

DESIGN CONCEPT (VISITOR AND SECURITY IMPROVEMENTS)

Washington Monument Grounds
Between 14th and 17th Streets and Constitution Avenue, NW and the Tidal Basin
Washington, D.C.

Report to the National Park Service

February 7, 2002

Abstract

The National Park Service (NPS) has requested conceptual approval of permanent visitor and security improvements to the Washington Monument and its grounds. Many of these improvements are contained within the Development Concept Plan for the Washington Monument and its grounds approved by the Commission on September 9, 1993. In addition, NPS proposes to incorporate security screening within the underground visitor facility and construct a connecting tunnel leading to the monument. The approved Concept Development Plan will need to be revised to incorporate these additions. NPS anticipates submission to the Commission for preliminary site and building plan approval in late spring of this year.

Authority

D.C. Code, sec 5-432, and Section 5 of the National Capital Planning Act of 1952, as amended (40 U.S.C. 71d).

Commission Action

The Commission:

- **Approves** the proposed Design Concept Plan for visitor and security improvements to the Washington Monument and its grounds, as shown on NCPC Map File No. 1.42(38.00)-40999, with the understanding that any substantial changes to the Monument Lodge or other elements of the design concept be resubmitted for “concept” approval prior to the submission for preliminary site and building plan review.

- **Requires** that, prior to submission of preliminary site and building plans, NPS submit a revised Development Concept Plan (DCP) incorporating proposed changes and additions to the currently approved Plan of 1993, a completed National Environmental Policy Act (NEPA) document, and a record of significant progress in the Section 106 historic preservation consultation with all parties.
- **Requests** that NPS recognize and accept the Commission as a “cooperating agency” in the preparation process for the NEPA document as identified in Council on Environmental Quality (CEQ) guidance issued in 48 Fed. Reg. 34264 (1983), concerning the joint use of NEPA documents, and that the document identify and reflect the cooperative status of NCPC as required by 40 CFR 1501.5, 1501.6 and CEQ guidance issued September 25, 2000.

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BACKGROUND AND STAFF EVALUATION

DESCRIPTION OF PROPOSAL

Background

On July 3, 2001 the Commission disapproved the National Park Service (NPS) proposal for an “External Security System for the Washington Monument.” This system consisted of a ring of 370 bollards around the monument at a standoff distance of approximately 200 feet. The Commission recommended that NPS consult with NCPC, the Commission of Fine Arts (CFA) and the Advisory Council on Historic Preservation (ACHP) staff and others, as appropriate, to amend the approved Subarea (1989) and Development Concept (1993) Plans for the Washington Monument Grounds to incorporate appropriate security design features as required. The Commission added that such features might include:

- Incorporation of security in the design of both streetscape and landscape elements at the perimeter of the monument grounds.
- Development of a second ring walkway at an appropriate width and distance from which to view the monument that, if necessary, also accommodates adequate security standoff requirements and incorporates security measures.
- The integration of other security design elements such as ha-has, plinths, terracing, and seat walls within the natural landscape of the monument grounds.

The Commission encouraged a long-term design solution that, in conjunction with implementation of the Development Concept Plan for the Washington Monument and its grounds, would have the potential to enhance the National Mall.

The current proposal is the National Park Service response to the Commission’s recommendations.

Concept Development Plan (1993)

On September 9, 1993, the Commission approved amendments to the Subarea Plan resulting in a revised Development Concept Plan (DCP) for the Washington Monument and its grounds. Since that time, various approved elements of the DCP have been implemented. Fifteenth Street, as well as Madison and Jefferson Drives between 14th and 15th Street were realigned. Tourmobile stops along 15th Street were moved out of the National Mall viewshed. To decrease the backup of Tourmobile vehicles along 15th Street, additional pulloffs were added to Madison and Jefferson Drives between 14th and 15th Streets and the Tourmobile kiosk was moved to Jefferson Drive. Other major elements of the DCP remain to be completed. These include: restoration of the Monument Lodge and its use as the portal to the underground visitor facility; reconfiguration of the walkways between the monument and 15th Street; improvement of the monument plaza area; and removal of the 16th Street surface parking lot (accessed from Constitution Avenue).

Currently Proposed Visitor and Security Improvements

Due to security considerations not anticipated in 1993, NPS proposes to modify the DCP in the following manner:

The walkways around the monument will be reconfigured as a series of partial ovals extending east and west from the plaza. These partially sunken walkways will incorporate low seating walls that replace the seating walls as shown in the DCP around the edge of the plaza. These walls will serve as the barriers that establish the perimeter required to protect the monument from vehicles. They will be screened in some areas by low berms located opposite the walls.

The underground visitor facility will include a security area to provide the required screening of all visitors entering the monument. Once screened, it is essential that these visitors do not come into contact with unscreened visitors. To ensure their separation, while also ensuring the unrestricted movement of pedestrians throughout the grounds, a tunnel is proposed to connect the underground visitors facility to the monument. Visitors will enter the monument one floor below the existing elevator lobby. The proposed design calls for visitors to exit through the existing monument doors on the plaza (surface level).

Other elements of the 1993 DCP will be achieved with little or no modification. The plaza itself will be flush and closer in design to the historic plaza. The flagpoles will be retained. The 16th Street parking lot will be removed and the German American Friendship Garden completed.

CONSULTATION

NPS staff has met informally with NCPC staff to discuss improvements to the Washington Monument and its grounds. NPS has been an active participant in the Commission's Security Task Force in which the planning and design of security improvements for the monument and grounds have been actively discussed. Subsequent to last summer's disapproval by the Commission of NPS's proposal for the provision of an interim security solution, NCPC and NPS staff met to discuss ways to integrate required security measures within the elements of the approved Development Concept Plan for the Washington Monument and its grounds. NPS staff consulted with the NCPC, CFA, DCSHPO and the ACHP staff in the design process that led to the current design concept. Subsequent to the NPS design team's Information Presentation to the Commission on January 10, 2002, NCPC staff has continued to work with the NPS and their design team in the ongoing development of this plan. Compliance with NEPA and Section 106 historic preservation requirements will require ongoing and full consultation with all parties, including the public.

EVALUATION

Staff recommends approval of the proposed Design Concept Plan for visitor and security improvements to the Washington Monument and its grounds. However, staff is concerned that elements of the currently proposed design concept may undergo substantial change, including, but not limited to, the height of the proposed walls, and alterations of and/or an addition to the Monument Lodge. Should this prove to be the case, staff recommends that the Commission require these changes be resubmitted for concept approval so as to avoid any surprises at the time of preliminary site and building plan review.

Staff's overall observations regarding the proposed design concept are as follows:

- The concept is straightforward and clean.
- The design respects the historic landscape and setting of the monument and grounds.
- The design concept extends beyond but is compatible with the approved Development Concept Plan (1993) for the Washington Monument and its grounds.
- The design concept is in keeping with the Commission's recommendations of July 3, 2001, in response to review of the Park Service's previously proposed "External Security System" for the Washington Monument.
- The design concept is consistent with the principles of the Commission's Security Task Force and, more specifically, those principles that have been proposed for the Washington Monument.

In the further design development of this concept, staff requests that the NPS and their design team consider the following:

- Ensure that any proposed alterations to the existing historic landscape and the Monument Lodge either avoid or appropriately mitigate adverse effect.
- Ensure that the design of the walls not constitute a safety hazard that could result in the required addition of a railing or other visible projection on the top of the wall.

- Provide an assessment of the capability of the Monument Lodge to accommodate the required movement associated with its proposed use as the entrance to the underground visitor's center and security screening facility.
- Explore alternatives to any major alteration of or addition to the Monument Lodge, should this be required to accommodate the proposed functional requirements of entry and egress.
- Consider the option of visitors returning directly from the monument to the visitors center - while also maintaining the ability to exit the monument at grade.
- Study the required size, configuration and location of the proposed underground visitor center skylight - so as to achieve the maximum benefit of sun orientation, light, climate control, etc. - with the least intrusion to the monument and grounds.
- Incorporate "green" architecture in the design of the underground access and visitors facility.
- Carefully identify view lines to be maintained and enhanced - when regrading and in the planting of additional trees, including preservation of the north-south view corridor from the White House to the Jefferson Memorial.
- Conduct all required environmental studies, including subsurface geology, hydrology and structural engineering studies, as may be required, to ensure maintenance of the existing water table, the structural integrity of the monument, etc.
- Resolve the siting and operation of the existing helicopter landing area.

Staff is pleased with the response of the current proposal to recommendations made in the Commission's review of the July 3, 2001 proposal for security improvements to the monument and its grounds, i.e.:

- The current proposal is consistent with the approved DCP for the Washington Monument Grounds, which calls for re-grading, realigning and reconfiguring walkways; the incorporation of a seat wall or walls around the monument; restoration of the Monument Lodge; the addition of an underground visitor center to be entered through the Lodge; elimination of the 16th Street surface parking lot; and other site and building improvements.

Staff is satisfied that comments regarding this previous proposal have been given due consideration, namely:

- That the opportunity exists to amend the DCP to include a second walkway ringing the monument at an appropriate distance for enhancing pedestrian circulation in this area, viewing the monument, and achieving the required security standoff distance.
- That an expansion of the re-grading of the monument grounds as contained in the Subarea Plan (1989) would also be required to provide a more symmetrical slope from the monument to the new walkway and a more continuous elevation for the construction of the ring walkway and associated security elements.
- That the incorporation of ha-has, plinth and/or seat walls would be more in keeping and less intrusive than the introduction of bollards.

COORDINATION

Coordinating Committee

The Coordinating Committee reviewed this item at its meeting on January 16, 2002, and forwarded the proposal to the Commission with the statement that the project has been coordinated with all agencies participating. The participating agencies were NCPC; the District of Columbia Office of Planning; the Fire Department; the Department of Housing and Community Development; the Department of Public Works; the National Park Service; and the Washington Metropolitan Area Transit Authority.

Commission of Fine Arts

On December 20, 2001, NPS made an information presentation to the Commission of Fine Arts (CFA). At its meeting on February 17, 2002, CFA is scheduled to review the proposed design concept for permanent security improvements on the grounds of the Washington Monument.

CONFORMANCE

National Historic Preservation Act

The Washington Monument was one of the first historic properties to be listed in the National Register of Historic Places in 1966. The monument grounds are also an element of the designated L'Enfant Plan (which includes the McMillan Plan in the designation).

Designed by Robert Mills and constructed between 1848 and 1889, the obelisk and grounds were completed without the elliptical colonnade that Mills originally envisioned for its base. A generation later, the McMillan Plan envisioned centering the monument within its setting at the crossing of the two axes of the Mall by embellishing the grounds with an elaborate Beaux Arts-style landscape plan of plantings, terraces and water pools. This plan was not realized. Since then, grading and paving modifications have been made to accommodate changing uses of the grounds. Nevertheless, the monument's setting since its completion has been "a grassy knoll with land gently sloping to every side" as described in the National Register documentation. The monument and its grounds--graded and landscaped after the monument was completed--are at the center of the National Capital's monumental core. This informal landscape, often referred to as a greensward, has acquired historic significance in its own right in the staff's judgment, especially in distinction to the more formal landscapes in the monumental core.

By letters dated February 6, 2002, NPS informed both the D.C. State Historic Preservation Office (D.C. SHPO) and the Advisory Council on Historic Preservation (ACHP) that it believes the best course of action to fulfill its Section 106 responsibilities would be to enter into a programmatic agreement with appropriate parties in order to establish a consultation process to consider any effects the proposed project would have to the Washington Monument and its grounds.

A programmatic agreement is an established alternative method (found at Sec. 800.14 of the Section 106 Regulations) of allowing for timely consideration of expressed concerns as a project is developed, thereby assisting a federal agency in completing its Section 106 responsibilities. It is particularly useful for complex undertakings for which the effects may not yet be known or anticipated, and for sites where some decisions may be made or implemented over time.

The D.C. Historic Preservation Review Board, which advises the D.C. SHPO, will consider this case at its public meeting on February 28, 2002.

Based on its understanding of the program and project as currently defined, the staff offers the following comments:

- The primary historic preservation concern is the continued stability and physical integrity of the monument itself. Studies to be conducted by NPS in this regard are as necessary to the Section 106 review as they are to the NEPA review. The proposal envisions constructing a new pedestrian tunnel through the existing foundation to a new elevator lobby inside the monument one level below the current floor. NPS has publicly affirmed that the study of the continued stability of the monument in relation to proposed changes is of paramount importance.
- As currently anticipated, the Memorial Lodge, a contributing structure on the Monument grounds, will be altered on its exterior if it is to serve as the entrance to the underground visitors center. While NPS's proposal to remove later alterations to the Lodge is to be commended, the effects of any further alteration or additions to the historic structure must be taken into account as the plan is developed.
- The surface of the landscape will be modified by the installation of the visitor center, particularly the skylight. While this feature will be an amenity for visitors as they wait to ascend the Monument, the proposed construction and change to the landscape, and to the visitor's experience of that landscape both from the ground and from the top of the monument, must be taken into consideration.
- The proposed design of the walkways, including the berms and retaining walls, has merit and meets several objectives: security from unauthorized vehicles, improved accessibility to the monument plaza for wheelchair users, and retaining walls that might serve as seats during public gatherings. The installation of multi-purpose elements that solve security problems while also creating amenities and/or not appearing to be security barriers is a primary goal of the Commission's Urban Design and Security Plan. In the context of the monument grounds, the proposed walkways constitute a change in the existing landscape and also, to some extent, in how the public will use and negotiate the paths of the monument grounds in the future.
- While the public will be able to exit the monument through its existing door on the east face, the requirement to segregate incoming and outgoing visitors will preclude visitors from entering the monument by the door. Instead, they will enter by tunnel to the new elevator lobby. This is a fundamental change to the visitor's experience of entering the monument. As

agencies must take into account the entry experience when proposing alternative entrances to historic buildings in order to accommodate handicapped visitors, NPS should take into account the proposed loss of this experience for monument visitors.

National Environmental Policy Act

Pursuant to the regulations implementing NEPA, and the NPS Environmental Compliance Field Guide (NPS-12), NPS achieved an environmental evaluation and review of the proposed action during development of plans for the Washington Monument grounds in 1981. Subsequent to that effort, revisions to a development concept were achieved by NPS and reviewed by the Commission in 1989 and 1993.

The approved DCP of 1993 included provisions for an underground visitor center and four major revisions to the walkway system of the Washington Monument grounds, along with other elements including roadway realignments at Madison and Jefferson Drives. All elements in 1993 were addressed by the referenced and cited environmental evaluation by NPS in the 1981 environmental analysis. At the time of consideration of the environmental effects of the proposed development in 1993-94, NPS concluded a Finding of No Significant Impact (FONSI) pursuant to NEPA requirements. The FONSI was signed in May 1995.

Staff review of the prior NPS NEPA documentation finds the sufficiency of the environmental determination is adequate to proceed in the review of the current revised NPS submission for conceptual approval only. Because there are additional elements to the current submitted Design Concept Plan, the NPS NEPA determination should be revisited and supplemented or re-issued as a new environmental assessment in accordance to CEQ implementing regulation guidance under its "Forty Most Asked Questions" Memorandum issued in March 1981. Within that guidance CEQ notes... "scoping may result in a redefinition of the entire project, as a result of mitigation proposals. In that case, the agency may alter its previous decision to do an EIS, as long as the agency or applicant resubmits the entire proposal and the EA and FONSI are available for 30 days of review and comment..." Staff believes the characteristics of the current submittal, in general, are similar to the 1981 NPS project proposal and analysis. However, important and unevaluated differences are now present in the 2002 NPS proposal that redefine the action, such as an underground tunnel for pedestrian access and the extent and degree of terrain alteration. This redefinition of the project must be reviewed in a revised NEPA document.

Because the staff believes NPS has internally scoped and defined the project to a significant degree, staff believes the appropriate course of environmental review is to complete a sufficiently revised and updated project environmental assessment (including a final determination by the NPS of the project's environmental effects). The public and other appropriate local government and federal agencies should be given an opportunity to comment on that NEPA review prior to submitting the preliminary design of the Washington Monument visitor and security improvements to the Commission. Staff also recommends that the Commission request that NPS recognize and accept the Commission as a cooperating agency in the preparation process for the NEPA document as identified in CEQ guidance issued at 48 Fed.

Reg. 34264 (1983) concerning the joint use of NEPA documents, and that the document identify and reflect the cooperative status of NCPC as required by 40 CFR 1501.5, 1501.6 and CEQ guidance issued September 25, 2000.

Federal Capital Improvements Program

This project is not included in the Federal Capital Improvements Program, Fiscal Years 2002-2007, adopted by the Commission at its meeting on July 3, 2001.

Comprehensive Plan

The proposed security improvements would replace the existing temporary ring of jersey barriers with permanent visitor and security improvements to the monument and its grounds. As the Washington Monument is part of the National Mall, applicable policies in the Parks, Open Space and Natural Features Element and in the Historic Features Element of the NCPC Comprehensive Plan apply:

- The great cross-axes of the Mall, from the Capitol to the Lincoln Memorial and from the White House to the Jefferson Memorial, constitute a unique national place that must be protected. The Mall is considered complete and any improvements should be limited in scope and sensitively designed to reinforce the integrity of this unique place.
- New construction on Historic Landmarks or in Historic Districts should be compatible with the historic architectural character and cultural heritage of the landmark or district.

