

MEMORANDUM

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 Hurten*

**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 20<sup>th</sup> 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.<sup>1</sup> 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 tree line, 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.

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<sup>1</sup>Prior 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 17<sup>th</sup> 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.

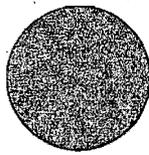
Second, the Advisory Council is concerned that the dusk and night views of the Mall would be disrupted by the current lighting plan. We understand these concerns and are committed to ensuring that the World War II Memorial does not intrude on the night time views of the image of the Washington Monument 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

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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 (NCPC), 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 28, 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.

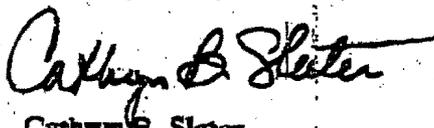
The National Mall is a site unique in American history. It is an architectural and landscape expression of great beauty, rich with historical association. But more than that, it has come to symbolize our Nation's democratic ideals. Its open vistas and traditional uses have enabled it to serve as truly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

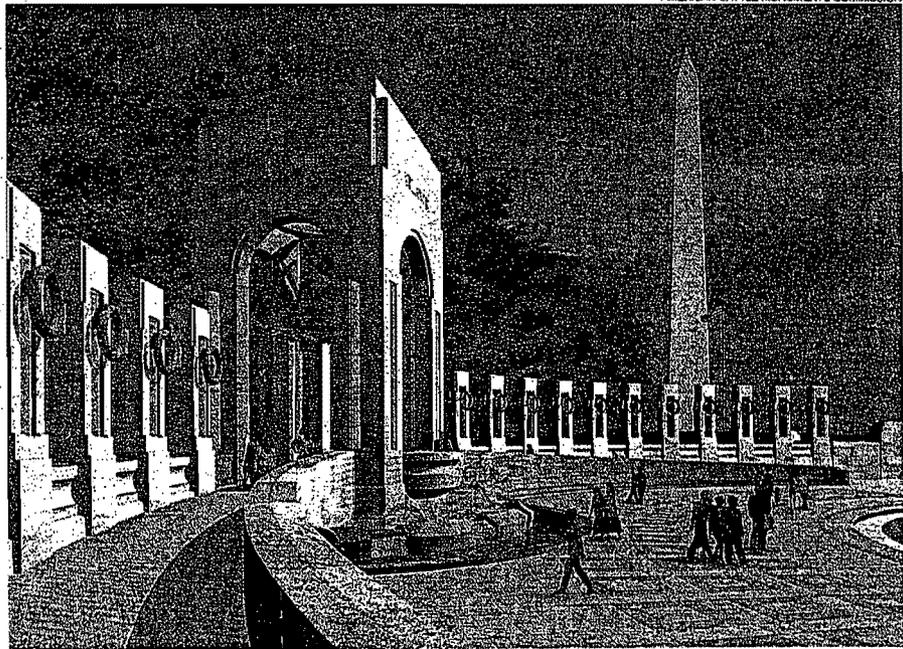
*A national memorial to World War II will soon be built. Maybe . . .*

BY JAY TOLSON

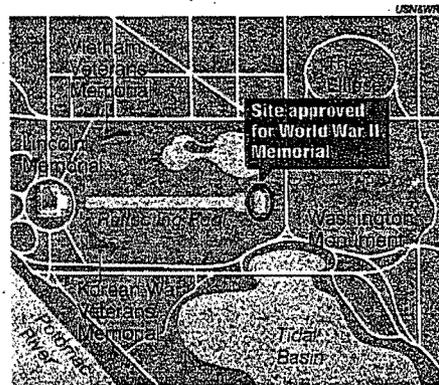
**I**mperialist kitsch" foisted upon the American public by a "little group of willful men." An architectural eyegore that violates principles of historic preservation and the clean vistas of the National Mall. To hear the charges of some critics, pundits, and organizations, you'd never guess they were 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



AMERICAN BATTLE MONUMENTS COMMISSION



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

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-

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. Editorials 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." ●