



May 15, 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 May 2, 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.

As you know, Pershing Park represents a nationally significant design by the renowned landscape architect M. Paul Friedberg, with a planting plan by the celebrated firm Oehme, van Sweden. Furthermore, as the D.C. Historic Preservation Office has determined, the park retains a high degree of design integrity and is eligible for listing in the National Register of Historic Places.

In the most recent meeting before the CFA on February 15, 2018, landscape architect David Rubin was introduced as a consultant to the project working on behalf of the applicant, the Centennial Commission. Although it was subsequently revealed that he and Sabine Howard, who is designing the memorial's sculptural elements, had not met before that day, the possibility of a multidisciplinary effort seemed to represent a crucial opportunity to balance the objectives of a new memorial within an historically significant park. Those were indeed the sentiments expressed by several CFA members at the meeting. CFA Member Toni Griffin, for example, emphasized that "the sculptor and the landscape architect need to collaborate" (quoting from the minutes of the CFA meeting, **here and hereafter**). CFA Member Elizabeth Meyer also voiced her concern that the sculpture was "evolving on its own without being coordinated with the landscape architect's design," later adding that the artist and the landscape architect "have to collaborate to make this a successful work of art," and that "the connection between the wall and the park is fundamental."

Despite the advice of the CFA and the fresh opportunity to arrive at a collaborative and balanced solution for the memorial's design, there is little evidence that any meaningful collaboration has taken place. The most recent proposal presents two familiar options ("Freestanding" and "Integrated") to entirely remove the cascade fountain from Pershing Park and insert a wall whose dimensions and location would fundamentally and adversely affect the park's original design. The following comments will, therefore, echo those made by TCLF on several past occasions, as well as remarks by the CFA members themselves.

A primary concern of both consulting parties and reviewing agencies has long been the applicant's proposal to replace the cascade fountain, the park's key, animating feature situated along the west side of the pool basin, with a massive wall supporting a bronze sculptural narrative. At the February CFA meeting, CFA Member Liza Gilbert asked whether other locations for the sculpture had been considered. According to the minutes of that meeting, Mr. Rubin responded that "he has not considered any other location because the site at the west edge was chosen before he was asked to participate in the project," adding that there would be advantages

to locating the sculpture elsewhere. It is disappointing to find that alternative locations for the sculptural elements have not been considered despite Mr. Rubin's subsequent participation in the project.

The "Integrated Option":

The Integrated Option would introduce a massive and imposing physical barrier to the west end of the park's basin, restricting access between the upper and lower levels of the plaza. The proposed wall would also block views of the pool basin from the western end of the park for those who are disabled or of small stature, a limitation that would be most sorely felt from the vantage point that is labelled the "overlook" area (frame 24 of 59).

The Integrated Option would also replace the dramatic effect of the cascade fountain with what is little more than a scrim of water flowing into runnels (frame 25 of 59). On that point, CFA Member Toni Griffin has already indicated that the design of the memorial needs to "conceptually incorporate the pool, as well as the sound of the water, in order to engage the rest of the landscape in the same way as the original fountain had," adding that the project team should "figure out how to engage the wall with the stairs, and how to integrate the water into this composition." The Integrated Option fails to achieve those goals.

The "Freestanding Option":

As is clear in the current proposal (e.g., frame 17 of 59), the freestanding wall would also block views to and from the western end of the park. Saying that he preferred that option, Mr. Rubin nonetheless admitted that it would "indeed limit sightlines across the central area of the park." CFA Member Elizabeth Meyer asked the applicant to consider moving the freestanding wall to other locations within the park, specifically suggesting "placing it closer to the statue of Pershing and the two walls that define its setting." Although Meyer recommended studying that location as a third option, the applicant has presented no such option in the most recent proposal.

CFA Member Liza Gilbert also questioned the decision to place the freestanding wall on the western side of the pool, observing that the area behind the wall "would be experienced as a tight, uncomfortable slot of space." Although the current proposal indicates that the Freestanding Option would add nearly 600 square feet of "gathering space" (frame 31 of 59) on the western terrace, those who gather there would find themselves confronted by a solid mass of wall looming fewer than 11 feet from the pool's edge and presenting what is essentially the rear façade of an artwork. Moreover, in the Freestanding Option, this rear (western) façade is the only surface area over which water would flow, further diminishing the already reduced effects of falling water on the larger expanse of the pool basin.

Both Options:

In both options, a 10'-7"-high wall more than 56 feet in length would dominate the western end of the pool basin, thus adversely affecting the park's visual and spatial organization. Notably, very specific guidance has been given to the applicant regarding the length of the wall. CFA Member Elizabeth Meyer, for example, recommended 49 feet as its maximum length, and CFA Member Toni Griffin suggested that elements of the existing landscape could provide datums to establish the dimensions of the new composition, siting the 50-foot distance between planters as "an appropriate length for the wall." It should also be noted that, in the latest proposal, the height of the wall is due, in part, to the fact that the ground plane of the sculpture has been elevated to some 3'-2" above the surface of the pool. According to minutes from the February

CFA meeting, sculptor Sabine Howard stated that the sculpture would be set “two feet above the pool.”

Both options also reduce the depth of water in the pool to just 3 inches. Doing so considerably alters the pool’s quality as a continuous reflective mass and would recast it as something between a wading pool and a splash pad, diminishing the intended auditory and cooling effects and, more significantly, the dignity of the original design. In the February CFA meeting, CFA Member Edward Dunston emphasized the need to “remember the vital part played in the Friedberg design by the sound of cascading water,” noting that “water is presented in the two options as a static, placid element.” Unfortunately, that observation is even more so true when considering the most recent proposal.

It is also notable that both options would interrupt and significantly lessen the pool basin’s surface area with new walkways (either L- or U-shaped)—in effect severing the relationship between the cascading water and the pool and parsing the unified expanse of the basin into segregated rectangles. At greater than 21 feet, the width of the walkway in the Integrated Option is excessive (see frame 22 of 59). Taken together with the proposed depth of the pool, these changes would transform Friedberg’s animated cascade and pool into an expanded hardscape interrupted by shallow sections of placid water—a transformation reinforced by the grid-like paving pattern that would extend from the walkway into the basin, visible in the proposal’s renderings (e.g., frame 26 of 59).

It is, therefore, clear that both proposed options would have significant adverse effects on the park’s visual and spatial organization, as well as on the cascade fountain and pool basin, which are contributing features in the National Register-eligible design. Indeed, the most recently proposed options represent adverse effects in both primary areas of the *Guidelines for the Treatment of Cultural Landscapes*, namely “Organizational Elements” (affecting visual and spatial organization) and “Character-Defining Features of the Landscape” (altering the cascade fountain and basin) and would thus seriously jeopardize the potential of Pershing Park to be listed in the National Register of Historic Places. While the recent proposal purports to achieve a “balance of two works of art,” neither option achieves that balance. As a consulting party, we continue to wait in vain for a truly collaborative approach that will produce a successful work of art and a meaningful connection between a new memorial and an historic park.



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cc: Edwin Fountain, Vice Chair, WWI Centennial Commission; Marcel Acosta, Executive Director, The National Capital Planning Commission; Darwina L. Neal, FASLA; David Maloney, State Historic Preservation Officer, D.C. Office of Planning; Rebecca Miller, Executive Director, D.C. Preservation League; William Brown, AOI of D.C.; Byron W. Adams, Administrator, Committee of 100 on the Federal City; M. Paul Friedberg, FASLA; Lisa Delplace, Oehme, van Sweden