



Executive Director's Recommendation

Commission Meeting: March 6, 2014

PROJECT Visitor Screening Facility Washington Monument Between 14th and 17th Streets, NW and Constitution Avenue, NW and the Tidal Basin Washington, DC	NCPC FILE NUMBER 6176
SUBMITTED BY National Park Service	NCPC MAP FILE NUMBER 1.42(38.40)43899
REVIEW AUTHORITY Approval per 40 U.S.C. § 8722(b)(1) and (d)	APPLICANT'S REQUEST Preliminary approval of site and building plans
	PROPOSED ACTION Approve with comments
	ACTION ITEM TYPE Staff Presentation

PROJECT SUMMARY

The National Park Service has submitted preliminary site and building plans for a new visitor security screening facility at the Washington Monument. The existing one-story structure was added to the east face of the Monument to accommodate security screening and visitor entry in 2001. This structure was intended to be temporary and requires replacement to meet the long term security and cultural resource management requirements at the Monument. The purpose of the proposed project is to improve the security and visitor flow at the Monument in a manner that preserves the character and visitor experience of the Monument and its grounds. The program for the facility includes queuing for 20-25 visitors, an accessible restroom for the National Park Service and United States Park Police staff, a staff office, and space for screening equipment.

The proposed visitor screening facility has been conceived of as a portal or passageway that will function as an independent structure and be connected to the east side of the Washington Monument in a minimal manner. In the future, if security screening is no longer required or the structure is not needed to perform security screening, the structure could be removed. The visitor screening facility incorporates the use of a double glazed envelope separated by a heavy structural member. The proposal calls for the use of glass on both the exterior and interior, but due to program requirements the outer layer of glass will need to have a level of opacity so that the screening process is not visible from the outside.

KEY INFORMATION

- Temporary visitor screening facility has been in place at the Washington Monument since 2001

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- New visitor screening facility has been conceived of as a portal or passageway and will function as an independent structure that is located on the east side of the Monument
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RECOMMENDATION

The Commission:

Approves the preliminary site and building plans for a visitor screening facility at the Washington Monument.

Adopts the National Park Service's Finding of No Significant Impact for the Washington Monument Visitor Security Screening Environmental Assessment; signed by the National Park Service on February 13, 2014

Notes that the use of laminated glass is preferential to the use of a polycarbonate material for the exterior of the visitor screening facility.

Requests the following information prior to final review:

- Detailed plan including the number and location of geothermal wells that will be required and what, if any, associated impacts there may be to the Monument and its foundations;
- Blast and ballistic analysis that will inform the final material selection for the visitor screening facility;
- Lighting design that demonstrates how the facility will be lit and to what intensity to ensure compatibility with the nighttime illumination of other monuments and memorials on the National Mall.

PROJECT REVIEW TIMELINE

Previous actions	Information Preservation in November 2010
Remaining actions (anticipated)	Final approval of site and building plans

Prepared by J. Hirsch
February 27, 2014

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I. PROJECT DESCRIPTION

Site

The Washington Monument (Monument) is located in the monumental core of Washington, DC and is the central element of the grand vista along the National Mall that connects the U.S. Capitol to the east and the World War II Memorial, Lincoln Memorial, and Reflecting Pool to the west. The project area

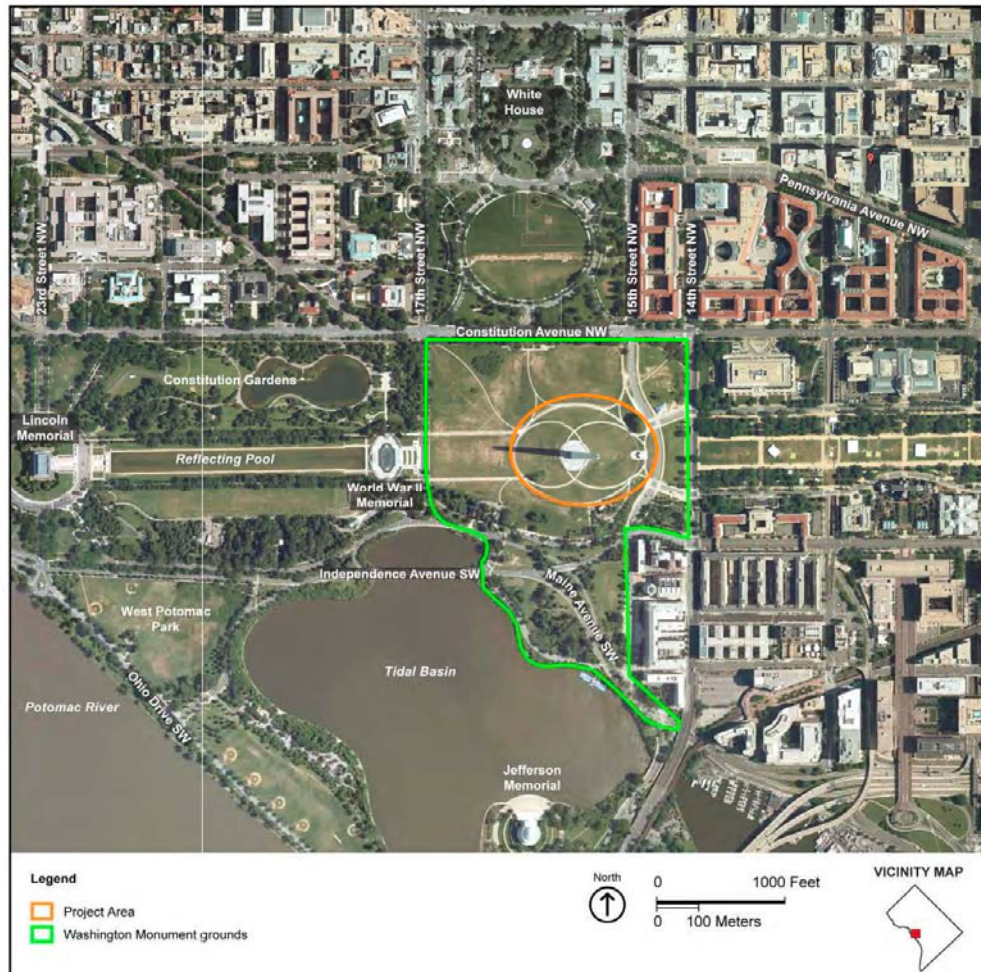


Figure 1: Project Location

for the Visitor Screening Facility is situated within the larger cultural landscape of the Washington Monument Grounds, which includes 106 acres bounded by Constitution Avenue to the north, Maine Avenue to the south, 14th Street on the east, and 17th Street on the west.

The project site includes a temporary security screening facility that was constructed along the east side of the Monument in 2001. At the base of the Monument is a large circular plaza with two concentric rings, and there are 50 American flags on the edge of the plaza. The Monument Lodge, built in 1888, serves as a waiting room, comfort station, and visitor services station for Monument visitors. The Sylvan Theatre, built in 1917, is also located on the south side of the Monument Grounds.



Figure 2: Aerial of project site

Background

The Washington Monument, as the nation's foremost memorial to George Washington, is one of the most recognizable structures in the world. The Washington Monument is a stone masonry structure that resembles the form of an Egyptian obelisk, standing approximately 555 feet tall. The Monument sits on an artificially constructed knoll that was designed to hide the original monument foundation and to provide additional stability to the soil underpinning it.

Since it opened in 1888, the Monument has been a major tourist attraction, and as one of the most prominent icons in the nation, it is toured by over 600,000 visitors annually with millions more visiting the surrounding grounds. Its popularity, combined with its status as an icon, make it a potential target for terrorist attacks. In 2001, the National Park Service constructed a temporary security facility at the base of the Monument to address a potential attack or takeover of the Monument. Therefore, since 2001, visitors are required to undergo electronic screening before gaining access to the Monument.

In 2006, a permanent perimeter vehicular barrier system including landscape improvements was constructed at the Monument. The Commission approved this perimeter security and landscape improvements in 2003. The proposed action is needed to replace the temporary structure that was added to the Monument in 2001 and to meet the long-term security and cultural resource

management requirements of the Monument. The long-term security and cultural resource management requirements include:

- Locating visitor screening outside the walls of the Monument to ensure protection of both human life and the monument structure in the event of a security breach
- Maintaining visitor use that has, since 1888, included access to the top of the Monument for views of the city of Washington
- Preserving the fabric of the Monument, which is a historic property
- Maintaining consistency with the Monument and Monument grounds cultural landscape in regard to views and vistas, buildings and structures, and circulation



Figure 3: Existing visitor screening facility constructed in 2001

Proposal

The proposed action would replace the existing temporary visitor screening facility located on the east side of the Washington Monument with a new glass pavilion structure. All visitor queuing and screening would occur within the new glass structure as well as entry and egress from the Monument. The program for the visitor screening facility includes queuing for 20-25 visitors, an accessible restroom for the National Park Service (NPS) and United States Park Police (USPP) staff, a USPP office, and requisite space for screening equipment. The USPP and NPS have the following specific requirements for the visitor screening facility:

- Full visibility outward to the north, east, and south;
- Full visibility inward is prohibited; from a datum of 4 feet above the floor level, translucent or opaque material must be used;

- Queuing for 20-25 people;
- Circulation within the facility is deliberately circuitous to avoid allowing a path of direct access into the Monument;
- New accessible staff restroom;
- Park Police office with full visual control of the security screening and be proximate to the entrance to the Monument to enable lock down, if needed;
- One magnetometer and one x-ray machine;
- Egress must be managed such that no visitors are allowed back into the Monument after they exit;
- Facility must have a ballistic rating;
- Facility must have a blast rating;
- Materials analysis – interior and exterior materials and finishes

There will be no change to how visitors access the Monument with the new visitor screening facility. Currently, visitors obtain timed passes at the Monument Lodge to visit the Monument in half hour scheduled increments. When visitors retrieve their tickets, they are notified of the limited facilities in the Monument (i.e., no restrooms) and then they proceed to the Monument to queue outside the existing security screening facility in groups of approximately 20-25 people. Once admitted, each visitor proceeds into the screening facility southeast door and through screening via x-ray and magnetometer. Visitors then enter the Monument through the east to ascend to the viewing platform by elevator in groups of no more than 24. Upon departure, visitors descend at their leisure in the elevator and exit the Monument through the east opening into the visitor screening facility and out the southwest exit. Visitor re-entry is managed through a stanchion and turnstile immediately outside the south exit. The existing screening facility is approximately 445 square feet and 16 feet wide by 28 feet long and 12 feet in height.

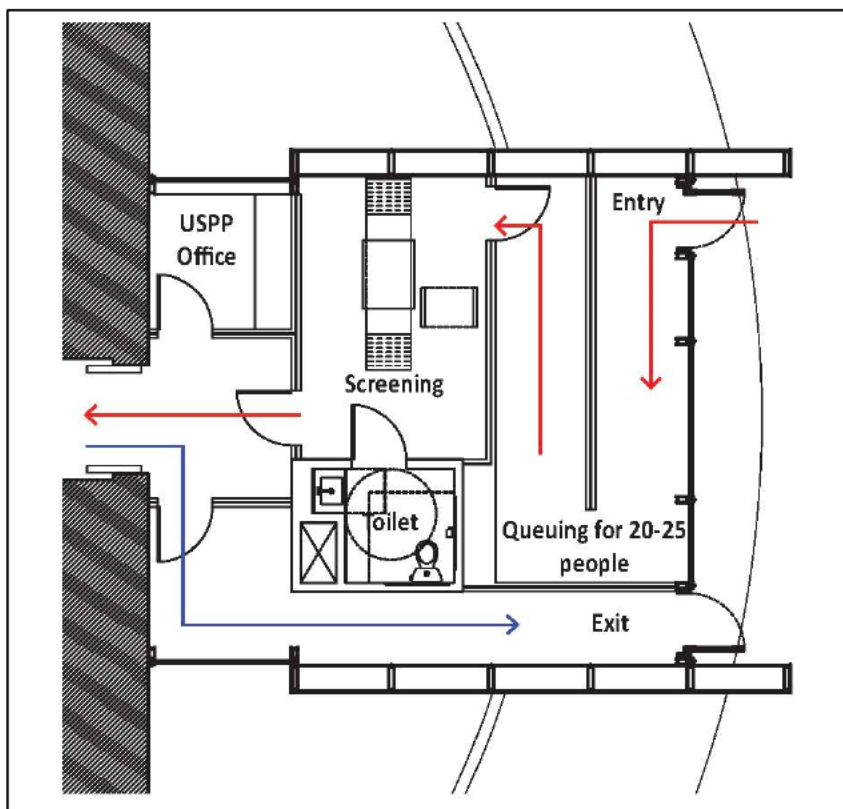


Figure 4: Plan of proposed visitor screening facility

to ascend to the viewing platform by elevator in groups of no more than 24. Upon departure, visitors descend at their leisure in the elevator and exit the Monument through the east opening into the visitor screening facility and out the southwest exit. Visitor re-entry is managed through a stanchion and turnstile immediately outside the south exit. The existing screening facility is approximately 445 square feet and 16 feet wide by 28 feet long and 12 feet in height.

The design approach for the new visitor screening facility is based on the idea of a “portal” or passageway. While the idea of a pure geometrical form such as a cube seemed to be an appropriate complement to the Monument, ultimately the cube seemed to compete with the pure geometric form of the Monument as an obelisk. The new screening facility will sit beside the Monument, and will function independently and be connected in the most minimal way. If at some point in the future the screening facility is not needed, it could be removed with minimal disturbance to the Monument. The proposed facility is approximately 785 square feet and 30 feet wide by 27 feet deep and 17-1/2 feet in height. The new facility would accommodate queuing for 20-25 people and will alleviate the need for large groups to congregate outside on the plaza. The USPP does not want to have large groups in front of the facility as it obscures their view outward, which is a security concern. The new facility will incorporate a sally port, which removes the necessity for a stanchion and turnstile on the exterior of the building.

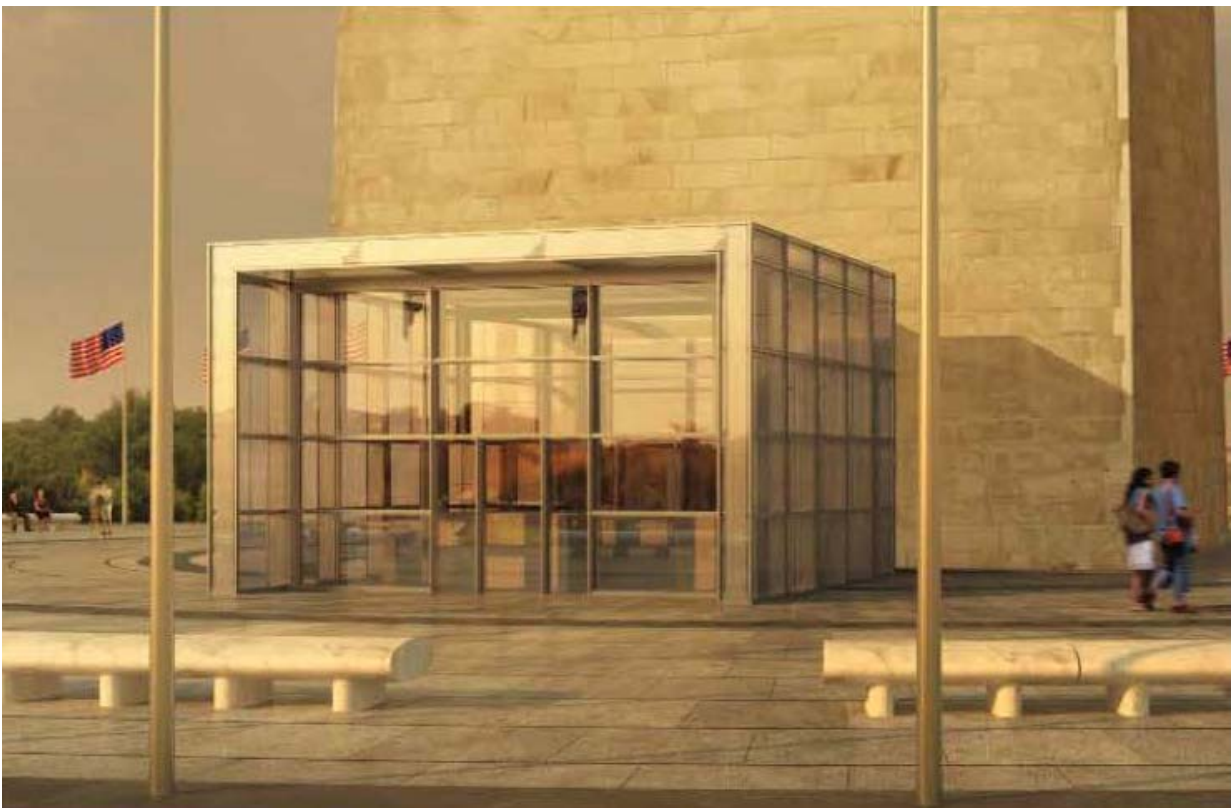


Figure 5: Rendering of proposed visitor screening facility

The design of the visitor screening facility incorporates a double glazed envelope separated by a heavy structural member and airspace. The outer layer is proposed to be ballistic rated laminated glass (or polycarbonate) with a metal mesh insert. The inner layer is proposed to be laminated glass

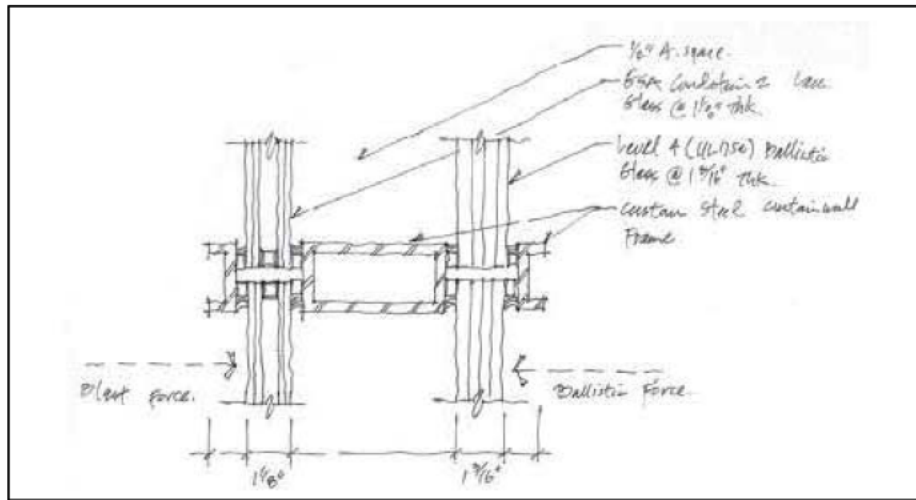


Figure 6: Conceptual drawing of structure

approximately 1-1/8" thick. Depending on the heat gain associated with the metal mesh insert, an alternative composite fiber material might be used that simulates the appearance of glass. The roof of the facility will be fritted glass or tinted glass to mitigate heat gain.

Due to the location of the Monument on the National Mall, and the sensitivity to visual resources, no rooftop equipment is proposed. Two or three geothermal wells, each at a depth of approximately 400-500 feet are proposed. The geothermal well field would be tied to a heat pump through a closed loop system consisting of two refrigerant pipes. The heat pump will be located in a mechanical room beneath the new facility and would be accessed by a hatch and ship's ladder that would be flush against the floor of the new facility. Currently, the wells are proposed to be located north of the Monument as this location is in close proximity to the new facility and will require minimal subsurface trenching. The wells would be drilled at a diameter of approximately 12 inches and spaced 20 feet apart. After installation, the wells would be covered with 6-12 inches of soil and turf and would not be visible from the surface.



Figure 7: Location of geothermal wells

The wells would be drilled at a diameter of approximately 12 inches and spaced 20 feet apart. After installation, the wells would be covered with 6-12 inches of soil and turf and would not be visible from the surface.

A lighting design has not yet been developed, but the submission materials indicate that NPS will engage a lighting specialist to ensure that the site lighting will be designed in accordance with guidelines of the Illuminating Engineering Society of North America and the nighttime illumination of other monuments and memorials on the National Mall. In addition, a Threat and Blast Analysis is required and will be undertaken during the next phase of design. This analysis

will be essential to inform the proper design of structural details, including the foundations and building envelope. Without this information, it is difficult to determine the blast and ballistic requirements of the interior partitions and exterior walls.

II. PROJECT ANALYSIS/CONFORMANCE

Executive Summary

The proposed visitor screening facility will meet the long-term security and cultural resource management requirements of the Monument and overall is consistent with the Federal Elements of the Comprehensive Plan of the National Capital. The design of the proposed facility accommodates security and screening functions which will allow visitors to gain access to the interior of the Monument, and also respects the Monument and its grounds as a historic property. In addition, the proposed visitor screening facility is a significant aesthetic improvement to the existing one-story structure that is currently located on the east side of the Monument.

Analysis

Staff recommends **the Commission approve the preliminary site and building plans for the visitor screening facility at the Washington Monument.** Over the past several years, NPS has worked through the design review process, compliance with the National Environmental Policy Act, and consultation under Section 106 of the National Historic Preservation Act to develop a range of alternatives for designing a new visitor screening facility for the Monument. Over 40 alternatives were developed and generally these designs can be grouped into three categories:

- Options that utilized existing facilities such as the Sylvan Theater and Monument Lodge for security screening with pathways leading to the Monument;
- Options of varying sizes and shapes for a new above-ground security screening facility located in different positions relative to the Monument; and
- Options for a new subsurface entry into the Monument that were incorporated into the landscape in different configurations.

Three of the alternatives were carried forward for detailed analysis in an Environmental Assessment (EA). The alternatives included in the EA included the following: 1) Pavilion on the plaza; 2) Subsurface entry and screening facility at the east edge of the Monument; and 3) Ramp cut into the plaza with a subsurface entry and screening facility. Based on the environmental analysis, Section 106 consultation, and the program for the new facility, NPS identified the pavilion on the plaza as the preferred alternative. One consequence of this configuration and its placement adjacent to the Monument was a substantial blast and ballistic requirement.

NPS developed two options for the pavilion on the plaza – a pure “glass cube” and “portal”. The “glass cube” and “portal” options have nearly identical footprints, but the massing, height, and materiality varied. The U.S. Commission of Fine Arts (CFA) approved the “portal” option in June 2013. Through the Section 106 process, the consulting parties advocated for the size, scale, and footprint of the pavilion to be as minimal as possible while still satisfying the program requirements and purpose and need of the project. NPS developed several design iterations for the

massing of the pavilion in order to make sure the proper scale was achieved in the context of the monumental core of the nation's capital. Through a viewshed analysis and Section 106 consultation, the majority of stakeholders favored a minimal cube with the smallest footprint and height that would embody a balanced proportion.

Though a short volume would likely be the most thermally efficient, massing studies indicated that if the facility was too short, it would appear incongruent adjacent to the pure geometric obelisk of the Monument. Therefore, while a pure cube seemed to be the appropriate form to complement the Monument as a pure obelisk, ultimately the two competed with each other. Therefore, the proposed design is not quite a pure cube, but will act as a portal or passageway for visitors who enter the monument. The proposed design will function independently and be connected in the most minimal way. A ballistic glass with a metal mesh insert is proposed for the exterior of the pavilion. This material will reduce the visibility of the security screening process, but will allow the USPP to maintain visibility outward. Staff notes that there is also the possibility a polycarbonate could be used for the exterior due to blast and ballistic requirements as well as the heat gain associated with the metal mesh insert. Therefore, for aesthetic reasons staff recommends that **the Commission note that the use of laminated glass is preferential to the use of a polycarbonate material for the exterior of the visitor screening facility.**

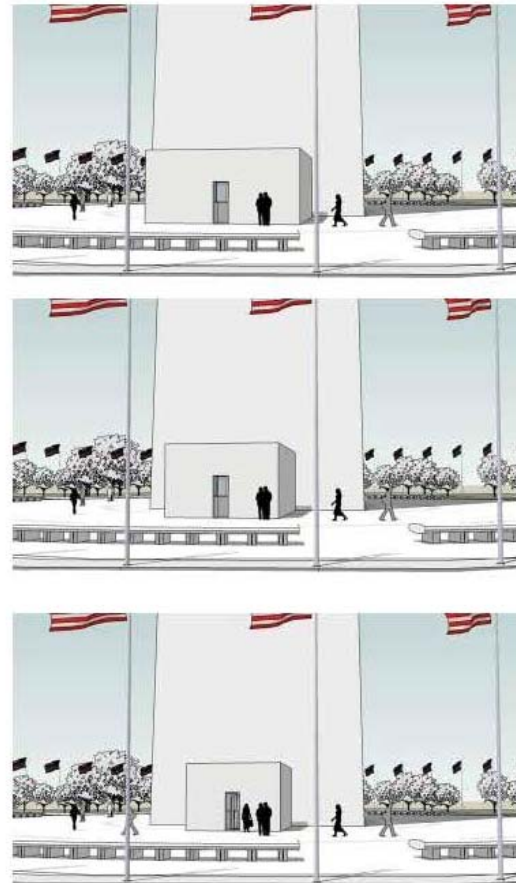


Figure 8: Massing studies for visitor screening facility

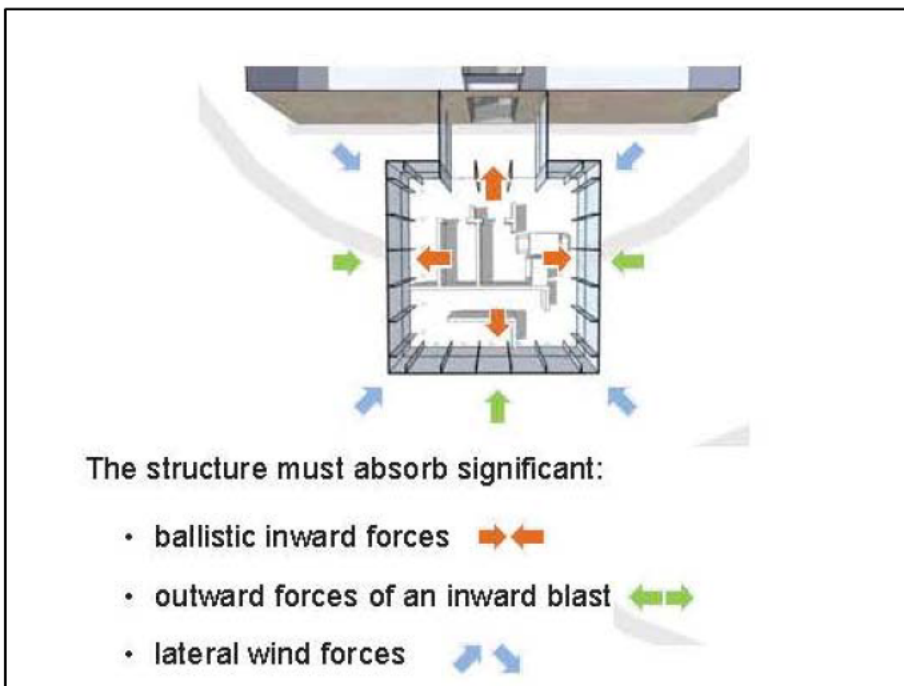
Given the prominent location of the Washington Monument along the National Mall, no rooftop equipment is proposed for the new screening facility. In order to heat and cool the facility, NPS is proposing to use geothermal wells and has identified a location to the north of the Monument for 2-3 wells of to a depth of approximately 400-500 feet. Additional information is required in order to determine the number of geothermal wells that will be needed, and therefore staff recommends that prior to final review **the Commission requests a detailed plan including the number and location of geothermal wells that will be required and what, if any, associated impacts there may be to the Monument and its foundations.**

The final material selection for the exterior will be informed by the blast and ballistic analysis, and therefore staff also recommends **the Commission requests the blast and ballistic analysis that will inform the final material selection for the visitor screening facility.** Finally, the lighting

design for the facility has not yet been determined and therefore staff recommends that **the Commission request information on how the facility will be lit and to what intensity to ensure compatibility with the nighttime illumination of other monuments and memorials on the National Mall.**



Figure 9: Aerial perspective of proposed visitor screening facility



The structure must absorb significant:

- ballistic inward forces 
- outward forces of an inward blast 
- lateral wind forces 

Figure 10: Diagram of blast and ballistic considerations

Comprehensive Plan for the National Capital

The project is consistent with policies in the Federal Elements of the Comprehensive Plan for the National Capital, and in particular those policies contained in the Preservation and Historic Features Element and the Visitors Element. These policies encourage the federal government to preserve and protect historic properties while also accommodating visitors and balancing the needs of security and accessibility. The proposed action will satisfy both of these areas.

Policies in the Preservation and Historic Features Element that the proposed action is consistent with include the following:

- Plan carefully for appropriate uses and compatible design in and near the monumental core to reinforce and enhance its special role in the image of the nation's capital.
- Protect and enhance the vistas and views, both natural and designed, that are an integral part of the national capital's image.
- Encourage the practice of good design principles throughout the region to continually strengthen the image of the nation's capital.
- Sustain exemplary standards of historic property stewardship.
- Identify and protect both the significant historic design integrity and the use of historic landscapes and open space.
- Protect the settings of historic properties, including views to and from the sites where significant, as integral parts of the historic character of the property.
- Conduct archaeological investigations at the earliest phases of site or master planning in order to avoid the disturbance of archaeological resources.
- Ensure that new construction is compatible with the qualities and character of historic buildings and their settings, in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and the *Guidelines for Rehabilitating Historic Buildings*.
- Develop the monumental core in accordance with the principles of the *Legacy Plan* and the *Memorials and Museum Master Plan*. The National Mall's historic open space and monumental character should be respected and preserved for the benefit of future generations. New development should not infringe on the integrity of the National Mall and the surrounding monumental core, and should be excluded from the *Reserve* (in accordance with the Commemorative Works Act, as amended).

The proposed action is consistent with the following in the Visitors Element:

- Balance the needs of security and visitor accessibility by ensuring that federal visitor attractions in the National Capital Region provide for the safety of visitors while remaining accessible and aesthetically pleasing, following the recommendations in *The National Capital Urban Design and Security Plan*.

National Capital Urban Design and Security Plan Objectives and Policies

The National Capital Urban Design and Security Plan (2002) specifically notes that given the prominent location of the Washington Monument on the National Mall, a custom design for perimeter security would be required. In 2006, the walkways along the Monument Grounds were

reconfigured and a permanent perimeter vehicular barrier system incorporating retaining and plinth walls was constructed (the Commission approved this design in 2003). The design for the proposed visitor screening facility has been carefully considered in the context of the Monument's location along the Mall, its visibility from surrounding viewsheds, as well as the landscape improvements and perimeter security system installed in 2006. The proposed facility is consistent with vehicular barrier system and the recommendations in the National Capital Urban Design and Security Plan.

National Mall Plan

The National Mall Plan seeks to rehabilitate and refurbish the National Mall so that very high levels of use can be perpetuated and the needs of all visitors and users can be met in an attractive, high-quality, energy-efficient, and sustainable manner. The National Mall Plan establishes a framework to protect memorials and landscapes while maintaining large areas of unprogrammed open space. The plan seeks to balance contemporary uses while respecting the planned historic landscapes of the L'Enfant and McMillan plans. The proposed visitor screening facility was not included in the National Mall Plan, but was considered a separate project and part of the Washington Monument Perimeter Security Improvements (vehicular barrier system, landscape improvements, new flagpoles, lighting, irrigation, utility work, and rehabilitation of Monument Lodge).

National Environmental Policy Act (NEPA)

NCPC and NPS each have an independent responsibility to comply with the National Environmental Policy Act (NEPA); NCPC's responsibility stems from its approval authority over the project. In accordance with the Council on Environmental Quality's rules for implementing NEPA, and the Commission's Environmental and Historic Preservation Policies and Procedures, NPS prepared an Environmental Assessment (EA) for the project, to which NCPC was a cooperating agency. The EA analyzed a no action alternative and three development alternatives; the preferred alternative was identified as "Alternative C." Topics analyzed in the EA include: visitor use and experience, public safety, park management and operations, soils, visual resources, cultural resources, park operations and management, soils, transportation systems, vegetation, and utilities. NPS issued a Finding of No Significant Impact (FONSI) for Alternative C on February 13, 2014.

NCPC staff has reviewed the EA and NPS's FONSI and determined that the information and analysis provided meets the standards for an adequate EA as set forth in NCPC's Environmental and Historic Preservation Policies and Procedures and that a FONSI is warranted based on the information contained in the EA. Staff recommends **the Commission adopt NPS's Finding of No Significant Impact for the Washington Monument Visitor Security Screening; signed by NPS on February 13, 2014.**

National Historic Preservation Act (NHPA)

NCPC and NPS each have an independent responsibility to comply with the National Historic Preservation Act (NHPA); NCPC's responsibility stems from its approval authority over the project. NCPC designed NPS as lead agency to fulfill their collective obligations for Section 106

consultation. NPS initiated consultation with the District of Columbia State Historic Preservation Officer (SHPO) in November 2010 and Section 106 consultation meetings were held in March 2011, December 2011, February 2011, September 2012, and June 2013. Five options were presented to the Section 106 consulting parties in October 2012, and the majority of consulting parties expressed support for the freestanding pavilion (Alternative C in the EA).

Through the Section 106 consultation, NPS determined the construction of the visitor screening facility would have adverse effects on historic properties. Adverse effects include the construction of a building in the historically open space of the Monument plaza; alteration of the simplicity of the existing relationship between the Monument, plaza, and surrounding landscape; alteration of several significant views, including views of the Monument from the Monument grounds, the National Mall, and the air, and panoramic views from the Monument to the east, north, and south. To address the adverse effects, NPS, NCPC, the Advisory Council on Historic Preservation, and the SHPO entered into a Memorandum of Agreement (MOA). The MOA stipulates a design review process for finalizing the design of the proposed visitor screening facility. In addition, the MOA includes mitigation measures that consist of the development of interpretation and education materials that broadly address the prehistory of the site as well as the historical development of the Washington Monument and its grounds. The types of materials may include wayside exhibits, reconstruction drawings, brochures, or internet-based content. Other mitigation measures include a provision for NPS to implement a plan for periodic monitoring of elevation benchmarks on or near the base of the Monument prior to, during, and after construction and to make this information available to the public. NPS will also implement measures to protect the integrity of the Monument during construction.

III. CONSULTATION

Coordinating Committee

The Coordinating Committee reviewed the proposal at its February 12, 2014 meeting. The Committee forwarded the proposed preliminary site and building plans to the Commission with the statement that the proposal has been coordinated with all participating agencies. The participating agencies were: NCPC; the District of Columbia Office of Planning; the District of Columbia Department of Transportation; the District of Columbia State Historic Preservation Office; the General Services Administration; the National Park Service and the Washington Metropolitan Area Transit Authority.

U.S. Commission of Fine Arts

The U.S. Commission of Fine Arts (CFA) reviewed concept plans for the visitor screening facility its June 20, 2013 meeting. During this meeting, NPS presented two conceptual directions for the facility - a pure "glass cube" and "portal". The addition as a "glass cube" focused on a pure geometric form of a cube adjacent to the iconic obelisk of the Monument while the "portal" alternative focused on the subordinate role the addition would play as an entrance. CFA noted the transitory nature of security operations and advised that the facility should appear as an elegant, but temporary passage and therefore CFA endorsed the "portal" alternative. In addition to expressing a preference for the "portal" design, CFA commented that the lower roofline,

connecting hyphen, and embedded metal mesh would differentiate the addition from the Monument so that the new facility would appear as a transparent shadow at the Monument's base.

Coordination with local agencies

Through both the NEPA and Section 106 process, NPS coordinated with a number of agencies, organizations, and stakeholders. Among those who participated include: Advisory Council on Historic Preservation, U.S. Commission of Fine Arts, U.S. General Services Administration, Smithsonian Institution, Committee of 100 on the Federal City, District of Columbia State Historic Preservation Office, National Coalition to Save Our Mall, National Parks Conservation Association, National Trust for Historic Preservation, Washington, DC Guild of Professional Tour Guides, and the Washington Monument Society.

IV. APPENDIX

NPS Finding of No Significant Impact



FINDING OF NO SIGNIFICANT IMPACT

Washington Monument Visitor Security Screening

National Mall and Memorial Parks

The National Park Service (NPS) proposes an improved security visitor security screening facility at the Washington Monument (the Monument) located on the Washington Monument Grounds (Monument grounds) in Washington, D.C. The Monument is located within the National Mall and Memorial Parks unit of the NPS, which encompasses portions of the monumental core in downtown Washington, D.C., and includes the National Mall. The project is located in the Northwest quadrant of Washington, D.C.

In 2002, the NPS completed a design for Washington Monument permanent security improvements, which included a comprehensive landscape solution for a perimeter vehicular barrier system and a new screening facility. However, only the vehicular barrier system and a portion of the landscape design were implemented in 2006. The NPS is revisiting the feasibility of a permanent new entrance and visitor screening facility and the removal of the existing temporary facility.

The purpose of the proposed action is to improve the security and visitor flow at the Monument in a manner that preserves the character and visitor experience of the Monument and the Monument grounds. Action is needed to replace the existing temporary visitor screening facility to meet the Monument's long-term security and cultural resource management requirements developed by the Park and the United States Park Police (USPP).

These long-term security and cultural resource management requirements at the Monument include:

- locating visitor screening outside the walls of the Monument to ensure protection of both human life and the Monument structure in the event of a security breach;
- maintaining visitor use that has, since 1888, included access to the top of the Monument for views of the city of Washington;
- preserving the fabric of the Monument, which is a historic property; and
- maintaining consistency with the Monument and Monument grounds cultural landscape in regard to views and vistas, buildings and structures, and circulation.

NPS prepared an Environmental Assessment (EA) specifically for the Washington Monument visitor security screening facility in accordance with National Environmental Policy Act (NEPA) and implementing regulations, Title 40 Code of Federal Regulations (CFR) 1500–1508; NPS Director's Order 12: *Conservation Planning, Environmental Impact Analysis, and Decision Making* and Handbook; and Section 106 of the National Historic Preservation Act of 1966 (NHPA), as Amended, and its implementing regulations, 36 CFR 800.

SELECTED ALTERNATIVE

Based on the analysis presented in the EA, the NPS has selected alternative C: Freestanding Plaza Pavilion (the NPS preferred alternative) for implementation. The selected alternative focuses on providing the visitor queuing and screening on the Plaza, similar to the existing conditions. The pavilion material could be glass, concrete, or a combination of the two. Nevertheless, if glass were used, there would need to be some opacity to ensure the screening process would not be visible from the outside. The pavilion will include transparent roof material so that the Monument will be visible to visitors entering the facility.

Approach: Under the selected alternative visitors will continue to approach the Monument and Plaza via the existing circular paths to the north and south of the Monument Lodge. The intersection of these pathways with the Monument Plaza will not change.

Queuing and Screening: Visitors will enter the Monument through a glass-encased visitor entry and screening facility on the eastern face of the Monument. All visitor queuing and screening will occur within this new glass structure. The facility can accommodate approximately 20 to 25 for queuing to enter the Monument at one time. In addition, ingress and egress from the Monument will be through this new glass screening facility.

Monument Plaza: No changes will be made to the configuration, shape, or benches on the Plaza. The only alteration will be the appearance and footprint of the screening facility on the eastern face of the Monument. The footprint of the facility will be approximately 35 feet extending east from the base of the Monument and approximately 30 feet north to south, parallel to the Monument.

Landscape: No changes will be made to the landscape beyond the footprint of the Plaza. The new screening facility will be visible from the north and south.

The selected alternative will also include a small, single bathroom, for use by staff within the new screening facility. In addition, geothermal wells will be installed in order to supplement climate control and reduce energy consumption at the facility. It is anticipated that this array will consist of 2-3 wells, extending to a depth of 400-500 feet, spaced 20 feet apart, with pipes running from the wells to a subsurface mechanical room of the facility.

OTHER ALTERNATIVES CONSIDERED

In addition to the NPS selected alternative described above, the EA analyzed the no action alternative and two additional action alternatives – 1) Alternative A: No Action; 2) Alternative B: Ramp at Plaza Perimeter; and 3) Alternative D: Ramp in Plaza.

Alternative A: No Action - Upon completion of the August 2011 earthquake repairs there would be a continuation of the existing sequence of visitor ticketing, screening, and entrance into the Monument. Visitors would continue to retrieve their tickets at the Monument Lodge and queue on the granite Plaza located at the perimeter of the Monument. They would continue to exit from the Monument onto the granite Plaza.

This alternative was not selected because it is similar in concept to the selected alternative, but the selected alternative better meets the long-term security and cultural resources management requirements developed by the Park and USPP. In addition, the materials of the facility are aesthetically deficient and inconsistent with the aesthetics and visual character of the Monument and other resources such as the Monument Lodge and Survey Lodge. The presence of the temporary facility diminishes the visual integrity of the Monument resulting in adverse impacts to visual resources. The temporary facility is also at the end of its useful life.

Alternative B: Ramp at Plaza Perimeter - Visitor entry and queuing to the Monument would occur via recessed ramps directly adjacent to the east side of the Plaza. A subterranean entrance and facility would provide ingress and security screening to visitors. The Monument elevator would be extended down to this subterranean level to convey visitors to the top of the Monument.

The current temporary visitor screening facility would be removed and a fixed panel of glass would cover the existing Plaza entrance, allowing visitors to view the interior lobby of the Monument. All benches on the Plaza would remain. On the eastern edge of the Plaza, a 42 inch-high, ADA-compliant safety barrier would be installed to protect visitors from the risk of falling to the lower screening area. The materials used for the barrier would be based those used in the Monument or its landscape features, such as the walls installed as part of the 2002 landscape plan, and would be determined during the design process.

Cuts would be made into the landscape adjacent to the Plaza to accommodate the gentle sloping pathways that would connect the existing circular paths to the Plaza above and the new visitor entry and screening point below. The rise of the landscape from the Monument Lodge to the Plaza would not be elevated

above the current elevation. Nevertheless, there would be a cut into the landscape reaching a depth of 14 feet directly adjacent to the sloping pathways.

This alternative would require the removal of a large volume of earth from the east edge of the Plaza. Because the Monument's foundations do not extend down to bedrock and it currently rests on a deposit of fill, it has been historically vulnerable to heaving and differential settlement. In addition, the Monument is subject to high wind forces, the effects of which are mitigated in part by the weight of the earth holding it in place. Therefore, any large earth-moving activities around its perimeter pose a risk and great care must be taken to ensure the Monument remains stabilized and balanced in equilibrium.

Any change in weight on the east side of the foundation would require an equal change on the west side. In other words, the weight of the soil removed on the east side of Alternative B would require a similar removal of soil, equal in weight to the volume removed on the east, and in a mirrored location in the turfgrass area off the Plaza. To compensate for the visual impact, the soil could be removed and replaced with a lightweight concrete fill or on the east side heavier elements could be introduced within the envelope of the new construction.

Alternative B was not selected because the impacts to soils and cultural resources resulting from the cuts into the Monument foundation, lawn, and mound would alter the historic fabric and the topography and would be greater than those resulting from the selected alternative. The selected alternative does not remove historic fabric from the Monument and touches the Monument in a way that is completely reversible and requires the least amount of structural changes to the cultural landscape.

Alternative D: Ramp in Plaza

Visitor queuing, screening, and ingress to the Monument would occur via a ramp set in the Plaza. A subterranean entrance would provide space for visitor screening and convey visitors to the Monument via the Monument elevator, which would be extended down to the lower level.

The ramp would remove a portion of the Plaza including several visitor benches. In addition, a 42 inch-high, ADA-compliant railing would be set in the Plaza around the incision of the ramp to protect visitors from falling to the lower screening area. The railing materials would be based on those used in the Monument or its landscape features, such as the walls installed as part of the Laurie Olin landscaping plan, and would be determined during the design process.

Similar to Alternative B, Alternative D was not selected because the impacts to soils and cultural resources resulting from the cuts into the Monument foundation, lawn, and mound would alter the historic fabric and the topography and would be greater than those resulting from the selected alternative.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

The NPS is required to identify the environmentally preferable alternative in its NEPA documents for public review and comment (NPS 2001b). According to the CEQ regulations implementing NEPA (43 CFR §46.30), the environmentally preferable alternative is the alternative "that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources." The environmentally preferable alternative is identified upon consideration and weighing by the responsible official of long-term environmental impacts against short-term impacts in evaluating what is the best protection of these resources. In some situations, such as when different alternatives impact different resources to different degrees, there may be more than one environmentally preferable alternative.

Alternative C is also the environmentally preferred alternative because it has the least impact on historic and cultural resources. Unlike Alternatives B or D, it is reversible, which is preferable according to the Secretary of the Interior's Standards for the Treatment of Historic Properties. Alternative C also has the least impact to soils among the action alternatives because there would be no changes to the landscape beyond the footprint of the Plaza and no excavation or change to the topography.

The no action alternative would impact cultural landscapes/historic districts and structures due to the aesthetically deficient existing temporary entrance facility, its obscuring the east face entrance of the Monument, and adverse impacts to the views of the Monument from the east, south, and north.

Alternative B would require the removal of a large amount of soils on the east side of the Monument. In addition, geotechnical analysis performed for this alternative indicates that engineered solutions would be required to minimize movement of the foundation and entail balancing any change in weight loading on the east side of the foundation with an equal change on the west side. Consequently, an equally large amount of soil would need to be removed and replaced with lighter fill material on the west side of the Monument. In addition, Alternative B would require puncturing the foundation of the Monument to enable a subsurface point of entry on the east side.

Alternative D would not require removing or re-engineering earth from the Monument grounds, but it would require the removal and demolition of portions of the Plaza including two benches and multiple paving stones. In addition, Alternative D would also require puncturing the foundation of the Monument to enable a subsurface point of entry on the east side.

MITIGATION MEASURES

The NPS places strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the following protective measures will be implemented as part of the selected action alternative. The NPS will implement an appropriate level of monitoring throughout the construction process to help ensure that protective measures are being properly implemented and are achieving their intended results.

VISITOR USE AND EXPERIENCE

- The NPS shall prepare public interpretation and education materials that broadly address the historical development of the Washington Monument and its Grounds. Public interpretation and historical education media may include, but not be limited to wayside exhibits, reconstruction drawings, NPS-style brochures, and internet-based content. NPS shall include “What’s Going On?” informational signs to place on construction fencing for the duration of construction.
- NPS will continue periodic monitoring of elevation benchmarks on or near the base of the monument, prior to, during, and after construction and will make this information available to the public by request.
- Construction activity will be timed to minimize effects on planned special events occurring on the National Mall or in the project area.

PUBLIC SAFETY

- Construction workers and employees will follow an approved health and safety plan, which will adhere to all applicable laws, regulations, and NPS policies.
- Barriers and signs will be used around construction sites to divert the public from potential safety hazards.

SOILS

- Best management practices for erosion and sediment control will be employed during and after construction, including stabilization and re-vegetation after construction is completed.
 - During construction, exposed soils will be covered with plastic sheeting, jute matting, erosion netting, straw, or other suitable cover material to prevent soil erosion and movement during rain or wind events.

- Erosion containment controls, such as silt fencing and sediment traps (e.g., hay bales), will be used to contain sediment onsite.
- Replacement soil, which will be brought in from elsewhere, will not come from pristine sites and will be salvaged, in accordance with NPS policy.

VISUAL/AESTHETICS

- Ongoing review with regulatory agencies within the monumental core (District of Columbia Historic Preservation Office [SHPO], NCPC, and CFA) within the design development and Section 106 process will ensure that the proposed action blend as harmoniously as possible with the existing scale, context, and landscape in the project area.
- During construction, visual screening will be used to shield equipment during construction where appropriate and possible.

CULTURAL RESOURCES

- Throughout the design process, the NPS will continue to consult with cooperating agencies and consulting parties as defined in the Memorandum of Agreement (MOA) to ensure adverse effects to cultural resources are avoided, minimized, and mitigated to the maximum extent possible. (see Appendix D)
- Impacts to the cultural landscape will be minimized by ensuring that the operation and construction of a facility for Washington Monument visitor security screening is conducted in a manner consistent with *The Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for the Treatment of Cultural Landscapes*.
- Impacts to historic structures will be minimized by ensuring that work on the Washington Monument including its foundation and Plaza is conducted in a manner consistent with *The Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for the Treatment of Cultural Landscapes* (NPS 1992).
- If archeological resources are discovered during construction, all work in the immediate vicinity of the discovery will be halted until the resources can be identified and documented and an appropriate mitigation strategy can be developed. Consultation with the NPS, and/or the NPS regional archeologist and the SHPO will be coordinated to ensure that the protection of resources is addressed. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (25 USC 3001) of 1990 will be followed.

WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As documented in the EA, the NPS has determined that the selected alternative, alternative 4 (NPS preferred alternative), can be implemented without significant adverse effects. As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an Environmental Impact Statement (EIS): Visitor use and experience, public safety, park management and operations, and visual resource will experience both beneficial and adverse impacts as a result of implementing the selected alternative. Soils and cultural resources will experience adverse impacts as a result of implementation of the selected alternative. However, no significant impacts were identified that will require analysis in an EIS. Impacts that will occur to the affected resources are summarized as follows:

Visitor Use and Experience: The new screening facility will be more compatible with the aesthetics of the Monument and surrounding facilities, resulting in improved aesthetics and long-term beneficial impacts

to visitor use and experience. However, long-term adverse impacts will result from the obstruction of the original view of the Monument's intersection with the Plaza on the eastern face and visitor congestion on the Plaza. Short-term minor to moderate adverse impacts will vary based on the location and duration of construction of cumulative projects.

Public Safety: The continued adequate screening and protection provided by the facility in the selected alternative will result in long-term beneficial impacts to public safety. In addition, the new facility will help meet long-term security management goals, resulting in long-term beneficial impacts. Short-term minor adverse impacts to public safety could result from construction activities, but these impacts will be minimized by contractors following approved NPS health and safety plans.

Park Management and Operations: Under the selected alternative, Park operating and maintenance costs are expected to be lower than they are under Alternatives A, B, and D resulting in long-term beneficial impact to Park management and operations. Implementation of the selected alternative will have short-term minor adverse impacts to Park management and operations due to the disruption of the Park and requirements for construction-activity coordination and supervision.

Visual Resources: Implementation of the selected alternative will result in long-term moderate adverse impacts to views and vistas as a result of the temporary screening facility's placement blocking the visual intersection of the Monument with the Plaza. There will also be long-term beneficial impacts to visual resources as a result of the replacement of the temporary screening facility with a new facility that is consistent with the aesthetics and visual character of the Monument and surrounding areas.

Soils: Implementation of the selected alternative will require construction of a foundation below the frostline, which in the Washington, D.C., area is approximately 2.5 feet below grade. To do so, the Plaza would need to be penetrated, and footers for the structure would be placed. The weight-loading requirements for the Plaza are expected to be relatively light, similar to the temporary structure currently in place, and the structure could be supported by the fill without affecting the Monument foundations. Heavier structures will require further analysis to prevent impacts to the Monument. There will therefore be limited adverse impacts to soils as a result of implementation of the selected alternative, related to the small amount of soil that would be disturbed by excavation and compaction to place the foundation for the pavilion. Geothermal well installation at the site will have a negligible, adverse impact to soils through creation of two to three 400-500-foot wells, and through any additional excavation required for a subsurface mechanical room. A limited amount of soils will be disturbed, resulting in a long-term negligible adverse effect on soils and an associated short-term negligible effect on soils during construction that will be further minimized through the use of erosion and sediment control best management practices.

Cultural Resources: As a result of implementing the selected alternative, there will be a moderate long-term adverse impact to cultural landscapes/historic districts and structures because the historic east doorway will be obscured; the new entrance facility will intrude on views of the Monument from the east, south, and north; the plan will be asymmetrical; and the simplicity of an obelisk rising from the ground will be compromised. The affected portions of the Plaza will be replaced in kind after the installation of necessary water, sewer, and heating pipes.

Degree of effect on human health or safety: The selected alternative will not adversely affect public health or safety. Short-term adverse impacts to public safety could result from construction activities, but these impacts will be minimized by contractors following approved NPS health and safety plans. During construction, barriers and signs will be used around the construction sites to divert the public from potential safety hazards.

Overall, public safety will be improved by the continued adequate screening and protection provided by the facility resulting in long-term beneficial impacts to public safety. The new facility will help the NPS to meet long-term security management goals.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, wetlands, prime farmlands, wild and scenic rivers, or ecologically critical areas: No wetlands,

prime farmlands, wild and scenic rivers, ecologically critical areas, sites sacred to American Indians, or other significant ethnographic resources occur within or adjacent to the Project Area, and none will be affected by the actions associated with this alternative as a result.

Although a small portion of the southwest corner of the Monument grounds is located within designated floodplains, the project area is not in the floodplain. Therefore, a floodplain statement of finding was not necessary for this project because the selected alternative will not affect floodplain functions or values, affect floodwater flows, or involve construction of structures that could be affected by flooding.

Historic or Cultural Resources

A multitude of cultural resources are located within the project area or adjacent to it and have been included in the defined Area of Potential Effect (APE), ranging from cultural landscapes, individually listed historic properties, monuments and memorials, historic districts, and statues. Forty individual historic properties and memorials, seven cultural landscapes, and seven historic districts are within the official APE (including the primary and secondary APE), all of which are enumerated in Chapter Three of the EA. The selected alternative has the potential to directly affect the cultural landscape and historic districts and structures associated with the Washington Monument Grounds and the historic resources contained within. Affects would be long term and moderate, but would be designed to be reversible. Affects to archeological resources are unlikely. Geothermal wells may penetrate into undisturbed layers that could contain archeological resources, but the limited impact area would make this disturbance unlikely to alter the integrity of any archeological sites to the point where their National Register status would be compromised.

Degree to which effects on the quality of the human environment are likely to be highly controversial: No highly controversial effects in terms of scientific uncertainties as a result of the selected alternative were identified during the preparation of the EA or by the public during the public comment period.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks: No highly uncertain, unique, or unknown risks were identified during either preparation of the EA or through public comment.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration: The selected alternative neither establishes a NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts: Implementation of the selected alternative will have no significant cumulative impacts. As described in the EA, past, present, and future actions and projects within the project area that could affect visitor use and experience, public safety, park management and operations, soils, visual resources, and cultural resources include National Museum of African American History and Culture (NMAAHC), Martin Luther King, Jr. Memorial (MLK), Dwight D. Eisenhower Memorial, American Veterans Disabled for Life Memorial (AVDLM), Vietnam Veterans Memorial Center, Lincoln Memorial Reflecting Pool Rehabilitation, Constitution Avenue Street Improvements, Madison Drive Streetscape Improvements, Jefferson Seawall Rehabilitation, Potomac Park Levee Project, Washington Monument Earthquake Damage Repairs, Kutz Bridge Rehabilitation, Installation of Capital Bikeshare Stations, National Mall Turf and Soil Reconstruction, Sylvan Theater Project, Constitution Gardens Project, various security upgrades, and the National Mall Plan. The cumulative impacts conclusions were reached for the following resources:

Visitor Use and Experience: Implementation of the selected alternative will have long-term beneficial and minor adverse impacts. When combined with the long-term beneficial and long-term minor adverse impacts to visitor use and experience resulting from implementation of the selected alternative, there will be a long-term beneficial cumulative effect.

Public Safety: When combined with the long-term beneficial and long-term minor adverse impacts to public safety resulting from implementing the selected alternative, overall long-term beneficial

cumulative impacts will occur with some of the benefits being offset slightly by the minor adverse impacts from this alternative.

Park Management and Operations: When impacts to Park management and operations from past, present, and reasonably foreseeable future actions are considered along with the short-term impacts that will result from implementation of the selected alternative, there will be short-term minor adverse cumulative impacts to Park management and operations. When impacts to Park management and operations from past, present, and reasonably foreseeable future actions are considered along with the long-term beneficial impacts of implementing the selected alternative, there will be a long-term beneficial cumulative effect to Park management and operations.

Soils: Implementation of cumulative action projects will result in improved protection to soil resources at the project site and long-term beneficial cumulative impacts on soils. The negligible short- and long-term adverse impacts under the selected alternative will minimally lessen the long-term beneficial cumulative impacts to soils, but the overall cumulative impact on soils will be beneficial.

Visual Resources: When combined with the long-term beneficial and long-term moderate adverse impacts to visual resources resulting from implementation of the selected alternative, there will be a net long-term beneficial cumulative effect, lessened somewhat by the long-term moderate adverse impacts of this alternative.

Cultural Resources: Long-term moderate adverse impacts to cultural landscapes/historic districts and structures will result from implementation of the selected alternative. In combination with the largely long-term beneficial impacts that have resulted from the cumulative actions, the selected alternative will have a noticeable adverse contribution to the overall long-term beneficial impacts, but will not change the combined impact.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources: NPS has coordinated with state and federal agencies through the Section 106 process to mitigate adverse impacts to historic and cultural resources resulting from the implementation of the selected alternative. Section 106 consultation was initiated with consulting parties in November 2010 to introduce the project. Section 106 consulting parties meetings were held over the course of the project in March 2011, December 2011, February 2011, September 2012 and June 2013. Five options were presented to the Section 106 consulting parties and the Commission of Fine Arts (CFA) in October 2012. Three of these alternatives in addition to the no action alternative were carried forward for analysis in the EA. In spring 2013, two concepts for the Pavilion on the Plaza option were developed and presented to CFA in June 2013. CFA awarded a Concept Approval for one of these options: the Portal option. In conjunction a Memorandum of Agreement (MOA) was drafted in March 2013. The MOA was signed in on 10 February 2014.

Although implementation of the selected alternative will result in long-term adverse impacts to historic and cultural resources, if future security conditions change, the selected alternative is reversible.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat: As described in the EA, because of the urban nature of the site and the fact that the proposed activities will be located entirely within previously disturbed or maintained landscapes, no impacts to any state- or federally-listed species are expected from implementation of the selected alternative. On October 14, 2010, the National Capital Region of the NPS sent letters to both the U.S. Fish and Wildlife Service and the District Department of the Environment regarding the potential for any state- or federally-listed species that could be affected by the Lincoln Memorial Reflecting Pool rehabilitation. On December 29, 2010, the USFWS responded that other than transient species, no proposed or federally listed species are known to exist in the project area. The District Department of Environment did not provide further updates or comments in response to this letter.

Whether the action threatens a violation of federal, state, or local environmental protection law: The selected alternative violates no federal, state, or local environmental protection laws.

PUBLIC INVOLVEMENT

Public scoping for the Washington Monument Security Screening EA began November 2, 2010, and concluded March 31, 2011. During this time, a public scoping meeting was held on November 8, 2010, at the National Capital Region Headquarters at 1100 Ohio Drive SW, Washington, D.C., 20242. Notice of the public meetings was posted on the NPS Planning, Environment, and Public Comment website (PEPC). Approximately 30 people attended the meeting, including representatives from the National Coalition to Save Our Mall, National Capital Planning Commission, the Guild of Professional Tour Guides, the Committee of 100, the District of Columbia State Historic Preservation Officer (SHPO), and Cultural Tourism in DC. The purpose of this meeting was to solicit public input on the purpose, need, and objectives of the project, major issues, and potential alternatives. Following the public meeting and for the remainder of the public scoping period, informational signage was placed outside of the Monument Lodge to solicit input from the visiting public.

At the public meeting and during the 150-day public scoping period, NPS received a total of 51 comments from a combination of unaffiliated individuals and associations. The commenters generally articulated concern for the Monument's structural stability and, in turn, visitor safety. Concern was also expressed about impacts to visitor use and experience and visual resources. Several commenters expressed interest in increased visitor amenities and interpretive opportunities. Numerous commenters voiced concern or support for various alternatives and many even suggested new alternatives.

After the initial scoping meeting and following conclusion of the public scoping period, the project team reviewed and analyzed the public comments and used this input to develop new alternatives. Following the alternatives development process, a second comment period began September 6, 2011, and concluded November 30, 2011. During this time, another public meeting was held on September 20, 2011, at Union Station at 50 Massachusetts Avenue, NE, Washington, DC, 20002 in the Columbus Club from 4:30 p.m. to 6:30 p.m. The purpose of the meeting was to provide information to the public about the design alternatives and to gather public input regarding the alternatives presented at the meeting.

At the public alternatives meeting and during the following public comment period, 20 comments were received and several information articles were submitted. Commenters expressed concerns about the structural stability of the Monument and what would happen as a result of any alternatives requiring underground activities. Many commenters had questions about the damage from the August 2011 earthquake and how it may have affected the Monument's stability. Various commenters expressed support for or concern about the alternatives presented.

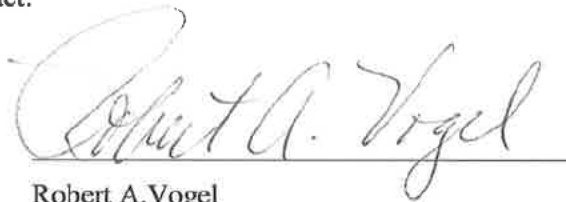
The EA was made available for public review and comment on July 26, 2013 through September 9, 2013. The EA was also placed on the NPS's PEPC website. During the public comment period, the NPS received 8 pieces of correspondence from the public and one correspondence from an agency commenting on the proposed action. Public comments and NPS response to comments are shown in Attachment 2.

CONCLUSION

The NPS has selected alternative C for implementation. In light of the impacts described in the EA for the project and with guidance from NPS *Management Policies 2006*, natural and cultural resources information, professional judgment, and considering agency and public comments, the impacts that will result from the selected alternative will not impair any Park resources and values (see attached Impairment Determination). The selected alternative does not constitute an action that normally requires preparation of an EIS. The selected alternative will not have a significant effect on the human environment. Adverse environmental impacts that could occur to Park natural and cultural resources are negligible to moderate in intensity. There are no significant impacts to visitor use and experience, public safety, park management and operations, soils, visual resources, and cultural resources. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the selected alternative will not violate any federal, state, or local environmental protection law.

Based on the foregoing, an EIS is not required for this action and will not be prepared. This is a finding of no significant impact.

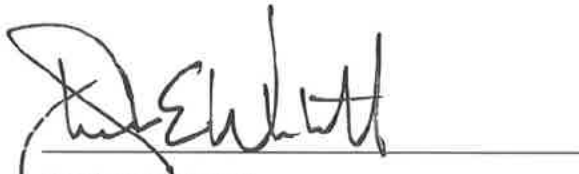
Recommended:



Robert A. Vogel
Superintendent
National Mall and Memorial Parks

2-13-14
Date

Approved:



Stephen Whitesell
Regional Director
National Capital Region

2.13.14
Date

ATTACHMENT 1: NON – IMPAIRMENT DETERMINATION

The NPS has determined that implementation of the selected alternative will not result in impairment of park resources and values of the National Mall and Memorial Parks and the Washington Monument. Pursuant to the NPS Guidance for Non-Impairment Determinations and the NPS NEPA Process (October 31, 2011), a non-impairment determination for the selected alternative is included here as an appendix to the Finding of No Significant Impact.

The prohibition against impairment originates in the NPS Organic Act, which directs that the NPS shall:

promote and regulate the use of the...national parks...which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.

According to *NPS Management Policies 2006*, an action constitutes an impairment when its impact “would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values” (sec. 1.4.5). To determine impairment, the NPS must evaluate “the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts” (sec. 1.4.5).

National Park System units vary based on their enabling legislation, natural and cultural resources present, and park missions. Likewise, the activities appropriate for each unit and for areas in each unit also vary. For example, an action appropriate in one unit could impair resources in another unit. The Washington Monument and the National Mall and Memorial Parks include much of the monumental core of Washington, D.C. In 1933-1934, federal parkland in the District of Columbia was consolidated under the management of the NPS. In the years that followed, a number of major memorials were added to the area that would come to be known as the National Mall including the Washington Monument. Today, the Washington Monument, along with the other memorials and areas of the monument core including the National Mall are managed by the NPS.

As stated in the *NPS Management Policies 2006* (sec. 1.4.5), an impact on any park resource or value may constitute an impairment, but an impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; or
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- identified in the park’s general management plan or other relevant NPS planning documents as being of significance

The resource impact topics carried forward and analyzed for the NPS selected alternative in the EA, and for which an impairment determination is contained in this appendix, are soils, visual resources, historic structures and districts, and cultural landscapes. The following describes each resource or value for which impairment is assessed and the reasons why impairment will not occur.

Soils – The selected alternative will disturb a small amount of soil for the excavation of foundation and eventual compaction caused by the foundation of the pavilion. In addition, as a result of the installation of geothermal wells and their associated mechanical room, a limited amount of soils would be disturbed and removed. Effects to soils during construction will be minimized through the use of erosion and sediment control best management practices. Overall, the amount of soils disturbed as a result of the selected alternative is less compared to the other action alternatives carried forward for analysis. In addition, the implementation of the selected alternative will not diminish the productivity of the soil of the

greater project site, will be localized to the footprint of the new facility, and will not harm the long-term integrity of the soils resources in the project area. Therefore, implementation of the selected alternative will not constitute impairment of soils in the project area.

Visual Resources – Although the new visitor security screening facility will add a semi-permanent component to the base of the Monument, it will be designed and constructed such that the materials and design will be consistent with the aesthetics and visual character of the Monument and surrounding buildings. The facility could be removed without damage to the Monument when security conditions permit. In addition, though the selected alternative will obscure the visual intersection of the base of the Monument with the Plaza on the eastern face of the Monument, the facility could be removed, and view of this visual intersection restored. Although implementation of the selected alternative will have long term adverse impacts to the visual resources of the Monument, this alternative is reversible and will not constitute impairment to visual resources.

Historic Structures and Districts – There will be no impairment to any historic structures or districts within the National Mall and Memorial Parks as a result of implementing the selected alternative. There will be a moderate long-term adverse impact to historic districts and structures because the historic east doorway will be obscured; the new entrance facility will intrude on views of the Monument from the east, south, and north; the plan will be asymmetrical; and the simplicity of an obelisk rising from the ground will be compromised. The affected portions of the Plaza will be replaced in kind after the installation of necessary water, sewer, and heating pipes. In addition, although implementation of the selected alternative will result in long-term adverse impacts to historic structures and districts, if future security conditions change, the selected alternative is reversible and would in turn reverse long-term adverse impacts. Thus, the selected alternative does not constitute impairment to historic structures and districts.

Cultural Landscapes – Similar to the impacts to historic structures and districts, there will be long-term moderate adverse impacts to cultural landscapes as a result of the implementation of the selected alternative. However, if future security conditions change, the selected alternative is reversible and would in turn reverse long-term adverse impact. Thus, the selected alternative does not constitute impairment to cultural landscapes.

Summary

The NPS has determined that the implementation of the NPS selected alternative will not constitute an impairment of the resources or values of the Washington Monument and National Mall and Memorial Parks. As described above, adverse impacts anticipated as a result of implementing the selected alternative on a resource or value whose conservation is necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or identified as significant in the National Mall Plan or other relevant NPS planning documents, will not constitute impairment. This conclusion is based on consideration of the park's purpose and significance, a thorough analysis of the environmental impacts described in the EA, the comments provided by the public and others, and the professional judgment of the decision-maker guided by the direction of the NPS *Management Policies 2006*.

ATTACHMENT 2: NPS RESPONSE TO COMMENTS

Washington Monument Visitor Security Screening Public Review EA Comments

Comment #	Comment	NPS Response
1	The continuation of the use of the current temporary structure is clearly the best choice to avoid disruptions and minimize cost. The best way to check visitors is the way it is done now, in the current screening facility outside the Monument.	The existing facility was intended as a temporary structure and does not meet the Monument's long-term security and cultural resource management requirements developed by the National Park Service (NPS) and the United States Park Police (USPP).
2	By your own estimates, Alternative C - Freestanding Plaza Pavilion, which the EA is advocating, would cost \$4,549,214. A new structure is unnecessary and this expenditure is unjustified.	The benefits of the selected alternative (Alternative C) have been documented in the Environmental Assessment (EA), specifically within the Value Analysis, which is appended to the EA. The selected alternative is the lowest cost alternative that meets the needs and fulfills the long-term security and cultural resource management requirements for the Monument.
3	The new glass or glass and concrete pavilion would be a larger and more visually obtrusive presence than the existing security structure and so would add to the current adverse impacts of that structure on the Washington Monument.	Although the new facility under the selected alternative would be taller than the existing temporary facility, the change in height compared to the total height of the Monument would be minimal. Impacts to the Monument resulting from the new facility will be minimized or mitigated through implementation of the Memorandum of Agreement (MOA) design review process.
4	Unfortunately, the EA is vague in specifying the dimensions of the structure and the depth of any foundation work required to implement this option. For example, unlike the existing temporary structure, the Option C structure would likely require a new foundation, which is unspecified as to its depth and soil impacts. The adverse impact of Option C described in page 2-20 with respect to "cultural landscape/historic district" is self-serving in stating the structure would "not exceed the existing footprint" but gives no specificity regarding its foundations or height within that footprint.	The NPS shares your concerns. The design details will be worked out as the design process progresses. Any impacts to the Monument resulting from the new facility will be minimized or mitigated through the implementation of the Memorandum of Agreement (MOA) review process. Impacts are not expected to exceed moderate levels.
5	Potential threats to the Monument foundation. It appears that this glass or glass and concrete structure would require excavations to create new footings and so like Options B, D, and E could pose an unacceptable threat to the Monument's stability.	Please see response to comment #4.

Comment #	Comment	NPS Response
6	<p>Visual impact. In addition to being an even larger presence than the existing facility on the sensitive Washington Monument grounds, the structure's glass walls and roof would reflect sunlight onto the surroundings. At night, unlike the existing opaque structure, the cube would be a glowing object at the foot of the Monument. The EA states (section 2-4) that the roof would be clear to allow visitors a view of the Monument, thus potentially casting strong upward light on the Monument and detracting from the simplicity of the obelisk and its current lighting system.</p>	<p>Please see response to comment #3. The potential for visual impacts resulting from glare will be mitigated throughout the design process and the selection of materials, specifically treatments and coatings that can be done to eliminate the potential for glare. In addition, an architectural lighting specialist will be engaged to ensure that the site lighting is designed in accordance with the Illuminating Engineering Society of North America standards, NPS lighting design standards, and is compatible with the nighttime illuminations of other monuments and memorials on the National Mall.</p>
7	<p>Visitor experience. A glass enclosure would potentially create an oppressively hot environment for visitors during summer months.</p>	<p>The NPS shares your concerns. Any potential impacts to visitor experience resulting from implementation of the selected alternative will be mitigated through the design process. In addition, as USPP and NPS employees will be occupying the facility during its hours of operation, the facility will comply with Occupational Safety and Health Administration temperature requirements.</p>
8	<p>Cost. The \$4.5 million price tag in an era of reduced budgets and staff cutbacks could be better spent on more urgent Mall maintenance and upgrade needs.</p>	<p>Please see response to comment #2.</p>
9	<p>We also request that a "moat" encircling the Washington monument be considered as a security barrier that can be aesthetically pleasing and functional with the use of recirculating water to the various ponds/lagoons. This "moat" and canal method should also be considered as a security method for other soft targets in our Nation's capital like the Lincoln Memorial. With Washington being the nation's front yard to the world, let us make a point to beautify and remedy stagnant water problems while we protect our treasures with time proven methods such as moats and canals.</p>	<p>This suggested alternative would not meet the purpose and need of the project. A moat would not serve to mitigate for non-vehicular borne threats and the potential takeover of the monument. In addition, a permanent vehicular security barrier was constructed in 2006 and already serves the purpose of protection against vehicular borne attacks. Finally, a moat would not allow visitors access to the Monument, which is a fundamental component of both the Park's mission and NPS mission.</p>
10	<p>I would like to express my objections to the plan put forward by the National Park Service to build a new visitor screening facility at the Washington Monument. There is absolutely no requirement for it. The present facility is entirely adequate.</p>	<p>Please see response to comment #1. In addition, the need for the project is to meet the long-term security and cultural resource management requirements at the Monument. The existing temporary facility does not fully meet those needs.</p>

Comment #	Comment	NPS Response
11	<p>One of the arguments put forth for replacement of the present facility is that the new facility would enable a greater number of visitors to be screened per hour. My understanding is that the limiting visitor capacity is the elevators and the number of visitors that can be accommodated on the observation deck.</p>	<p>The ability to screen a greater number of visitors per hour is not part of the project purpose or need. The project purpose as stated in the EA is to improve the security and visitor flow at the Monument in a manner that preserves the character and visitor experience of the Monument and the Monument grounds. The project need is to meet the Monument's long-term security and cultural resource management requirements.</p>
12	<p>The park service wants to build an underground visitor center immediately adjacent to the Washington Monument. If they do that, they will undermine the already shaky foundation of the structure - which sits on filled-in land. The nature and depth of bedrock underneath is unknown. Any digging anywhere near the Washington Monument, as they propose, would weaken the structure's resistance to earthquakes.</p>	<p>The construction of an underground visitor center is outside the scope of this project. This project proposes to construct a visitor security screening facility. In addition, the selected alternative is Alternative C, the Freestanding Plaza Pavilion, which would be placed on the Monument plaza and not be constructed underground. Please also see response to comment #4 for a discussion of the corresponding foundation for this structure.</p>
13	<p>As it is, the structure is well protected against the only credible threat to it - from truck-borne explosives - through the usual obstacles.</p>	<p>The permanent vehicular barrier system was completed in 2006. However, this vehicular barrier system does not protect against the potential takeover of the Monument and other non-vehicle borne threats. As a result, the NPS constructed a temporary visitor security facility in 2001. The current project is needed to meet the Monument's long-term security and cultural resource management requirements.</p>
14	<p>Please provide responses to how comments provided in April 2013 on Draft EA were addressed.</p>	<p>Comments provided by NCPC in April 2013 were combined and deconflicted with NPS comments and revisions were incorporated into the final EA.</p>
15	<p>Does the Energy Independence and Security Act of 2007 (EISA) apply to the project? Stormwater management should be addressed in the EA. NCPC staff understands that EISA applies to federal projects of 5,000 square feet or more. What is the square footage of the WAMO project? If EISA applies, a short summary of how the project complies and will address stormwater management should be included.</p>	<p>EISA will be addressed during the design process as the design is fleshed out.</p>