

J. Carter Brown

Director Emeritus, National Gallery of Art

file w. w. II
memorial

Fax to: The First Lady
c/o Melanne Verveer

Fax No. 456-6266

Fax From: J. Carter Brown

Fax No. 347-2107

Date: October 13, 1999

This Fax consists of 6 pages including cover sheet.

(If you are puzzled by this and want to see the incoming letter, please call.)

THE COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

NATIONAL BUILDING MUSEUM
441 F STREET, N.W., SUITE 312
WASHINGTON, D.C. 20001-2728

202-504-2200
202-504-2195 FAX

October 8, 1999

Dear Tersh:

I am in receipt of your round-robin letter of October 5 on the design of the World War II Memorial. I am delighted by its expression of the importance of this memorial and what it commemorates, and the sense your letter gives of an acceptance of that site's appropriateness to the centrality of World War II in the American experience

For convenient reference, I have numbered your paragraphs sequentially, and would like to give you a Fine Arts Commission perspective on these issues.

(1.) We are of course pleased by the track record of the Committee of 100 in its interest in "preserving and implementing the concepts of the L'Enfant and McMillan Commission Plans." We like to think the Commission of Fine Arts, which was statutorily created basically for this purpose, shares these concerns. As to the connection of these plans to the proposed World War II Memorial, it is often overlooked that the L'Enfant Plan indicated the Potomac River (or its swampy edge) at the location of the present site, and so is irrelevant for these discussions. The McMillan Plan, on the contrary, developed that whole area west of the Washington Monument in a very elaborate design, with a great deal of masonry and many level changes and water features, extending across the Mall with far more structure than anything currently proposed. From the beginning, the implied cross axis of the "Rainbow Pool" has been retained, even though a planned pool that would have provided a far more pronounced cross-axis a bit further west along the Reflecting Pool was never built.

(2.) See the reference to the "McMillan concept" above.

(3.) We will of course be taking more looks at design details in the course of the design review process. We believe the American public has been generously and frequently informed on the issues, both on national television and in national newspapers and newsmagazines. We could not agree more strongly that this site "demands a memorial that truly honors our country and all American citizens who contributed to that epic victory." We are somewhat puzzled as to what you mean by the "historic concept and meaning" of the Mall, as addressed below.

(4.) We are in total agreement as to the importance of the Mall and its great east-west axis, and the extent to which "here the nation commemorates its history and celebrates our national ideals and democratic principles." We might posit that World War II has something to do with the history of the United States, and even something to do with preserving our national ideals and democratic principles against the imminent threat of totalitarian and racist domination. Otherwise, over half-a-million Americans would have died in vain. It is very hard to understand what is meant by altering the "symbolic power" of the Mall, if it is agreed

that this event occurred in defense of the same ideals promulgated and defended by others already commemorated in that great space, notably General, and later President George Washington; the signers of the Declaration of Independence; the black soldiers of our Revolutionary War, Commander-in-Chief and President Abraham Lincoln; General and later President U.S. Grant and his soldiers; and combatants in World War I, the Vietnam War, and the Korean War.

As the inscriptions and iconography have not yet been reviewed, we cannot comment specifically on the degree of meaning they will help convey. As with the Gettysburg Address in the Lincoln Memorial, or the quotations from Roosevelt in the FDR Memorial, and the statuary in each, we believe that meaning added by such elements can be far from "ludicrous." The arches are tucked well back behind the axial lines of trees, and serve to help frame and reinforce the central axis and its vista. The extent to which they can be interpreted as triumphal would seem consonant with your reference in paragraph three to World War II as an "epic victory."

If it is to be a memorial, the motif of a wreath would seem apposite. The pillars we found an improvement over the previous design, in the sense of strength they will connote. Each will bear the name of one of the states or territories, and so together they symbolize the unity -- to an extent perhaps unprecedented before or after-- with which this nation rallied around our democratic ideals, and will give each citizen who visits a piece of the memorial with which they can specifically relate. From a visual point of view, the pillars are designed in such a way as to allow transparency and radial views through to the woods on either side.

The torch of freedom purposely is not pretending to be "an eternal flame" like those on the Etoile in Paris and here at the JFK grave site, but a tall torch, coming up out of a crater, symbolizing the triumph of light over darkness, and embodying the ideals for which the war was fought. It carries with it the concept of passing the torch to future generations, so this becomes something more than a commemoration of a single generation of veterans and citizens who saved our country.

This Commission, too, was worried about the proposed cenotaph (which was specifically designed as being not a tomb, but a stand-in for those who are *not* buried there), by virtue of some perhaps misreading it as a sarcophagus, and we are hopeful that those responsible can come up with a different solution. However, the idea of the "sacred precinct" would seem totally consonant with the *gravitas* and significance of such a memorial, and will help define the space (much as the lowering of the ground plane does in the Vietnam Memorial), and differentiate it from the recreational areas where people throw frisbees and jog.

The loose use of the word "imperial" appears to us ironic. This design is for a memorial whose vertical dimensions are modest--some think much too modest--in relation to the principal visual features of the Mall. It will serve to focus attention, in one direction, on the great Lincoln Memorial, which is based on a temple form inherited from the Roman Empire, and, in the other, on an obelisk, used by autocratic pharaohs and oligarchic priests for

some 3,000 years. Yet no one questions the appropriateness of co-opting these visual traditions in the great architectural continuum that is the hallmark of our capital city.

(5.) If this is to be a memorial, it should help people remember those who died in the service of our ideals and our survival as a democratic nation. As indicated above, this kind of sacrifice is implicit in virtually all the memorials on the Mall.

(6.) It is true that I hinted to the Battle Monuments Commission that they should explore the possibility of a metallic solution to the arches. In retrospect, I believe that this might have turned out to be either clunky or frivolous. Two gazebos, in retrospect, are probably not appropriate there and, as one of the veterans put it, "World War II was not a walk in the park."

Great thought has been given to the question of pedestrian access at the west end of the memorial in addition to the ramps just a few feet away. It is crucial to remember that the current pedestrian route has to go out and around the edges of the Rainbow Pool, so that the basic route will remain the same. From an aesthetic and symbolic point of view, it would be a great shame to have the space leaking out at the west end. Furthermore, to satisfy the Disabilities Act requirements, one would have to insert additional long, presumably zig-zagging ramps at that point, which would be wholly disruptive to the architectural integrity of the design. As it is expected there will be ceremonies there, and one needs to encourage contemplation, the idea of providing a shortcut for the hurried tourist runs counter to the mood and significance of the memorial as a whole.

Great study was given to including some grass around the pool. A great deal more grass has been provided in the gently sloping area that connects the pool to 17th Street. From a practical point of view, however, the Park Service has learned from their experience at the Vietnam Memorial, where they had to pave over the area of high foot-traffic, the grass would probably end up not looking very well. One has to remember that the principal area will not be paving, but water, as it is now, and that from most points on the Mall (except from the top of the Washington Monument!), and all points adjoining the Mall, the lowered paved area will simply not be visible. It is of course a misnomer to say that the memorial stretches "across the entire width of the Mall," as the curved stands of elms are being retained, and everything north and south of them will remain green.

As to the central axial vista, it has been scrupulously left open, with the pillars stopping well short of it. As the plane of the pool and its grounds have progressively been raised, and an amphitheater-like capability is now provided by the slope from 17th street (both changes accommodating public comment), it is difficult to understand the charge that the design has become progressively worse or the implication that there has been no public interaction.

(7.) Many points in paragraph seven have already been dealt with, but it is hard to understand why the Rainbow Pool will not forever be the "centerpiece of the memorial." The fountains will be restored and enhanced, and one should visualize an improved water play being the dominant vertical feature of the design. There will be opportunities for

contemplation in the trees, and one needs to recognize the very small percentage of surface that this memorial will provide, as compared to the breadth and length of the National Mall, stretching as it does from Capitol Hill to the Potomac River, and adjoining in the monumental heart the very large green areas that go south to the end of Haines Point.

(8.) Paragraph eight brings us back to this whole question of meaning, which we have tried to address. Ultimately, I imagine this becomes a subjective reaction, and will always be colored by anyone who believes that war is too unpleasant a thing for us to be reminded about, and that it would be better to leave the Reflecting Pool as is, so that one can stand at its edge and look out at the traffic zipping back and forth on Independence Avenue or 17th Street. Some visitors to Washington have expressed their exasperation with the vastness and monotony of the Mall. In one instance, Joseph Albers, then chairman of the design department at Yale (and admittedly before more recent improvements such as Constitution Gardens and the National Gallery's Sculpture Garden) remarked to me that the trouble with Washington was that "it is a city of space, but no spaces." Are we really to believe that the existing Mall is absolutely perfect?

(9.) We of course concur completely about the significance and educational potential of this memorial and its legacy. Honest people can and always will differ in matters of aesthetics. Nostalgia for the status quo is always with us, as is resistance to change. However, a site and design that has been endorsed by leading figures in the architectural community, like Hugh Hardy, David Childs, or Bill Lacy; by architectural critics of the distinction of Robert Campbell or Ada Louise Huxtable; by both the statutory reviewing commissions as well as the National Park Service; by seventy-six signatories in the Senate (including an early critic, Senator Robert Kerry); and by the thousands of donors who have been moved to contribute already more than \$75 million to the project, it seems that the word "travesty" is perhaps somewhat exaggerated.

Sincerely,



J. Carter Brown
Chairman

Mr. Tersh Boasberg, Chairman
The Committee of 100
1800 Massachusetts Ave., NW
Suite 600
Washington, DC 20036

cc: Dorn McGrath, Former Chairman, Committee of 100
David Grinnell, Former Chairman, Committee of 100
Marion K. Schlefer, Former Chairman, Committee of 100
Members of the Commission of Fine Arts

Members of the National Capital Planning Commission
Members of the National Capital Memorials Commission
Members of the American Battle Monuments Commission
Members of the World War II Memorial Advisory Board
Members of the Competition Design Jury for the National World War II Memorial
Members of the Architect-Engineer Evaluation Board for the World War II Memorial
Senator Robert Dole, National Chairman of the World War II Memorial Campaign
Frederick W. Smith, National Co-Chairman of the World War II Memorial
Robert Stanton, Director, National Park Service
Arnold Goldstein, Superintendent, National Parks-Central
John Hale, Superintendent, National Capital Parks-East
Terry Carlstrom, Superintendent, National Capital Region
Erin Broadbent, Superintendent, National Mall
First Lady Hillary Rodham Clinton
Richard Moe, President, National Trust for Historic Preservation
Charles Atherton, Executive Secretary, The Commission of Fine Arts

J. Carter Brown

Director Emeritus, National Gallery of Art

file
WWII
memorial

Fax to:

HELENNE VERJEE

Fax No. 456-6244

Fax From:



Fax No. 347-2107

Date: January 15, 1997

This fax consists of 4 pages including cover sheet.

The attached is a fuller answer to your question.

Haydn Williams has filled me in on the White House plans.

As you know, the Fine Arts Commission will meet informally tomorrow (Thursday a.m.), and I will fill you in on the results of that.

Things look very much on track.

Best,



1201 PENNSYLVANIA AVENUE, N.W., SUITE 621, WASHINGTON, D.C. 20004
TELEPHONE (202) 347-1906 TELEFAX (202) 347-2107

MEMO FOR THE RECORD

Re. NCPC EXECUTIVE SESSION 9 JANUARY 1997: WORLD WAR II
MEMORIAL - Winning Design (winner's name remains secret)

Prior to inviting the applicants in to make their presentation, the Commission discussed the implication of the meeting. The White House is concerned about how the design will be received by the relevant review agencies. The President will be making a public announcement 18 January and does not wish to be caught off-guard by unexpected criticism of the design as President Bush was following the unveiling of the Korean War Memorial.

Chairman Gantt was concerned that the President's announcement might compromise the careful deliberations necessary for an objective review. Jack Finberg, representing GSA, the entity in charge of construction and management concerns, insists that all formal review procedures are expected to be maintained. Dr. Patricia Elwood cautioned that care should be taken when reacting to the design so as not to give or imply tacit approval. The Chairman requested that no motions be made to approve or disapprove.

Presentation:

(Bill Lacey, who would have made the presentation, was marooned up in New York due to bad weather.)

Ambassador Hayden Williams, accompanied by Major General Herrling, made the presentation. He stated several times that one of the chief points in favor of the winning entry was its flexibility. It could be adjusted without compromising the design. He said the jury reviewing the six entries selected from the competition was one of the most prestigious that could be assembled and included in part:

David Childs (Chair)
John Chase
Hugh Hardy
Laurie Olin
Ada Louise Huxtable
Earl Powell
Sen. Inouye
Elliott Richardson
Fay Jones
Admiral Long

2.

The Design:

The Rainbow Pool would center on a large oval plaza. The pool and plaza would be lowered 14 feet from the level of 17th Street. This would provide a recognizable space with a distinct volume of its own that would manage to preserve the primary east-west axial view.

A broad flight of steps would lead down from the street to the plaza which would be flanked by hemicycles at north and south. The two hemicycles would be each defined by 22 partially fluted, free-standing, non-supportive, 39' high columns. The columns would rise from the level of the plaza and screen the hemicycle walls.

The 45' high hemicycle walls would retain earthen berms planted with a new hybrid species of white rose hardy enough to bloom much of the year. The two berms would be bisected by north-south axial entrances to the plaza. These entrance walks apparently would provide entrances to interior exhibit spaces located beneath the berms. Natural light would be brought in with the introduction of skylights at the top of the berms. The design would allow for approximately 35,000 square feet of usable interior space.

An auditorium, originally proposed as an element flanking the west side of the Rainbow Pool, appears to have been dropped from the scheme as unnecessary.

Reaction:

Of the basic observations made, Dr. Elwood's was the most important: "A question that should be asked of any design is how it addresses the 100-year flood."

Chairman Gantt, addressing General Herrling and Ambassador Williams, stated that the Planning Commission considered the Executive Session an information presentation only. In an effort designed to preserve the orderly process of normal review especially of a project of this magnitude, the members would make no comment for or against the design. Ambassador Williams assured the Commission that the ABMC was anxious that normal procedures be followed.

The Commission of Fine Arts was represented by staff member Jeffrey Carson

Postscript:

Despite Chairman Gantt's admonition for restraint, the Commission members were clearly impressed by the design. John Parsons (National Park Service representative) went so far as to declare one significant aspect "brilliant".

MEMORANDUM

*file WWII
monument*



TO: MARIA ECHAVESTE
CHARLES BURSON
IRENE BUENO
BOB NASH
BRUCE LINDSAY
CHUCK BRAIN
✓ MELANNE VERVEER
ELLEN LOVELL
DAN SAKURA
LAURA GRAHAM
CHRISTINE STANEK

FR: KRIS BALDERSTON

RE: BABBITT LETTER RE THE WORLD WAR MONUMENT

As you may know, the Advisory Council for Historic Preservation (ACHP) recently announced that they were opposed to the new WW II Memorial that is set to be built on the Mall between the Washington Monument and the Lincoln Memorial. This has been a controversial issue for a number of years but the National Park Service, the National Capital Planning Commission, and the Fine Arts Commission have all revamped the original plan and have approved the current proposal. I have attached the recent articles highlighting the ACHP's opposition.

Also attached is Secretary Babbitt's response to the ACHP's critique. The letter is being sent out today and could create some interest in the press. The Secretary is opposed to the ACHP's request to delay the memorial. This is relevant because the POTUS is tentatively expected to attend the groundbreaking in mid-November.



THE SECRETARY OF THE INTERIOR
WASHINGTON

SEP 13 2000

Ms. Cathryn B. Slater
Chairman
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue, N.W., Suite 809
Washington, D.C. 20004

Dear Chairman Slater:

Pursuant to the National Historic Preservation Act and its regulations, specifically 16 U.S.C. § 470h-2(1)(1994), and 36 C.F.R. § 800.7(c)(4)(1999), this letter, with its enclosure from the National Park Service, responds to the September 5, 2000 comments of the Advisory Council on Historic Preservation on the proposed World War II Memorial. These comments have been taken into account.

If you have any questions, please contact Mr. John G. Parsons, Associate Regional Director for Lands, Resources and Planning in the National Capital Region, National Park Service, at (202) 619-7025. Pursuant to the regulations, this response is being provided to all consulting parties, and the public will be notified of its availability.

Sincerely,

Enclosure



Office of the Director

United States Department of the Interior

NATIONAL PARK SERVICE

1849 C Street, N.W.

Washington, D.C. 20240

SEP 13 2000

Memorandum

To: Secretary of the Interior

From: Director *Robert H. Anderson*

Subject: Response to Comments from the Advisory Council on Historic Preservation
Regarding the Proposed World War II Memorial.

This Memorandum was prepared in response to the September 5, 2000 comments of the Advisory Council on Historic Preservation (Advisory Council) on the proposed World War II Memorial. Pursuant to Section 106 of the National Historic Preservation Act (NHPA), the National Park Service (NPS) has taken the Advisory Council's comments into account in reaching a final decision on the proposed Memorial. This Memorandum provides a summary of our decision and its rationale as well as evidence of careful consideration of the specific comments of the Advisory Council. As set forth below, in this instance, we must disagree with the Advisory Council.

I. Summary

The siting and design of the proposed World War II Memorial is the result of a seven year approval process prescribed by the Commemorative Works Act of 1986. Since 1993, that process has resulted in 17 public meetings before various groups, including the National Capital Memorial Commission (NCMC), the Commission of Fine Arts (CFA), the National Capital Planning Commission (NCPC), and the District of Columbia Historic Preservation Review Board (DCHPR). These meetings and the resulting public involvement have had a substantial impact on the evolution of the Memorial's design.

The selection of the Rainbow Pool site was endorsed by NCMC and approved by CFA and NCPC. By July of 1996, NPS, CFA, NCPC, and the American Battle Monuments Commission (ABMC) had agreed on design guidelines for the Rainbow Pool site. In January of 1997, ABMC announced that the winner of the design competition was Friedrich St. Florian. The design, as originally proposed, was rejected by the Secretary of the Interior, CFA, and NCPC as too intrusive on the cultural landscape. Nevertheless, both CFA and NCPC reaffirmed that as the defining event of the 20th Century for the United States and the world, the World War II Memorial warranted placement at the Rainbow Pool site.

Once changes were made to the design by ABMC and its design team, the design concept was approved by CFA and NCPC in the summer of 1998. Further revisions were made and the preliminary design was then approved by CFA and NCPC in May and June of 1999 respectively. Design development has continued and there is currently a final design. This design was considered by CFA and approved in July 2000. It has also been submitted to NCPC for approval. NPS is committed to working with the appropriate approval bodies in the final stages of the planning process.

NPS also complied with NEPA with respect to its role in the World War II Memorial planning process. On May 13, 1998, NPS made available for a 30-day public review its *Environmental Assessment, The National World War II Memorial* (EA). The EA documents the alternatives considered for the establishment and operation of a National World War II Memorial in West Potomac Park, Washington, D.C. It describes the proposed design concept and analyzes the pertinent environmental impacts of its establishment and construction as well as any necessary mitigation measures for the identified impacts following the conclusion of the public review. NPS selected the preferred alternative and determined that it resulted in a Finding of No Significant Impact (FONSI).

Pursuant to Section 106 of the NHPA, NPS has consulted with both the District of Columbia Historic Preservation Officer and the Advisory Council on the proposed Memorial. The details of this process are discussed below in the specific response to the Advisory Council's comments.

II. Response to Advisory Council Comments

Based on the September 5, 2000 letter from the Advisory Council, NPS understands that the Council is concerned primarily with two issues. First, the Advisory Council is troubled by NPS's approach to the requirements of Section 106 and what it sees as the limited nature of public involvement in the site and design selection process. Second, the Advisory Council believes that the current design does not achieve the strict standard of compatibility with the historic setting of the National Mall. NPS believes that there has been extensive public participation and that requirements of Section 106 have been met. In addition, NPS finds that the current design of the World War II Memorial respects and enhances the historic landscape and will become an admirable addition to the Nation's Capital.

A. Advisory Council Participation in Section 106 Process

The Advisory Council raises the procedural issue of integrating Section 106 of the National Historic Preservation Act with the process established under the Commemorative Works Act, which guides the site selection and design process. The Advisory Council believes that it was afforded only a limited opportunity to consider alternative sites and designs because these aspects were set by the time the Council was brought into the process in July of 1997.

The Commemorative Works Act is silent on the application of Section 106. However, NPS must incorporate other applicable laws, including Section 106, into the process established by the Commemorative Works Act. We recognize the concerns of the Advisory Council about the coordination of these two laws. We are committed to working with the Advisory Council to establish a process that results in more effective formal participation of the Council in the early stages of our future planning for memorials on National Register properties in the Nation's Capital.

This being said, NPS has complied with the Section 106 process with respect to the proposed World War II Memorial. Under Section 106, NPS contacted the District of Columbia Historic Preservation Officer (DCHPO) and the Advisory Council about the proposed Memorial in February 1996.¹ At that time, NPS had determined that a memorial at the Rainbow Pool site would not have an adverse effect on West Potomac Park, the Washington Monument Grounds, or the Mall, if its design did not "overwhelm the site and its delicate relationship with view sheds, vistas, and spatial relationships with the treeline, landscape and existing memorials." However, NPS was informed by the DCHPO that the Advisory Council had indicated that, in its opinion, a determination of effect was premature until such time as a design concept was developed.

Subsequently, a design concept was developed. On June 3, 1997, NPS submitted this design concept to the DCHPO and the Advisory Council. Under the Section 106 regulations promulgated by the Advisory Council, NPS applied "the criteria of effect . . . and [found] that the construction of the World War II Memorial [would] technically have an adverse effect on the West Potomac Park and the Washington Monument Grounds." Under the regulations, consultation with the Advisory Council is not required until a determination of adverse effect has been made. Therefore, in July 1997, NPS invited the Advisory Council to participate in consultation on the effects of the design.

Elements of the original design, particularly the massive berms and loss of the elms, were deemed to be too intrusive on the cultural landscape. As a result, the Secretary of the Interior, the Commission of Fine Arts, and the National Capital Planning Commission rejected the intrusive elements of this design. As a result of this reaction to the scale of the original design, a significant reduction was made and a new design evolved.

¹Prior to 1996, the DCHPO had already been very involved in the planning process. As the representative of the Mayor of the District of Columbia on NCMC, the DCHPO participated in the public deliberations on the proposal as early as March 1993, when NCMC unanimously endorsed legislation that would authorize establishment of the World War II Memorial. In addition, when the Constitution Gardens site, which included potential improvements to the Rainbow Pool, was unanimously endorsed by NCMC in June 1995, the DCHPO again participated in the deliberations representing the Mayor.

Because NPS had informed the Advisory Council that changes were in the process of being made to the original design, the Advisory Council stated that it was not necessary to review the design as had been requested in July of 1997. By letter of September 18, 1997, Don Klima of the Advisory Council wrote:

In subsequent telephone communications, you have informed us that changes to the proposal are in progress. Consequently, . . . we see no need to review the design referenced in your letter, and originally scheduled for review by the District of Columbia Review Board on August 28, 1997.

Therefore, there was no review of the original design by the Advisory Council. Similarly, the original design concept was removed from the agenda of the meeting of the District of Columbia Historic Preservation Review Board, which is a panel appointed by the Mayor that advises the DCHPO on Section 106 issues.

NPS proceeded to consult with both the Advisory Council and the DCHPO on the revised design. The design concept was submitted to the District of Columbia Historic Preservation Review Board (DCHPRB) and the Advisory Council in May of 1998. NPS provided a copy of the EA to the Advisory Council, briefed the Council, presented the design concept to the Council, and received favorable verbal comments on the design from the Council in 1998. NPS met with a panel of members from the Advisory Council again in 1999 and received additional favorable verbal comments on the progress of the design. At the same time, the DCHPO was considering the new design. The DCHPRB held public meetings on the Memorial in 1998, 1999, and 2000. NPS submitted the final design to the DCHPO and the Advisory Council on June 30, 2000.

In June of 2000, NPS transmitted a draft Memorandum of Agreement to the DCHPO and the Advisory Council. NPS responded to comments from the DCHPO and the Advisory Council on this draft and developed a revised draft on July 13, 2000. However, on July 25, 2000, the Advisory Council informed NPS that it believed, "[b]ased on [its] review of the draft agreement dated July 13, 2000, the high level of public interest, the exceptional values at stake, and the short time remaining for the National Park Service to complete its various reviews . . . further consultation on a memorandum of agreement [would] not be productive and therefore [the Advisory Council] will provide formal Council comment in accordance with Section 800.7 of our regulations." Through this letter, the Advisory Council decided not to participate in the Memorandum of Agreement that was eventually signed by the other consulting parties—NPS, DCHPO, and the American Battle Monuments Commission—on August 8, 2000.

The Memorandum of Agreement sets forth measures for mitigating the adverse effects of siting and design and provides for continuation of consultation on elements of the memorial composition that are not yet fully refined. In the letter to NPS from the DCHPO transmitting the

signed Memorandum of Agreement, the DCHPO states that "[i]t is appropriate that the memorial to such a significant century-defining event should be placed in juxtaposition with memorials to the most definitive events of the previous two American centuries."

As stated in the above summary, NPS believes that it has involved the Advisory Council as required by Section 106 and the regulations promulgated by the Advisory Council.

The Advisory Council also raised the concern that public involvement in the planning process for memorials is not extended to a national scale. NPS did publish notices concerning actions being taken on this Memorial in the *Federal Register* and invited public comment. The *Federal Register* is the Federal Government's publication for disseminating information nationwide. In addition, in the experience of NPS, unless a memorial is of overarching public interest, there is little public response to nationwide inquiries. In the 14 years following enactment of the Commemorative Works Act, 12 memorials have been erected, all of which have been placed on National Register properties with little controversy. Nevertheless, NPS will evaluate the suggestion of the Advisory Council that we take further steps to expand the public discussion on national memorials to a national audience.

Finally, the Advisory Council asserts that the information contained in the recently published cultural landscape report entitled *West Potomac Park, Lincoln Memorial Grounds, National Capital Parks Central, August 1999* and the *East and West Potomac Parks Historic District, Revised National Register of Historic Places Nomination, July 1999* did not play a role in the World War II Memorial proposal. The information in both documents was used from 1995 to the present in guiding the design development of the memorial.

We support the cultural landscape report's conclusions and recommendations and believe that the design of the memorial is in concert with them. The information contained in *Chapter VI, Design Guidelines* of the report was instrumental in guiding both primary and secondary elements of the memorial design. Under *Structures*, Guideline 3 states:

Future commemorative features should be located in the Lincoln Memorial study area only if they will have a minimal impact on the historic setting. Site design of such features should sensitively incorporate historic components such as circulation patterns, vegetation, views and vistas and site furnishings to preserve the integrity of the historic landscape and historic structures.

We believe that the resultant design is respectful of the integrity of this historic landscape, its views and vistas, vegetation and primary historic paths, as discussed below. Although there can certainly be differences of opinion as to the aesthetic success of the integration of this design into the historic landscape, NPS did consider the information contained in the cultural landscape report as a part of the World War II Memorial process.

II. Design

Although the Advisory Council states that "from its first involvement, [it] has accepted that it is possible to design a World War II Memorial on [the Rainbow Pool] site that would harmonize with its historic surroundings," the Council is concerned with three particular aspects of the current design: (1) the Memorial's overall scale and impact on vistas, (2) the current lighting plan, and (3) the proposed sculptural element.

First, the Council believes that overall scale of the Memorial, and in particular the 56 pillars, enclose the plaza, disrupt the historic vistas, and generally violate the open feeling and fundamental simplicity of the National Mall. NPS respectfully disagrees with these conclusions. The critical, if not sacred, vistas in the Nation's Capital, as directed by the L'Enfant and MacMillan Plans, are the macro vistas between major memorials and public buildings. In our judgment, this Memorial does nothing to block the vistas between the Lincoln Memorial and the Washington Monument. On the micro scale of the vistas from 17th Street or within West Potomac Park, we believe that the memorial will be visible, in a configuration reinforcing the historic ground plane, but will provide for an openness that allows views through it. The roughly six-foot spacing between the pillars results in a view that is 60% open. The height of the pillars will be one-quarter of the height of the trees behind them, one-eighth of the height of the Lincoln Memorial, and only three one-hundredths of the height of the neighboring Washington Monument. Thus, we have been vigilant in ensuring that the transparency of this historic landscape will be maintained.

Second, the Advisory Council is concerned that the dusk and night views of the Mall would be disrupted by the current lighting plan. We understand these concerns and are committed to ensuring that the World War II Memorial does not intrude on the night time views of the image of the Washington Monument in the Reflecting Pool from the Lincoln Memorial. Our experience with memorials has been that careful testing of lighting upon completion of the memorial is the only sure way to set the intensity of lighting to the appropriate level. As a part of the Memorandum of Agreement, discussed above, the parties have agreed to continue to "consult on and evaluate the Memorial lighting plan to ensure that the lighting does not overwhelm the subtle lighting now in place at the Lincoln Memorial and other locations in West Potomac Park." NPS is also committed to act in concert with the Commission of Fine Arts and the National Capital Planning Commission to resolve any lighting concerns.

Finally, the Advisory Council is concerned about the effect on the axial vista of a sculptural element, which has been under consideration. There has been no final decision at this point on whether a sculptural element will be included in the Rainbow Pool. However, NPS recognizes that this type of element could intrude on the vista if it were not subject to the same restraint as the rest of the design. Therefore, if it is to be proposed, it will be created in such a way that it will not intrude upon the vistas we have been so conscientious in protecting to this point. NPS will not permit any sculptural element in the Rainbow Pool that will significantly alter this premier axial vista or interfere with the play of the recreated fountains in the Rainbow Pool. To

that end, we have already placed parameters on its design such that a sculptural element could not exceed 15 feet in height or 40 feet in diameter at its base. As with the memorial lighting, this design concept will be thoroughly considered by all relevant approval bodies at the appropriate time.

III. Conclusion

In summary, NPS is committed to working with the Advisory Council in the future to address any perceived problems with the Section 106 process. However, NPS believes that it has complied with the National Historic Preservation Act. In addition, NPS believes that, as a result of the process dictated by the Commemorative Works Act, the current design and location will memorialize World War II in an appropriate and significant way that is compatible with the National Mall.

MEMO

TO: MARIA ECHAVESTE
IRENE BUENO

FR: KRIS BALDERSTON

RE: WORLD WAR II MONUMENT

- The controversy over the WW II Monument continues. As noted in the attached articles, the Advisory Council on Historic Preservation publicly opposed the plan that has been approved by the National Capital Planning Commission (NCPS), the NPS, and the Fine Arts Committee. While they do not have formal veto power, Interior Secretary Babbitt has to respond to them by September 21 when the NCPC meets again. Interior wants to make sure that we are still on board with the current concept. We are tentatively scheduled to do a ground-breaking ceremony, at the request of former Senator Dole, on November 10-11, 2000.

THE WASHINGTON POST

SEP - 7 2000

Federal Panel Criticizes WWII Memorial

Preservation Council Calls Design Plan Incompatible With Mall's Historic Setting

By LINDA WHEELER
Washington Post Staff Writer

The Advisory Council on Historic Preservation slammed the controversial World War II memorial in an official report, saying it "has serious and unresolved adverse effects on the preeminent historic character of the National Mall."

The council is the first federal agency to criticize the site and design of the memorial that has gone through a complicated approval process. Memorial critics, who generally have been ignored by the commissions that oversee the Mall, said yesterday they felt vindicated.

The harsh report was delivered in an official letter to Interior Secretary Bruce Babbitt, who is the final arbiter of which monuments get built on federal lands. He is required by law to consider the council's concerns before making his decision.

Babbitt spokesman John Wright said the letter had just arrived late yesterday and that the secretary was not ready to comment.

The council usually mediates conflicts that arise between planned federal projects and local historic preservation goals. It's rare when the differences can't be worked out.

On Aug. 28, the council held a five-hour hearing at which memorial sponsors, assisted by the National Park Service, presented their design plans, and then opponents spoke.

The council conferred on Friday and released the letter late Tues-

day, according to a spokeswoman.

Elizabeth Moss, council publications manager, said "99.9 percent of the thousands of cases we see each year are resolved quietly. This [World War II memorial] letter is most unusual."

The council was concerned particularly with the memorial design, a sunken replica of the existing Rainbow Pool surrounded by a plaza and 56 columns. The panel called the design incompatible with its historic setting and a violation of the open feeling of the Mall.

The National Park Service was criticized for not involving the council in the early stages, "when there can be meaningful consideration of alternatives. . . . When the NPS did bring the Council into the process in July, 1997, the most critical aspects of the memorial proposal were firmly set."

In 1994, the council asked the Park Service to develop a cultural landscape study of the Lincoln Memorial grounds to guide future development plans, according to the letter. The Park Service took five years to complete the study, then didn't release it until July 2000. The council found the report excellent but too late to significantly affect the site selection.

The council "has become the first entity to break the lockstep of approval," Del. Eleanor Holmes Norton (D-D.C.), a longtime opponent of the site, said at a news conference yesterday. "The ball is in Secretary Babbitt's court, and he has been an extraordinary trustee



BY FRANK JOHNSTON—THE WASHINGTON POST

Charles Cassell, co-chairman of Veterans to Save the National Mall; Del. Eleanor Holmes Norton (D-D.C.); Judy Scott Feldman, co-chair of the National Coalition to Save Our Mall; and Dorothy Height, seated in back, president emerita of the National Council of Negro Women, at news conference.

of the nation's monuments. . . . I expect the secretary to take a second look."

Since 1995, the memorial has received a series of required approvals from three federal commissions, with one last hearing on the design scheduled for Sept. 21 by the National Capital Planning Commission.

The site, between the Lincoln Memorial and Washington Monument, was quietly approved in 1995 by the necessary federal commissions and dedicated by President Clinton on Veterans Day the same year. There was little public interest in the site until a design was unveiled two years later that

was promptly denounced for blocking the famous vista between the Lincoln Memorial and Washington Monument.

Although the design has been greatly altered, individuals and groups steadily protested the site selection at commission meetings but were politely ignored.

Yesterday, Charles Cassell, a World War II veteran and co-chairman of the Veterans to Save the National Mall, said he felt vindicated by the council's letter. "A government agency has made our argument against building this monument on the Mall better than we could," he said at the news conference.

Advisory Council On Historic Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

September 5, 2000

Honorable Bruce Babbitt
Secretary
Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Dear Secretary Babbitt:

On July 25, 2000, we notified you that the Advisory Council on Historic Preservation (Council) would provide formal comments under Section 106 of the National Historic Preservation Act on the proposed development of the National World War II Memorial. To accommodate scheduling needs of the National Park Service, I convened a panel of Council members, consisting of myself, Vice Chairman Stephen B. Hand, expert member Bruce D. Judd, FAIA, and Paul W. Fiddick, representing the Secretary of Agriculture. On August 23, 2000, the panel conducted a public meeting to hear the proponents' presentation of the project and to receive public testimony. The panel has now prepared comments on behalf of the full Council, which I am pleased to provide to you.

First, the Council notes its strong support for a long overdue memorial to honor those who served in the Armed Forces during World War II and to commemorate our country's participation in the war. There is no question that this defining event of the twentieth century, and the American people's pivotal role in it, warrant commemoration by a memorial commensurate with their effort and sacrifice. Nevertheless, the Council believes that the World War II Memorial, as now proposed, has serious and unresolved adverse effects on the preeminent historic character of the National Mall. We believe this is due in part to the National Park Service's (NPS) approach to the requirements of Section 106 and the limited nature of public involvement in the site and design selection process.

At the heart of our procedural concern is how the NPS conducts its Section 106 responsibilities when following the process established under the Commemorative Works Act to guide the siting and design of memorials. As this case demonstrates, among the most critical issues faced by NPS and its partners under the Commemorative Works Act is that of site selection. For many years, the Council has encouraged the NPS to involve the Council in the early stages of memorial development when there can be meaningful consideration of alternatives. Regrettably, such early

consultation on the World War II Memorial did not occur. The NPS did not consult with the Council on either site selection or the design competition. When the NPS did bring the Council into the process in July 1997, the most critical aspects of the memorial proposal were firmly set. Consequently, only limited opportunity has existed under Section 106 to consider alternative sites or designs.

This concern about coordination and early Council involvement is relevant not only to the present case but to all memorial proposals subject to both the Commemorative Works Act and Section 106. The NPS is currently revising the procedures under the Commemorative Works Act, and we request that you ensure that the resulting process integrates Section 106 effectively into the planning and development of future memorials. The Council is prepared to work with the NPS to achieve this objective.

When major changes to an exceptionally significant American landmark like the National Mall are contemplated, it is essential that citizens be given an opportunity both to understand these changes and to express their views on them. As the emerging public discourse on the proposed World War II Memorial indicates, proponents and opponents alike share a reverence for our Nation's democratic ideals as represented on the Mall as well as a universal desire to commemorate the American experience in World War II. Unfortunately, the agencies that oversee planning and design issues within the District of Columbia rarely extend public involvement to a national scale. As challenging as this may be, however, expanding the public dialogue is the only way to ensure that decisions of such import are not looked back upon with regret. A model for such a process is the public outreach initiative concluded recently by the NPS as part of its responsibilities under both Section 106 and the National Environmental Policy Act for the White House Comprehensive Design Plan. It is worthy of consideration when similar proposals about the future of national icons are contemplated.

For public involvement in the Section 106 process to be successful, and for effects to historic properties to be properly considered, it is also necessary that appropriate information be available to all. In 1994, the Council requested the NPS to develop a cultural landscape study of the Lincoln Memorial grounds to help better understand the effects of future development plans on this highly sensitive area. The NPS agreed to prepare it within two years. Although completed in August 1999, the NPS did not release the resulting *Cultural Landscape Report: West Potomac Park, Lincoln Memorial Grounds* until July 2000. Both the report and the recent revisions to the National Register nomination for the East and West Potomac Park Historic District are excellent studies that provide needed insight into the qualifying characteristics of these important historic properties and possible effects of the World War II Memorial proposal. Regrettably, the information came too late to affect significantly the current proposal.

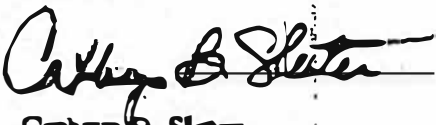
The National Mall is a site unique in American history. It is an architectural and landscape expression of great beauty, rich with historical association. But more than that, it has come to symbolize our Nation's democratic ideals. Its open vistas and traditional uses have enabled it to serve as truly common ground for all Americans. These values invest use of the proposed

Rainbow Pool site with some unusually difficult design challenges. Certain adverse effects of this proposal became inevitable upon its selection: the demolition and reconstruction of the Rainbow Pool, the dedicated use of existing open space in the premier historic landscapes, and permanent alteration of significant vistas and views of the McMillan Plan, in particular the axial vista from the Washington Monument to the Lincoln Memorial. Nonetheless, the Council, from its first involvement, has accepted that it is possible to design a World War II Memorial on this site that would harmonize with its historic surroundings, thereby substantially mitigating these adverse effects.

We recognize that the design team has taken this challenge seriously and we commend them for their efforts. However, the Council believes that the current design of the proposed Memorial does not achieve this necessarily strict standard of compatibility with its historic setting. Several existing features, and other features yet to take form, are particularly problematic. First, the Memorial's overall scale and complexity create a tension with the transcendent symbolic significance and fundamental simplicity of the National Mall. In particular, the visual screen of 56 ornamented pillars while enclosing the plaza, violates the open feeling of the Mall and intrude upon the uncluttered historic vistas. Second, dusk and night views on the Mall would be altered by the current lighting plan which serves to further magnify the Memorial as a newly introduced element on the Mall. And third, the sculptural element under consideration for the reconstructed Rainbow Pool has the potential to significantly alter the premier axial vista along the Mall.

In the Council's view, it is of utmost importance that the National World War II Memorial complement and not compete with the Mall's transcendent historic and cultural values and that the Mall remain genuinely the common ground that it has been historically. You have stated your intent to ensure that no unacceptable impacts to the historic properties occur as a result of this project. In that spirit, we urge reconsideration of the current Memorial design to preserve the distinctive character of this national treasure. In accordance with Section 106 of the National Historic Preservation Act, the Council is conveying these comments and recommendations to you for your consideration. We look forward to your response and stand ready to assist you in achieving our shared goal of creating a worthy legacy for future generations.

Sincerely,



Cathryn B. Slater
Chairman

Scenes from the Mall

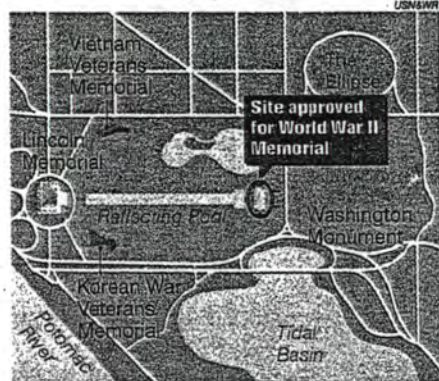
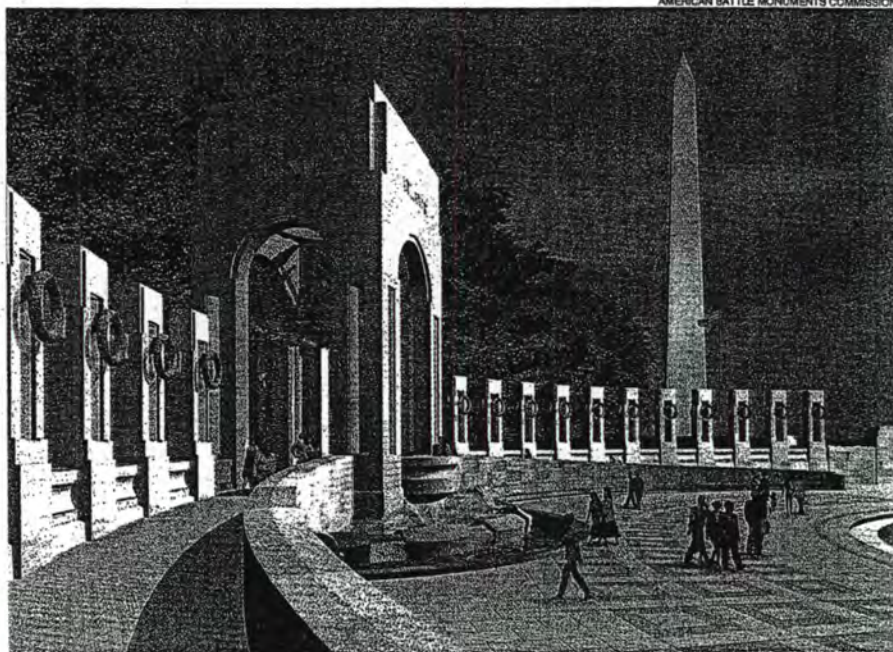
A national memorial to World War II will soon be built. Maybe...

BY JAY TOLSON

Imperialist kitsch" foisted upon the American public by a "little group of willful men." An architectural eyesore that violates principles of historic preservation and the clean vistas of the National Mall. To hear the charges of some critics, pundits, and organizations, you'd never guess they were talking about a monument dedicated to one of America's finest hours. But the growing controversy is not over the *idea* of the National World War II Memorial, which most Americans agree is long overdue. It's over the site and design, and it's quickly become an informal trial of conflicting views on public art and the proper use of public space—and on who should make decisions about both.

Starting this Veterans Day, work is supposed to begin on Friedrich St. Florian's design: a sunken plaza with two arches, 56 pillars, and other elements around a rebuilt Rainbow Pool at the eastern end of the Reflecting Pool between the Lincoln Memorial and the Washington Monument. So what's so bad about that? On the design front, say some, almost everything. Paul Goldberger of the *New Yorker*, for example, pronounced the plan an "aesthetic disaster" with the "power neither of great classical architecture... nor of pure abstract forms." Though he has been seconded by other critics, just as many others, including those of the *Washington Post* and the *Baltimore Sun*, say the style is appropriate. "That's a worldwide style, called stripped classical in this country, and it evokes that era," says Robert Campbell of the *Boston Globe*, who also served on the evaluation board for the design competition.

On the Mall. Critics have also voiced concerns about the structure's impact on the Mall. In a letter to the secretary of the interior last week, a review panel of the Advisory Council on Historic Preservation (an independent federal agency) wrote, among other reservations, that the "visual screen" of the pillars could interrupt the open vistas and flow of the Mall. But supporters say the Commission of Fine Arts and the National Capital Planning Commission had earlier addressed such concerns, reducing the scale and changing many of the elements of the original design. Memorial campaign spokesman



Mike Conley says that the 17-foot pillars are to be arrayed around the opposite ends of the plaza, flanking the 41-foot arches and below the existing tree line, leaving open sightlines across the middle of the memorial. Some critics have also asserted that the new memorial will destroy an older existing memorial, a violation of preservation principles, and will do so in ways that are legally questionable. In rebuttal, historian Michael Richman has documented that the Rainbow Pool was not part of any original memorial plan, and all review bodies claim to have complied with statutory guidelines.

And it's hard to make the case that this is an elitist conspiracy when it was World War II veteran Roger Durbin, a rural let-

The much-debated design (above), to be realized at the end of the Reflecting Pool
 • When "America came of age"

ter carrier, who got the ball rolling in 1987 by persuading his congressional representative, Ohio Democrat Marcy Kaptur, to push for a national memorial. That's not to say that all vets lined up behind the proposed memorial after the legislation was signed into law in 1993. But the passing away of that generation of veterans—now at the rate of something close to 1,000 a day—has lent urgency to the cause, and the memorial fundraising campaign has already closed in on its target of \$100 million.

Controversies about memorials on the Mall are certainly nothing new. They didn't even begin with the tempest over the Vietnam Veterans Memorial. Editorialists and others tried unsuccessfully to quash the proposal for a memorial to Ulysses S. Grant in 1907. J. Carter Brown, chairman of the Commission of Fine Arts, thinks there is even less reason that "Mall purists" should succeed in preventing the newest addition. "Washington shouldn't be allowed to be a nostalgia bath for the 19th century," he says. "After all, it was at that moment, between 1941 and '45, that America came of age." •

file with
Memorial

J. Carter Brown

Director Emeritus, National Gallery of Art

Fax to: Melanne Verveer

Fax No. 456-6244

Fax From: J. Carter Brown

Fax No. 347-2107

Date: September 28, 2000

This Fax consists of 3 pages including cover sheet.

As relates to my telephone message this morning.

There has been considerable confusion about the World War II Memorial on the Mall, which received final approval last week, and for which ground will be broken on Veteran's Day, November 11th.

Nervousness about this project is understandable. Our great national Mall is beloved by all Americans, and is symbolically central to our historical understanding of ourselves. Changes to the Mall have been universally controversial, one by one, since the MacMillan Commission was decried in the press for proposing a radical rethinking of the design one hundred years ago.

Criticism comes typically from writers who have not seen the model and understood the extremely modest and in fact enhancing improvement to the Mall that the project represents in urban design terms. Luckily, although it is slow, the Washington process involves a whole series of public reviews, eighteen of which have taken place over the past few years, and much comment has been incorporated in a vastly improved design.

The Commission of Fine Arts, which grew out of the Mall project proposed by Senator MacMillan in 1902, is a design watchdog that should provide comfort that nothing deleterious to our Mall will be allowed. Its track record in reviewing the many changes to the Mall over the years speaks for itself. This does not mean that when any change is proposed, controversy does not inevitably ensue. The Grant Memorial at the foot of the Capitol was proposed even before the Commission was in being, amid vast controversy. Stretching across the Mall, Shady's great sculptural monument has turned out to be one of the best pieces of public sculpture in America. The proposal for I.M. Pei's East Building on the Mall was criticized for blocking views of the Capitol, as well as its design, and since completion has consistently been voted by the American Institute of Architects one of the ten best American buildings of all time. The location and design of the Lincoln Memorial was decried by many; the Jefferson Memorial was opposed by protesters lying down in front of bulldozers in 1942; and the bitter controversy swirling around the Vietnam Memorial design by Maya Lin is well known.

The fundamental reason that the World War II project will settle in and, I predict, become much loved, is that it is so modest as even to risk being inadequate to the significance of its subject. Its strength, however comes from outside its design elements, from its very placement. It is wrong to look at Friedrich St. Florian's design, with its beautiful sculptural elements by Raymond Kaskey, as an isolated work. The design is a landscape solution, not only *not* interfering with the great vista, but making a positive contribution to it by helping frame and celebrate it. It is as if, in musical terms, the soloist is the great vista between Washington and Lincoln, and what is being provided is some accompaniment, which should never be judged in isolation.

The location is absolutely right, and luckily there seems to be broad consensus that it is justified. Washington stands for our victory in creating this nation; Lincoln at one end and Grant on the other for the healing of its great schism, and the freeing of the slaves. These were the first two of the three signal nation-building epochs of our history, one in the 18th and century and one the 19th. On that same central axis, are we to say nothing of at least comparable significance has happened since 1865?

In terms of significance, everyone seems to recognize that there is simply nothing comparable to the World War II era contribution of America to the world, and to our own coming of age as a nation. In addition to recognizing the sacrifices of those who served in uniform, the legislation calls for recognition of America's "participation" in the war. This was in many ways our finest hour, when national unity brought a diverse nation together to a degree never achieved before or since. The fifty-six pillars represent the units in that participation to which citizens can come for identification with it. They will be bound together by a great interweaving rope to express the unity that the memorial will celebrate. The apsidal climax, with its still pool underneath, is the field of sculptural gold stars, evoking the flags hung from windows on Main Streets across the country from houses whose sons would never return. It will be very moving. So many are the names of the fallen that the Maya Lin strategy of listing them is not an option. However, what distinguishes the human brain from those of animals is our ability to understand the significance of one thing standing for another.

What the memorial itself stands for is the centrality of this great national achievement. It warps the ground plane with a gentle grassy slope down a mere six feet (compared to the 585 feet reached next door by the Washington Monument from that plane), helping to cup the space and provide an improved environment around the Rainbow Pool, from which now one is distracted by the traffic whipping by on Independence Avenue. The slope will be flanked by some 48 running feet of relief sculpture, depicting in human terms all those who were involved. The curved elements on both sides are tucked back beyond the long axial lines of trees. They simply reinforce McKim's and Olmsted's fundamental design initiative that the long reflecting pool needed something to help bring it to an end, and to do so with a transverse element, ending in curves, that would not interfere the viewshed. The relatively short pillars, 17 feet against great elms 60-90 feet tall, allow six-foot spaces between them, so the openness will remain. But the new sense of place will now allow for contemplation.

Our much loved Washington and Lincoln Memorials have become the expected experience of Washington, featured on travel posters. Beyond their prettiness and their familiarity, however, is their significance. We need future generations to approach the Mall as a place of recreation, but we need as well for it not to be dumbed down to merely that. The very values and ideals to which those two large monuments refer are the ones whose survival we owe to the generation in World War II that made our present freedoms possible.