



July 18, 2018

Earl A. Powell III, Chairman  
U.S. Commission of Fine Arts  
401 F Street, NW  
Washington, DC 20001

Dear Chairman Powell:

I am writing on behalf of The Cultural Landscape Foundation (TCLF) to provide comments on the latest plans (dated July 19, 2018) for the National World War I Memorial proposed for Pershing Park in Washington, D.C. TCLF is an official consulting party to the Section 106 review process currently underway regarding the memorial, and representatives of TCLF have attended the various pertinent meetings hosted by the National Park Service (NPS), the U.S. Commission of Fine Arts (CFA), and the National Capital Planning Commission (NCPC), submitting written comments at every opportunity to do so.

If I may, I wish to provide some context about the timeline of this approvals process. With the impending centenary of the end of World War I later this year, there is a great sense of urgency on the part of the World War I Centennial Commission (WWICC) to secure design approval and begin construction of a memorial. That urgency has been fed in part by recent media coverage that has questioned why it has taken so long to obtain the needed approvals. In addition, a letter-writing campaign has been initiated by the WWICC to its supporters, urging the CFA Commissioners to approve the design being presented today (despite the fact that no images of the actual proposed design are shared as part of the WWICC's campaign).

The perceived urgency of the present moment is the result of a significant, strategic error on the part of the client. As the WWICC Vice Chair noted in the February 2017 CFA meeting (according to the CFA's meeting minutes): "Historic preservation of the park landscape emerged as a critical issue in May 2015 in meetings with review agencies during development of the design competition program." Also of note, the Vice Chair said in the very first CFA meeting, in November 2015: "Due to the short time frame and limited funding ... the design competition is proceeding simultaneously with development of the Determination of Eligibility for the park [to be listed in the National Register of Historic Places]." In fact, Peter May, the National Park Service liaison to the WWICC, has stated that he had assumed in 2014 that the park would be determined eligible for listing in the National Register. Moreover, in a telephone conversation in Spring 2015 I told the WWICC Vice Chair that the park would likely be determined eligible for listing.

Consequently, the WWICC knew "during development of the design competition program" in May 2015 that "historic preservation of the park landscape had emerged as a critical issue." Moreover, the WWICC Vice Chair, as a former board president of the DC Preservation League, should have known that this could present an issue in the approvals process. Nevertheless, one can assume that in the interest of expediency, the design competition package said nothing about potential preservation issues and the possibility that the park would be determined eligible for listing in the National Register, as Mr. May had assumed, and it discouraged the very features, such as a pool and cascade, that define Pershing Park. Had those issues been addressed at the outset, this project might actually be approaching a real groundbreaking.

Since the November 2015 CFA meeting, when the five finalist designs for a memorial in Pershing Park were first presented to the Commission, the Commissioners have been clear about the need for the WWICC design team to respect and respond to the M. Paul Friedberg design for the park. Through six separate meetings, the design team has received well-informed guidance and advice, along with numerous questions, from the Commissioners, all intended to help develop a memorial that achieves the goal of honoring those who served in World War I, that is compatible with the National Register-eligible Pershing Park, and is befitting a place on Pennsylvania Avenue (a National Historic District) and in the nation's capital. However, since the selection of the winning proposal in January 2016, the client and the design team have insisted on inserting a large-scale sculptural wall—first a *bas* relief and now in high relief—into Pershing Park, despite repeated reservations and observations expressed by Commissioners. For example, in the February 2017 meeting, Commissioners “asked if other typologies of commemorative form had been considered” and “advised abandoning the idea of the wall and developing a new concept.” This insistence on a wall was cited at the May 2018 meeting when Commissioners noted the “stubbornness on the part of the project team” and that “the sculpture wall is the stubborn element.”

Yet the only substantive change from the May 2018 meeting appears to be that the WWICC has shifted its allegiance from a sculptural wall embedded along the western side of the pool (Option B) to a freestanding wall within the pool (Option A). As we noted in our comments in May 2018, both options would have an adverse effect on Pershing Park's signature design feature, the cascade and pool, and would destroy the park's character-defining visual and spatial relationships. During the course of these meetings, Commissioners have repeatedly cited the significance of the pool and cascade, which are essential to animating the space, providing a soothing auditory barrier to the surrounding traffic as well as a cooling mist that is all too welcome on hot summer days like today. Nevertheless, the latest proposal not only includes a wall, but also includes iterations of walkways through the pool, which would fundamentally alter the Friedberg design, and the reduction of the water's depth in some cases to that of a scrim. These changes alone could result in substantial delays due to design reviews and modifications related to coping, edging, water depth, and handrails.

One issue that has been raised consistently during the various review meetings is the treatment of the kiosk. It has been cited by the WWICC design team as one of the park's key focal points, along with the pool and cascade and the statue of General Pershing. Yet treatment of this area has been meager at best—a grouping of flagpoles—despite encouragement to view it as a potential site for a memorial.

Following the May 2018 CFA meeting, Pershing Park's original landscape architect, M. Paul Friedberg, met on June 11, 2018, in New York City with the memorial design team—Joseph Weishaar, the architect, Sabin Howard, the sculptor, and David Rubin, the consulting landscape architect (World War I Centennial Commission Vice Chair Edwin Fountain did not attend). I attended the meeting at Mr. Friedberg's invitation. The meeting proved encouraging because the design team had rendered to a high degree of specificity plans to site the sculptural wall designed by Mr. Howard in place of the kiosk. The sculpture, in this proposal, was rendered in the round (iterations of this appear on pages thirteen and fourteen of the present proposal). This appeared to respond to numerous suggestions by CFA Commissioners that the design team consider the kiosk site for memorial elements.

Siting the sculpture in the round in place of the kiosk is a concept that TCLF could support because it would meet the Secretary of the Interior's standards for rehabilitation, honor the park's historic

visual and spatial relationships, recognize and restore the cascade and pool (which is the central, defining feature of the park), and maintain (indeed, strengthen) the park's three focal points by creating a strong link among the Pershing statue, cascade and pool, and memorial wall.

Sincerely,

A handwritten signature in dark ink, consisting of a large, stylized 'C' followed by a smaller 'A' and a long horizontal line extending to the right.

Charles A. Birnbaum, FASLA, FAAR