



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.

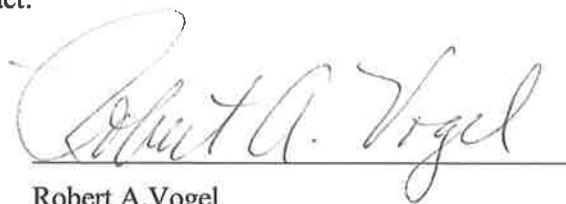
The EA was made available for public review and comment on July 26, 2013 through September 9, 2013. The EA was also placed on the NPS's PEPC website. During the public comment period, the NPS received 8 pieces of correspondence from the public and one correspondence from an agency commenting on the proposed 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	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.	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.
7	Visitor experience. A glass enclosure would potentially create an oppressively hot environment for visitors during summer months.	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.
8	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.	Please see response to comment #2.
9	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.	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.
10	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.	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.

Comment #	Comment	NPS Response
11	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.	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.
12	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.	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.
13	As it is, the structure is well protected against the only credible threat to it - from truck-borne explosives - through the usual obstacles.	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.
14	Please provide responses to how comments provided in April 2013 on Draft EA were addressed.	Comments provided by NCPC in April 2013 were combined and deconflicted with NPS comments and revisions were incorporated into the final EA.
15	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.	EISA will be addressed during the design process as the design is fleshed out.