Section 106 Update to Consulting Parties

The National Park Service (NPS) is continuing Section 106 consultation on the proposed installation of permanent vehicle barriers at the Thomas Jefferson Memorial. The purpose of this update is to keep you informed of how revisions to the alternatives and further analysis resulted in the selection of a preferred alternative, and to summarize the impacts of this alternative on cultural resources. The coordinated Thomas Jefferson Memorial Vehicle Security Barrier Environmental Assessment is now available for review. NPS invites you to review these materials and to submit your comments at <u>www.parkplanning.nps.gov/jefferson_memorial_perimeter</u>.

Background

The current design process seeks to build and improve upon earlier efforts in 2002 and 2004. NPS reinitiated Section 106 in December of 2009, and hosted a public meeting on August 11, 2010. During this meeting, a draft area of potential effect was identified. In addition, NPS and its design team presented three potential alternatives: barrier as a streetscape feature, barrier as a landscape feature, and barrier as a formal feature. Following this meeting, comments from consulting parties indicated concern that the perimeter security system be compatible with future anticipated projects as described in the National Mall Plan.

During fall of 2010, the NPS submitted the concepts to the Commission of Fine Arts (CFA) for a concept design approval. CFA approved the concept of Alternative 1, the streetscape barrier, in its meeting on September 16, 2010, stating that this alternative would best support the overall design character of a memorial set in a garden landscape. They further recommended (1) careful attention to the spacing and detailing of piers and wall sections as the design is developed to avoid a "relentless appearance"; (2) more shade trees to improve the pedestrian experience; and (3) flexibility in further developing the concepts, and potentially incorporating aspects of other alternatives into the final design. This approval's focus was on the "alignment" of the security barrier at the street's edge, with the understanding that further design discussion would be required to define the massing, material, and style of the barrier.

NPS further developed all three alternatives and, during November of 2010, engaged in an internal study to determine its preferred alternative. Through a standardized process of choosing by advantages, Alternative 1 was selected because it offers the advantages of (1) creating a barrier at a maximum distance away from the memorial, benefitting security; (2) creating opportunities to recapture the Olmsted Jr. Landscape Design by creating an open and transparent option, protecting the open interior grounds (no interior walls) and reflecting the streetscape rather than attempting to be part of the memorial grounds; (3) it is easily accessed from the road for maintenance needs; and (4) it limits opportunities for pedestrian skateboarding. This process concurred with the CFA's concept approval of the security barrier alignment as streetscape because it offered the NPS the greatest advantages, as described above.

Following the selection of the preferred alignment, during 2011 and 2012, possible design elements of the wall have been explored. Three meetings have been held with the staff representatives of the CFA,

NCPC and the SHPO to explore the range for type, style and number of railings, curb height, and pier massing and spacing. Each meeting sought to further focus the wall into a range of design alternatives that could be an acceptable addition to the Thomas Jefferson Memorial landscape. Development of design elements is still underway. Ongoing consultation on the wall design will continue with the various reviewing agencies once the range of design is established. The current proposal is expected to be compatible with all projects proposed in the National Mall Plan, including future improvements to the walkways around the Tidal Basin.

In 2013, NPS completed an Environmental Assessment to analyze impacts of the no action and the three alternatives. See appendix A for a description of the three action alternatives analyzed, including the preferred alternative, barrier as a streetscape feature. Appendix B depicts the proposed primary and secondary Area of Potential Effects (APE). It includes the Thomas Jefferson Memorial, Washington Monument, East and West Potomac Parks Historic District, and the L'Enfant Plan. View the EA for a full description of the contributing resources for each of these historic properties and their related landscapes.

Summary of Effects to Cultural Resources of the Preferred Alternative

Under the preferred alternative (Appendix A), the streetscape barrier, construction activities for the barrier, the bus drop off/loading zone, the new accessible parking spaces, and the new concession kiosk would have moderate, short-term, adverse impacts on the cultural landscape of the Jefferson Memorial due to noise and the visual impacts of equipment, demolition and installations.

The streetscape barrier design and placement would have no direct adverse effect on the Jefferson Memorial, the Washington Monument, or the L'Enfant Plan of the City of Washington and contributing views and vistas, but would have minor, long-term, adverse impacts on other contributing resources of the East and West Potomac Parks Historic District. The barriers would terminate at the stone abutments of the Inlet and Outlet Bridges. To mitigate the adjacency of the barriers to the historic bridges, the barriers have been designed to stand off and not engage the bridge abutments, and would be constructed using materials and detailing compatible with those of the bridges. The new barriers are also lower than the bridge walls and would be secondary to them in scale.

The streetscape barrier placement would not directly affect other contributing buildings, structures, objects, or landscape features in the East and West Potomac Parks Historic District, but the new barrier would be visible in the views around the Tidal Basin. These views are a contributing element of the historic district. The open character of the barrier piers and railing would reduce the visual impact on the views. Placing the barrier at the south perimeter of the Jefferson Memorial landscape minimizes the intrusion into the cultural landscape and the impacts on the circulation features of the memorial site. Widening and replacement of the East Basin Drive sidewalk for multiple uses alters the curb line. The required removal of seven historic trees would impact those contributing features of the landscape. They would be replaced, offset slightly inward, with new, less mature trees. Placement of the barriers along the south edge of the site and the open design of the barriers mitigates the potential impact on the contributing views of the Jefferson Memorial landscape and retains the opportunity to restore the Olmsted landscape in the future. Only the far vistas to the east and west from the Memorial would be impacted. Moving the bus drop-off/loading zone and the accessible parking to the west removes them

from view from the Memorial, and planting new vegetation to screen the interstate to the south and east would have long-term beneficial impacts on the spatial characteristics of the site. The streetscape barrier would not affect the Memorial itself or its terrace and stylobate walls.

Through placement of the barrier along the edge of the site, and with the protective mitigation measures described below, the streetscape barrier has the potential to have no adverse effect on historic properties. Following the current comment period, NPS will seek to conclude consultation under Section 106.

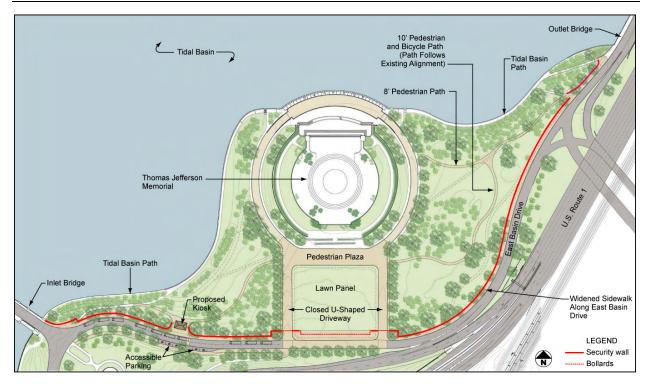
Please view the EA at <u>www.parkplanning.nps.gov/jefferson_memorial_perimeter</u> for the full analysis of all alternatives.

Proposed Mitigation Measures

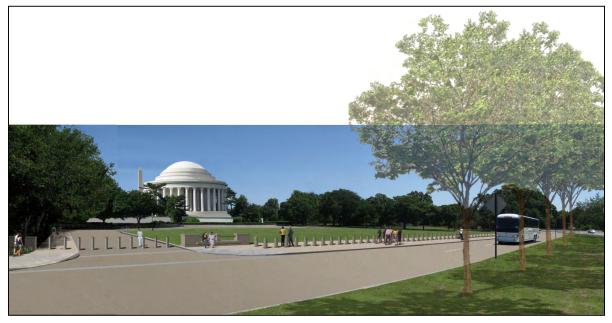
Implementation of the preferred alternative would allow for avoidance of impacts to most features of the Jefferson Memorial and its Grounds. However, given that wall design is still being developed, the following measures have been proposed to ensure avoidance of impacts to the landscape, and thus have been identified as mitigation measures in the EA:

- Materials, features, and finishes would be used that would be compatible with the existing conditions.
- Removed trees and shrubs would be replaced, as appropriate, to mitigate the impacts of the some of the trees, shrubs, and ground cover that would be lost. These plantings would be guided by the Olmsted Plan for the grounds as documented in the *Jefferson Memorial Cultural Landscape Inventory* of 2001.
- NPS would implement site improvements in accordance with the *Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for Cultural Landscapes* to ensure development is compatible with the historic setting and harmonizes with historic structures and landscapes.
- NPS would continue to review designs with the SHPO, NCPC, and CFA to ensure that the proposed actions blend as harmoniously as possible with the existing scale, context, and landscape in the project area.

In addition to the above mitigation measures proposed in the EA, NPS also proposes to seek funding to complete a Cultural Landscape Report in order to develop design guidelines for the implementation of site improvements.



Alternative 1 (Preferred Alternative): Barrier as Streetscape Feature, Design Diagram



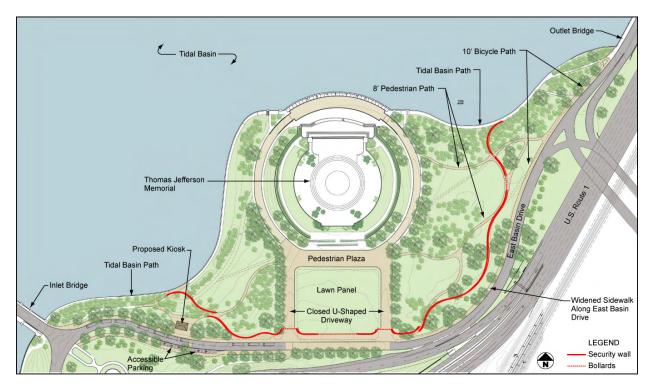
Alternative 1 (Preferred Alternative), South Lawn, Option with Bollards



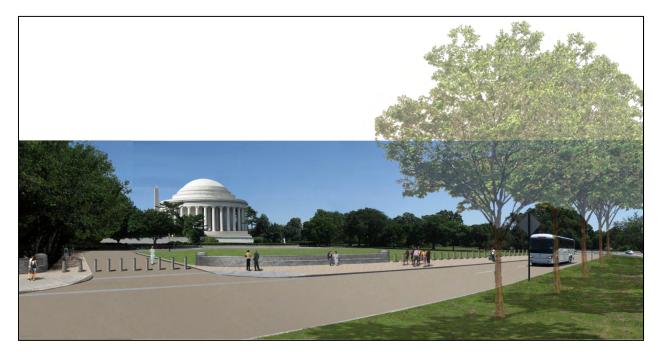
Alternative 1 (Preferred Alternative), South Lawn, Option with Piers



Alternative 1 (Preferred Alternative), Bus Drop-Off and Loading Zone



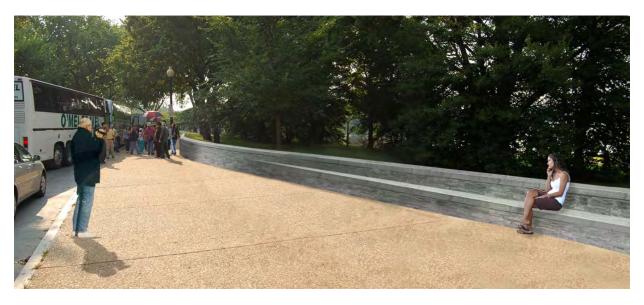
Alternative 2: Barrier as Landscape Feature, Design Diagram



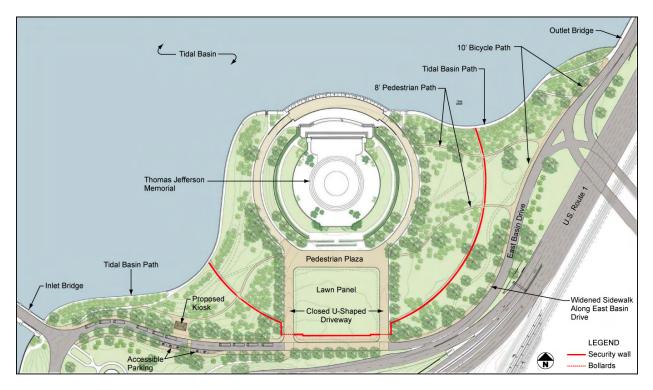
Alternative 2, South Lawn



Alternative 2, East View



Alternative 2, Bus Drop-Off and Loading Zone



Alternative 3: Barrier as Formal Feature, Design Diagram



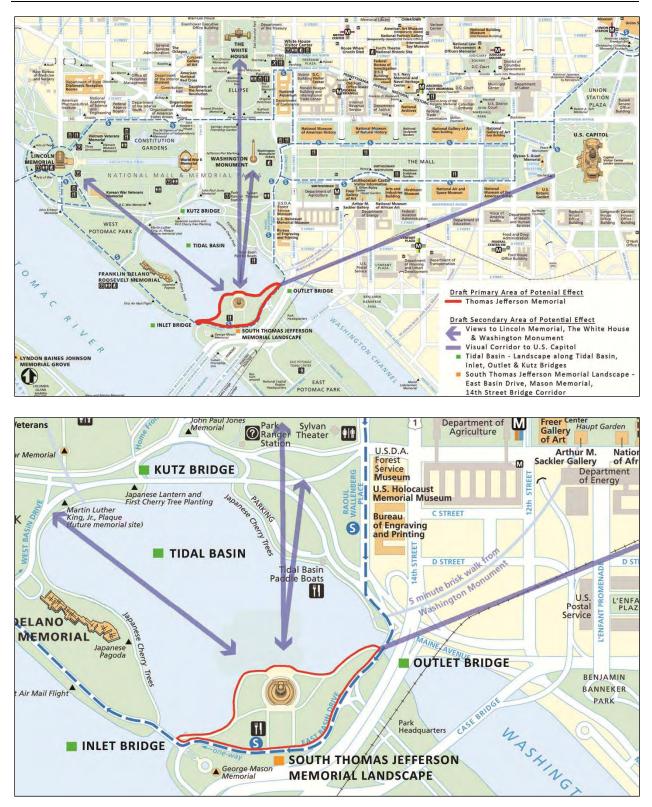
Alternative 3, South Lawn



Alternative 3, East View



Alternative 3, West End



Thomas Jefferson Memorial Proposed Area of Potential Effect, Overall and Detail