

**DECISION NOTICE
AND
FINDING OF NO SIGNIFICANT IMPACT**

**WASHINGTON MONUMENT
PERMANENT SECURITY IMPROVEMENTS
ENVIRONMENTAL ASSESSMENT**

Responsible Agency:
National Park Service

Cooperating Agency:
National Capital Planning Commission

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Abstract:

The National Park Service (NPS) has published an Environmental Assessment (EA) to assess the potential consequences of the Washington Monument Permanent Security Improvements. XPS announces its decision, in accordance with -the National Environmental Policy Act of 1969, as amended (NEPA), Council on Environmental Quality (CEQ) Regulations 40 CFR Parts 1500-1508, NPS Director's Order-12(DO-12), and the National Historic Preservation Act of 1966, as amended (7~A). The purpose of this Decision Notice and Finding of No Significant impact (FONSI) is to communicate clearly consideration by the NPS of all reasonable alternatives, to communicate the NPS rationale for selecting the chosen alternative. to identify any mitigation measures to be implemented as a part of the selected alternative and to explain why the selected action will not have significant effects on the environment. Vie selected alternative is Alternative A, an underground visitor screening facility and passageway and a landscaped vehicle barrier system of walled terraces and pathways.

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I. BACKGROUND

The National Park Service (NPS) prepared the *Washington Monument Permanent Security Improvements Environmental Assessment* and made the EA available to the public for a review period from April 21 - June 21, 2002. The NPS prepared the EA in compliance, with the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulations implementing NEPA, the National Historic Preservation Act (NHPA), and the NPS Director's Order-12 (DO-12), and in cooperation with the National Capital Planning Commission (NCPC). This EA documents the alternatives considered for the proposed security improvements to the Washington Monument and its Grounds. The EA seeks to determine the potential impacts and recommended mitigation measures related to the proposed action, as well as a No Action Alternative- The EA addresses short-term construction-related impacts and long-term operational effects, as well as the cumulative impacts that would result from this and other projects within the study area.

The NPS has analyzed the technical and procedural components of this EA, along with the comments it received from the public, the reviewing agencies and others during the public comment period. This decision document presents the Decision Notice of the NPS selection of the preferred alternative and, consistent with Council on Environmental Quality regulations (43 CFR 1500), the NPS announcement that the preferred alternative results in a Finding of No Significant Impact (FONSI).

II. SUMMARY OF THE PROPOSED ACTION

Due to the high visibility and importance of the Washington Monument, increased national security concerns, and the prominence of the Monument and its setting, the NPS proposes permanent improvements to the current temporary security systems at the Washington Monument and its Grounds and related revisions to the 1993 Development Concept Plan. These improvements would include the construction of a permanent visitor screening facility to replace the interim facility located adjacent to the Monument, and the installation of a permanent vehicle barrier system to replace the temporary concrete jersey barrier system. The program also includes enhancement of the visitor experience as well as general improvements to the Monument Grounds.

The existing concrete jersey barriers and the interim visitor security facility obstruct important vistas to and from the Monument and its Grounds, intrude on the setting of this important national icon, and disrupt pedestrian circulation patterns. In addition, the current system requires

heavy personnel staffing by the U.S. Park Police. The pathways and facilities on the Monument Grounds also require updating. Walks and paths to the base of the Monument need to be made more accessible for persons with physical disabilities. Concession facilities on the site are inappropriately situated and restroom facilities are inadequate. In addition, conditions currently do not allow the provision of educational and interpretive programs and visitor services to meet NPS standards. Finally, while waiting to obtain tickets or to ascend the Monument, visitors to the Monument are completely exposed to the weather.

The November 2001 *Program Requirements for the Washington Monument Permanent Security Improvements* for the design and construction of a new permanent screening facility and vehicle barrier system, enhancement of the *visitor* experience and general improvements to the Monument Grounds include:

- improvement of security;
- enhancement of the visitor experience;
- provision of outdoor recreation opportunities;
- rehabilitation of the cultural landscape;
- improvement of accessibility;
- preservation of the Monument structure;
- rehabilitation of the Monument Lodge; and
- completion of the 1993 Development Concept Plan for the Washington Monument Grounds

III. AGENCY DECISION

Environmentally Preferred Alternative

CEQ regulations implementing NEPA require a federal agency to identify the alternative or alternatives that are considered to be environmentally preferable. In this case, the No Action Alternative appears to involve the fewest impacts to environmental and historical resources. However, this alternative would not satisfy the underlying purpose and need for the proposed action as it would not satisfy the NPS program requirements for permanent security improvements for the Washington Monument and its Grounds. Therefore, implementation of one of the two action alternatives is necessary to satisfy the purpose and need for the proposed action.

Of the two action alternatives, Alternative A would have the fewest adverse impacts and the greatest number of positive impacts. Under this alternative, the barriers and structures that detract from this historic landmark would be removed, pathways consolidated and the compacted soil improved. Therefore, Alternative A, the Below-Grade Alternative, is the environmentally preferred alternative.

Preferred Action Alternative

The NPS has selected Alternative A (the Below-Grade Alternative) as the preferred alternative from the EA. This is the development of an underground screening facility and underground

passageway to the Monument, a landscape vehicle barrier system of walled terraces with pedestrian pathways, and Grounds improvements, consistent with the its description in the EA. A graphic representation of Alternative A is shown on in the EA on page 3-5.

IV. RATIONALE FOR PREFERRED ALTERNATIVE

The criteria used by the NPS to select Alternative A (Below-grade Alternative) as the preferred alternative are contained in the November 2001 Program Requirements for *Washington Monument Permanent Security Improvements*. The preferred alternative (Alternative A) best meets the requirements by providing:

- Protection against acts of terrorism, vandalism, and espionage;
- A design which preserves the Monument structure (highest priority program requirement) not allowing modifications, attachments, or appendages of any type to the exterior surfaces of the structure, nor compromising the geotechnical stability of the Monument.
- A facility to safely screen potential visitors to the Monument and separate them physically from people outside the secured area;
- A vehicle barrier system located at least 200 feet from the *outer* comers of the Monument that can meet specified standards for stopping moving vehicles, while still allowing access for service and emergency vehicles;
- Consolidated ticketing functions and visitor services including education and interpretive areas, a bookstore, visitor queuing areas, and restrooms to improve the visitor experience and enhance the delivery of essential visitor services;
- A vehicle barrier system which allows pedestrian as well as bicycle traffic to flow through the barrier at numerous points, and encourage users to follow established paths between the Monument and surrounding streets and access points, while not precluding walking across the Grounds;
- Improvements to the Monument Grounds which retain its ability to continue as a critical *open space* element of the Monumental Core for public activities including First Amendment demonstrations, special events, concerts, and recreation including softball, jogging, and kite flying;
- Improvements to the Monument Grounds which preserve the quality of the cultural landscape with consideration of topography, adjacent roadways, aesthetic quality, and viewsheds; and
- A design which improves accessibility for physically challenged individuals in accordance with published codes and standards

Mitigation Measures

The implementation of the preferred alternative would result in a variety of short- and long-term impacts. Potential mitigation measures were identified in the EA to address environmental impacts. NPS also received a number of comments and mitigation suggestions from members of the public and from local, state, and federal agencies. All practicable means of avoiding or minimizing environmental harm from the selected alternative were adopted, through the program of mitigation, monitoring and enforcement outlined on the next page.

Impacted Areas	Mitigation Measures
Geophysical Resources	<ul style="list-style-type: none"> • Implement erosion and sediment control measures to protect surface waters, in compliance with DCRA. • Perform extensive and detailed geotechnical investigations and calculations [completed June 2002] • Continue NPS engineering analysis, of excavation and construction to ensure no harm to the Monument's integrity. • Balance cut and fill to minimize the import or export of soil. • Design and place the cut and fill of soil to result in no substantial net change in soil loads surrounding the Monument. • Design and implement structural additions to the Grounds to result in no net change in localized soil loads during construction or operation of the facilities.
Biological Resources	<ul style="list-style-type: none"> • Minimize the face area of proposed impervious surface features such as walking paths to the extent practicable to further reduce the potential for sedimentation and contamination impacts to surface waters. • Maintain existing materials storage for the U.S. Army Corps of Engineers flood control plan, which is not to be disturbed or removed during project construction or operation. • Confine heavy equipment to areas -of proposed development during construction to limit the disturbance of vegetation. • Revegetate disturbed or denuded areas to reduce the potential for erosion, and to accelerate the reestablishment of vegetation and enhance wildlife habitat • Implement best management practices (BMPs) for the identification, collection, transport, treatment, and disposal of hazardous materials and waste encountered, if any. • Use commercial power sources instead of portable generators for construction to minimize emissions, where feasible. • Apply water to active grading areas and unpaved roads as necessary to reduce or eliminate visible dust plumes. • Select truck haul routes for soil removal and construction materials that minimize impacts to residential noise receptors.
Cultural Resources	<ul style="list-style-type: none"> • Continue NPS consultation with the IJC-SHPO, ACB?, NCPC, and concurring parties to ensure that the project is undertaken in accordance with Secretary of Interior's Standards for Rehabilitating Historic Structures and Cultural Landscapes, pursuant to the Programmatic Agreement • Rehabilitate the Monument Lodge in accordance with the Secretary of Interior's Standards. • Install additions to the Monument Lodge that can be reversed with minimum damage to the historic fabric of the structure. • Use ground surfaces and planting materials of the highest quality and appropriateness to the historic precedents.

In addition to the mitigation measures identified above, Federal and District of Columbia permitting requirements for the construction, as listed in the EA, will be satisfied..

V. DESCRIPTION OF THE ALTERNATIVES

The EA addresses the environmental consequences of three alternatives, as follows: Alternative A (Below-Grade Alternative), Alternative B (Above-Grade Alternative), and Alternative C (No Action Alternative). The two build alternatives are intended to fulfill the security goals and objectives for the Monument through the three types of physical improvements: (1) visitor screening facility, (2) vehicle barrier system, and (3) Grounds improvements. The No Action Alternative addresses the status quo and assumes that no improvements would be implemented-

Alternative A (Below-Grade Alternative) includes:

- an underground screening facility ~and passageway to the Monument
- a landscaped vehicle barrier system of walled terraces and pathways
- removal of the above-ground visitor queuing area and temporary visitor screening facility located on the Monument plaza immediately adjacent to the Monument entrance
- removal of the existing ticket distribution kiosk on the west side of I 15th Street at Madison Drive
- removal of the unsympathetic addition to the Monument Lodge
- rehabilitation of the Monument Lodge and construction of a compatible new addition to serve as the portal to a new underground visitor screening facility containing a ticketing/lobby area, a security queuing and screening area, an educational and interpretive area, and other visitor services
- installation of a skylight to allow light into the screening facility and preserve the visual connection to the Monument
- an underground passageway would gently slope upward (less than 5 percent grade) to the Monument, connecting to a new elevator lobby constructed one floor beneath the existing lobby
- replacement of the concrete jersey vehicle barriers with a vehicular barrier system consisting of walled terraces 24 to 30 inches high around the Monument
- a berm, set back approximately 450 feet from the wall west of the Monument, to visually screen the wall from the west
- subtle regrading of the Monument's grassy mound to achieve a more uniform topography and provide easier pedestrian flow and universally accessible walkways
- replacement of the existing concrete at the plaza with high-quality paving materials and benches
- removal of the parking lot at 16'h Street and completion of the German-American Friendship Garden
- augmentation of landscape with new trees along the primary streets and other locations on the edges of the Grounds
- preservation and interpretation of the Jefferson Pier
- preservation of the existing recreational fields

Alternative B (Above-Grade Alternative) includes:

- visitor screening facility near the Sylvan Theater consisting of two buildings clustered in a less visible and less used part of the Grounds and containing ticketing, security queuing and screening, educational and interpretative displays, and other visitor services
- removal of the above-ground visitor queuing area and temporary visitor screening facility located on the Monument plaza immediately adjacent to the Monument entrance
- removal of the existing ticket distribution desk on the west side of 15th Street at Madison Drive
- an above-ground, double-fenced security pathway through which law enforcement personnel would escort groups of screened visitors to a double-locked door at the entrance to the Monument
- replacement of the existing jersey barriers with a vehicular barrier system consisting of security bollards along the 1.25-mile perimeter of the Monument Grounds
- rehabilitation of the Monument Lodge, including removal of the unsympathetic addition, and improvements to the Washington Monument Grounds, including replacement of the asphalt paving at the plaza with grass and a low granite wall, removal of the parking lot at 16th Street and completion of the German-American Friendship Garden

Alternative C (No Action Alternative) would retain the existing structures and elements of the Washington Monument Grounds in their existing use and condition. There would be no new development or reconfiguration of facilities. Specifically, the No Action Alternative does not involve a return to a previous condition, but involves the continued use of existing temporary measures for Monument security, visitor screening and access, and vehicle barriers. The existing security system, which consists of NPS and U.S. Park Police personnel identifying, grouping, and isolating ticketed tour members in the plaza around the Monument, would continue; the interim screening structure located adjacent to the base of the Monument and temporary concrete jersey barrier system would remain. Under the No Action Alternative, paths on the Monument Grounds would remain unimproved in their current locations. The parking lot on the northern portion of the Grounds at 16th Street would remain and the German-American Friendship Garden would not be completed.

In addition to the three alternatives described above, additional alternatives were considered in the EA. These additional alternatives were eliminated from further consideration because they did not satisfy the purpose and need of the proposed action. A series of functional goals and objectives were established at the onset of the planning process, as enumerated in the November 2001 *Program Requirements for the Washington Monument Permanent Security Improvements* and distributed by the NPS. These objectives included improvements to security, visitor flow, recreation, cultural landscape, accessibility, and the Monument structure. Alternatives A and B were assessed due to their potential to fulfill the program goals and objectives. The No Action Alternative was assessed as required by NEPA, but does not satisfactorily meet any of the program goals and objectives for permanent security improvements.

VI. ENVIRONMENTAL CONSEQUENCES

The construction of permanent security improvements to the Washington Monument and its Grounds is not expected to result in significant adverse impacts on the environmental cultural, or socioeconomic resources. The potential environmental consequences (summarized in EA Section ES-5) and proposed mitigation are described in detail in the EA. The following are summaries of the most notable environmental consequences for the two action alternatives: Alternative A (Below-grade Alternative) and Alternative B (Above-grade Alternative). Where no impacts are mentioned for a given resource area, there were no substantive issues of concern resulting from the implementation of each of the alternatives. The environmental consequences of Alternative C are described in EA.

Alternative A (Below-grade Alternative)

The placement of visitor screening and access facilities underground would improve the security of the Washington Monument. Underground facilities would increase the distance between visitor screening functions and the Monument, and physically separate screened visitors from unscreened visitors. In addition, those security improvements would reduce demands on the U.S. Park Police and eliminate the stationing of security vehicles on the Monument Grounds.

The construction of underground visitor screening and access facilities would result in a negligible change to the bearing force of the Monument on the underlying clay layer, thereby preserving the structural integrity of the Monument and having a positive impact on historic resources.

Underground facilities for visitor queuing would preserve the cultural and visual landscape, enhance the interpretive experience of visitors, and still allow visitors an above-ground experience before and/or after an internal Monument tour, in addition, removing the temporary screening facility, eliminating the unsightly jersey barriers, replacing the unsympathetic external additions to Monument Lodge, removing the existing parking lot, realigning and increasing the accessibility of pedestrian walkways and the plaza, and replacing the plaza asphalt with more appropriate materials would have positive visual impacts and would improve the visitor experience.

Alternative A would also allow the German American Friendship Garden to be completed and fulfill objectives of the, Comprehensive Plan for the National Capital.

Any contaminated soils identified within the proposed areas of soil cut would be carefully removed, transported and deeply buried in locations of proposed fill, in accordance with applicable Federal and District of Columbia regulations for handling contaminated materials. Construction impacts would all be temporary in duration and would be mitigated. For example, temporary impacts to soils from erosion would be minimized implementation of erosion and sediment control measures. Sod or trees removed during construction would be revegetated and supplemented. Construction equipment would be strictly confined to areas of proposed *development to limit* disturbance to vegetation. Water would be used on active grading areas and

unpaved roads to eliminate visible dust plumes. Best management practices and construction procedures would be implemented.

Additional information on environmental consequences is summarized on pages 14-15 of this Decision Notice/FONSI. Overall, Alternative A would result in many positive impacts on the cultural and socioeconomic resources with only a few minor detrimental impacts on natural resources. (F-A pages ES-5-9)

Alternative B (Above-grade Alternative

The placement of visitor screening and access facilities above ground near the Sylvan Theatre would improve the security of the Washington Monument by increasing the distance between visitor screening functions and the Monument but would adversely impact the current and expected visitor circulation patterns. Additionally, under Alternative B it would be difficult to physically separate screened visitors from unscreened visitors because of the vulnerability of the double-fenced security pathway.

The construction of above ground visitor screening and access facilities would result in a negligible change to the bearing force of the Monument on the underlying clay layer, thereby preserving the structural integrity of the Monument and having a positive impact on historic resources.

Above ground facilities for visitor queuing would enhance the interpretive experience of visitors and allow visitors an above-ground experience before and/or after an internal Monument tour, but would not preserve the cultural and visual landscape. Removing the temporary screening facility, eliminating the unsightly jersey barriers, replacing the unsympathetic external additions to Monument Lodge, removing the existing parking lot, and replacing the plaza asphalt with more appropriate materials would have some positive visual impacts, and would somewhat improve the visitor experience. However, the above ground double-fenced security pathway, the perimeter bollards, and the new above ground structures at the Sylvan Theatre would have a major negative impact on the cultural and visual landscape.

Under Alternative B, the double-fenced pathway would create major detrimental impacts to recreation and pedestrian circulation by introducing a permanent obstruction to the southeast corner of the Grounds and preventing circumnavigation of the Monument at the plaza. In addition, the remote location for ticketing and access away from the primary pedestrian circulation route would not be easily identifiable for visitors.

Furthermore, while this alternative would allow the German-American Friendship Garden to be completed, the perimeter bollards would have moderately detrimental impacts on staging for recreation, special events, First Amendment activities and festivals. Finally, the new facilities would moderately disturb grasslands (sod) and have a major impact on trees in the southeast corner and the roots of trees along the perimeter of the site.

Any contaminated soils identified within the proposed areas of soil cut would be carefully removed, transported and deeply buried in locations of proposed fill, in accordance with applicable Federal and District of Columbia regulations for handling contaminated materials-

Other construction impacts would be temporary in duration and would be mitigated. For example, temporary impacts to soils from erosion would be minimized implementation of erosion and sediment control measures, Sod removed during construction would be revegetated. Construction equipment would be strictly confined to areas of proposed development to limit disturbance to vegetation. Water would be used on active grading areas and unpaved roads to eliminate visible dust plumes. Best management practices and construction procedures would be implemented.

Overall, Alternative B would result in a few positive impacts on the cultural resources by removal of *the* existing jersey barriers and temporary screening facility but would create greater negative impacts as a result of the double-fenced security pathway. (EA pages ES-5-9)

VII. AREAS OF CONCERN

In making its decision to select the preferred alternative, Alternative A, and in reaching its Finding of No Significant Impact, the NPS considered issues raised by the public during the EA public review and comment period as well as issues raised by the Commission of Fine Arts (CFA) and the consulting parties to the Programmatic Agreement signed pursuant to Section 106 of the NEPA.

Consideration of Viable Alternatives

While presented as comprehensive development strategies, the alternatives in the EA comprise four types of physical improvements including visitor screening facilities, vehicular barrier systems, access to the Monument for screened visitors, and Grounds improvements. Other options for either visitor screening facilities, vehicular barrier systems or access for screened visitors have been suggested by comments on *the* EA, the CFA and the consulting parties to the Section 106 Programmatic Agreement. Comments on the EA also suggested that additional comprehensive options, which recombine various component improvements from the alternatives in the EA, should be addressed. However, the impacts of the component improvements in Alternatives A, B, and C have already been assessed- Creating permutations of the components already assessed would not be beneficial. Therefore, the NPS has further analyzed only alternative options for visitor screening facilities, vehicular barriers, or access to the Monument for screened visitors. Finally, several visitor screening and vehicle barrier improvements were considered as alternatives to the respective improvements proposed in Alternatives A and B. The most notable of these improvement options are discussed as "alternatives considered but eliminated!" in section 3.5 of the EA- The descriptions below summarize options for visitor screening and vehicle barrier improvements that have been suggested by the public as alternatives to the improvements proposed in Alternatives A and B of the EA:

Visitor Screening Facility Internal to Monument

This alternative would require an opening to be placed in the west wall of the Monument. Although this portal existed as part of the original construction of 152 feet of the Monument that was completed between 1848 and 1853, it was sealed as part of the decision to revise the original

Robert Mills design. This portal was included as a part of the colonnade perimeter that Mills had designed. When Colonel Thomas Casey made the decision in 1878 to erect a simple obelisk without ornamentation or the colonnaded structure, the design revision resulted in the simplest form of the obelisk with one door facing east. The completed Washington Monument never had a western portal which presents significant historic preservation concerns to introduce one.

In this alternative, the reopening of the western portal is required to achieve a one-way flow of visitors. A magnetometer and small x-ray machine would * be placed in the space between the eastern opening and the entrance to the elevator lobby and would be contained with blast doors at both ends. Visitors would still queue outside the Monument and would be admitted for screening one at a time until the elevator was full for the ascent to the top of the Monument.

The major factor in rejecting this alternative is that it does not even minimally meet the security objectives of the project. Security experts confirm that time and distance are critical factors in dealing with a terrorist incident. That is, the farther the security screening is from the target the better. Thus, conducting the screening within the target violates the first principle of security. Second, the small magnetometer and x-ray machines are not considered adequate for security for the Monument and the space within the cast wall of the Monument cannot be enlarged to accommodate the required screening equipment. Therefore, this alternative has been rejected on the basis of the lack of space for a two-station state of the art security screening area, the unacceptable risk of screening within the target, and the adverse effect on the historic character of the Monument by adding a new portal. Further, the impracticality of screening visitors individually while those waiting to be screened queue outside the Monument and those already screened wait in the elevator does not meet the objective of improving the visitor experience.

Visitor Screening in Underground Facility at the Base of the Monument

Structural engineers advise that an underground facility at the base of the Monument is possible if it completely surrounded the Monument. This visitor screening facility would be beneath the plaza and would connect to the Monument by a passageway through the foundation. The engineers also advise that the excavation and construction would have to be done incrementally to ensure continuous even loading on the footings of the Monument. This expense and risk alone give reason for rejecting this alternative, but the need for an above ground structure to provide access to the underground facility is equally troublesome.

In the schematic design an above-ground pavilion has been located to the south of the Monument outside of the plaza and flag poles to attempt to mitigate its visual intrusion on the simple composition of the plazas and the base of the obelisk. The building would contain security screening equipment, elevators and stairways, Ticketing, bathrooms, queuing and interpretive displays would be located below grade. Although delicate in its architectural expression the visual imbalance which this building creates with the Monument is plainly unacceptable. Further, it is very disruptive of the designed symmetry of the plaza and the surrounding Monument Grounds.

From a security standpoint this facility is acceptable. Adequate controls would be placed in the entrance and below grade structures which would lessen the threats to the Monument and its visitors.

Based on the structural risk to the Monument, the extra cost of incremental excavation and construction, and the visual intrusion of a building in close proximity to the Monument, this alternative was rejected.

Visitor Screening Facility at the Entrance to the Monument

This alternative would place a new structure on the east side of the Monument to provide the ticketing and security functions with a direct connection to the Monument entrance. This facility could be built in concert with the underground facility beneath the Monument Lodge where the bookstore, education and interpretive facilities and restrooms, would be located. Tickets could also be issued in both facilities so as to avoid visitor confusion or inconvenience. Screening would not be required for the underground facility in that it would not be integral to the Monument experience.

Given the security principle of maximizing the distance between the screening and the target as described in Alternative I and aesthetic intrusions of a building located on the plaza as described in Alternative 2, this alternative has been rejected.

Visitor Access by Shuttle between the Underground Visitor Facility and the Monument Entrance

This alternative would not include the underground concourse extension of the visitor facility to the Monument. Instead, an aboveground vehicle would be used to transfer the 25 ticketed visitors from the exit doors of the visitor facility to the Monument. A separate 8-foot wide roadway would be constructed paralleling the proposed walkway system. The shuttles would run, at 3 1/2 minute intervals and could return visitors to the visitor facility if they desired. This would require at least five vehicles to maintain the visitor flow and have a redundancy in case of malfunction. Secure vehicle-building connections or docking mechanisms would be required at the Monument Lodge and the Monument to preclude improper boarding or entrance to either facility. Maneuvering of the vehicles would require the standard back up alarm heard on commercial vehicles.

The visually and physically intrusive nature of the vehicles crossing the Monument Grounds and plaza every 3 1/2 minutes would be unwelcome and intrusive in this pedestrian environment. The inconvenience to the visitors having to board the shuttle would interrupt the visitor experience. The additional time consumed for boarding, deboarding and transit time results in a less efficient operation. The additional staff required for bus operations would increase costs. A fee for this service cannot be imposed as NPS policy precludes charging visitors to visit the Washington Monument. The noise of the vehicles, whether gasoline or electric, as they ascend the hill as well as the back up alarm would be disruptive to the visitors walking to the Monument and on the plaza. The vehicles would have to be stored off the grounds while not in use as there is no location to construct a garage on the grounds.

Based on the increased costs of operation, noise, disruption of visitor experience and visual impacts, this alternative was rejected.

Vehicle Barrier System - Water Moat

In this alternative a moat encircling the Monument with a series of bridges for pedestrian access would be constructed. If the water in the moat remained Year-round, the Potential for a frozen surface capable of supporting a vehicle would not meet the security objective of the vehicular barrier system. Further, if the water in the moat was deep enough to meet the security objectives of a vehicular barrier, serious visitor safety concerns would ensue.

The addition of a moat wide enough to preclude vehicular access to the Washington Monument would result in a significant visual alteration of the greensward of the cultural landscape of the Washington Monument. Further, this wide moat would significantly disrupt the visitor experience of free access across the Grounds.

Based on visual impacts, disruption of the visitor experience, visitor safety concerns and failure to meet security objectives, this alternative was rejected.

Vehicle Barrier System - Bollards Internal to Grounds

In 2001, a vehicular barrier system consisting of a ring of bollards encircling the Monument within the greensward was proposed by *the* NPS. Upon its submission to the Commission of Fine Arts and the National Capital Planning Commission for review and approval, it was disapproved as a visual intrusion on the cultural landscape. In the judgment of the review commissions, bollards are associated with the hard edge of streets and sidewalks and are out of character with the broad grassy Landscape of the Monument Grounds.

The implications of the full range of alternative improvements described above have been considered in designating Alternative A the preferred alternative for improvements at the Washington Monument.

Additional Technical Studies

Several technical studies have recently been completed analyzing implementation of Alternative A at the Washington Monument. Preparation of the subject EA was conducted in, full coordination with the teams conducting these studies. Accordingly, the preliminary data and analyses from these studies were available during preparation of, and are included in, the EA. The refined information now published in these reports supports, and furthers the level of detail *of, the* general analysis presented in the EA. The findings of the published reports are summarized below.

The "Subsurface Investigation, Monument Grounds and Visitor Facility, Washington Monument, Washington DC" was published by Mueser Rutledge Consulting Engineers on June 10, 2002, This geotechnical engineering report investigates subsurface structural issues related to implementation of Alternative A. In order of decreasing elevation, the report documents the

strata on the Monument Grounds as: Stratum F - FUL Stratum T1 (A) - Sandy Silt, Stratum T2 Silty sand, Stratum T3 - Sand and Gravel, Stratum TI (D) - Plastic Clay, Stratum D -Decomposed Rock, and Groundwater. The average existing water table level at the Monument Grounds has risen several feet since the last subsurface investigation in the 1970s and is currently at about Elev. -5.7 ft (relative to mean sea level). The maximum depth of excavations under Alternative A would be Elev. +3.0 feet Given the relative elevations of the existing groundwater and proposed excavations, which are separated by nearly nine feet, there would be no dewatering required under development of Alternative A. Accordingly, there would be no drying of the deep subsurface clay layer that indirectly supports the Monument. As such, with respect to groundwater issues, Alternative A would not affect the subsidence of the Monument. The report also documents recommendations to be used in the final design and implementation of the structural and landscape improvements on the Monument Grounds. The recommendations are in keeping with the detailed recommendations from the Mueser Rutledge 1973 report, as presented in Section 4.1 of the EA.

In addition to the engineering report on geotechnical issues, an outline of the sequence of construction on the below grade sections of the monument by the structural engineers, a preliminary Cultural Landscape Report, and a preliminary Historic Structures Report for the Monument Lodge have been prepared for the proposed project site. Preliminary opinions of the impacts of the design proposal on the basis of the draft Cultural Landscape and Historic Structures Reports have been summarized in technical memoranda prepared by the NPS.

In particular, the Preliminary Opinion of the Design Proposal as it Relates to the Washington Monument Grounds, dated July 15, 2002, identifies the significant components of the cultural landscape as the unadorned grassy mound on which the Monument sits, east-west and north-south vistas, performing arts use at the Sylvan Theatre area, external road system, formal street trees and informal massing of trees along the edges, recreational use of the Grounds, Jefferson Pier, Monument Lodge, Survey Lodge, flagpoles and night lighting of the exterior face of the Monument. On the basis of the preliminary documentation in the draft Cultural Landscape Report and other available resources, the NPS has concluded that while the proposed project will have a noticeable effect on the cultural landscape, it does adhere to the Secretary of the Interior's Standards for the Treatment of Historic Properties-

Further, the Preliminary Opinion of the Design Proposal as it Relates to the Washington Monument Lodge, dated July 19, 2002, identifies the character-defining features of the Monument Lodge as the overall massing form, size and symmetrical composition of the façade and plan; materials (granite, marble and brick); structural system-4 including the vaulted roofs; placement of fenestration openings, primary entrance with its architectural features, door and transom light; symmetrical placement of interior rooms and the public room, including its original finishes as well as the marble and terrazzo finishes applied in the early 20th century.

On the basis of the preliminary -documentation in the draft Historic Structures Report and other available resources, the NPS has concluded that the proposal meets the Secretary of the Interior's definition of "rehabilitation" if Guidelines 2, 6 and 9 of the Standards for Rehabilitation are met. The assumptions to be met are that the south interior bearing wall will be retained, the north interior bearing wall will be retained to the greatest extent possible, the vaulted ceiling and

terrazzo floor will be repaired rather than replaced, the appearance of the historic windows will be restored, and the interior spatial relationships will be retained to the greatest extent possible-

Safety and Security

The improvements proposed under Alternative A have been evaluated by the NPS and determined to meet the November 2001 *Program Requirements for the Washington Monument Permanent Security Improvements*. In particular, development under Alternative A would provide for several specific requirements regarding security. The underground screening facility would preserve the Monument structure (highest priority program requirement) not allowing modifications, attachments, or appendages of any type to the exterior surfaces of the structure, nor compromising the geotechnical stability of the Monument. The underground facility would also effectively screen potential visitors to the Monument and separate them physically from people, outside the secured area- Finally, the retaining wall system would provide a vehicle barrier system located at least 200 feet from the outer corners of the Monument that can meet required standards for stopping moving vehicles, while still allowing access for service and emergency vehicles.

Nevertheless, there have been a variety of comments on the EA regarding perceived inadequacies related to security implications of the Alternative A improvements. Toward addressing these concerns, the NPS has recently conducted a security advisory charrette that included security specialists from the U.S. Department of the Interior, U.S. Park Police, FBI, U.S. Secret Service, Department of State, Booz-Allen & Hamilton and Applied Research Associates. This advisory group reviewed and concurred in a specific list of security performance goals for the Washington Monument, including the following:

- Screen visitors at a remote location from the Monument to create maximum distance between the first interaction with security personnel and the Monument and, thus, increase protection of the Monument if an incident takes place at the remote location
- Deliver screened visitors to the Monument in such a manner that they do not interact with unscreened visitors to prevent screened visitors from being handed illegal items after they have been screened
- Prevent vehicles containing large loads of explosives from approaching the Monument

The list of security goals provides an objective scale for evaluating the security implications and suitability of specific improvements proposed under Alternative A. Particular improvements that have been questioned *with* regard to security concerns include the underground remote visitor screening facility, the underground passageway and the visitor screening facility skylight.

Most importantly, the remote underground visitor screening facility would meet the primary U.S. Park Police goal to effectively protect the structural integrity of the Washington Monument. The underground facility served by the associated underground passageway would also meet the goal of the U.S. Park Police to physically remove visitor screening to the maximum distance from the Monument while not disturbing the viewshed of the Monument Grounds. The underground passageway meets the goals of the U.S. Park Police to separate screened visitors from contact

with unscreened individuals while maintaining the character of the viewshed on the Monument Grounds.

Aesthetics and Visitor Experience

The relationship of the proposed improvements under Alternative A to the aesthetic character and visitor experience at the Washington Monument is a critical issue. The retaining walls inherent in the vehicular barrier system of Alternative A have been perceived to result in a loss of open landscape at the Grounds and a hindrance to visitor circulation. However, to retain maximum perceived open space character, the retaining walls have been designed to reduce their maximum height to 30 inches and will be placed into the landform around the Monument to further minimize their visual presence.

Comments on the EA have also stated concerns regarding the appropriateness of adding glass elements on the Monument Grounds. The addition of glass under Alternative A would be within the Monument Lodge addition and in the skylight proposed for the below ground visitor screening facility. As explained in Section 5.2.2 of the EA, the addition to the Monument Lodge would be compatible with the historic character of the Lodge and would provide for the distinguished use of the Lodge as a visitors facility. The 1960s cinderblock addition and aluminum awnings that currently detract from the historic structure would be removed- The new addition would be installed in a manner that would result in minimal damage to the historic materials of the structure. As documented in Section 3.2, the skylight at the screening facility would be constructed flush to the ground to minimize intrusion on ground-level views of the Monument Grounds. Additionally, the area of glass in the skylight would comprise less than one-tenth of one percent of the 73-acre Monument Grounds. Therefore, elevated views of the Grounds from the Monument or aircraft would not be noticeably affected.

VIII. HISTORIC PRESERVATION

Pursuant to the regulations of the Advisory Council *on* Historic Preservation (Advisory Council) implementing Section 106 of the National Historic Preservation Act, the NPS has consulted with the Advisory Council and the District of Columbia State Historic Preservation Officer (DC SHPO) and has determined that this project will have an effect on National Register resources Pursuant to 36 CFR § 800.14, a programmatic agreement among the NPS, DC SIVO, NCPC and Advisory Council was signed on April 4, 2002. Interested parties were invited to sign the agreement as "Concurring Parties" and the following organizations have agreed to sign as of this date: Committee of 100, National Trust for Historic Preservation, Washington National Monument Society, Guild of Professional Tour Guides and Advisory Neighborhood Commission 2A. A schedule of consultation meetings has been established keyed to submission of design materials for review and approval by the NCPC, CFA and DC S11P0,

The objective of this programmatic agreement is to ensure, to the extent feasible, that the design of the permanent security improvements is compatible with the qualities of the Washington Monument and its Grounds that qualify this and adjacent historic properties for the National Register of Historic Places. Further, the purpose of the programmatic agreement is to facilitate public participation.

IX IMPAIRMENT OF PARK RESOURCES OR VALUES

In addition to determining the environmental consequences of the preferred & alternative, NPS Management Policies (NPS, 2001), Director's Order 12 and Director's Order 55 require analysis of potential impacts to determine if the proposed action would impair park resources.

The fundamental purpose of the National Park System, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. NPS managers must always seek ways to avoid or minimize to the greatest degree practicable adverse impacts on park resources and values. However, these laws do give NPS managers discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values. Although Congress has given NPS managers discretion to allow certain impacts within parks, that discretion is limited by the statutory requirement that the NPS must leave park resources and values unimpaired, unless a particular law directly and specifically provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including opportunities that otherwise would be present for the enjoyment of those resources or values. An impact to any park resource or value may constitute impairment. However, an impact would more likely constitute an impairment to the extent it affects 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 a goal in the park's general management plan or other relevant NPS planning document.

In addition to reviewing the significance of the Washington Monument and its Grounds, I, as the Superintendent of National Capital Parks - Central have determined that implementation of the preferred alternative will not constitute an impairment of the park's resources and values. This conclusion is based on a thorough analysis of the impacts described in the EA, the agency and public comments received, and the professional judgment of the decision-maker in accordance with the National Park Service's Management Policies, 2001 and Director's Order 55. As described in the EA, implementation of the preferred alternative will not result in major, adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of the Washington Monument or of the Park System of the Nation's Capital; (2) key to the natural or cultural integrity of the Washington Monument and its Grounds or the Park System of the Nation's Capital; or (3) identified as a goal in the park's general management plan or other relevant National Park Service planning documents.

X. FINDING OF NO SIGNIFICANT EMPACT

This FONSI is based on the EA for the Washington Monument Permanent Security Improvements. As previously explained, NPS prepared the document to fulfill the requirements of NEPA, NBIPA, DO-12 and DO-55. In accordance with these regulatory requirements, the EA addresses short-term construction-related impacts and long-term changes to existing environmental conditions under each of the proposed alternatives, as well as the cumulative

impacts that would result from this and other proposed *projects* in the area. In addition, the EA was focused on the most critical issues and resource disciplines as determined by *the* scoping process.

The NPS engaged in a public scoping process as part of *the* preparation of an EA- The purpose of the scoping process was to allow citizens and public agencies to identify issues that should be addressed in the EA, including but -not limited to, alternatives, potential impacts, and suggested mitigation measures. For the purpose of this EA, *the* scoping process was undertaken through the public presentation and review process conducted *by the* NCPC. Additional public outreach was achieved through the ongoing Section 106 process pursuant to the National Historic Preservation Act. The NPS developed a Programmatic Agreement with NCPC, Advisory Council and the DC SBPO and other interested parties to guide the consultation process.

The NPS has fully evaluated the information and analysis contained in the EA, and has considered comments on the EA received from the public, reviewing agencies, and others. On the basis on these considerations, the NPS has determined the EA adequately and accurately addresses the environmental issues and impacts of the proposed project. The NPS has fully evaluated and selected Alternative A as the preferred alternative using the criteria of 40 CFR § 1508.27 to determine the significance of the proposed action by examining its context and intensity. On this basis, the NPS has determined that the preferred alternative for the Washington Monument Permanent Security Improvements does not constitute a major Federal action significantly affecting the quality of the human environment and that an Environmental Impact Statement (EIS) is not required.

Recommended,

(signed)

Date 7/22/02

Arnold Goldstein
Superintendent
National Capital Parks - Central
National Park Service - National Capital Region

Approved:

(signed)

Regional Director
National Capital Region, National Park Service