



## Executive Director's Recommendation

Commission Meeting: March 4, 2021

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<b>PROJECT</b> <b>Second Division Memorial Modification</b> President's Park Constitution Avenue, NW & 17th Street, NW Washington, DC	<b>NCPC FILE NUMBER</b> 8120
	<b>NCPC MAP FILE NUMBER</b> 1.24(73.10)45271
<b>SUBMITTED BY</b> United States Department of the Interior National Park Service	<b>APPLICANT'S REQUEST</b> Approval of preliminary and final site development plans
<b>REVIEW AUTHORITY</b> Commemorative Works Act per 40 U.S.C. § 8905	<b>PROPOSED ACTION</b> Approve preliminary and final site development plans with comments
	<b>ACTION ITEM TYPE</b> Staff Presentation

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### PROJECT SUMMARY

The National Park Service (NPS), in cooperation with the Second Indianhead Division Association Memorials Foundation, has submitted preliminary and final site development plans for proposed modifications to the Second Division Memorial. The memorial is located in the southwest corner of President's Park on the Ellipse near Constitution Avenue and Seventeenth Street, NW in Washington, DC. It 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 Commission reviewed the concept plans for the memorial on the consent calendar in November 2019. The applicant has addressed the Commission's comments and the final design reflects the recommendations adopted at that time.

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. This is achieved through the addition of two new stone plinths that accommodate panels for future inscriptions. The memorial will not include names of individuals. Other proposed improvements include accessibility upgrades in compliance with the Architectural Barriers Act and Section 504 of the Rehabilitation Act, as well as a new walkway to the memorial. The Second Division Memorial and President's Park South are managed by the National Park Service as part

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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 Eggert 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 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 through the addition of a new walkway.

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## RECOMMENDATION

The Commission:

**Approves** the preliminary and final site development plans for the Second Division Memorial Modification located in President's Park.

**Notes** the original (1936) memorial included the central panel with sculpture and architectural frame, and it was later enlarged with two wing walls that share similar material and treatments.

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

**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; however, the proposed memorial modification will address these issues.

**Finds** the proposed accessibility improvements and walkway design are consistent with Commission's recommendations at concept review.

## PROJECT REVIEW TIMELINE

<b>Previous actions</b>	- Comments on concept plan (November 2019)
<b>Remaining actions (anticipated)</b>	- None

## PROJECT ANALYSIS

### Executive Summary

The proposed design reflects the Commission's comments and recommendations as provided during the concept review. As a reminder, the Commission supported the applicant's expansion 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.

The Commission also expressed support for 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. The applicant's final design adheres to these recommendation. Finally, the Commission supported a curvilinear walkway to connect the memorial to the Constitution Avenue sidewalk and suggested at least one leg of the pathway be more directly connected to the Avenue to preclude pedestrians from cutting across the lawn. The final design includes curvilinear walkways that address this concern.

The proposed memorial design, accessibility improvements and walkway alignment are consistent with the concept review recommendations. Therefore, staff recommends the **Commission approve the preliminary and final site development plans for the Second Division Memorial Modification located in President's Park.**

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## **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 other 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 proposed expansion 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. As noted previously, the Commission had expressed support for this 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. The applicant had explored several solutions, and ultimately the Commission expressed support for 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. The final design adheres to this solution.

Finally, as noted previously, the existing memorial is located in a grassy lawn without a paved connection to the surrounding sidewalk network. The applicant previously submitted two different pathway options that would allow for an accessible route to the memorial. The first option was a single, direct linear connection from Constitution Avenue to the memorial. The second option was 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. At concept review, the Commission expressed support for the curvilinear design, and this is reflected in the final plans. The applicant has also addressed concerns raised about pedestrians cutting across the lawn by tightening the arc of the walkways and adding interpretive elements directly in front of the memorial on Constitution Avenue. As the design reflects previous comments, staff recommends the **Commission finds the proposed accessibility improvements and walkway design are consistent with Commission's recommendations at concept review.**

Finally, the memorial modification will include new lighting to provide a soft up-lighting of the memorial and light poles. After consultation with staff, the number of fixtures were reduced and the locations were adjusted to minimize their visibility. Overall, the lighting approach appears sensitive to the memorial and the surrounding context.

## **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 an expansion that considers the history, use, and setting of the memorial.

### **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. The National Park Service made a finding that the project would have "No Adverse Impact" on historic properties. On February 24, 2021, the DC State Historic Preservation Office (DC SHPO) concurred with the finding. NCPC has designated NPS lead for Section 106 purposes.

### **National Environmental Policy Act**

NCPC and NPS 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 applied categorical exclusion C.8 to the proposed project. It applies to replacement in kind of minor structures and facilities with little or no change in location, capacity or appearance. Likewise, pursuant to § 601.12 of NCPC's NEPA Regulations, NCPC has determined that the project can be categorically excluded from further environmental analysis based on categorical exclusion #2, which pertains to the "approval of the installation or restoration of minor site elements...." Prior to applying this categorical exclusion, NCPC staff determined that no extraordinary circumstances were present.

## **CONSULTATION**

### **Coordinating Committee**

The Coordinating Committee reviewed the proposal at its February 10, 2021 meeting. The Committee forwarded the proposed comments to the Commission with the statement that the proposal had been coordinated with participating agencies, including: NCPC; the District of Columbia Office of Planning; the District Department of Transportation; the General Services Administration; and the Washington Metropolitan Area Transit Authority. The District Department of Energy and Environment (DOEE) asked that NPS coordinate with them regarding any permitting requirements. The District of Columbia State Historic Preservation Office (DC SHPO) noted that their coordination was conditioned upon satisfactory completion of the Section 106 review process.

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

The U.S. Commission of Fine Arts approved the memorial modification at their November 19, 2020 meeting. A copy of the action is attached.

## **ONLINE REFERENCE**

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

- Project Synopsis
- Submission Package

Prepared by Matthew Flis  
02/25/2021

## **ATTACHMENTS**

- Powerpoint
- Commission of Fine Arts Letter

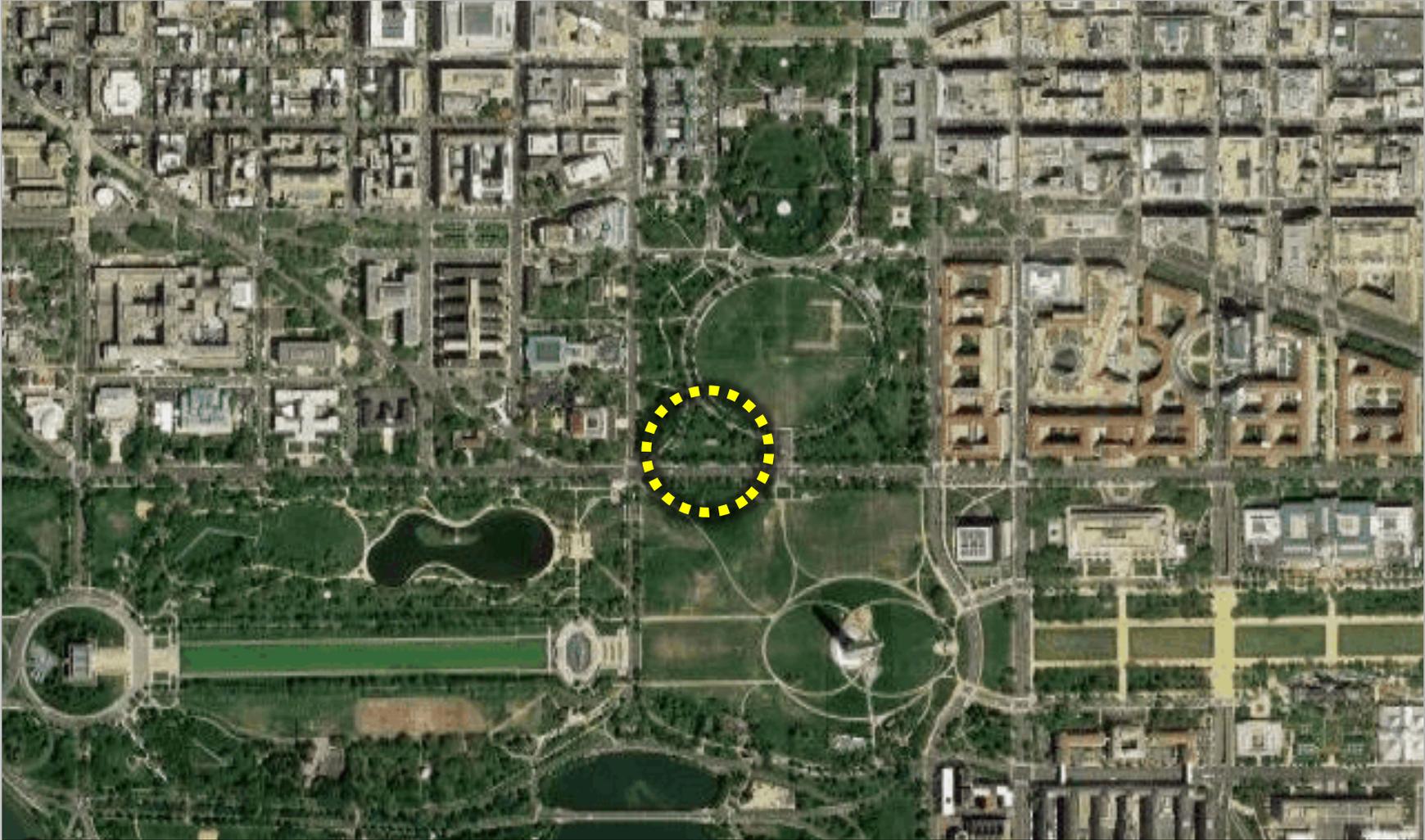
# Second Division Memorial Modification

Constitution Ave NW & 17th St NW, Washington DC

Preliminary and Final Site Development Plans

United States Department of the Interior

# Site Location



Location Map

# Existing Conditions



# Existing Conditions



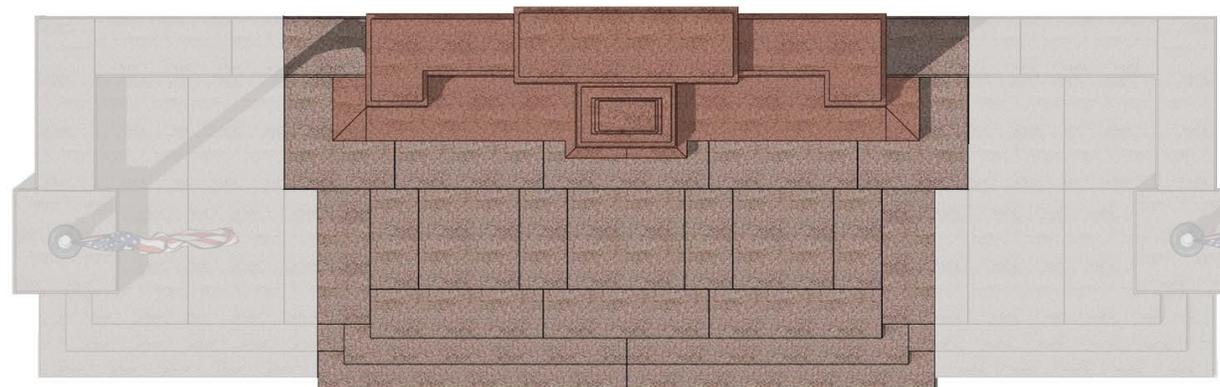
# Memorial History - 1936

## MEMORIAL CHRONOLOGY - ORIGINAL ELEVATION AND PLAN

ORIGINAL MEMORIAL, 1936



SOUTH ELEVATION - NTS

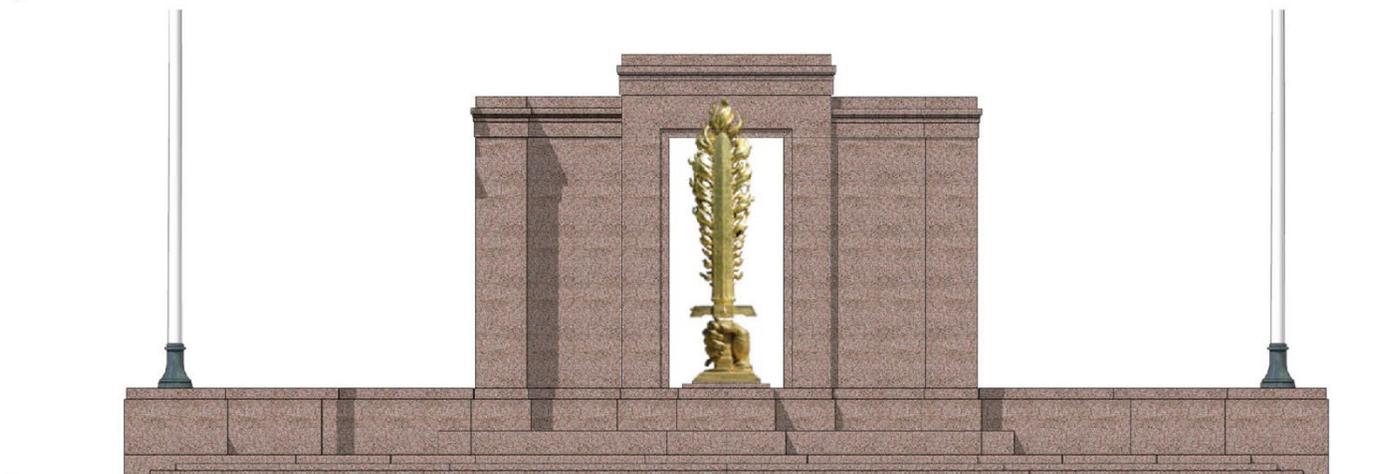


PLAN VIEW - NTS

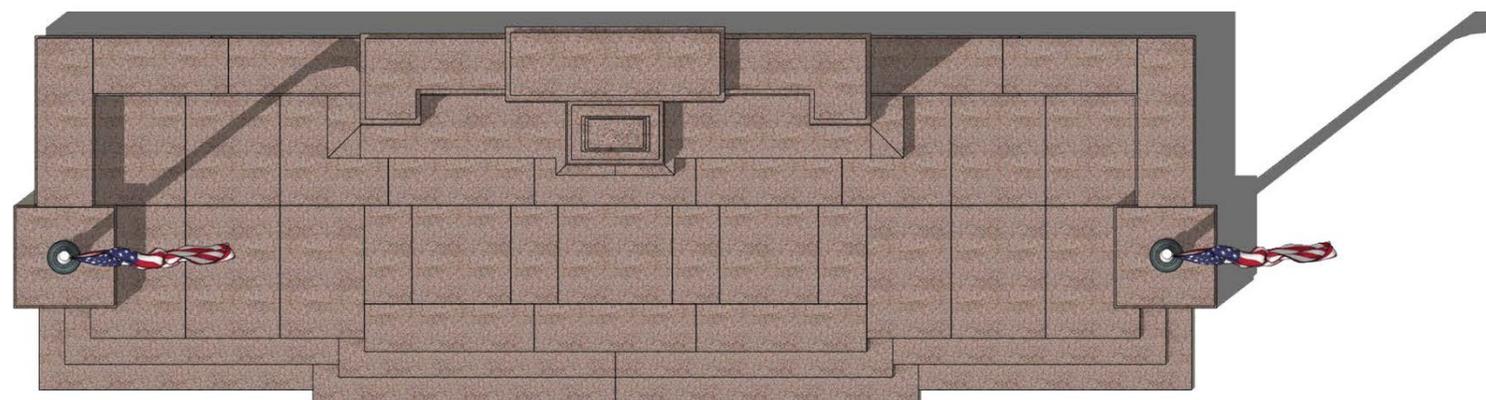
# Memorial History - 1962

## MEMORIAL CHRONOLOGY - ADDITION TO ELEVATION AND PLAN

MEMORIAL ADDITION, 1962

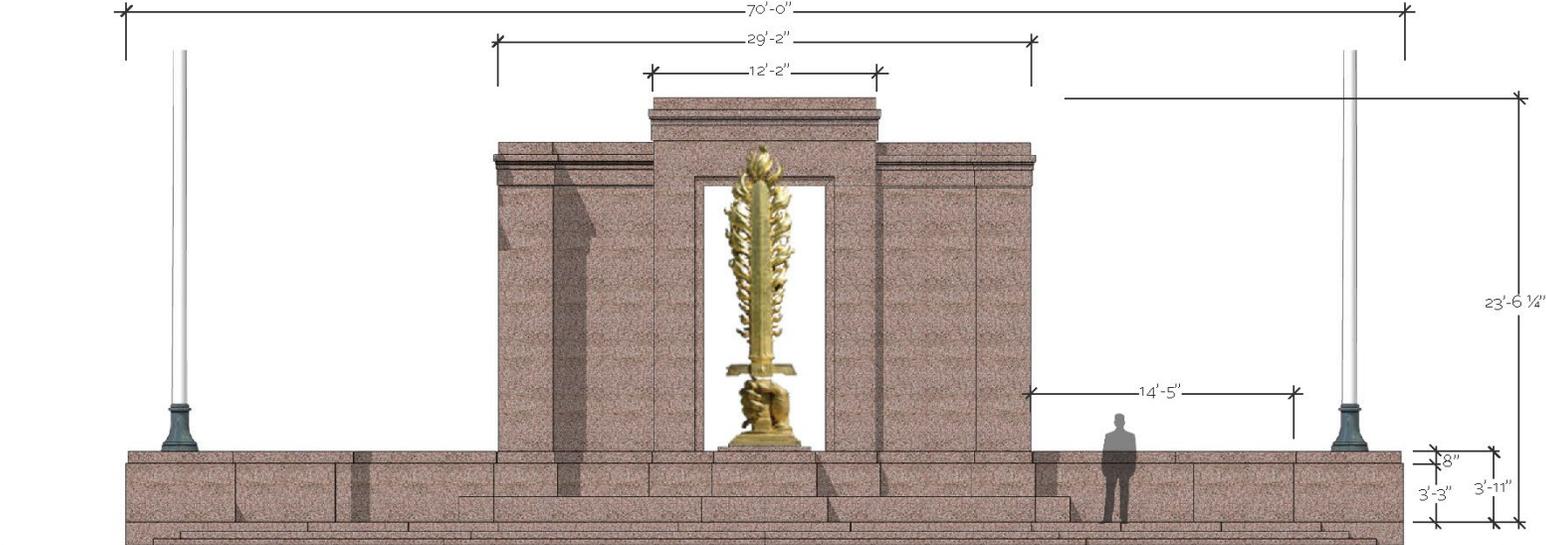


SOUTH ELEVATION - NTS

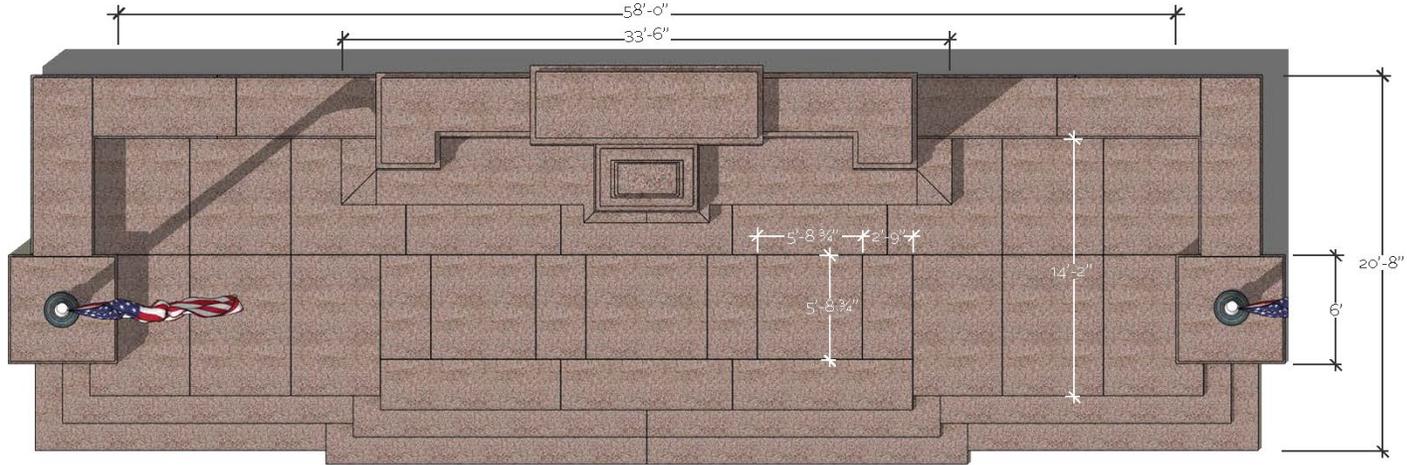


PLAN VIEW - NTS

# Existing Memorial Elevation and Plan

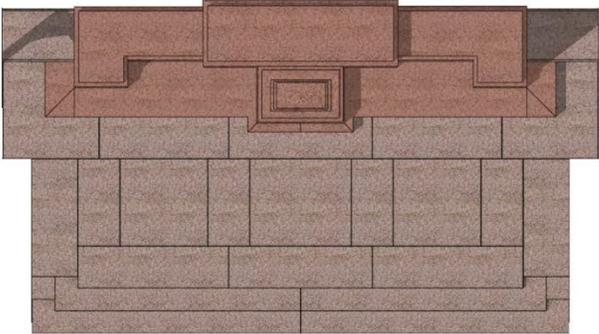


SOUTH ELEVATION - NTS

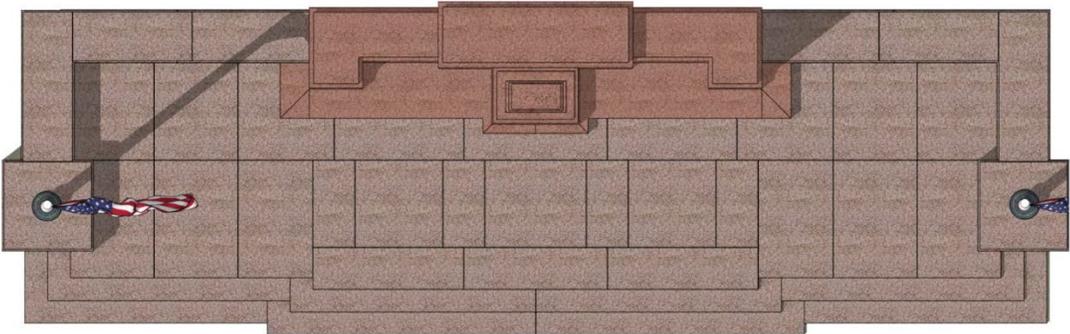


PLAN VIEW - NTS

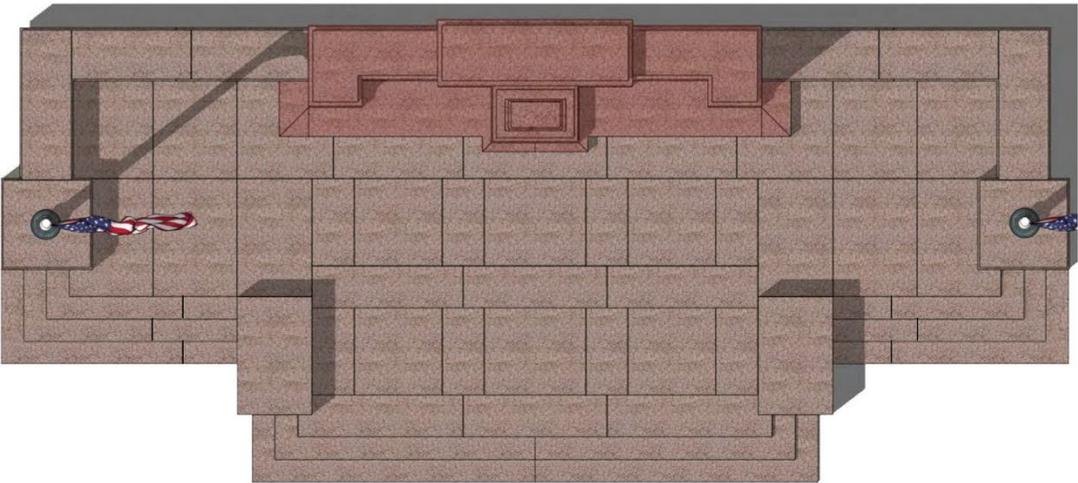
# Expansion Chronology



ORIGINAL MEMORIAL



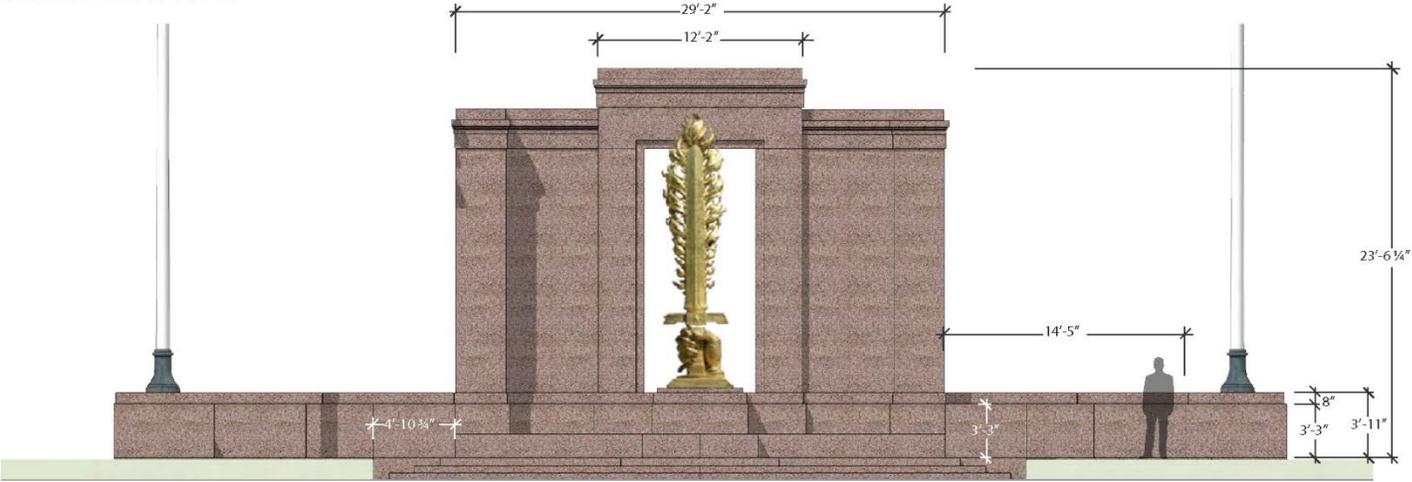
CURRENT MEMORIAL ADDITION



PROPOSED EXPANSION

# Proposed Design

PROPOSED DESIGN - ELEVATION AND PLAN



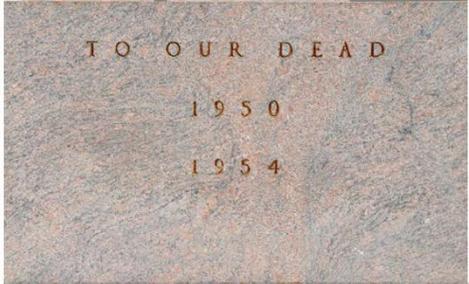
SOUTH ELEVATION - NTS



PLAN VIEW - NTS

# Proposed Plinth Elevations with Text

**PROPOSED DESIGN - PLINTH ELEVATIONS CONCEPT**

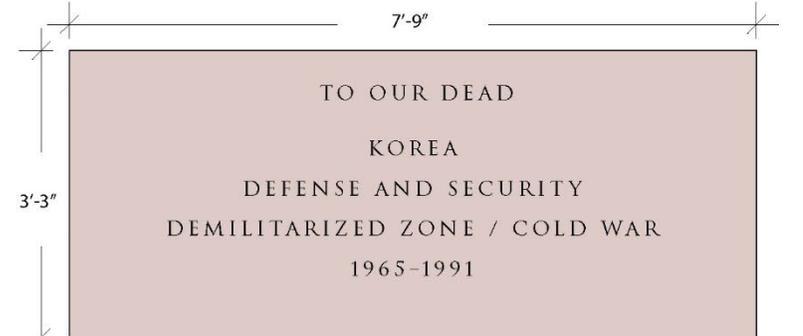
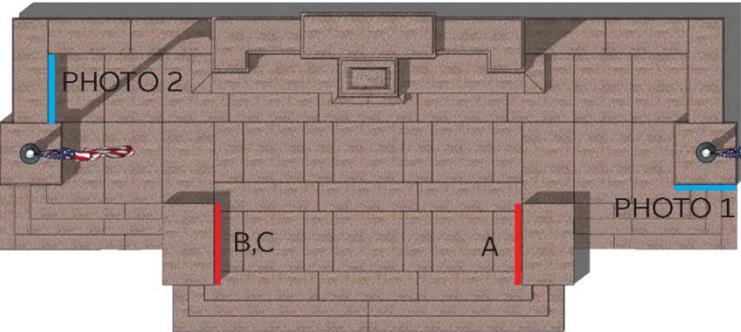


EXISTING INSCRIPTION **PHOTO 1**

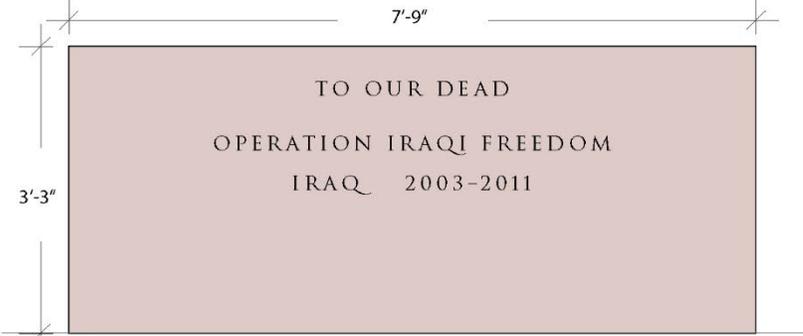


EXISTING INSCRIPTION **PHOTO 2**

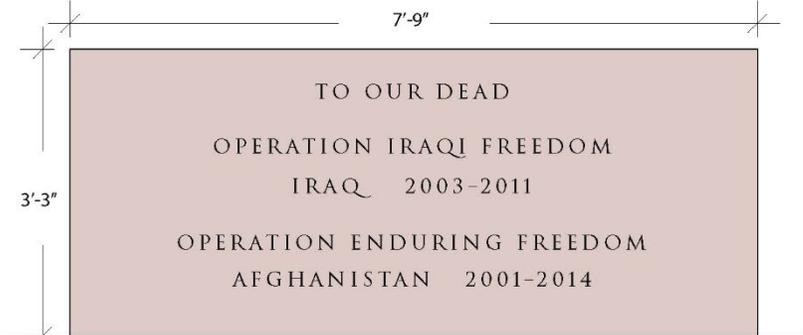
*All proposed inscriptions to match the font, size, and spacing depicted in Photo 2.*



**A** - EAST PLINTH WEST FACE PROPOSED INSCRIPTION 2021

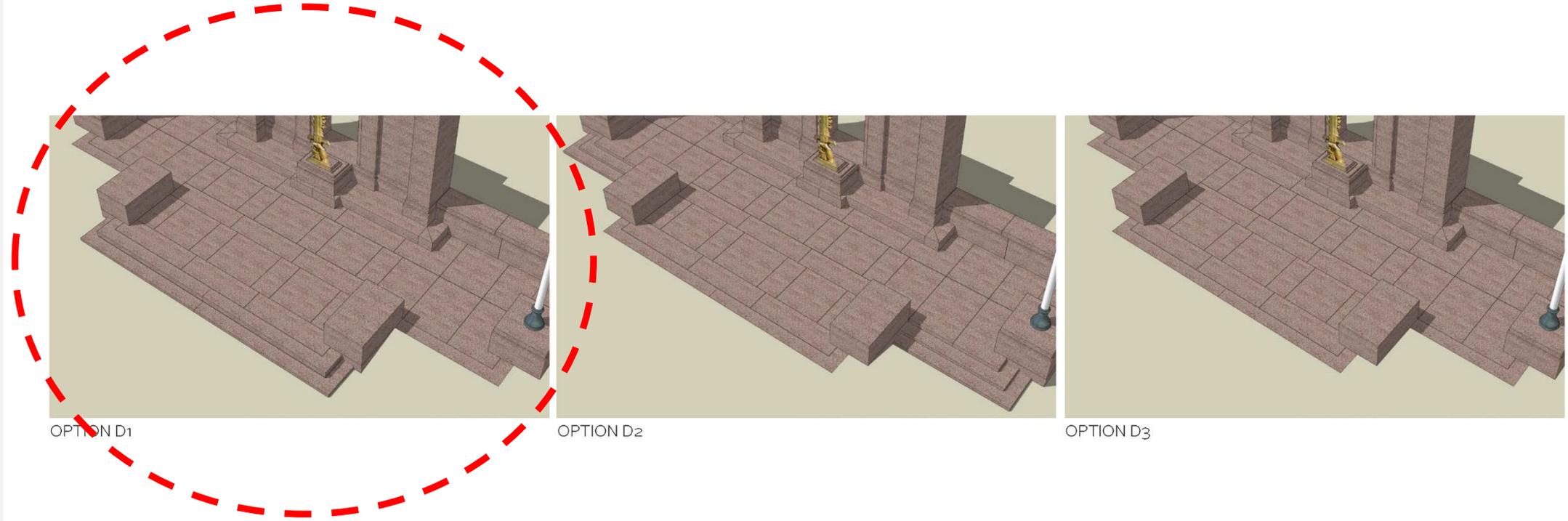


**B** - WEST PLINTH EAST FACE PROPOSED INSCRIPTION 2021

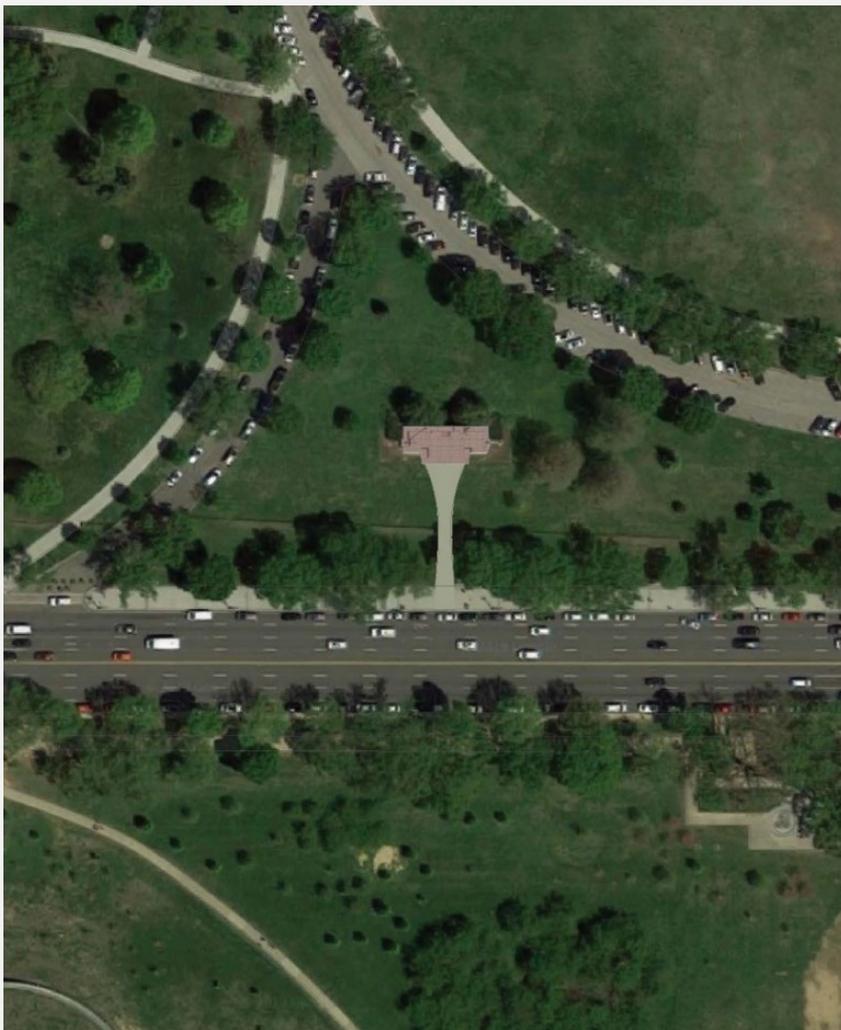


**C** - WEST PLINTH EAST FACE PROPOSED INSCRIPTION 2024

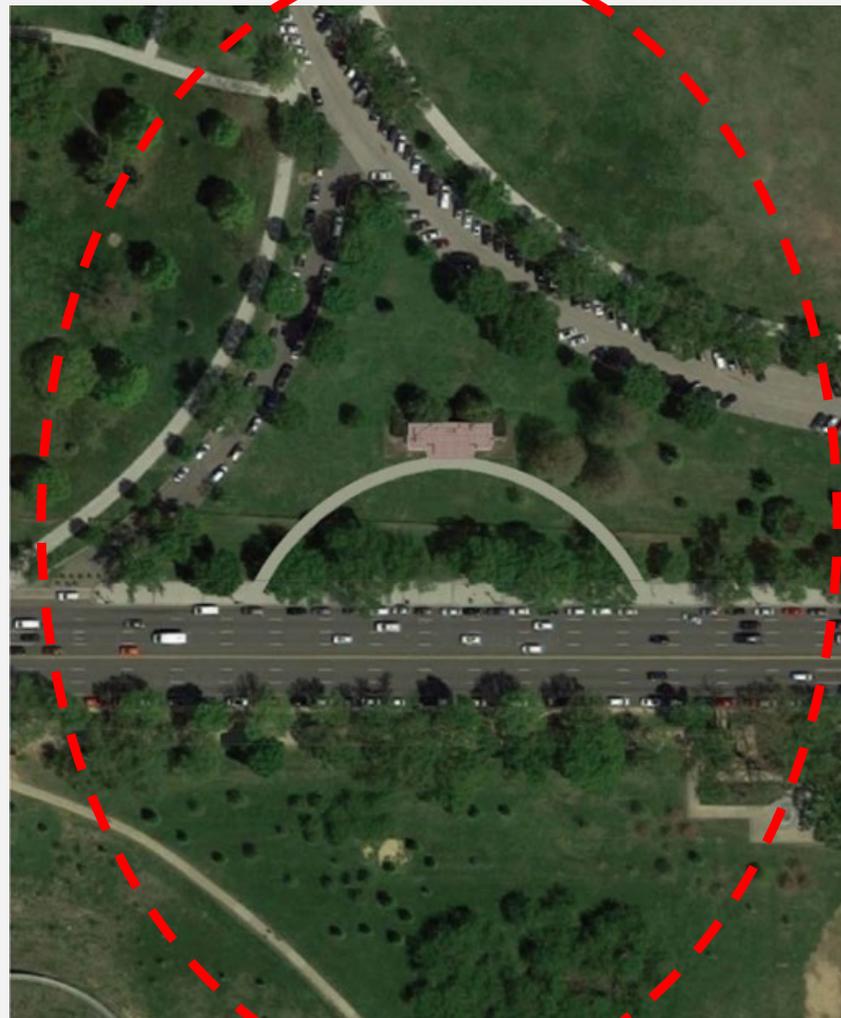
# Concept Review – Accessibility Approaches



# Concept Review – Approach Design



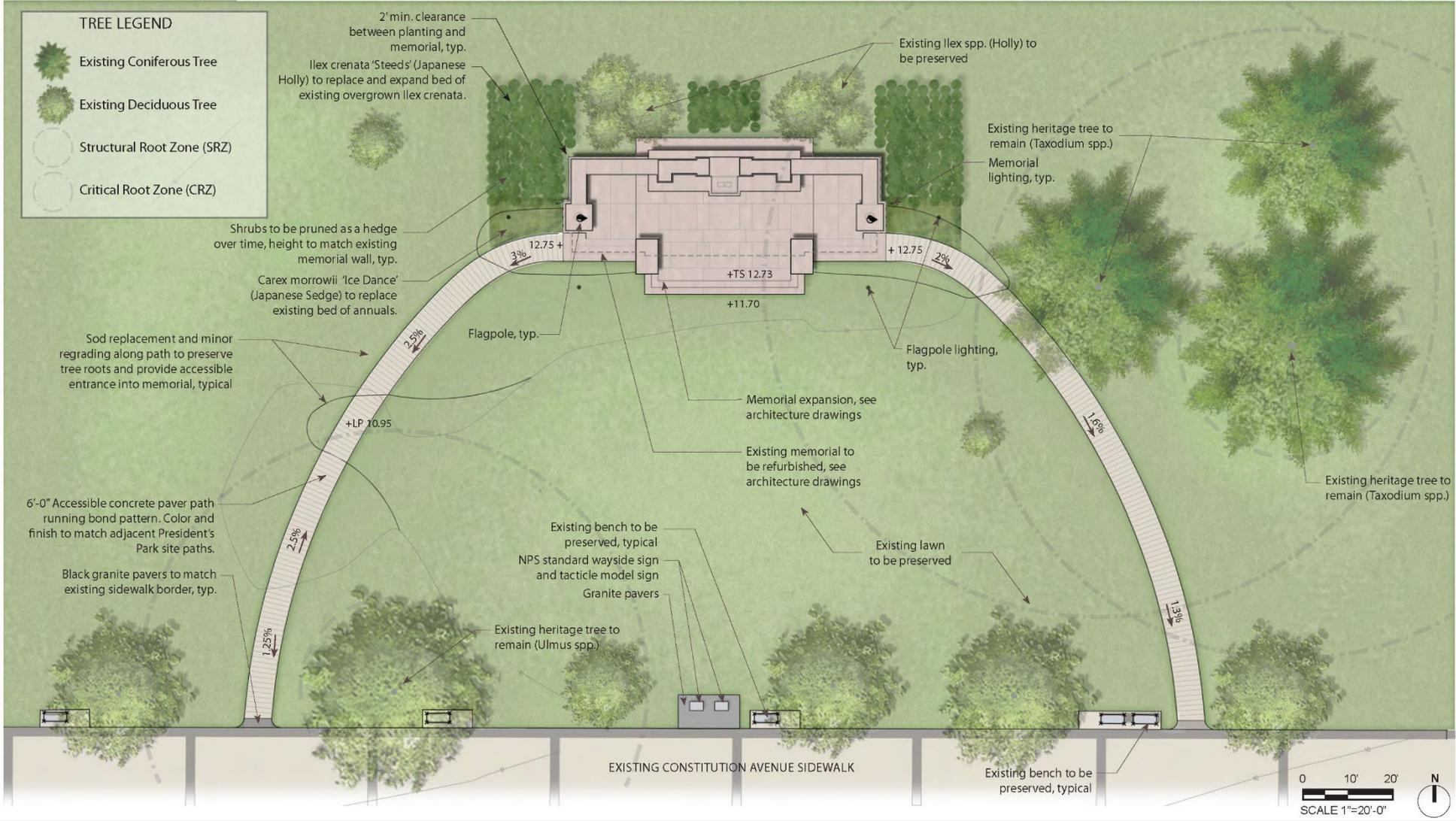
Linear Approach



Curvilinear Approach

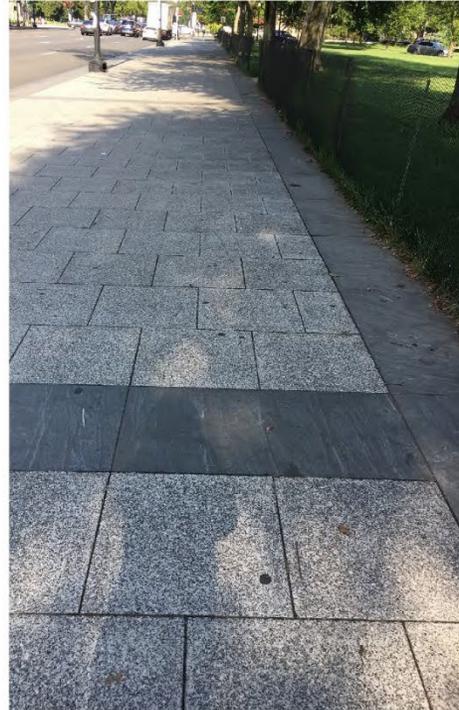
# Proposed Site Plan

## PROPOSED DESIGN - SITE PLAN



# Existing Sidewalks in Area

## PROPOSED DESIGN - ACCESSIBILITY CONCEPTS

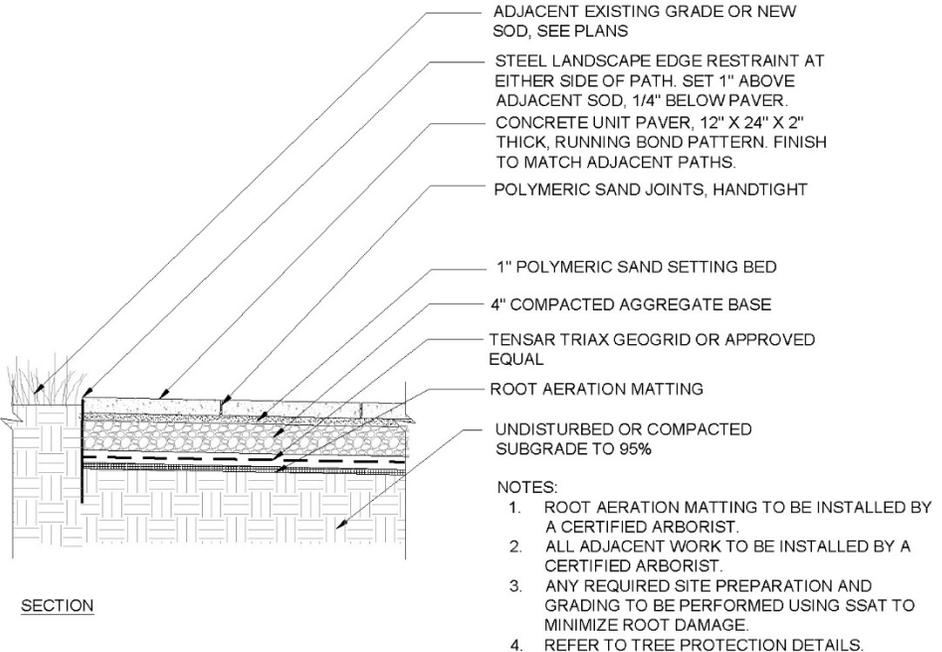


EXISTING SIDEWALK ADJACENT TO MEMORIAL SITE

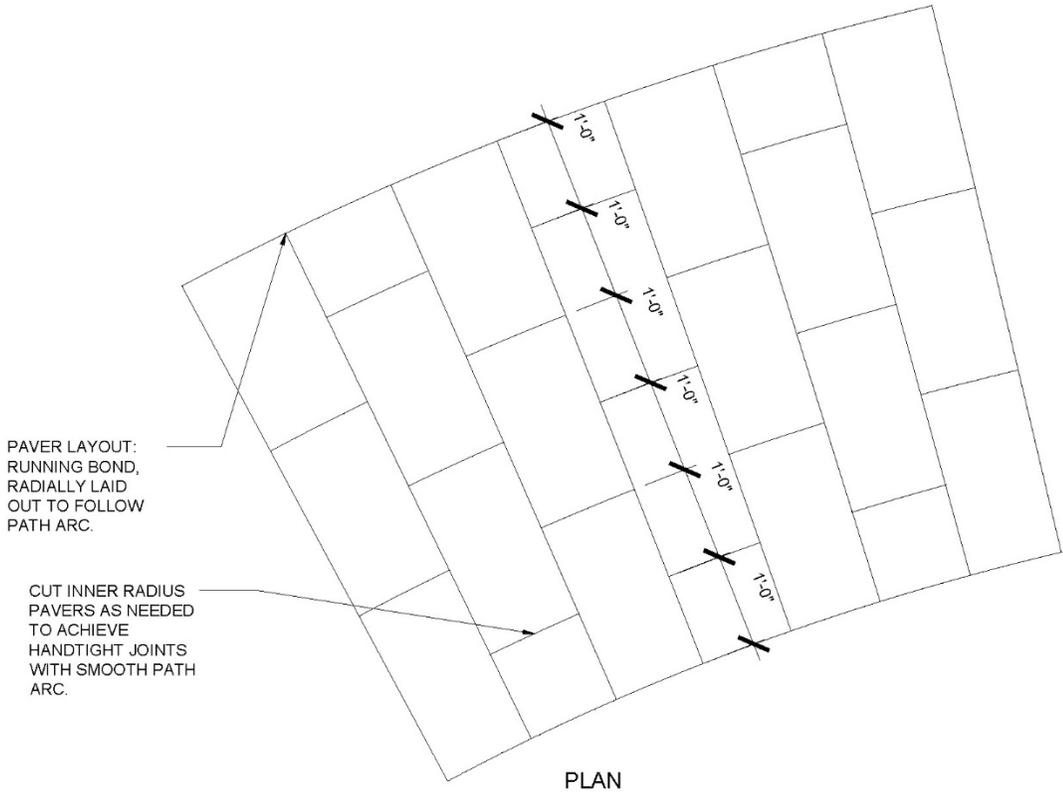


ADJACENT CURVILINEAR PATH

# Proposed Walkway Details



SECTION



PATH PAVING - SECTION AND PLAN - NTS

# Proposed Lighting Fixtures



FLAG POLE LIGHT FIXTURE



MEMORIAL LIGHT FIXTURE

# Proposed Lighting Design



# Proposed Design With Curvilinear Approach



# Proposed Memorial



SECOND INFANTRY DIVISION MEMORIAL, WASHINGTON, DC

# 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

25 November 2020

Dear Ms. Mendelson-Ielmini:

In its public meeting of 19 November conducted by videoconference, the Commission of Fine Arts approved, based on its prior review of the submission materials, the proposed final design for alterations to the Second Division Memorial, located on the south side of the Ellipse at Constitution Avenue, NW. In their support of the project, the Commission members suggested further study of the historic landscape design to determine the appropriate type and size of plants to use in framing the memorial within the context of the Ellipse; they questioned the use of Japanese hollies, which they cautioned may not provide sufficient scale, quality, and robustness for this purpose. They requested that the design team consult with the staff on the final plant selection.

The Commission appreciates the careful work undertaken in designing this latest extension of the Second Division Memorial. As always, the staff is available to assist you with future submissions.

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  
Lisa Delplace, Oehme, van Sweden