## The Committee of 100 on the Federal City



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March 15, 2019

Robin Nixon, Acting Superintendent National Mall and Memorial Parks National Park Service 1100 Ohio Drive, SW Washington, D.C. 20242

SUBJECT: Comments on the Draft Memorandum of Agreement for the Latest Design for the World War I Memorial in Pershing Park

Dear Ms. Nixon:

The Committee of 100 on the Federal City (Committee of 100), founded in 1923, is the District of Columbia's oldest citizen planning organization. The Committee of 100 has been especially interested in the design of the proposed World War I Memorial in Pershing Park, located at Pennsylvania Avenue and 14<sup>th</sup> Street, NW. This is an important location, just south of Downtown, at the north edge of the Monumental Core and just east of the White House area.

The Committee of 100 has been involved with this project since the initial public meeting on May 20, 2015. The Committee of 100 has submitted comments on the design of the WWI Memorial over the past three (almost four) years. A total of eight comment letters have been submitted through February 2019. Two of these comment letters were to NCPC, the last being dated January 18, 2019, and six were to the National Park Service. All the comments are on the Committee of 100 website, under "Pennsylvania Avenue" in the "Planning" Section. In addition, members of the Committee of 100 have participated in all of the Consulting Parties meetings.

Our comments today are on the "Revised Draft Memorandum of Agreement" which was circulated last Thursday, March 7 with comments due this coming Friday, March 15, 2019.

The review and discussion of the design of the World War I Memorial by the Consulting Parties, and the National Capital Planning Commission and the Commission of Fine Arts, has been a long and sometimes contentious process.

Committee of 100 on the Federal City Comments to the National Park Service on the Revised Memorandum of Agreement for the Latest Design of the World War I Memorial in Pershing Park March 13, 2019

The Committee of 100 has advocated retaining as much of the original Pershing Park design as possible while still accommodating the World War I Memorial in a meaningful way. It is important to stress and continue the "urban park" role and benefits of this important open space.

## Comments on the Revised Memorandum of Agreement (Distributed March 7, 2019)

We suggest the following changes to the Memorandum of Agreement:

- 1) page 2, WHEREAS #4: needs an "and" at end of sentence.
- 2) page 4, MITIGATION, d. Treatment of Vegetation: "In kind" replacement is unclear. We suggest "Comparable healthy" or "new or replacement of same species or material."
- 3) page 5, MITIGATION, Treatment of Vegetation, e and f: The MOA should require hiring of a consultant who meets the appropriate or applicable *Secretary of the Interior's Professional Qualifications Standards*, such as one meeting the Historic Landscape Architect standard.
- 4) page 6, ADMINISTRATION, a. Reporting, last full line: How will Consulting Parties be notified? Just a change on the website is inadequate. We suggest that the MOA specify using the contact list for Consulting Parties (same list used to notify Consulting Parties of the February 25, 2019 meeting).
- 5) page 6, ADMINISTRATION, b, c, d, e: There should be a requirement to notify the Consulting Parties if any of these actions should be triggered.

We believe these comments will improve the Memorandum of Agreement. We suggest that in the future, when changes are made to a document being reviewed, the revised document be presented in a "red line" version so that the additions/deletion/revisions can be more easily understood by reviewers.

Respectfully submitted,

Stephen A. Hansen, Chair

cc: Marcel C. Acosta, Executive Director, National Capital Planning Commission

Thomas Luebke, Secretary, U.S. Commission of Fine Arts

Andrew Trueblood, Interim Director, D.C. Office of Planning

David Maloney, State Historic Preservation Officer for the District of Columbia

Edwin Fountain, World War I Centennial Commission

Claire Sale, AECOM