



Executive Director's Recommendation

Commission Meeting: June 5, 2025

PROJECT Texas Legation Memorial 600 Block of Indiana Avenue, NW Washington, DC	NCPC FILE NUMBER 8330
SUBMITTED BY United States Department of the Interior, National Park Service	NCPC MAP FILE NUMBER 1.21(73.10)46022
REVIEW AUTHORITY Commemorative Works per 40 U.S.C. § 8905	APPLICANT'S REQUEST Approval of final site development plans
	PROPOSED ACTION Approve final site development plans with comments
	ACTION ITEM TYPE Staff Presentation

PROJECT SUMMARY

In 2020, Public Law 116-248 authorized the Daughters of the Republic of Texas (DRT) to establish a commemorative work on federal land in the District of Columbia and its environs to commemorate and honor those who, as representatives of the Republic of Texas, served in the District of Columbia as diplomats to the United States and made possible the annexation of Texas as the twenty-eighth State of the United States, in accordance with the Commemorative Works Act (40 U.S.C. 8901 et seq.) (CWA). The CWA defines approval requirements related to the location, design, and construction of commemorative works in the District of Columbia and its environs. The National Capital Planning Commission (NCPC) and the U.S. Commission of Fine Arts (CFA) approve site and design for new commemorative works. The National Park Service (NPS) must approve and permit the final site and design for each new memorial.

NPS, in collaboration with the DRT has submitted the final site development plans for the Texas Legation Memorial. The Commission previously expressed support for the site on Indiana Avenue during the site selection review in December 2021 and approved the preliminary site plan at that location at the March 7, 2024 meeting. At the preliminary review, the Commission recommended the applicant continue to evaluate the size and treatment of the proposed memorial text to ensure it is easily legible for all visitors. The updated memorial includes larger lettering to address the Commission's concern and a simpler overall design and landscape plan. The proposed memorial remains modest in size and is located in an existing planter area on Indiana Avenue. The site is under the jurisdiction of NPS. The memorial includes a star shaped base with a five-sided white granite plinth on top. The top of the plinth is angled toward the sidewalk so visitors can see the 'Daughters of the Republic of Texas' medallion on top. The front three sides of the plinth pentagon will include the story of the Texas Legation, a map of the Republic of Texas and the names of the

Delegates from the Republic of Texas that came to the District to negotiate the addition of Texas as a state.

KEY INFORMATION

- The CWA establishes requirements for building commemorative works on federal lands within the District of Columbia and its environs. It applies to lands under the jurisdiction of the US Department of the Interior (DOI) and the US General Services Administration (GSA).
- In general, in accordance with CWA, the key benchmarks for authorizing a new monument are summarized below:
 - (1) Congress authorizes each new monument purpose (subject) and a monument sponsor by separate federal law.
 - P.L. 116-248 authorizes the establishment of a commemorative work on eligible Federal land in the District of Columbia and its environs.
 - (2) The sponsor consults with the National Capital Memorial Advisory Commission (NCMAC) on alternative sites and design concepts.
 - At the October 5, 2021, NCMAC meeting, the DRT presented the Site Selection Study for comment. NCMAC determined no opposition to the proposed sites, noting that Site F may be most suitable.
 - (3) NCPC and CFA must each approve the site and design for new commemorative works.
 - At the November CFA meeting, the DRT presented the Site Selection Study for comment and CFA supported Site F, Option 1.
 - (4) NPS must approve and permit the final site and design for each new memorial, after the steps above are completed.
- The DRT proposes a memorial that is modest in scale and includes a plaque on a plinth, mounted on a start shaped marker stone. The memorial includes a map illustrating the Republic of Texas, the list of diplomatic ministers that came to Washington, DC to negotiate the inclusion of the Republic of Texas and the story of their effort.
- NCPC reviewed the site selection for the memorial in December 2021, and expressed support for Site F, Option 1, located at the south side of Indiana Avenue and 7th Street, NW. The applicant selected the site supported by the Commission.
- The Commission approved the preliminary site plans in March 2024 with a recommendation to continue to evaluate the size and treatment of the proposed memorial text to ensure it is easily legible for all visitors, which the applicant has done in the updated design.

RECOMMENDATION

The Commission:

Approves the final site development plans for the proposed Texas Legation Memorial located on Indiana Avenue, NW in Washington, DC.

Notes the project includes plants native to both Texas and the Washington, DC area and **finds** the plant selections are appropriate due to their limited area and relevance to the commemorative intent.

Notes the applicant has updated the design to address the Commission's recommendation to increase the font size of the memorial, and the updated lettering will ensure the memorial is easily legible to visitors.

PROJECT REVIEW TIMELINE

Previous actions	December 2, 2021 – Site Selection
	March 7, 2024 – Preliminary Site Development Plans
Remaining actions (anticipated)	None

PROJECT ANALYSIS

Executive Summary

NPS, on behalf of the Daughters of the Republic of Texas (DRT), has submitted final site development plans for a memorial honoring the Texas Legation. The applicant worked to address comments received by staff, the U.S. Commission of Fine Arts, and the District of Columbia State Historic Preservation Office (SHPO) during the preliminary design review. The proposed final design successfully updates the modest design features including larger lettering on the stone plinth and a simpler landscape plan. As such, staff recommends the **Commission approves the final site development plans for the proposed Texas Legation Memorial located on Indiana Avenue, NW in Washington, DC.**

Analysis

The Daughters of the Republic of Texas have sponsored this design to bring a commemorative work to honor those who, as representatives of the Republic of Texas, served in the District of

Columbia as diplomats to the U.S. and made possible the annexation of Texas as the 28th state of the United States. The memorial includes:

- A stone plinth with informative etching
- Official Daughters of the Republic of Texas medallion
- Improved landscaping inside the existing granite surround

The goal of the memorial is to provide information about the history of the annexation of Texas into the United States and honor those diplomats who made it possible. The location is significant because it is in the middle of multiple locations where the diplomats lived and worked. Staff analyzed this project using guidance in the Commemorative Works Act (CWA), the *Comprehensive Plan of the National Capital*, and the applicant's site selection criteria and program needs. A general principle set forth in the Comprehensive Plan is to protect and improve the open space character of the Monumental Core and the integrity of each memorial and park element. Further, the Comprehensive Plan includes policies to enhance the quality of the visitor experience to the Nation's Capital.

As a reminder, the CWA (40 U.S.C. 8905) includes decision criteria for site and design approval:

- Surroundings – to the maximum extent possible, a commemorative work shall be located in surroundings that are relevant to the subject of the work.
- Location – a commemorative work shall be located so that it does not interfere with or encroach on, an existing commemorative work, and to the maximum extent practicable, it protects open space, existing public use, and cultural and natural resources.

This site is a portion of wide sidewalk along the south side of Indiana Avenue, under the jurisdiction of NPS. The wide sidewalk is divided between the street side and the building side by planters, one with a raised stone edge and one with metal wrought iron style fencing. The applicant proposed the memorial in the existing raised stone planter which allows enough space for the memorial while also keeping it enclosed in a fixed space, easily accessible to visitors.

The memorial includes two main elements: the stone memorial and the landscaping. The memorial design continues to include a star shaped stone base topped with the pentagon shaped memorial plinth. The applicant is proposing the star base and plinth constructed out of white Mt. Airy granite and topped with an 11-inch diameter Daughters of the Republic of Texas Historic Sites medallion. On the three sides of the plinth closest to the sidewalk, the applicant is proposing three memorial engravings telling the story of the Texas Legation, a map of the Republic of Texas, and the Republic of Texas diplomats sent to Washington, DC. The proposed text size for the left and right engraving face is proposed at 3/4" and the applicant had previously shifted the memorial 6" closer to the edge of the planter bed to ensure it is easily legible for all visitors, in response to the Commission's comments.

The proposed memorial landscape is organized by two asymmetrical plant palettes, oriented to the NW corner where the memorial is located. A field of low-growing, native evergreen sedge makes

up the foreground, maintaining visual access to the plinth. Beyond the sedge is an interplanted field of native meadow plants, Blue Grama grass and Blazing star, to create a taller backdrop. The organic shape relates to the Brazos River Basin that defines the two distinct landscapes of Texas. Soil bermed at the rear (southeast) corner of the planter creates a subtle high point where a Sweetbay Magnolia tree is located on a visual axis from the memorial plinth. The solitary tree with its singular, pronounced white blossoms represents the Lone Star State and Texas's time period as a republic. The two juxtaposed native planting zones recall the diversity, orientation, and unique breadth of Texas's ecological regions across the state. The selection of plants include some that are native to Texas along with several native to the Mid-Atlantic of Washington, DC. Staff believes that the memorial is modest in size, has a very clear theme, and the proposed landscape palette is appropriate. Further, the plant selections are appropriate due to their limited area and relevance to the commemorative intent.

CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

Comprehensive Plan for the National Capital

The proposed final design for the Texas Legation memorial is not inconsistent with the *Comprehensive Plan for the National Capital*, particularly the Urban Design and Visitor and Commemoration Element which encourages locating new commemorative works near public transportation, and in accordance with the Commemorative Works Act, and in consideration of the recommendations of the Memorials and Museums Master 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 several criteria, including surroundings, location, material, landscape features, and site-specific guidelines. As noted above, the planning and design comments are designed to ensure the proposal broadly meets the CWA criteria.

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. The site currently under consideration was not identified as a site for memorials within the 2M Plan, but is appropriate for a memorial of this size and scale.

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 in 2021. Consultation has concluded with a concurrence by the DC SHPO that the project would have no adverse effects on historic resources. NCPC is a consulting party in the process.

National Environmental Policy Act

NCPC and NPS will each have an independent responsibility to comply with the National Environmental Policy Act (NEPA); NCPC's responsibility stems from its approval authority over the site and design of the memorial. NPS has prepared Categorical Exclusion CE 3.3.C.18 construction of minor structures, including small, improved parking lots, in previously disturbed or developed areas. NCPC

CONSULTATION

Coordinating Committee

The Coordinating Committee reviewed the proposal at its May 14, 2024 meeting. The Committee forwarded the proposed comments on the final design to the Commission with the statement that the proposal has been coordinated with all participating agencies. The participating agencies were: NCPC, NPS, GSA, the District Office of Planning, the District Department of Energy and Environment, the DC SHPO, DDOT and the Washington Metropolitan Area Transit Authority.

U.S. Commission of Fine Arts

The U.S. Commission of Fine Arts (CFA) approved the final design for the memorial on the consent agenda at its meeting on May 15, 2025.

National Capital Memorial Advisory Commission

Section 8905(a)(1) of the Commemorative Works Act requires memorial sponsors to consult with the National Capital Memorial Advisory Committee (NCMAC) on the selection of alternative sites and design concepts prior to submitting the project to NCPC for formal review. NCMAC reviewed the site selection analysis on October 5, 2021. The proposed memorial design was reviewed by NCMAC on March 19, 2024.

ONLINE REFERENCE

The following supporting documents for this project are available online:

- Public Law 116-248

- NCMAC letter
- CFA letter

Prepared by Jamie Herr
05/16/2025

POWERPOINT (ATTACHED)

Texas Legation Memorial

600 block of Indiana Ave NW, Washington, DC

Approval of Final Site Development Plans

United States Department of the Interior

Project Summary

Commission Meeting Date: June 5, 2025

NCPC Review Authority: 40 U.S.C. § 8905

Applicant Request: Approval of Final Site Development Plans

Session: Staff Presentation

NCPC Review Officer: Jamie Herr

NCPC File Number: 8330

Project Summary:

The National Park Service (NPS) on behalf of the Daughters of the Republic of Texas (DRT) has submitted final site development plans for a memorial for the Texas Legation. H.R. 3349 Republic of Texas Legation Memorial Act was approved during the 116th Congress (2019-2020) and stated that the DRT will design a commemorative work to honor those who, as representatives of the Republic of Texas, served in the District of Columbia as diplomats to the US and made possible the annexation of Texas as the 28th state of the United States.

At the preliminary review in March 2024, the Commission provided the following recommendations:

The Commission:

Approves the preliminary site development plans for the proposed Texas Legation Memorial located on Indiana Avenue, NW in Washington, DC.

Notes the memorial site was supported by the Commission during the site selection review in December 2021.

Notes that the applicant is proposing plants native to Texas and DC and finds that this is appropriate for such a small area and supported by our recent guidance for cultural landscapes.

Recommends the applicant continue to evaluate the size and treatment of the proposed memorial text to ensure it is easily legible for all visitors.

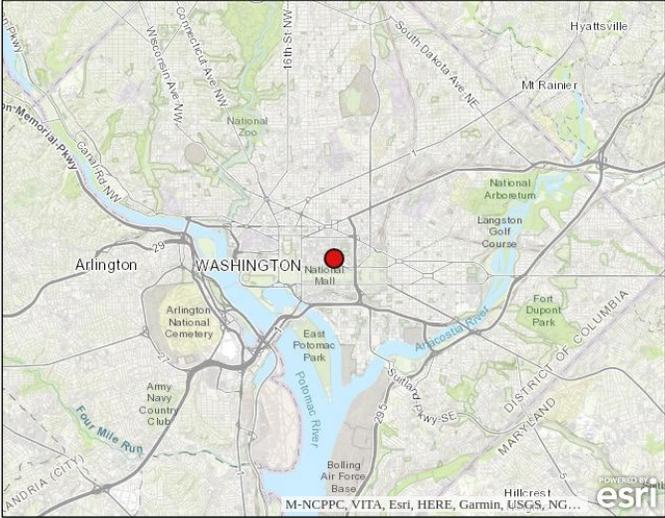
Project Summary

The memorial will include:

- Stone plinth with informative etching
- Official DRT medallion
- Improved landscaping inside existing granite surround

The goal of the memorial is to provide information about the history of the annexation of Texas into the United States and honor those diplomats who made this possible. The location is important because it sits in the middle of multiple locations where these diplomats lived and worked. The Commission previously provided comments on the site selection for the proposed memorial at the December 2, 2021 meeting. The Commission then approved the preliminary design at the Indiana Avenue, NW location at the March 7, 2024 Commission meeting.

Site Location



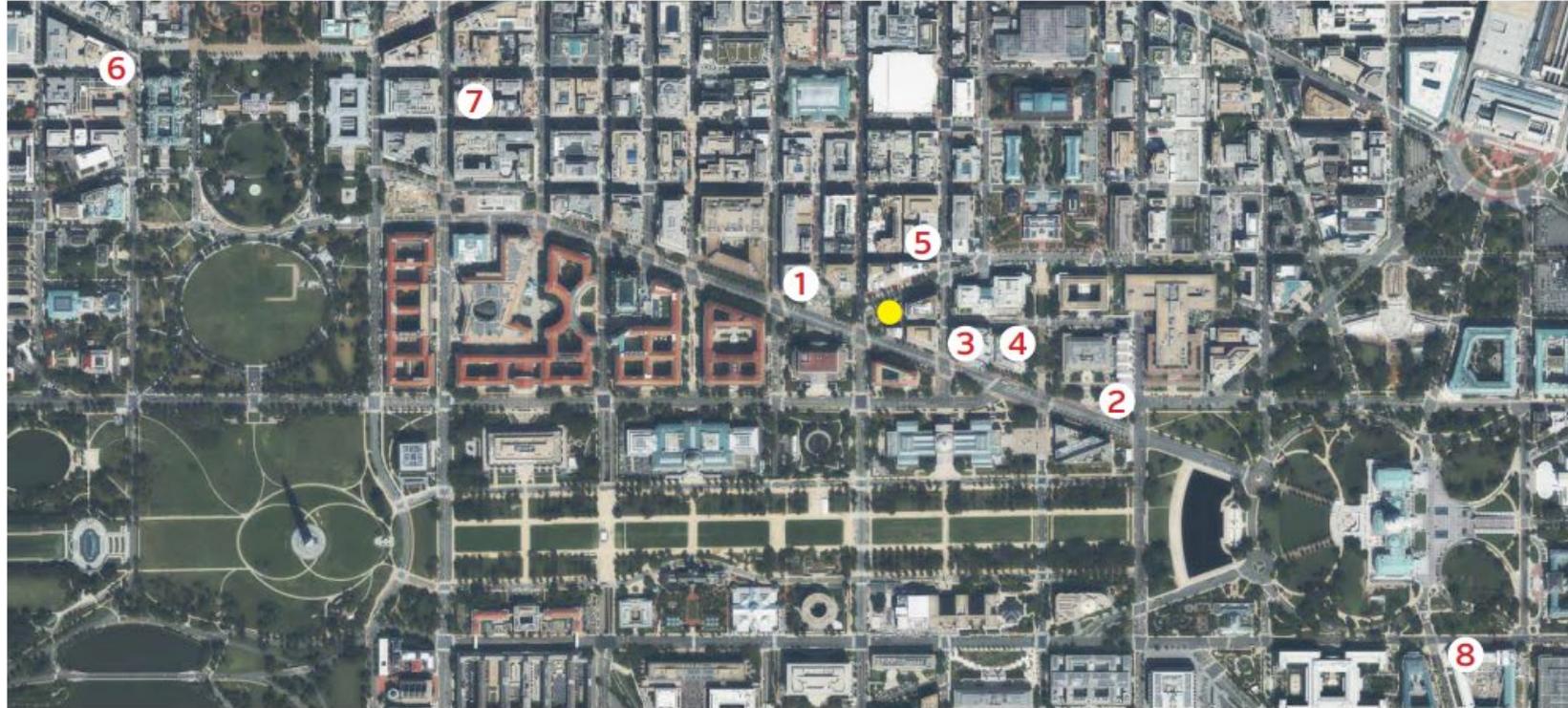
Location Map

Memorial Location



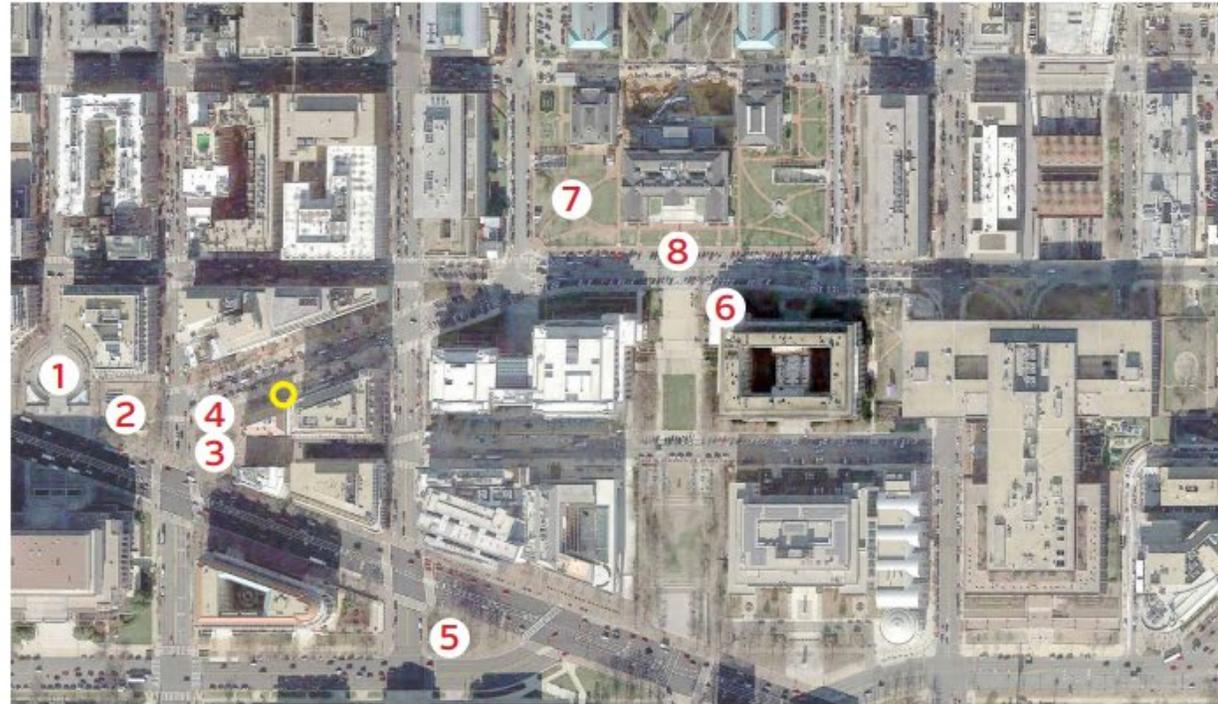
Memorial Site Context

DOCUMENTED HISTORICAL LOCATIONS ASSOCIATED WITH THE REPUBLIC OF TEXAS LEGATION TO THE U.S.



1	2	3	4	5	6	7	8
MEMUCAN HUNT MINISTER PLENIPOTENTIARY AND ENVOY EXTRAORDINARY	ANSON JONES MINISTER PLENIPOTENTIARY	ANSON JONES MINISTER PLENIPOTENTIARY	BERNARD E. BEE, SR. CHARGES D 'AFFAIRS	ISAAC VAN ZANDT CHARGES D 'AFFAIRS	ISAAC VAN ZANDT CHARGES D 'AFFAIRS	ISAAC VAN ZANDT CHARGES D 'AFFAIRS	C.H. RAYMOND ACTING CHARGES D 'AFFAIRS
Mrs. Page's boardinghouse Today it is the Navy Memorial	Mrs. Pittman's boardinghouse Today it is the William B. Bryant Annex to the US Courthouse	Gadsby's Hotel Today it is the John's Hopkins Campus	M. Lawrence's, near Gadsby's Today it is the Canadian Embassy	Mrs. Bowen's boardinghouse Today it is the Patrick Henry Building	Boardinghouse Today it is a commercial office building	F street between 13th and 14th streets Today it is a commercial office building on F street	Mr. Underwood's Today it is the Cannon House Office Building
1837-1838	1839	1839	1840-1842	1843	1843-1844	1844	1845

Memorial Design Context



SURROUNDING AREA

The project site, indicated in yellow, is surrounded by existing memorials and sculptures of significance, listed below.



US NAVY MEMORIAL PLAZA



GENERAL WINFIELD SCOTT HANCOCK STATUE
Sculptor: Henry Ellicot



GRAND ARMY OF THE REPUBLIC MEMORIAL
Sculptor: J. Massey Rhind



TEMPERANCE FOUNTAIN



BRIGADIER GENERAL ALBERT PIKE
Artist: Gaetano Trentanove



OLD DC COURTHOUSE

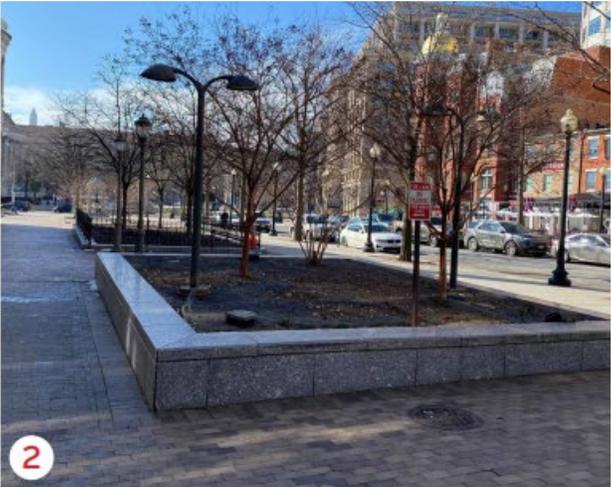


DARLINGTON MEMORIAL FOUNTAIN
Artist: C. Paul Jennewein



ABRAHAM LINCOLN STATUE
Sculptor: Lot Flannery

Area Existing Conditions



Site Existing Conditions



REMOVE EXISTING
TREES (3)

REMOVE EXISTING
LIGHT POLES

Site Pedestrian Conditions



Memorial Site



Memorial Design

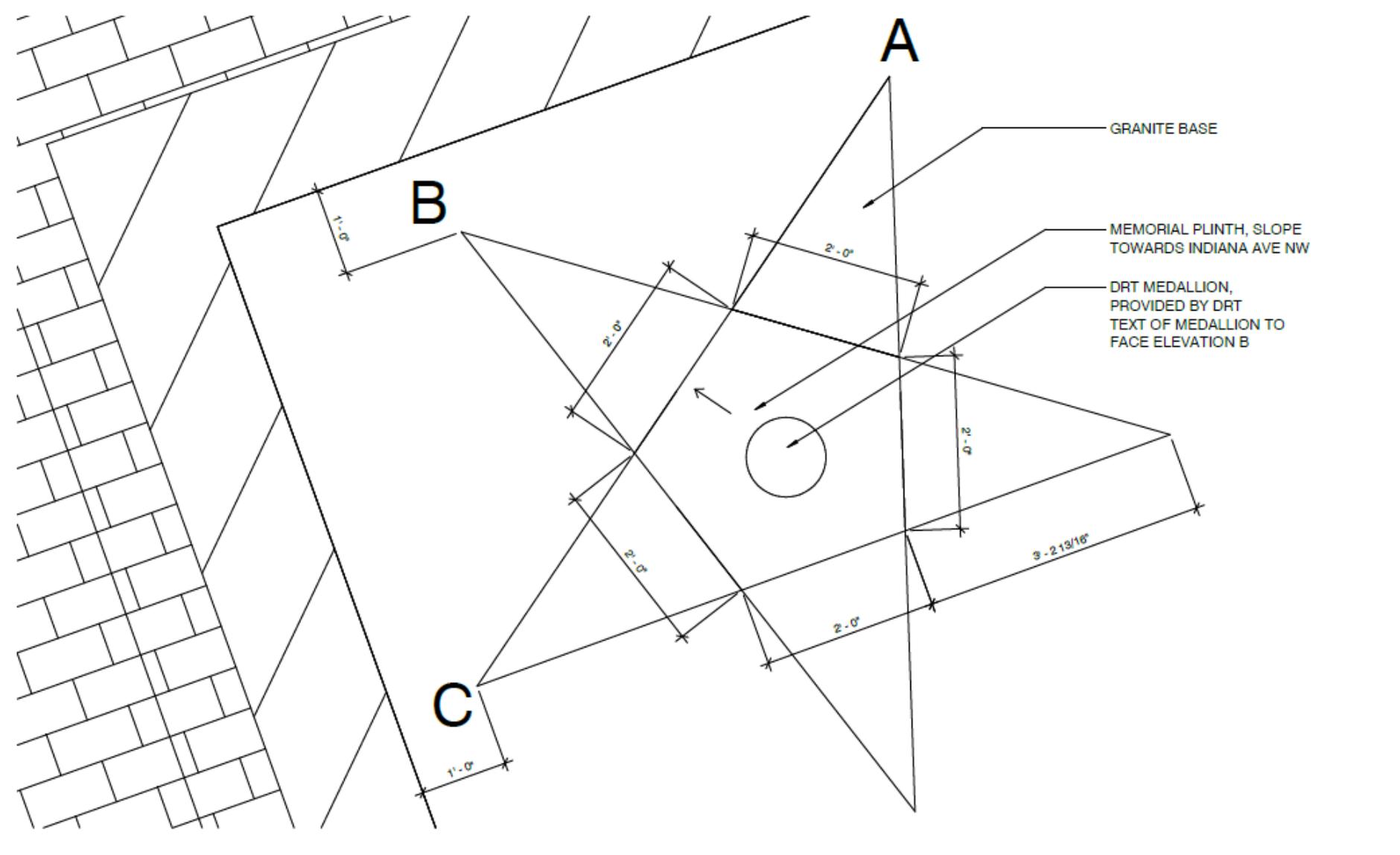


PLAN

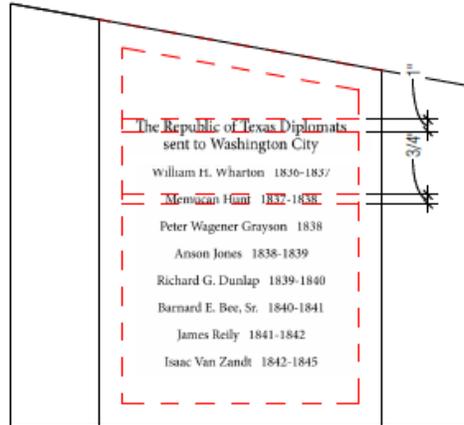


RENDERING
(SHOWN FOR SCALE PURPOSES ONLY. SEE LANDSCAPE DESIGN FOR PROPOSED PLANTINGS)

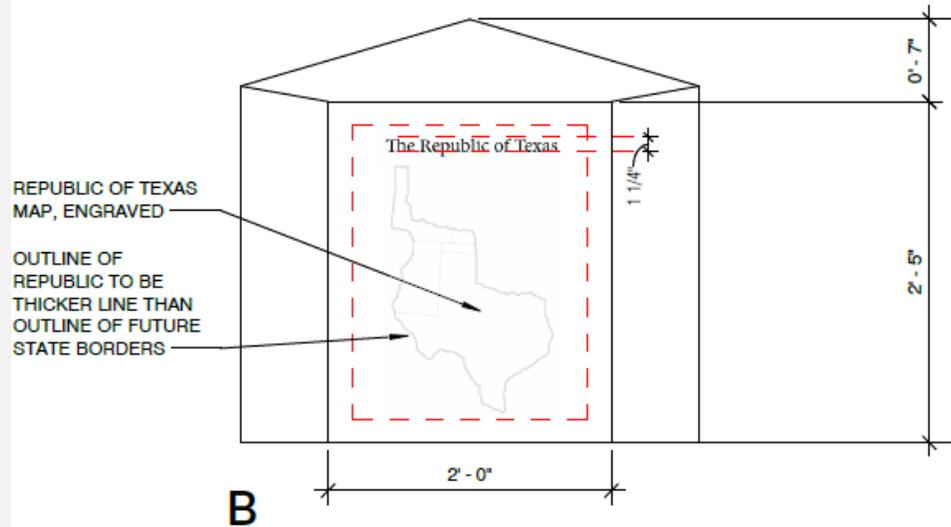
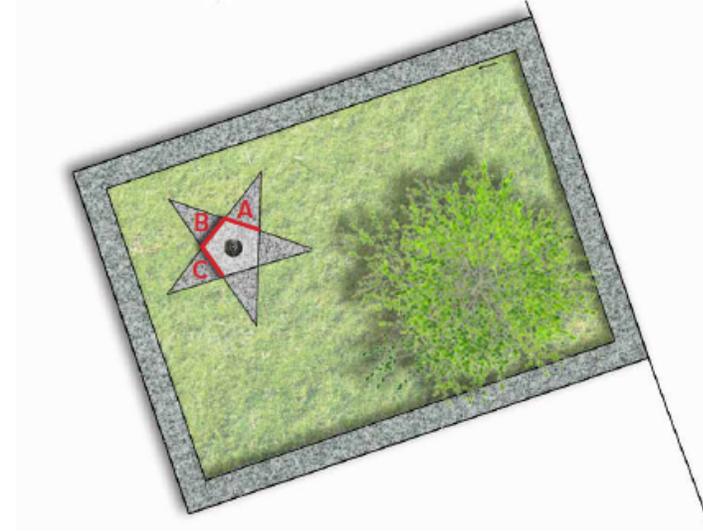
Memorial Engraving Details



Memorial Elevations

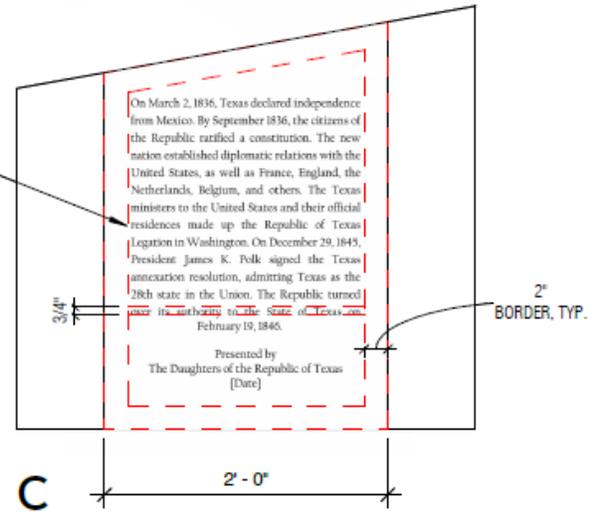


A



B

TEXT ENGRAVED,
3/4" FONT SIZE
2" BORDER ON
ALL SIDES



C

Memorial Text Size Examples

The Republic of Texas Diplomats
sent to Washington City

William H. Wharton 1836-1837

Memucan Hunt 1837-1838

Memorial Material and Medallion Detail

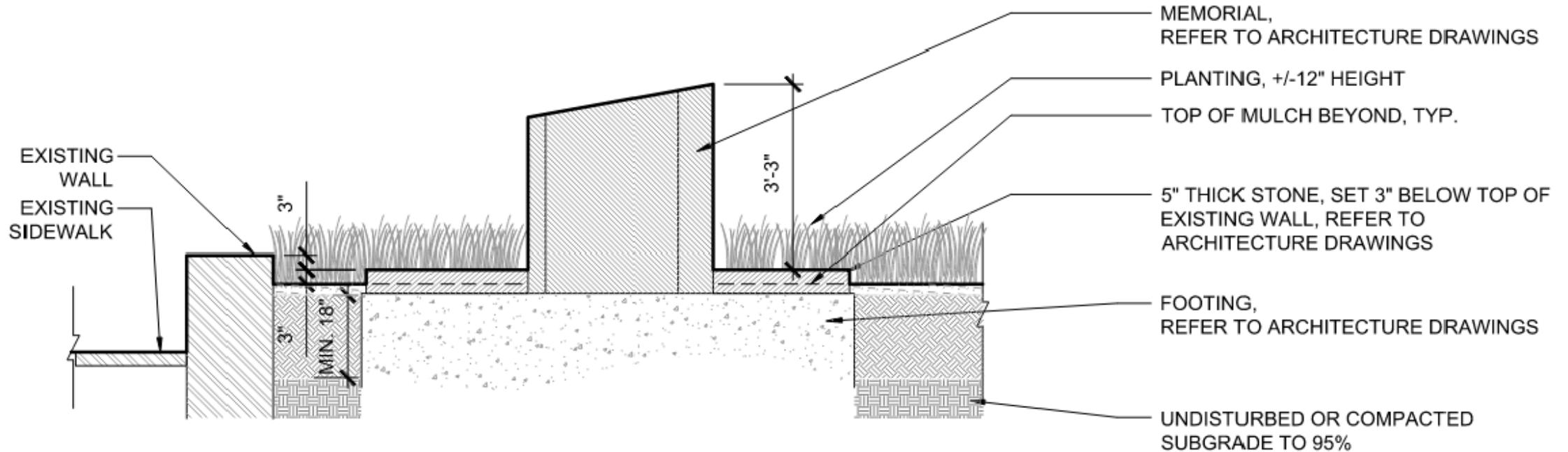


11" DRT HISTORIC SITES MEDALLION
(PROVIDED BY THE DRT)



ACTUAL SAMPLE FROM RUGO STONE
POLISHED MT. AIRY GRANITE

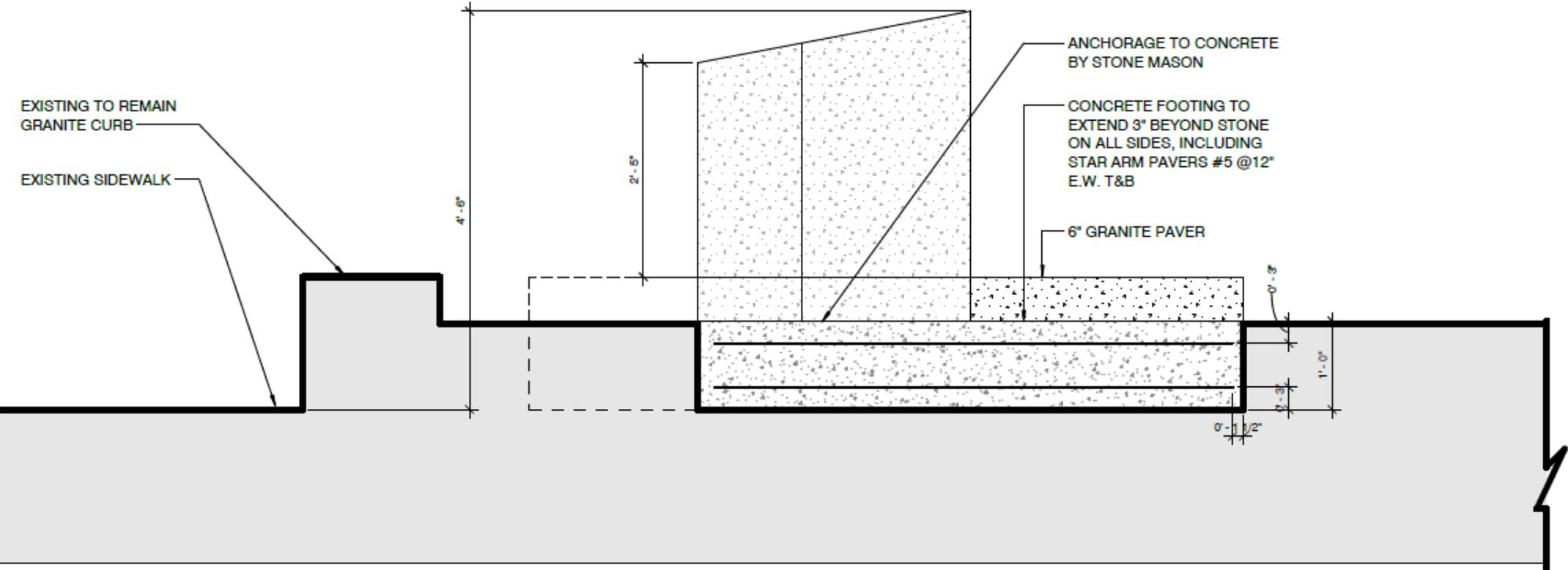
Memorial Section



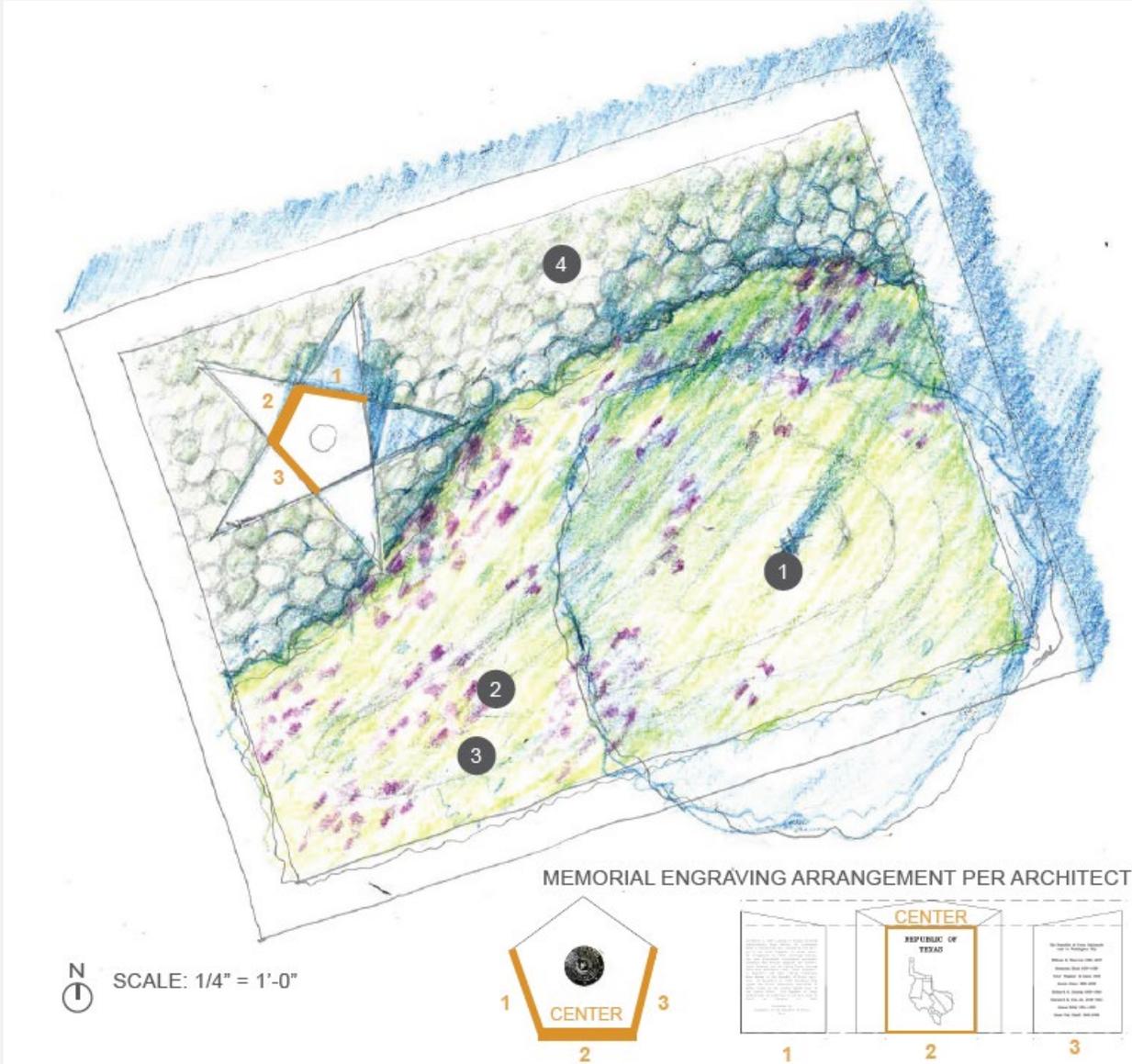
NOTE:

1. FOOTING MUST BE CUSTOMIZED TO FOOTPRINT OF "STAR" SHAPED PAVER PLINTH IN ORDER TO MAXIMIZE SOIL FOR PLANTS SURROUNDING THE MEMORIAL.
2. PAVER PLINTH MUST BE SET 3" BELOW TOP OF EXISTING WALL TO ACHIEVE MAXIMUM VIEW OF MEMORIAL TEXT

Memorial Plinth Section



Memorial Design - Landscape



1 ALTERNATIVE A: *MAGNOLIA VIRGINIANA*
Sweetbay Magnolia - TREE & FLOWER



2 *BOUPELOUA GRACILIS* 'BLONDE AMBITION'
Blue Grama Grass



3 *LIATRIS SPICATA* 'KOBOLD'
Blazing Star



4 *CAREX LAXICULMIS* 'HOBB'
Bunny Blue Sedge



BULB PLANTING CHARACTER IMAGE
Provides early-mid Spring seasonal interest.

Proposed Memorial Rendering

