



June 20, 2017

Ms. Catherine Dewey  
National Park Service  
Chief of Resource Management  
National Mall and Memorial Parks  
900 Ohio Drive, S.W.  
Washington, D.C. 20024

Dear Ms. Dewey:

We are grateful for the opportunity to provide comments in advance of the June 28, 2017 Section 106 meeting concerning the most recent iteration of *The Weight of Sacrifice*, the World War I Memorial proposed for Pershing Park in Washington, D.C. We had a glimpse of this proposal – the so-called “[Restored Pool Concept](#)” – at the May 18, 2017 meeting of the U.S. Commission of Fine Arts (CFA), and subsequently in more detail on the National Park Service’s website. The design team is to be commended for its sympathetic treatment of the park’s perimeter. In fact, when the as-built plan for the [National Register-eligible](#) M. Paul Friedberg-designed Pershing Park is overlaid with the most recent proposal, many of the character defining features along the perimeter are retained.

In the National Park Service’s “Secretary of the Interior’s Standards with Guidelines for the Treatment of Cultural Landscapes,” which have direct bearing on the Section 106 review of the proposed memorial, the “Guidelines” are organized along two primary areas: [1] Organizational Elements of the Landscape and [2] Character-Defining Features of the Landscape. As the author of that document, I can confirm that what the memorial’s proponents call the “Restored Pool Concept” would have adverse effects as noted in both of those primary areas. In fact, the proposed design would have adverse effects on the heart of the park’s spatial organization and circulation, and the water features. Let me explain:

Currently, Pershing Park’s waterfall, whose east-facing side is approximately thirteen feet wide, is flanked by sets of stairs that run 40 to 45 feet in length. This open amphitheater-like seating wraps around with its southern perimeter, creating a welcoming cradle that shelters the pool and the sunken plaza. The openness of the staircases also provides visual connectivity with the elevated western end of the park, and facilitates comfortable movement between the upper and lower levels of the park. The proposed “Restored Pool Concept” would replace this open area with a 65-foot-long east-facing wall that severs the connection between the upper and lower levels. [NOTE: the [scale drawing provided by the memorial’s proponents](#) on pages ten and seventeen of the most recent proposal appears to illustrate a wall that’s approximately 75 feet in length – this discrepancy is repeated in the [plans submitted by the memorial’s proponents to the National Capital Planning Commission](#) for their forthcoming July 13, 2017 meeting]. Using the memorial proponents’ scale drawing as a guideline, the points of access and egress flanking the fountain would be reduced in width by at least 75%, down from 40 to 45 feet in length, to ten feet on either side of the wall. This very diminished area would no longer be sufficient to

accommodate casual seating in these areas and would limit sight lines that make people feel safe – both considerations of Friedberg’s original design. Moreover, part of these considerably constricted ten-foot-wide areas would also have to accommodate a channel that captures water that would flow down the north and southern sides of the wall (it is also assumed that since these channels would be of a very limited width, that this would be more of a sheet of water).

The purpose of these changes is to remove the fountain and replace it with a 65-foot-long wall with a bronze bas-relief sculpture with life-sized figures, which would have a “pool” behind it. It is our understanding that this new static feature would have a “sheet” of, rather than rushing, water, and would significantly alter what Paul Friedberg described in a February 12, 2017 letter about Pershing Park as, “The range and character of water -- sound, reflection, movement, focal point and symbolism.”

Regarding the pool, which is labeled as “restored,” the adverse effect is significant (for a comparison see Exhibit A as an Appendix to this letter). A new “L-shaped” path would be inserted within the pool’s existing footprint, reducing the pool’s surface area by some 40%, since the water would be replaced with hardscape. The depth of the remaining pool areas surrounding this new hardscape is ill-defined; it’s unclear whether the current depth will be maintained or would become a scrim or a combination of the two (for example, the walk area to the south of the pool basin, is shown dry in the rendering on page eleven, wet in the rendering on page fourteen, and shallow in the axonometric on page twelve). Whichever way, the integrity of the pool is significantly diminished. Moreover, according to the site plan of the proposed memorial, steps that currently lead down to the pool on the northern and eastern sides would be eliminated. By definition, that is not restoration.

In addition to the loss of some 40% of the pool surface, the removal of the existing fountain is more than a physical loss; it impacts the integrity of Friedberg’s design, especially the “feeling” that it conveys. The fountain in Friedberg’s Pershing Park was not only aesthetically pleasing and commanding, it was designed to mitigate noise (from the surrounding vehicular traffic); have a cooling effect (from the mixing of air and water resulting during evaporation); and serve as a place of respite in the center of the city, offering opportunities for recollection, contemplation and remembrance, or, as Friedberg noted, “where the topography and the viewer came to rest.” The proposed wall, more than six times the length of the existing fountain, only provides small areas along its sides along which water would sheet down. This is a substantial change from the more exuberant cascade that mitigated noise and provided a cooling effect.

This shared concern has been well documented by the CFA. In their [February 16, 2017 meeting](#), CFA members expressed reservations about the wall, which was presented as part of an earlier design iteration called the “Pool and Plaza” concept (the proposed wall in this concept was 75 feet long by 10.5 feet high). Vice Chair Elizabeth Meyer, FASLA, according to [detailed meeting minutes](#):

**Advised abandoning the idea of the wall and developing a new concept.** She supported treating a memorial here as an insertion in the existing park; she emphasized that the

fabric of Pershing Park is intact, and an insertion implies that pieces would be removed and altered in some precise, limited way. She said that the commemorative program has many other potential expressions than the large wall, which is holding back the creativity of the designers; she encouraged them to reimagine the stairs or the [now disused] kiosk as opportunities for commemorative features. [Emphasis added]

At the May 18, 2017 CFA meeting, the memorial's proponents presented the "Restored Pool Concept," and reiterated their position that the wall – now 65 feet long – was the only option for their preferred commemorative element, a bronze bas-relief. On [page nine of their presentation, in a section labeled "Design Studies," they presented four vaguely-articulated alternatives](#), accompanied by the following text:

The solutions shown here were attempts to reconfigure the design and meet the aforementioned goal [of the WWI Centennial Commission]. Each of the solutions was evaluated and ultimately dismissed because it either failed to meet the commemorative goals of the WWI Commission, caused significant change to the existing park features, or resulted in a design which had overall negative consequences on the experience and function of the park.

Following that presentation, a June 1, 2017 letter from CFA Secretary Thomas Luebke summarizing the meeting, noted that the Commissioners, "emphasized the fundamental importance of the design's experiential character—including the visual, auditory, and tactile qualities of water— in making this park work successfully as a memorial." Moreover: "For the proposed bas-relief wall, they advised further study to determine whether its length is appropriate, and they requested more information about the treatment of the top and rear of this wall, as well as the design of the stairs at its sides."

Collectively, the visual and functional barrier created by the insertion of a 65-foot-long wall; the corresponding loss of more than 50 feet of open access between the upper and lower plaza levels; the severed relationship between the southern and western amphitheater stairs/risers; the introduction of new hardscape into the pool basin (changing the pool's shape and diminishing its surface area by more than 40%); and, the loss of the dynamic, animating qualities of water that is fundamental to the park's feeling and integrity, constitute substantial adverse effects on the Friedberg design, which has been [determined eligible for listing in the National Register of Historic Places](#). This is all being done because of the memorial proponents' insistence on the insertion of a 65-foot-long wall with a bronze bas-relief sculpture into the heart of the park.

The memorial's proponents have not sufficiently demonstrated, despite the repeated urging of the CFA and others, much more than a perfunctory willingness to explore alternatives that would carefully integrate memorial elements into the existing historic park, interventions that would mitigate adverse effects on its central defining feature.

As noted at the outset, the memorial proponents' design team is to be commended for its sympathetic treatment of the park's perimeter. However, the idea that the "Restored Pool Concept" is a restoration is completely false. **This is not a restoration; rather it is a rehabilitation effort, but with the addition of a feature that is so incompatible in scale that its insertion destroys the integrity of the heart of the park.** Moreover, it destroys the integrity of the most important work of landscape architecture in the Pennsylvania Avenue National Historic Site's expanded period of significance, as outlined in the Cultural Landscape Inventory (May 10, 2016). That period of significance spans 1976-1990, and encompasses a collection of modernist and postmodernist parks commissioned by the Pennsylvania Avenue Development Corporation.

We thank you for the opportunity to provide comments.

Sincerely,

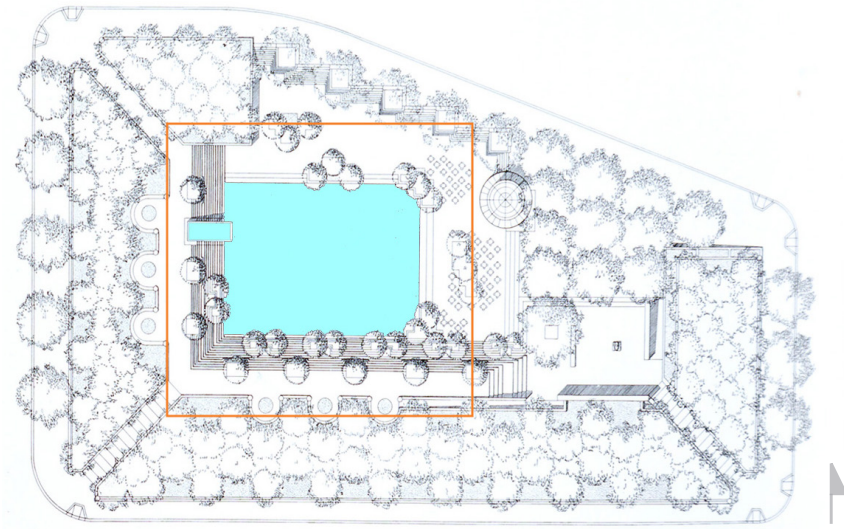
A handwritten signature in dark ink, consisting of a large, stylized 'C' followed by a horizontal line that tapers to the right.

Charles A. Birnbaum, FASLA, FAAR  
President + CEO, TCLF

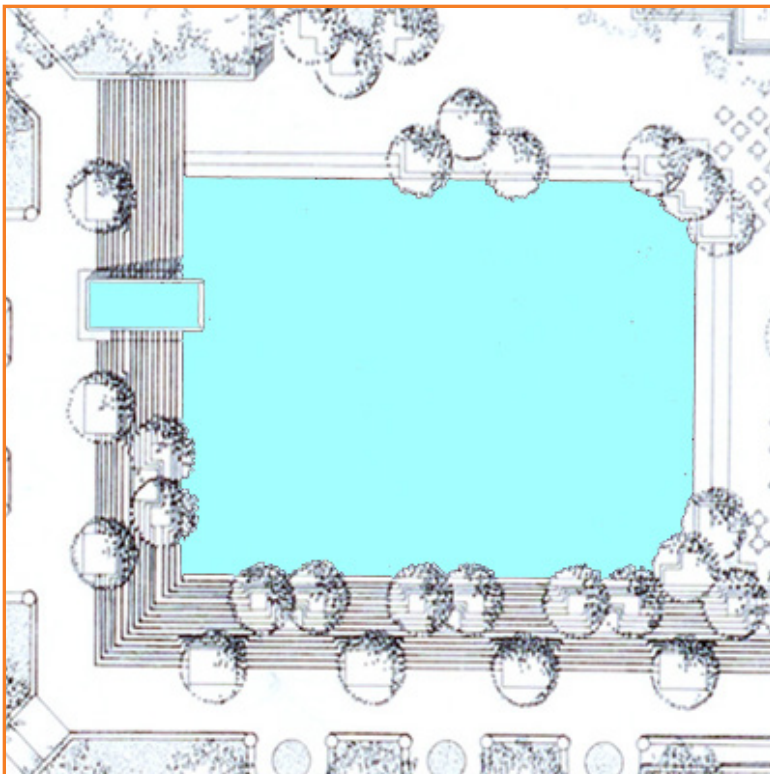
cc: Claire Sale, AECOM; David Maloney, State Historic Preservation Officer for the District of Columbia; Thomas Luebke, Secretary, U.S. Commission of Fine Arts; Elizabeth Miller, National Capital Planning Commission; Peter May, Associate Regional Director, National Capital Region, National Park Service; Darwina Neal; Rebecca Miller, DC Preservation League, The Committee of 100; M. Paul Friedberg, FASLA; Lisa Delplace, OvS; Bill Brown, AOI

# Exhibit A

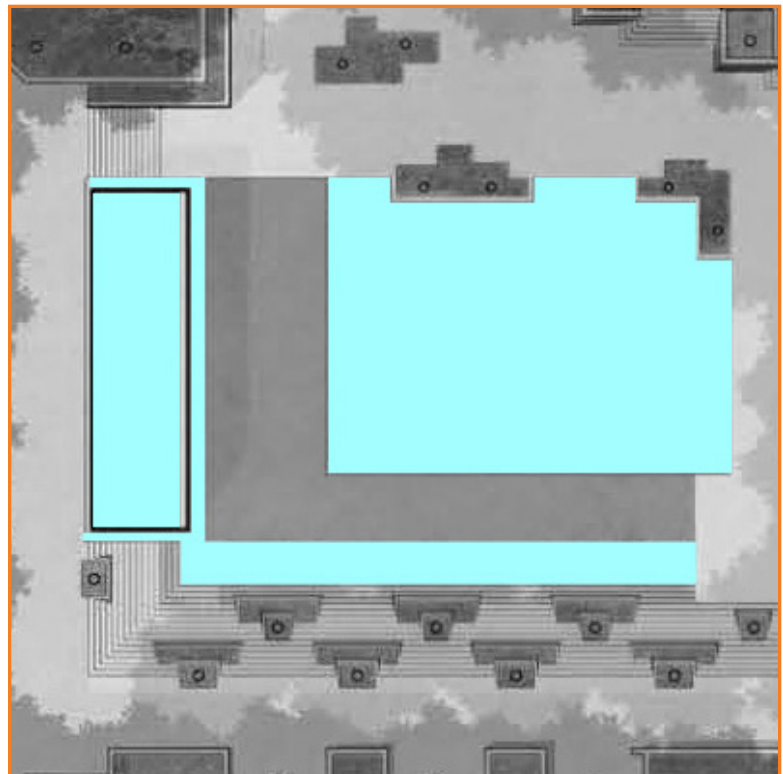
M. Paul Friedberg Design (1981)



## Pool Basin



Existing



Proposed