

**Testimony before the
Subcommittee on National Parks, Historic Preservation, and Recreation
U.S. Senate Committee on Energy and Natural Resources March 23, 2000**

By Judy Scott Feldman, Ph.D.
Co-chair, Task Force on Memorials
Committee of 100 on the Federal City

Senator Thomas and committee members, thank you for this opportunity to testify about our recent experiences regarding memorials and monuments. I am Mr. Cooper's co-chair on the Committee of 100's Task Force on Memorials and an art and architectural historian, with twelve years of college teaching experience, and a frequent lecturer in art history for the Smithsonian Resident Associates Program.

One reason the Committee of 100 is so concerned about the status of memorials and monuments, and the new policies that are being proposed for locating new commemorative works, is because of what is happening in particular with regard to the proposed National World War II Memorial.

Let me just briefly review some of the relevant facts. The site for the proposed WWII Memorial was selected behind the scenes by the memorial's sponsor and the federal review agencies. This site, known as the Rainbow Pool and located at the eastern end of the Reflecting Pool between the Washington Monument and Lincoln Memorial at 17th Street, is listed in the National Register of Historic Places in three separate designations. The Committee of 100 is not opposed to commemorating World War II. It is the current design at the Mall location that is our concern. The approved design of the proposed Memorial will dramatically alter this historic open and green park-like setting and replace it with a solid granite plaza stretching from tree line to tree line across the open central panel of the National Mall. In 1998 the National Park Service (NPS) carried out the Section 106 review of Historic Preservation Law and found that the proposed Memorial would have significant "adverse impact" on the National Mall. However, with final decisions on the proposed Memorial to be made as soon as in the coming weeks and months, the review process is not yet completed.

Although there are clear policies and historic preservation and environmental laws in effect that govern the siting and design of commemorative works, it is also evident that, in the example of the WWII Memorial, they are not always uniformly enforced. In particular the NCPC policy restricting future memorials from the main part of the Mall has grandfathered in the WWII Memorial at its proposed site even though construction has not yet started. The NPS also has policies - compiled in its "Guidelines for the Treatment of Cultural Landscapes" and "Draft Management Policies" -- which provide clear guidelines for the protection of cultural properties, for historic preservation, and for the regulation of commemorative works. The Draft Management Policies document, which is a revision of 1988 policies, was recently put out for public comment and we have attached to our testimony the Committee of 100's comments on it.

We support these policies, and in particular their guidelines with regard to including public participation in all stages of planning for park lands. For example, Policy 5.2.1. states that "each park will consult with outside parties having an interest in the park's cultural resources;" that these parties include "interested federal agencies; tribal, state, and local governments; park-associated groups;

present-day park neighbors, and interest groups;" and "that consultations with these groups "will take place as soon as practical."

This policy of extensive consultation is exactly the kind of public involvement that my colleague Mr. Cooper suggested should be put into amendments for the Commemorative Works Act. We believe that had this policy been followed with the WWII Memorial, the questions and concerns could have been avoided. Instead, the public was not involved in site selection. Although the Committee of 100 and other interest groups and concerned citizens has continually sought opportunities to consult with federal agencies about alternative sites or design concepts, no meaningful consultation has taken place.

We are also in agreement with the guidelines for historic preservation. Again, however, they have not always been vigorously applied in the case of the proposed WWII Memorial. For instance, the historic Rainbow Pool will be destroyed and then a new pool constructed six feet below grade and at a 15% reduced size. Even though the National Park Service, as well as other federal preservation agencies, have found that the Memorial will have an "adverse impact" on the Mall site, there have been no changes to the design that would lessen that impact. On the contrary, the current design unveiled in 1999 introduced new vertical elements, in the form of 56 17-foot high pillars, and replaced what were large panels of grass with solid granite. We believe that the proposed Memorial's design, sunken plaza, and enclosure on three sides, which will prohibit pedestrians from walking through this vital part of the Mall between the Lincoln Memorial and Washington Monument, will severely alter this portion of the Mall.

In summary, although clear policies governing park lands, historic preservation, and commemorative works are already in place, looking at the example of the proposed World War II Memorial, we believe that these policies have not been uniformly enforced and so have been ineffective. Public opinion and the editorial opposition of papers such as the New York Times and Wall Street Journal, attached with our testimony, have had little or no significant effect on the site process.

In the absence of significant federal oversight with regard to the proposed WWII Memorial, which is planned to be sited on our most sacred national landscape and on an integral portion of the Lincoln Memorial site, the Committee of 100 has initiated two actions for which we welcome Congressional and public support. First, in order to raise public awareness of the danger to the Mall of the proliferation of memorials, including the WWII Memorial, we have nominated the West End of the Mall - between the Washington Monument and Lincoln Memorial - to the "11 Most Endangered Historic Places of 2000" list of the National Trust for Historic Preservation. Second, we have asked the memorial's sponsor, the American Battle Monuments Commission, and NPS to give Congress, the federal agencies, and the American people a preview of what is being proposed by constructing a full-scale temporary mock-up at the Rainbow Pool site. The temporary scaffolding at the Washington Monument shows how effective a temporary installation can be in dramatizing the extent of a memorial. Our proposals are attached to this testimony.

Let us be clear that we support the idea of a National World War II Memorial. However, because of the above problems, we ask you to halt the WWII process until compliance with existing provisions of the Commemorative Works Act, NPS Management Policies, and Historic Preservation and Environmental Laws can be thoroughly reviewed. At the same time, we urge you to consider an immediate moratorium for all proposals planned for the Mall, including the World War II Memorial. If the proposed moratorium is to be truly effective, it needs to be made applicable now before this gigantic 7.6-acre memorial mars forever this historic green, open space. We would welcome the opportunity to work with you and your subcommittee to save the National Mall for future generations.

Mr. Chairman, the Committee of 100 urges this subcommittee to support the Joint Task Force on Memorials but to work to institute a meaningful public participation process and to strengthen existing policies and make them enforceable. The Mall is a national landmark area. Its future is of concern to all Americans.

Thank you.