

NATIONAL TRUST *for* HISTORIC PRESERVATION

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.June 21, 2002 VIA FAX 202-426-1835

Mr. Arnold Goldstein, Superintendent,
National Park Service, National Capital Region 1100 Ohio Drive, SW
Washington, D.C. 20242

Re: Washington Monument - Permanent Security Improvements Comments on Environmental Assessment

Dear Superintendent Goldstein:

The National Trust for Historic Preservation appreciates the opportunity to comment on the Environmental Assessment (EA) issued by the National Park Service for Permanent Security Improvements to the Washington Monument, including the construction of a permanent visitor access/screening facility and the installation of a permanent vehicle barrier system, as well as general improvements to the Monument grounds. As you know, the National Trust has also participated as a consulting party under Section 106 of the National Historic Preservation Act (NHP A).

We commend the National Park Service (NPS) for its efforts to integrate Section 106 compliance into the complex inter-agency review process for this project. However, we have serious concerns about the EA, as described in more detail below.

The Cultural Landscape Report and Historic Structures Report Need to be Completed Prior to the Development and Evaluation of Alternatives, in Order to Assess the Project's Effects on Historic Properties.

The Cultural Landscape Report (CLR) and Historic Structures Report (HSR) have not been completed. Yet they are essential to a full understanding of the character-defining features and elements of the Monument, the Lodge, and the landscape that will be affected by the proposed security improvements. We anticipate that the sections of the CLR and HSR addressing treatment recommendations and design guidelines will be especially valuable in this regard. Because this essential information is lacking, an analysis of alternatives and their effects on historic properties is premature. The NPS has put the cart before the horse, by developing a specific proposal for landscape modifications and an addition to the Monument Lodge, *without* the crucial information that should guide and influence the design proposal in the first place. The policy choices involved in evaluating above-ground vs. below-ground alternatives, or landscape treatments such as berms vs. bollards, or architectural concepts for the Lodge addition,

cannot be resolved appropriately without the information on character-defining features contained in the CLR and HSR.

The chronology that is being constructed from the thousands of existing drawings and photos should serve as more than a research tool. Identifying its historic characteristics and potential areas for further evaluation, this depiction of the site's evolution should provide guidance (rather than post-hoc justification) for the proposed action. It is unclear how the NPS can develop and seek approval for a specific proposal, with a detailed plan for landscaping and simulated visuals before having culled this essential information from the CLR and HSR. Until the preparatory studies are complete, a broadly conceptual proposal would be more appropriate.

The identified objectives of providing opportunities for outdoor recreation and preserving cultural landscape quality are inseparable from the preservation of the Monument structure and Lodge. The Cultural Landscape Report and the Historic Sites Report should reflect this symbiosis. Consideration of the significance, condition, and planned use of the grounds should direct, and be directed by, similar considerations for the Monument at every stage of the review process. Furthermore, the conclusions and recommendations of those reports are useful for the Section 106 review only insofar as they actually inform the NPS proposal for the federal undertaking.

The Graphic and Visual Representations in the EA are Insufficient to Elicit Meaningful Comment from the Public.

Public participation is an important component of both NEP A and the Section 106 review process. The National Trust is especially concerned about the public's views on this project, in light of our congressional charter, which calls on the Trust to "facilitate public participation" in historic preservation. 16 U.S.C. § 468; As the NPS knows well, the Washington Monument is one of America's most sacred landmarks. Since the main purposes of this undertaking include removing obstructions of "important vistas to and from the Monument and Grounds," the graphic representations in the EA should help the public to understand and respond to the proposed alternatives. Visual/Scenic Resources (aesthetic concerns) and Visitor Experience (resource integrity concerns) (see EA at p.ES-5) are resource disciplines that could be made understandable to the public through clear and specific plans, elevations, sections and vista analyses.

The EA states that there would be no cumulative impacts on cultural and ethnographic resources under Alternative A, but the unfinished CLR and HSR reports make it difficult to understand and comment on the visual impact of the proposals on the landscape. More graphic illustrations are necessary to refute or affirm this conclusion. For example, the relationship between the Monument Lodge and the proposed wall is a critical element that is not pictured in the simulations. The visual appearance of the walls and terraces are similarly difficult to make out from the EA. A representative for Olin noted at the June 19 meeting that these walls would be simple and "minimally visible in the landscape," while they are classified in the EA as having

a positive visual impact on the visitor experience. In any event, the inadequate graphic simulations in the EA make it difficult or impossible for the public to assess this impact.

The EA also asserts that the potentially adverse impact of underground access on the visitor experience is mitigated enough that Alternative A would still result in a "major improvement." However, it is not clear what criteria have been used to assess the visitor's experience. The National Trust is concerned about the impact on visitors of entering the Washington Monument through the basement and ascending to the observation platform from a deepened elevator, rather than entering the Monument through the historic portal and ascending from ground level. Further consideration should be given to this diminished experience for the visitor. The tunnel is another area of concern, given its relatively small dimensions of 10. feet by 8 feet, but visual representations of the tunnel in the EA would facilitate the ability of the public to comment on this critical element.

Supplementary Documentation is Needed for Further Comment.

In order to facilitate public involvement and meaningful consultation, NPS should revise the EA and provide consulting parties and the public with more comprehensive information about the assumptions and program requirements underlying the development and evaluation of alternatives for this project. }

We note that EA Section 1.2, "Purpose of the Proposed Action," contains certain objectives established by NPS to "guide the development" and "define the programmatic expectations" of the proposed project. (EA at 1-2.) For instance, Section 1.2 states that "[n]either modifications nor attachments or appendages of any type shall be allowed to the exterior surfaces of the [Washington Monument]." (EA at 1-3.) However, other critical assumptions and program requirements are implied but *not* expressly stated in the EA, and were apparently an important factor in NPS decisionmaking. This critical information should be provided to the public and consulting parties as a basis for the commenting process.

For instance, NPS has indicated that any new above-grade structures are not acceptable. This critical assumption is not delineated in the EA. Section 3.5 lists five alternative approaches considered but eliminated by NPS, and indicates that at some time in the past, "[a]n above-grade visitor screening facility located at the Monument Lodge was rejected b)' review agencies. The facility would have been a new structure introduced into the primary viewshed." (EA at 3-13.) This position was reiterated during the June 19 consultation meeting, i.e., that the NPS would not consider an above-ground visitor screening facility as the preferred alternative, because such proposals had been rejected in the past by reviewing agencies. The EA should be more explicit about this and other assumptions that limit the consideration of alternatives.

1 Assumptions and program requirements related to security improvements could be shared without including details whose disclosure might raise security concerns.

The NPS also stated at the June 19 meeting that the screening facility could not be inserted into the Monument itself. Although Section 3.5 of the EA refers generally to "U.S. Park Police requirements that no weapons or explosives enter the Monument," those requirements, and the critical assumption that the screening facility must be located at a distance from the Monument, are not included in the portion of Section 1.2 related to improvement of security, or anywhere else in the EA.

In addition, the EA does not appear to disclose or discuss certain other assumptions or requirements used in the NPS evaluation. For example:

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* distributed by the NPS. The two build alternatives propose to fulfill the goals and objectives[.]

EA at 3-1 (emphasis added). These functional goals and objectives were used to evaluate and eliminate from further consideration a number of alternative approaches, including five alternatives briefly described in Section 3.5.

The purpose of this impact analysis is to determine if proposed security improvements at the Washington Monument are compatible with the desired visitor experience goals at the Monument and surrounding monuments and memorials. To determine visitor experience goals, the two visitor surveys from 1998 ... and National Capital Parks-Central staff observations were evaluated.

EA at 5-33 (emphasis added). In the National Trust's view, the EA should identify and describe the specific "functional goals and objectives" referenced in Section 3.1, the specific "visitor experience goals" referenced in Section 5.3, and any other assumptions or program requirements utilized by NPS.

Section 3.5 of the EA provides a brief summary of five alternatives that were eliminated by NPS. However, Section 3.5 does not present sufficient information for the National Trust or the public to fully understand the five alternatives or the reasons for their elimination. We urge the NPS to provide a more detailed description of alternatives evaluated and eliminated, including the advantages and disadvantages of each, which would help the consulting parties and the public to understand the agency's reasoning. This analysis was promised to the consulting parties months ago, but has not been forthcoming.

In addition, the National Trust concurs with the Advisory Council that NPS should provide additional information to the consulting parties about the process for reviewing the proposed project:

- Schedule of reviews as currently anticipated (Stipulation 6);

- Schedule for completion of prioritized components of Cultural Landscape Report (Stipulation 8);
- Schedule for completion of prioritized components of Historic Structures Report for Monument Lodge (Stipulation 8);
- Schedule for completion of any components of Historic Structures Report for Washington Monument that would be used for decisionmaking in the project; Schedule for completion of further design of barrier wall as it relates to Monument Lodge (proposed by NPS in response to comments); and,
- Schedule for completion of further design of plaza at base of Monument (agreed to by NPS in response to comments).

Consideration of Alternatives in the EA is Skewed.

Alternative B, the above-ground alternative, is a "straw-man" alternative, designed to be objectionable. In fact, however, Alternative B has discrete elements that could be combined with elements of Alternative A in order to develop a more complete array of alternatives.

First, Alternative B involves construction of new above-grade facilities. However, the NPS has made it clear that the agency would not consider an above-grade facility, because such proposals have been rejected in the past by reviewing agencies. Thus, there is a risk that Alternative B was automatically eliminated and never had a fair chance of receiving any consideration.

Second, Alternative B involves construction of new above-grade facilities adjacent to the Sylvan Theatre, a non-historic structure "located in a less-visible and less-used part of the Grounds. . . away from the primary view and vistas." (EA at 3-6.) However, the EA concludes that the new above-grade facilities and secure pathway together would have a "moderately negative impact on the Sylvan Theatre complex and cultural landscape," (EA at 6-13), and a "major negative impact on the cultural landscape quality of the Monument Grounds." (EA at 6- 14). The EA fails to evaluate the impact of the new above-grade facilities alone, and fails to take into account that the new facilities would be out of the primary viewshed, and could be designed to be compatible with the Sylvan Theatre and its landscape.

Third, Alternative B involves construction of a ring of "densely placed bollards," (EA at 3- 7), while Alternative A involves a "series of low walls and terraces [that] gracefully surround the Monument," (EA at 5-24). The EA states that "Alternative B's addition of a continual line of bollards would generate a major negative impact on the landscape of the Grounds." (EA at 6-12.) In addition, the EA explains that a 2001 proposal for a vehicle barrier system involving bollards "was rejected by review agencies due to the inappropriate relationship of bollards and the natural setting of the Grounds," (EA at 3-13). The EA does not explain why Alternative B involves a less desirable ring of bollards, rather than a more desirable system of walls and terraces.

Fourth, Alternative B involves replacing the existing asphalt paving of the plaza with an "interior grassy area and an outer hardscape ring,"(EA at 3-8), while Alternative A involves

replacement with "upgraded pavers and materials consistent with the tone of the Monument," (EA at 3-4). No explanation is given for the difference between the plaza treatments. Nevertheless, the EA concludes that, "[0]verall, changes to the walkways and Monument plaza under Alternative B would result in adverse impacts to visitor access and orientation to the Washington Monument." (EA at 6-26.)²

In other words, Alternative B is loaded up with undesirable features, which help to ensure its rejection when compared to Alternative A. The EA fails to explain why the more mitigated features of Alternative A, such as the less harmful treatment of the plaza, or the "graceful" walls and terraces, rather than the dense bollards, could not be applied equally to Alternative B. The failure to mitigate the alternatives to a comparable degree results in a skewed evaluation, and is contrary to NEP A.

There is at least one feature, however, which appears to be treated more advantageously under Alternative B. The new educational facility would be underground in Alternative A, but above-ground in Alternative B. The EA concludes that the Alternative A educational facility would "greatly enhance" and "substantially improve" the visitor experience, (EA at 5-37,5-38)., and would be a "positive improvement" especially for visitors unable to acquire a ticket to the interior of the Monument. (EA at 5-36.) On the other hand, the EA concludes that the Alternative B educational facility would provide only "minor or moderate benefits to visitors unable to acquire a tour ticket," (EA at 6-28).

We disagree with this negative assessment of the educational facility in Alternative B. Since the facility would be located in a separate building from the ticketing, tour queuing, and security functions (EA at 6-26), visitors could enjoy the educational facility under Alternative B, regardless of whether they have tour tickets, and without having to go through security screening. As a result, visitors would not have to relinquish their strollers (as Alternative A would require), stand in extra lines, and endure other inconveniences, just to visit the educational facility. Alternative A, by contrast, would require all visitors to go through security screening, including those unable to acquire tour tickets before they could gain access to the educational facility. In our view, these limitations on public access to the educational facility under Alternative A would make it less desirable than the Alternative B educational facility. However, the EA fails to evaluate whether the Alternative B educational facility, together with its advantages, could be combined with other desirable features of Alternative A. Nor does the EA evaluate whether the advantages of a separate educational facility, with more open public access, could be achieved at an underground site.

In our view, NPS should consider a new set of alternatives that combine features from the above-ground and below-ground concepts, such as: (1) an above-ground facility for visitor screening and/or education; (2) a vehicle barrier system of walls, terraces, and berms; and (3) an upgraded plaza at the base of the Monument to enhance the pedestrian experience. In our view,

² We are also concerned about the star pattern proposed for the pavers on the plaza. In our view, this pattern would not be appropriate or compatible with the Washington Monument.

NPS should also give serious consideration to the alternative approach proposed by the Committee of 100, which was presented at the June 19 meeting of consulting parties. At a minimum, NPS should include in the EA a detailed description of the Committee of 100 alternative, the advantages and disadvantages of this alternative, the agency's analysis of the alternative, and the reasons for its rejection, if any.

Conclusion

Thank you for considering the views of the National Trust. We look forward to continuing our consultation under Section 106 in order to develop alternatives or modifications to the project that would avoid, mitigate, and minimize the adverse effects of the security measures on the Washington Monument.

Sincerely,

(signed)

Elizabeth S. Merritt
Deputy General Counsel

cc: Martha Catlin, ACHP
David Maloney, SHPO
Nancy Witherell, NCPC
Don Hawkins, Committee of 100
Judy Scott Feldman, National Coalition to Save Our Mall
David Bell, DCPL