to the site's spatial organization, omnidirectional views, built features (including water features), vegetation, and small-scale built features, will result in detectable long-term adverse impacts on Pershing Park, and therefore the Pennsylvania Avenue, NW - White House to the Capitol - Cultural Landscape. The selected alternative will replace the existing cascade fountain with a freestanding commemorative sculpture fountain, place a central island walkway across the pool basin, remove steps and planters, replace vegetation, and remove trash cans.

However, several of the site's missing functions and characteristics will be reinstated. The selected alternative will retain pool basin footprint, repair the pool to be operational, and replace the cascading water in the pool basin, which is currently dry. Although the fountain feature will change, the new freestanding sculpture will recreate a focal feature at the western portion of the pool. The fountain will help create ambient noise and visual interest that can be seen and heard from various points around the park, recreating a condition that is similar to the original design of Pershing Park. Modifications to the ramps to improve universal accessibility will be undertaken in a manner that is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, and will not substantively alter the spatial organization or character-defining

features of the park. All vegetation will be replaced in-kind or with compatible vegetation. Although the total number of trees from the Oehme van Sweden planting plan will be reduced, the reduction will result in more soil volume per tree and increased tree viability. Temporary changes to the Pennsylvania Avenue street trees will occur during construction when the trees are replaced. However, these changes will be consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties because the trees will be replaced in-kind.

The selected alternative includes the construction of new elements within the site that will expand the commemorative experience, expand circulation, and reinstate the intended experience of a pool and fountain. These improvements will temporarily prohibit visitor use at the site during construction, resulting in temporary noticeable adverse impacts on visitor use and experience during construction; however, the impacts will be short-lived.

Mitigation Measures

In order to mitigate potential impacts on cultural landscapes, a Memorandum of Agreement (MOA) between NPS, NCPC, WWICC, the Advisory Council on Historic Preservation (ACHP) and the DC State Historic Preservation Office (SHPO), was developed. The MOA includes specific measures, including design review, as well as minimization and mitigation strategies. These are described in detail in Attachment 1.

Marcel Acosta
Executive Director

Date

ATTACHMENTS FOLLOW ON SEPARATE PAGES

ATTACHMENT 1: SECTION 106 MEMORANDUM OF AGREEMENT

**MEMORANDUM OF AGREEMENT
AMONG
THE NATIONAL PARK SERVICE
THE WORLD WAR I CENTENNIAL COMMISSION
THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICER
THE NATIONAL CAPITAL PLANNING COMMISSION
AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING
THE ESTABLISHMENT OF THE NATIONAL WORLD WAR I MEMORIAL
WASHINGTON, DC**

This Memorandum of Agreement ("MOA") is made as of this th 10 day of April, 2019, by and among the National Park Service (NPS), the World War I Centennial Commission, the District of Columbia State Historic Preservation Officer (DC SHPO), the National Capital Planning Commission (NCPC), and the Advisory Council on Historic Preservation (ACHP) (referred to collectively herein as the "Parties" or "Signatories" or individually as a "Party" or "Signatory"), pursuant to Section 106 of the National Historic Preservation Act ("NHPA"), 54 U.S.C. §§ 306108, and its implementing regulations 36 CFR Part 800 ("Section 106") regarding the Establishment of the National World War I Memorial in Washington, DC; and

WHEREAS, through Public Law 113-291, 3091 Stat. 3292 (December 19, 2014), the U.S. Congress redesignated Pershing Park in the District of Columbia as a World War I Memorial; and

WHEREAS, through Public Law 113-291, 3091 Stat 3292, the U.S. Congress has authorized the World War I Centennial Commission (WWICC) to enhance the General Pershing Commemorative Work on the World War I Memorial site by constructing appropriate sculptural and other commemorative elements, including landscaping, to further honor the service of members of the United States Armed Forces in World War I; and

WHEREAS, the World War I Memorial site is located within the Pennsylvania Avenue National Historic Site (Pennsylvania Avenue NHS), which is under the jurisdiction of the National Mall and Memorial Parks (NAMA), a unit of the National Park Service (NPS); and

WHEREAS, after detailed study of various alternatives to avoid and minimize adverse effects of the proposed World War I Memorial, the NPS has defined the preferred option as the Proposed Action in the *World War I Memorial Assessment of Effects*, as reflected in the plans attached hereto as Appendix A; and

WHEREAS, the World War I Memorial would result in a cumulative adverse effect on the Pershing Park due to the following actions:

- Removal of the existing cascade fountain structure;
- Alteration of the materials of the existing pool basin and modification of its depth;
- Insertion of a freestanding commemorative sculpture in the pool basin;
- Replacement of the circular metal and plastic kiosk with an elevated interpretive viewing platform; and

Memorandum of Agreement
The Establishment of the National World War I Memorial

- Modification, replacement, or removal of existing vegetation

WHEREAS, the proposed World War I Memorial constitutes a federal Undertaking subject to Section 106 of the NHPA; and

WHEREAS, pursuant to Section 106, federal agencies must take into account the effects of their undertakings on any district, site, building, structure or object that is included in or eligible for inclusion in the National Register of Historic Places, and afford the ACHP a reasonable opportunity to comment; and

WHEREAS, the NPS is entering into this Memorandum of Agreement (Agreement) pursuant to 36 CFR 800.6(c) to fulfill its responsibilities under Section 106; and

WHEREAS, the Memorial is being established pursuant to the Commemorative Works Act, 40 USC Chapter 89 (CWA); and

WHEREAS, the CWA requires that memorials are designed and located to protect open space (40 USC 8905), and cultural and natural resources (40 USC 8905(b)(2)(B)) to the extent practicable; and

WHEREAS, the National Capital Planning Commission (NCPC) has approval authority over the proposed World War I pursuant to the CWA, and NCPC is required to comply with Section 106 of the NHPA; and

WHEREAS, the NPS and NCPC have agreed that the NPS will be the lead agency pursuant to 36 CFR 800.2(a) (2) for the Undertaking to fulfill their collective Section 106 responsibilities; and

WHEREAS, the NPS initiated Section 106 consultation with the District of Columbia State Historic Preservation Officer (DCSHPO) on May 1, 2015; and

WHEREAS, the NPS has consulted with other parties including, but not limited to, the US Commission of Fine Arts (CFA), the Committee of 100 on the Federal City, the National Trust for Historic Preservation, the DC Preservation League, and the Cultural Landscape Foundation (see Appendix C for complete list of consulting parties); and

WHEREAS, the NPS notified the public and conducted a combined National Environmental Policy Act (NEPA) scoping and Section 106 consultation meeting on May 20, 2015, to inform the public of the World War I Memorial and solicit comments, followed by Section 106 consultation meetings held on December 16, 2015; September 21, 2016; February 9, 2017; June 28, 2017; February 13, 2018; November 5, 2018 ; and February 25, 2019 to provide additional opportunities for the Consulting Parties to comment on historic preservation concerns regarding the World War I Memorial; and

WHEREAS, in accordance with 36 CFR 800.4, the NPS and DCSHPO defined the Undertaking's Area of Potential Effects (APE) to include the structures, buildings, cultural landscapes, and viewsheds surrounding the project area and to encompass the geographic areas within which the Undertaking may directly or indirectly cause alterations in the character or use of historic properties, as shown in Appendix B; and

Memorandum of Agreement
The Establishment of the National World War I Memorial

WHEREAS, Pershing Park, the name by which the World War I Memorial site was formerly known, was determined individually eligible for listing in the National Register of Historic Places (NRHP) because it is a signature designed landscape by M. Paul Friedberg, one of American landscape architecture's most accomplished designers; it includes an overlay planting design by the noted landscape architecture firm of Oehme van Sweden; it demonstrates a high degree of integrity in location, design, and setting; it and contains original plant materials, including trees, lawn, grasses, and flowers; it , contains contributing features of historic, architectural, and symbolic significance in the Pennsylvania Avenue National Historic Site, a property listed in the NRHP; and because it contains contributing features in the Pennsylvania Avenue, NW-White House to the Capitol Cultural Landscape, which has been determined eligible for the NRHP; and

WHEREAS, the WWICC and the NPS substantially minimized the changes to the park from the initial design concept by adhering to the Secretary of Interior's Standards for the Treatment of Historic Properties as closely as possible; retaining the berms, the General Pershing Commemorative Work, the Bex Eagle sculpture, and much of the spatial relationship, seating, paving, vegetation, views and vistas, and sound of the fountain; and by minimizing the length of the commemorative sculpture, as shown in Appendix C; and

WHEREAS, the NPS, in consultation with the WWICC, DCSHPO, NCPC and the Consulting Parties, has determined that the Undertaking will have adverse effects on the World War I Memorial site (formerly Pershing Park), as described in the Summary of Adverse Effects Determination in Appendix E; and

WHEREAS, in accordance with 36 CFR 800.6(a)(1), the NPS has notified the Advisory Council on Historic Preservation (ACHP) of the adverse effects determination and provided the documentation specified in 36 CFR.11(3) and the ACHP elected to participate in the consultation; and

WHEREAS, the Signatories to this Agreement are the NPS, WWICC, NCPC, DCSHPO and ACHP; and

WHEREAS, the NPS submitted the concept design for the World War I Memorial to the NCPC on June 9, 2017 and on August 30, 2018, and the NCPC provided comments on the concept design on July 13, 2017 and October 4, 2018 respectively, and NPS subsequently submitted the revised concept for the World War I Memorial to the NCPC on December 7, 2018, and the NCPC approved the preliminary memorial and site development plans on February 7, 2019; and

WHEREAS, on July 5, 2018 the NPS submitted the revised concept design for the World War I Memorial to the CFA, and on July 19, 2018 "... the [CFA] members commented that the presentation demonstrated that the new commemorative purpose and the preservation of the historic park are not antithetical goals, and that the insertion of the freestanding sculpture wall at the western end of the central pool would successfully reinterpret the existing landscape. They also endorsed the project team's preferred configuration of creating a large paved area or viewing platform within the historic pool, bordered by a significant perimeter of water;" and

Memorandum of Agreement
The Establishment of the National World War I Memorial

WHEREAS, the NPS has released for public review and comment the *World War I Memorial Environmental Assessment*, which analyzed the potential environmental impact from the World War I Memorial; and

NOW, THEREFORE, the NPS and Signatories agree that the Undertaking shall be carried out in accordance with the following stipulations in order to take into account the effects of the Undertaking on historic properties.

STIPULATIONS

The WWICC, the NPS and NCPC shall ensure that the following measures are carried out:

1. DESIGN REVIEW

The NPS shall review the final design documentation after approval by NCPC and CFA, focusing on any substantive changes from the design as presented at the February 25, 2019 Consulting Parties meeting and at the February 7, 2019 NCPC meeting, at which time NCPC approved the preliminary memorial and site development plans, and make a determination as to whether the proposed final design may result in new adverse effects that have not already been resolved and/or the intensification of known adverse effects on historic properties. If the NPS determines that a new or intensified adverse effect will result, the NPS shall immediately notify the Signatories and Consulting Parties and will consult further to determine whether additional mitigation and/or an amendment to this Agreement will be necessary. Any such amendment will be addressed in accordance with Administration Stipulation 5.d.

2. MINIMIZATION

a. Structural Elements

New paving or other stone elements shall be materials consistent with the original design of the former Pershing Park as appropriate. The WWICC and the NPS shall retain the circular shape of the kiosk at the new belvedere. The WWICC and the NPS will continue to minimize the number and size of walkway connections to the pool edge.

b. Incorporation of Fountain

The WWICC and the NPS shall include a fountain in the design of the new commemorative sculpture in order to replicate the historic auditory experience of moving water and movement to the pooled water.

c. Treatment of Vegetation

The WWICC and the NPS shall replace vegetation at the site in-kind (i.e. with same or like vegetation), or with vegetation that adheres to the planting plan and that perpetuates the historic landscape design to the extent practicable with current NPS policies (i.e. non-invasive and native), as shown in Appendix A.

Memorandum of Agreement
The Establishment of the National World War I Memorial

3. MITIGATION

a. Treatment of General Pershing Commemorative Work Text

The WWICC and the NPS shall improve the readability of the existing General Pershing Commemorative Work. These improvements will re-letter the remaining poorly legible text in a manner consistent with improvements undertaken in 2018.

b. NRHP Nomination

Prior to the issuance of a construction permit, the WWICC shall provide funding not to exceed \$25,000 for the NPS, under the appropriate authority, to contract with a qualified consultant meeting the *Secretary of the Interior's Professional Qualification Standards* to prepare an NRHP nomination for the World War I Memorial in order to document the site's history, changes to the site, and the various elements of the World War I Memorial.

c. Historic American Landscape Survey Documentation

Prior to the issuance of a construction permit, the WWICC shall provide funding not to exceed \$45,000 for the NPS to contract with a qualified consultant meeting the *Secretary of the Interior's Professional Qualification Standards* to complete Level I Historic American Landscape Survey (HALS) documentation as specified in the Heritage Documentation Programs standards (Drawings: full set of measured drawings depicting existing conditions; Photographs: photographs with large-format negatives of views; photocopies with large-format negatives of select, existing drawings or historic views that are produced in accordance with U.S. Copyright Act; Written data: history and description). The field work, including photographs and measurements, for the HALS documentation shall be completed before any work on the site is carried out.

d. Modernist Landscape Context Study

Prior to the issuance of the construction permit, the WWICC shall provide funding not to exceed \$25,000 for the NPS to contract with a qualified consultant meeting the *Secretary of the Interior's Professional Qualification Standards* to develop a contextual study building upon existing surveys of publicly accessible Modernist Landscapes in Washington, DC. The study will consider the timeline of landscapes, identify key features of the style, and begin to identify relationships between them. The NPS shall provide a draft document for DC SHPO and NCPC comment prior to finalizing the document. This information will be made available to the public through an NPS website or other electronic means.

Memorandum of Agreement
The Establishment of the National World War I Memorial

e. Interpretative Materials

The WWICC and the NPS shall prepare interpretative materials covering the development and history of the World War I Memorial site, including the M. Paul Friedberg design, for use at the site as part of physical improvements and as part of an on-line database with the District of Columbia Office of Planning. The WWICC and the NPS shall provide drafts of the interpretive materials for DC SHPO and NCPC comment prior to finalizing the document. The type of materials produced and their method of distribution shall be determined by the Interpretation Division of NAMA. Historical interpretation shall be incorporated into the Memorial Site before the Memorial is opened to the public.

f. Donation of PADC Pavers

The WWICC shall obtain a stock of new 8" x 8" PADC custom pavers and provide them to the NPS to assist in ongoing replacement and maintenance of the Pennsylvania Avenue NHS. The new stock shall include up to 300 new pavers.

4. ARCHEOLOGY AND UNANTICIPATED DISCOVERIES

a. Post Review Discovery of Historic Properties.

Should historic properties including archeological resources be unexpectedly identified during the implementation of the Project or any actions taken pursuant to this Agreement, NPS shall immediately stop work in the location and contact NCPC and DC SHPO to report the discovery. NPS will consult with NCPC and DC SHPO to ensure that reasonable efforts are made to avoid, minimize, or mitigate adverse effects to such properties. NPS shall ensure that any resulting cultural resources work is accomplished in accordance with the relevant performance standards in Stipulation I, including the District of Columbia's Guidelines for Archaeological Investigations, applicable Secretary of Interior's Standards, and following appropriate ACHP guidance. Any dispute on the treatment of resources will be handled in accordance with Stipulation 5.c.

b. Treatment of Human Remains.

In the event that human remains, burials, or funerary objects are discovered during construction of the Project or any action taken pursuant to this MOA, NPS shall immediately halt subsurface construction disturbance in the area of the discovery and in the surrounding area where additional remains can reasonably be expected to occur and shall immediately notify NCPC, DC SHPO, and the District of Columbia Chief Medical Examiner ("CME") of the discovery under DC Code Section 5-1406 and other applicable laws and regulations.

If the CME determines that the human remains are not subject to a criminal investigation by federal or local authorities, NPS shall comply with the applicable federal or local laws and regulations governing the discovery and disposition of human remains and consider the ACHP's Policy Statement Regarding Treatment of Burial Sites, Human Remains, and Funerary Objects (2007).

Memorandum of Agreement
The Establishment of the National World War I Memorial

For actions involving Native American human remains or burials, NPS shall comply with applicable laws in accordance with provisions of the Native American Graves Protection and Repatriation Act, as amended (Public Law 101-601, 25 USC 3001 et seq) and regulations of the Secretary of the Interior at 43 CFR Part 10.

5. ADMINISTRATION

- a. Reporting. The NPS will update the Signatories, the Consulting Parties, and the public on the actions taken to implement the terms of this Agreement and the status of the World War I Memorial by providing an annual report on or before the effective date of this Agreement. Annual reports shall be developed for the duration of this Agreement and posted on PEPC, at a minimum. The NPS shall notify the Signatories and Consulting Parties identified in Appendix D via email, and the public when such annual reports are available.
- b. Duration. This Agreement will be valid for a period of seven (7) years from the date of execution by the last Signatory. If the World War I Memorial has not been fully constructed and/or all of the mitigation measures in this Agreement have not been implemented after five (5) years from the date of execution, the Signatories and Consulting parties shall reconsider the terms of this Agreement.
- c. Dispute Resolution. Should any Signatory object in writing to the NPS regarding any action carried out in accordance with this Agreement, the Signatories and Consulting Parties shall consult to resolve the objection. Should the Signatories be unable to resolve the disagreement, the NPS shall forward its background information on the dispute as well as the NPS's proposed resolution of the dispute to the ACHP. Within 45 days after receipt of all pertinent documentation, the ACHP shall provide the NPS with written recommendations, which the NPS shall take into account in reaching a final decision regarding the dispute, or notify the NPS that it shall comment pursuant to 36 CFR 800.7(c) and then proceed to comment. The NPS shall take the ACHP comments into account, in accordance with 36 CFR 800.7(c)(4). Any ACHP recommendation of comment shall be understood to pertain only to the subject matter of the dispute; the NPS's responsibility to carry out all actions under this Agreement that are not subjects of the dispute shall remain unchanged.
- d. Amendments. This Agreement may be amended when an Amendment is agreed to in writing by all Signatories. The Amendment will be effective on the date of the last signature.
- e. Termination. If any Signatory to this Agreement determines that the terms of the Agreement cannot be or are not being carried out, that party shall so notify the other Signatories and Consulting Parties in writing and consult with them to seek resolution or Amendment of the Agreement. If within 60 days a resolution or Amendment cannot be reached, any Signatory may terminate the Agreement upon written notification to the other Signatories. If the Agreement is terminated, and prior to work continuing on the Undertaking, the NPS must either execute a new Agreement or comply with 36 CFR Part 800 for any aspects of the World War I Memorial that have not yet been completed. The NPS will notify each Signatory as to the course of action it will pursue.

Memorandum of Agreement
The Establishment of the National World War I Memorial

- f. Anti-Deficiency Act. The obligations of federal agencies under this Agreement are pursuant to 31 USC 1341(a)(1), therefore nothing in this Agreement shall be construed as binding the United States to expend in any one fiscal year any sum in excess of appropriations made by Congress for this purpose, or to involve the United States in any contract or obligation for the further expenditure of money in excess of such appropriations.

- g. Electronic Copies. Within one (1) week of the last signature on this Agreement, the NPS shall provide each Signatory with one legible, color, electronic copy of this fully-executed Agreement and all of its attachments. Internet links shall not be used as a means to provide copies of the attachments since web-based information often changes. If the electronic copy is too large to send by email, the NPS shall provide each Signatory with a copy of this Agreement on an external digital storage device.

Execution of this Agreement and the implementation of its terms evidence that the NPS and NCPC have taken into account the effects of the Undertaking on historic properties and afforded the ACHP a reasonable opportunity to comment, and thereby satisfy their Section 106 responsibilities.

SIGNATURES FOLLOW ON SEPARATE PAGES

ATTACHMENTS

Appendix A: Preferred Alternative

Appendix B: Project Area and Area of Potential Effect

Appendix C: Evolution of World War I Memorial Design

Appendix D: List of Consulting Parties

Appendix E: Summary of Adverse Effects Determination

**Memorandum of Agreement
The Establishment of the National World War I Memorial**

SIGNATORY PAGE

World War I Centennial Commission



04/05/2019

Daniel Dayton

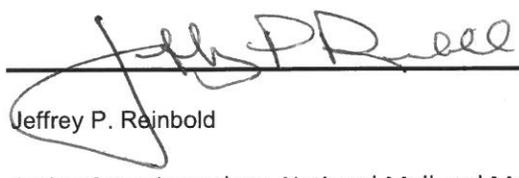
Date

Executive Director, World War I Centennial Commission

Memorandum of Agreement
The Establishment of the National World War I Memorial

SIGNATORY PAGE

NATIONAL PARK SERVICE

 _____ 4/9/2019
Jeffrey P. Reinbold Date

Acting Superintendent, National Mall and Memorial Parks, National Park Service

**Memorandum of Agreement
The Establishment of the National World War I Memorial**

SIGNATORY PAGE

DC STATE HISTORIC PRESERVATION OFFICER



CMLCOT FOR MALONEY

4-8-19

David Maloney

Date

District of Columbia State Historic Preservation Officer

**Memorandum of Agreement
The Establishment of the National World War I Memorial**

SIGNATORY PAGE

NATIONAL CAPITAL PLANNING COMMISSION



Marcel Acosta

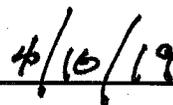
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Executive Director, National Capital Planning Commission

Memorandum of Agreement
The Establishment of the National World War I Memorial

SIGNATORY PAGE

ADVISORY COUNCIL ON HISTORIC PRESERVATION



John M. Fowler

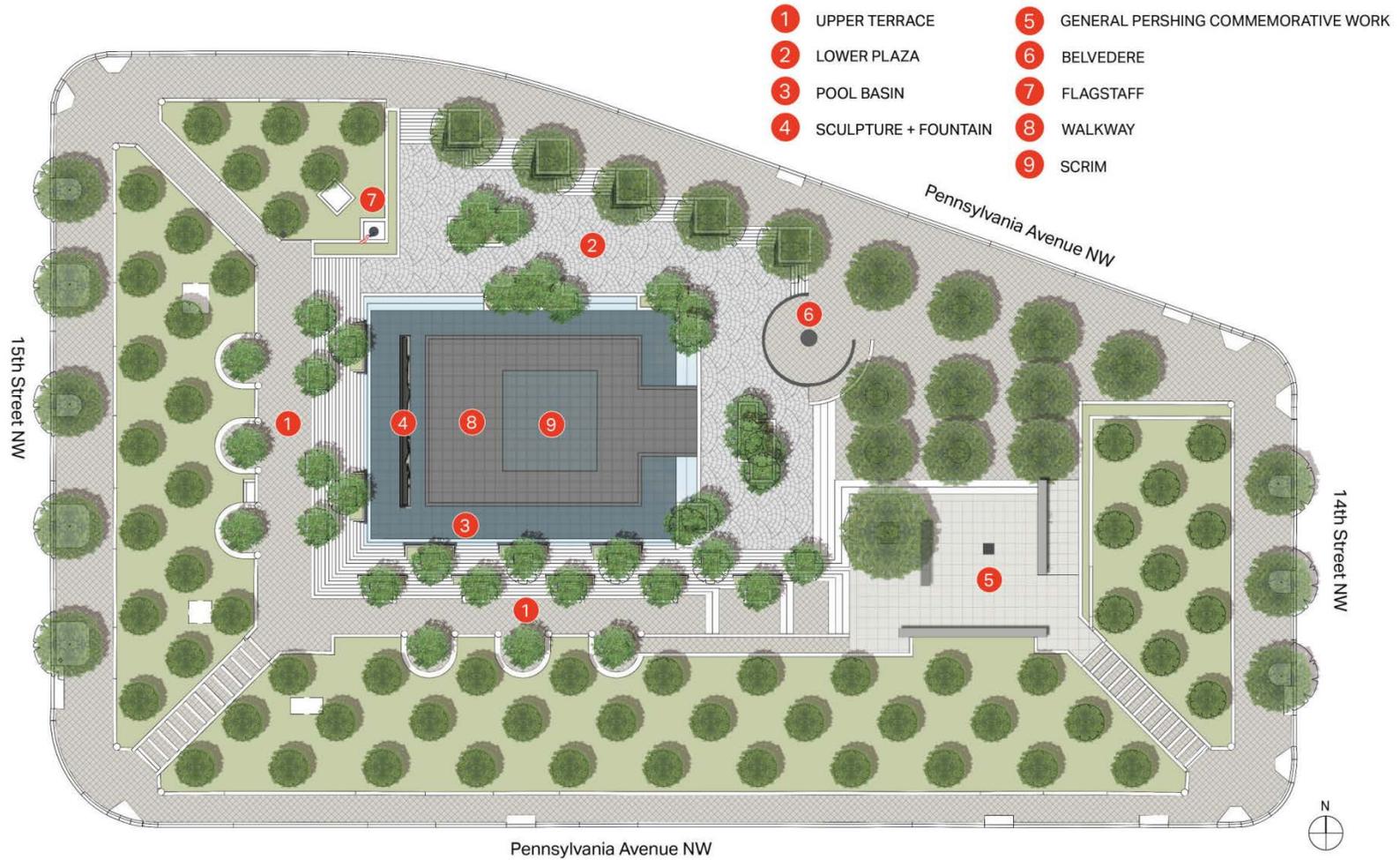
Date

Executive Director, Advisory Council on Historic Preservation

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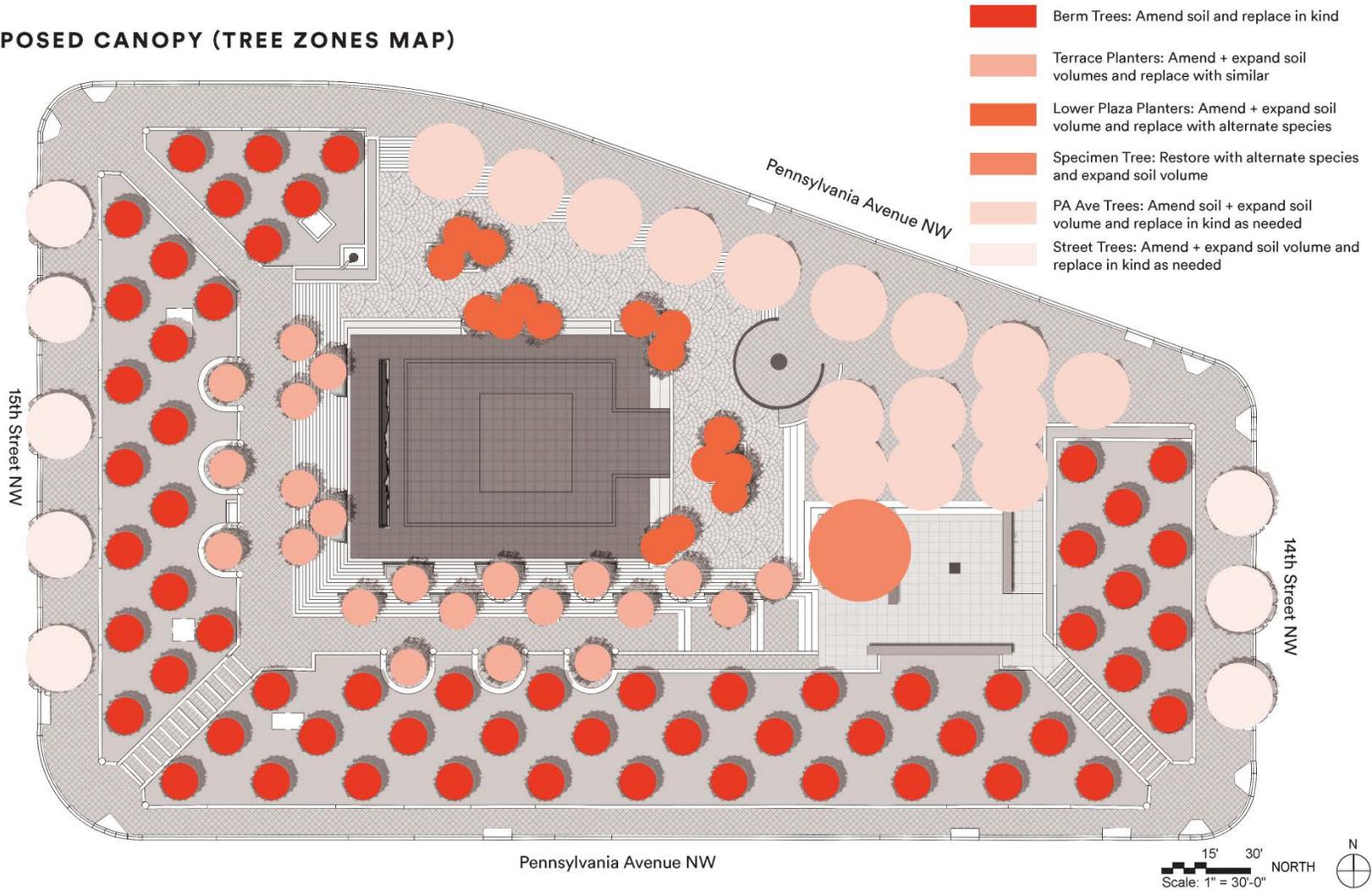
Memorandum of Agreement
The Establishment of the National World War I Memorial

Appendix A: Preferred Alternative Site Plan and Planting Plan



**Memorandum of Agreement
The Establishment of the National World War I Memorial**

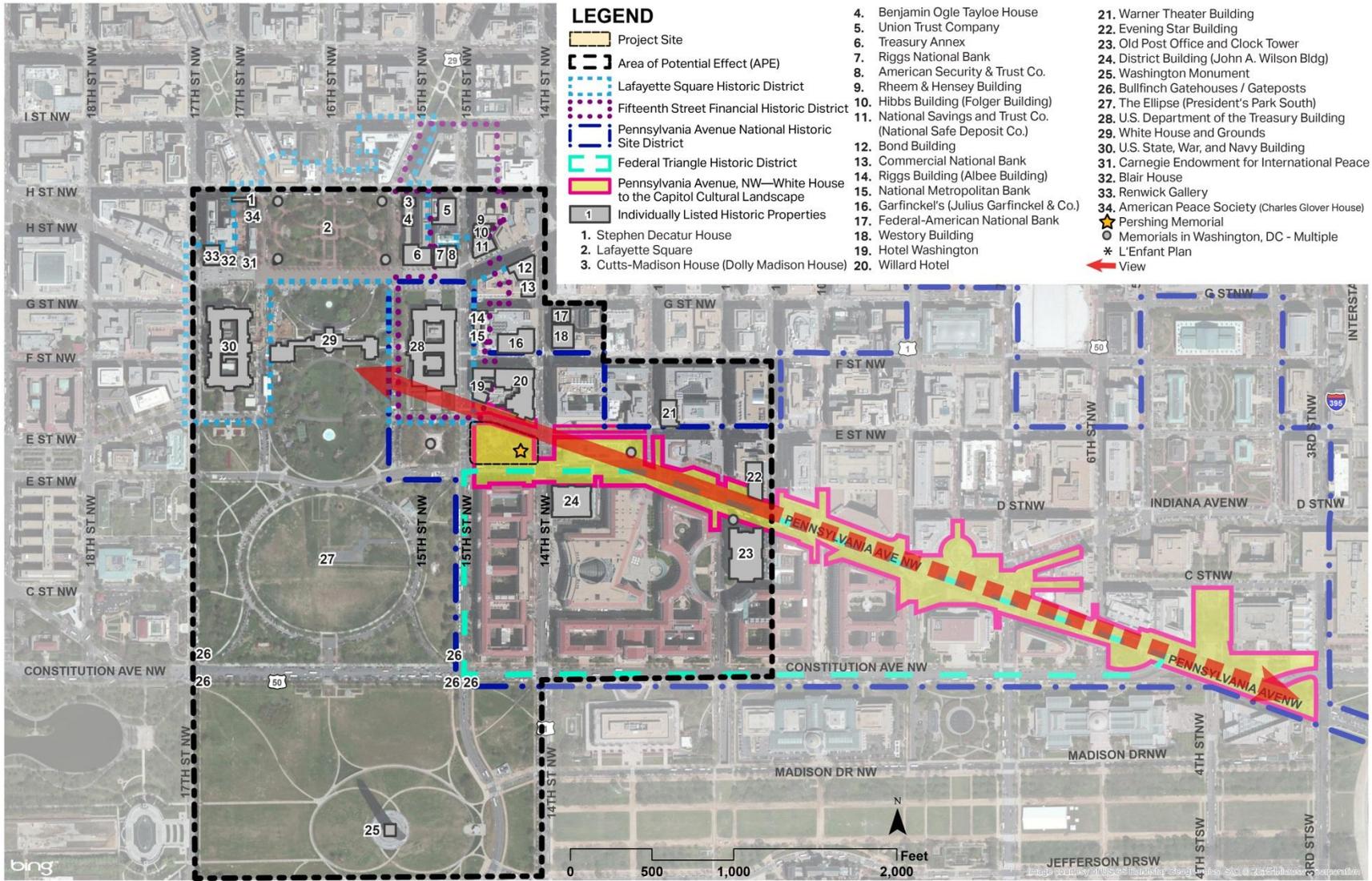
PROPOSED CANOPY (TREE ZONES MAP)



Memorandum of Agreement

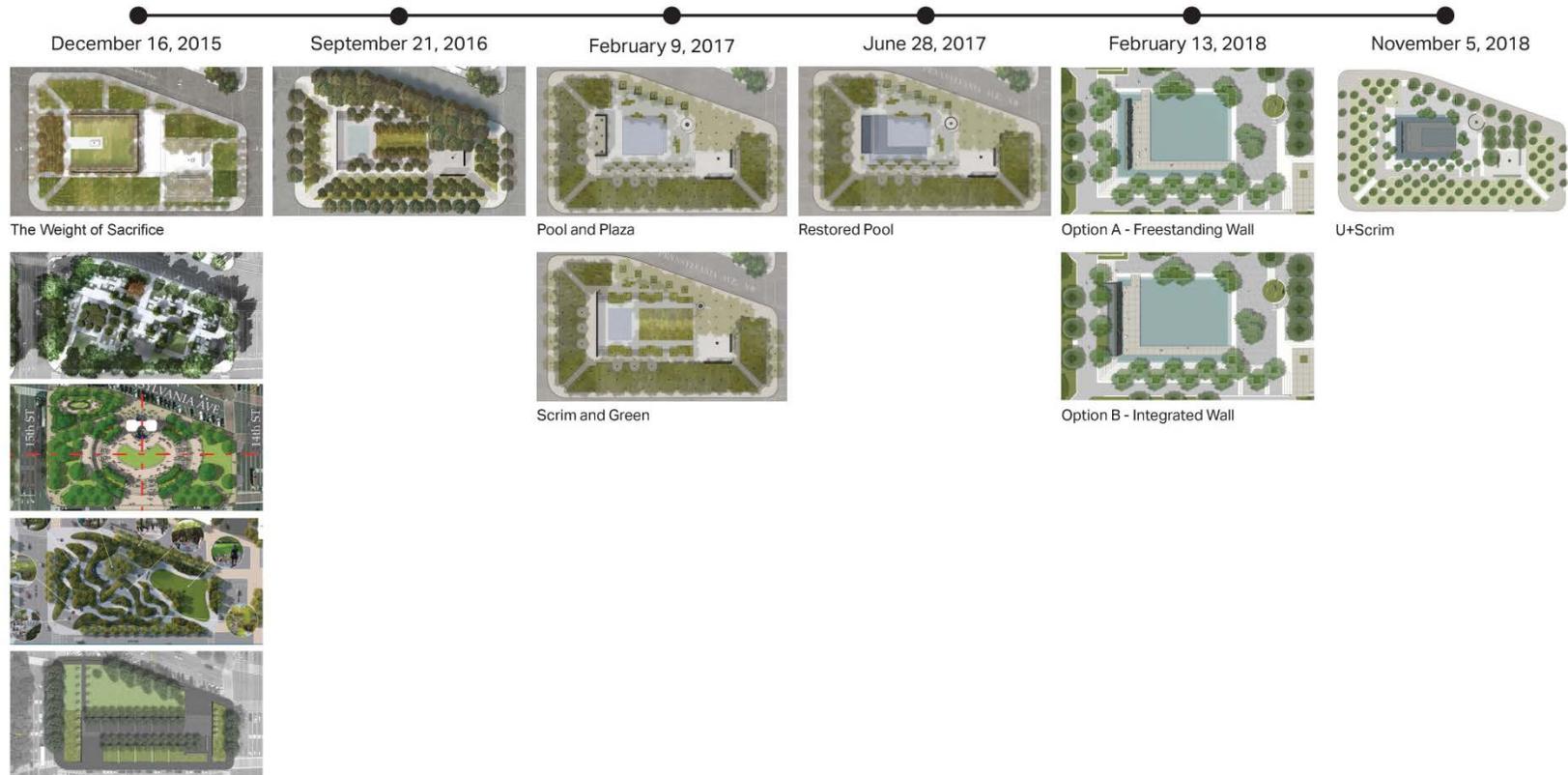
The Establishment of the National World War I Memorial

Appendix B: Project Area and Area of Potential Effect



**Memorandum of Agreement
The Establishment of the National World War I Memorial**

Appendix C: World War I Memorial Design Evolution to Minimize Adverse Effects



Memorandum of Agreement
The Establishment of the National World War I Memorial

Appendix D: List of Consulting Parties

Advisory Council on Historic Preservation

Advisory Neighborhood Commission 2C

American Society of Landscape Architects

Big Star Aquatics Construction

Cultural Tourism DC

DC Department of Public Works

DC Office of Planning

DC Preservation League

District of Columbia State Historic Preservation Office

Downtown DC BID

National Capital Planning Commission

National Coalition to Save Our Mall

National Trust for Historic Preservation

Oldest Inhabitants of the District of Columbia

Oliver Carr Company

Penn Quarter Neighborhood Association

The Committee of 100 on the Federal City

The Cultural Landscape Foundation

US Commission of Fine Arts

U.S. Environmental Protection Agency

U.S. General Services Administration

Washington Metropolitan Area Transit Authority

Memorandum of Agreement
The Establishment of the National World War I Memorial

Appendix E: Summary of Adverse Effects Determination

Resource	Assessment	Avoidance, Minimization, or Mitigation Measures
Pennsylvania Avenue, NW – White House to the Capitol Cultural Landscape	Adverse effect	Minimized change to structural elements. Mitigated through donation of PADC pavers; preparation of NRHP nomination, HALS, and interpretive materials; and changes to design identified (see below).
L'Enfant Plan of the City of Washington	No adverse effect	
Pennsylvania Avenue National Historic Site	No adverse effect	
Other Historic Properties within the APE	No adverse effect	
Pershing Park	Adverse effect; cumulative adverse effect due to overall changes to active, multi-layered lush experience of park	Avoided changes within multiple areas of the park. Minimized change through the retention of multiple structural elements. Mitigated through compatible design for proposed structural elements, preparation of NRHP nomination, HALS, and interpretive materials; and changes to design identified for specific elements (see below).
Retained		
Pershing Memorial granite walls, bench, and statue	No adverse effect	Avoided changes
Terra-cotta pavers	No adverse effect	Avoided changes
Memorial plaza granite flooring	No adverse effect	Avoided adverse changes; will repair granite flooring.
Belgian block paving	No adverse effect	Minimized changes; will clean and repair.
Semi-circular alcoves	No adverse effect	Avoided adverse changes; will clean and repair.
PADC lighting	No adverse effect	Avoided adverse changes; will clean and repair.
Removed		
Kiosk	Adverse effect	Minimized through the circular shape of belvedere.
Cascade fountain structure	Adverse effect	Minimized through the incorporation of falling water into sculpture feature and use of similar stone.
Modified		
Spatial Organization	Adverse effect	Minimized through maintain relationship of three focal features, and retention of circulation patterns throughout the site.
Granite planters	Adverse effect	Avoided changing most planters. Minimized change by retaining number of planters. Mitigated through placement of relocated planters and cleaning and repair of planters.
Granite steps	Adverse effect	Avoided changing most granite steps. Minimized through cleaning and repair of

Memorandum of Agreement
The Establishment of the National World War I Memorial

		steps.
Pool basin	Adverse effect	Minimized change to the depth of water along edges of pool basin. Minimized through replacement of pool basin.
Omnidirectional views	Adverse effect	Minimized through retention of open views.
Honey locust trees over lawn on berms	Adverse effect	Minimized change through tree replacement, improvements to soil and growing conditions.
Willow oaks above paving at NE corner	Adverse effect	Minimized change through tree replacement, improvements to soil and growing conditions.
Willow oaks in planters on north side of pool	Adverse effect	Minimized change through tree replacement, improvements to soil and growing conditions.
Crape myrtle trees	Adverse effect	Minimized change through tree replacement, improvements to soil and growing conditions.
Birch trees	Adverse effect	Minimized change through tree replacement, improvements to soil and growing conditions.
Lawn, native and naturalized grasses and perennials	Adverse effect	Minimized by compatible planting design, improvements to soil and growing conditions.
Lighting along elevated walks and Pershing Memorial	Adverse effect	Minimized through selection of compatible lighting design and placement.
Drinking fountain	Adverse effect	Minimized through installation of new drinking fountain.
Trash cans	Adverse effect	

U.S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

401 F STREET NW SUITE 312 WASHINGTON DC 20001-2728 202-504-2200 FAX 202-504-2195 WWW.CFA.GOV

27 September 2019

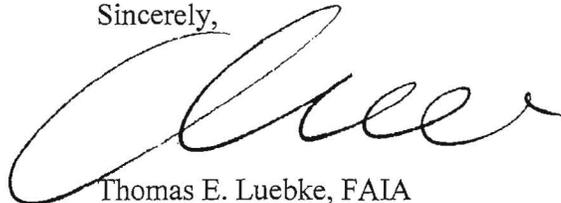
Dear Ms. Mendelson-Ielmini:

In its meeting of 19 September, the Commission of Fine Arts reviewed the final design for the National World War I Memorial, proposed to be located within Pershing Park on Pennsylvania Avenue between 14th and 15th Streets, NW. Expressing appreciation for the project team's thoughtful engagement throughout the collaborative process, the Commission approved the submission with the following comments.

The Commission members commended the final design of this national memorial, which they said will revitalize Pershing Park, creating a new work of art within an existing work of art. Regarding the resolution of outstanding details, they expressed support for the proposed location of the tactile model near the belvedere, and they advised further consultation with the staff about the details of the sculpture wall and the proposed inscriptions.

The Commission looks forward to the completion of this nationally significant commemorative work. Please coordinate with the staff on the resolution of final details, including the preparation of mockups for review by the Commission.

Sincerely,



Thomas E. Luebke, FAIA
Secretary

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

cc: Libby O'Connell, U.S. World War I Centennial Commission
David Rubin, Land Collective
Sabin Howard, Sabin Howard Sculpture
Joseph Weishaar, UU+ Designs