

Statue of Liberty National Monument
New York

U.S. Department of the Interior
National Park Service



STATUE OF LIBERTY NATIONAL MONUMENT NEW MUSEUM CONSTRUCTION

HERITAGE IMPACT ASSESSMENT



JUNE 2016

Contents

Executive Summary.....	1
Introduction	1
Administrative Data	2
Methodology.....	2
Identification.....	2
Determination of Impacts.....	3
Site History and Description	4
Outstanding Universal Value	4
Other Historic Designations	6
Background	8
Description of Proposed Development.....	10
Assessment and Evaluation of Impact.....	12
Grounds.....	15
Views to Liberty Island from New York City and New York Harbor	15
Views within and from the Island	15
Alternatives Considered and Mitigation Measures	17
Summary and Conclusions.....	18
Bibliography	19
Glossary of Terms.....	19
Acknowledgements and Authorship.....	20
Appendix A: Studies and reports on the Statue of Liberty and its setting.....	21
Appendix B: Views.....	23

Executive Summary

As a signatory to the World Heritage Convention, the United States (U.S.) believes in upholding its commitments under the Convention to assure the protection of the internationally-recognized values of its World Heritage Sites. Therefore, as part of its duty under the Convention, this Heritage Impact Assessment was prepared by the U.S. National Park Service for submission to the World Heritage Committee.

The U.S. National Park Service (NPS) is proposing to build a new museum on Liberty Island, the setting for and boundary of the Statue of Liberty World Heritage Site. The NPS consulted with preservation professionals including the State Historic Preservation Officers (SHPOs) of New York and New Jersey (senior responsible preservation officials for their respective state governments), the New York City Landmarks Preservation Commission (which oversees historic preservation issues for the City of New York), the Tribal Historic Preservation Officers (THPOs) from the Delaware Tribe of Indians and the Stockbridge-Munsee Community Band of Mohican Indians (responsible preservation officers for their respective Indian tribes), and preservation professionals within the NPS to identify attributes and assets that may contribute to the Outstanding Universal Value (OUV) of the Statue of Liberty and to determine impacts proposed project on the OUV. Although outside organizations did not review the entire report, their ideas were taken into account during its development.

NPS determined that three assets related to the setting of the Statue of Liberty would be impacted, however minimally, by this project. These assets include the Statue of Liberty Grounds, Views to Island from New York City/Harbor, and Views Within and From the Island. Because the location chosen for the museum is in an administrative portion of the island and its impact will be minimized by design features, such as low-reflective glass, limits on roof height, a living vegetated roof, and careful selection of color and materials to help the new museum recede into the background, the impact of the new museum will have neutral to slight effects on the OUV, while promoting a better appreciation of the Statue, its history and meaning to the 4 million visitors to the island each year.

Introduction

NPS is proposing to build a new museum on Liberty Island, the setting for the Statue of Liberty World Heritage Site. The whole of Liberty Island is included within the World Heritage designated area. There is currently a museum area within the pedestal of the Statue of Liberty, but it is not adequate to meet the needs of the approximately 4 million visitors to the island each year.

Recent life-safety upgrades at the Statue of Liberty have led to reduced occupancy levels inside the monument. Currently, only about 20% of visitors to Liberty Island are able to explore the museum area and go up inside the pedestal of the Statue of Liberty. The remaining visitors visit only the grounds of Liberty Island. Additionally, there is limited space for visitors to sit or take shelter in foul

weather. There is a need for both a richer interpretive experience that would be available to all visitors and indoor space for visitors during inclement weather.

In 2010, Hurricane Sandy inundated much of Liberty Island. As a result, to protect it and its contents from future storm surges, the proposed new museum is planned to be built at a higher elevation above sea level than most of the buildings currently existing on the island.

Because this is a major development effort for the 5.14 hectare island and to comply with U.S. commitments under the World Heritage Convention, the NPS conducted this Heritage Impact Analysis to determine how the construction of the proposed museum could impact the OUV of the Statue of Liberty.

Administrative Data

Name:	Statue of Liberty
Location:	New York, New York, United States of America
Coordinates:	N40 41 22 W74 2 41
Inscription Date:	1984
Administrator:	National Park Service, United States Department of the Interior
Report Compiler:	Margo Muhl Brooks, National Park Service

Methodology

The preservation professionals who wrote and reviewed this report used a two-step methodology for assessing impacts on the OUV of the Statue of Liberty. They first identified assets and attributes that contribute to the OUV using both published and unpublished reports and studies. Second, they used the guidance outlined in *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* (ICOMOS 2011) to determine how the proposal to build a new museum would impact those assets and attributes.

Identification

A number of reports and studies have been generated for the Statue of Liberty that analyze and outline the historic resources located on Liberty Island. These reports are listed in Appendix A. NPS employees reviewed the results of these studies to determine what attributes and assets contribute to the OUV for the Statue of Liberty and their relative value in conveying OUV (high, medium, low, negligible). They also used these studies to identify and group assets and attributes that do not convey OUV, but are listed on the National Register of Historic Places, a list of historic buildings, sites, districts and objects, considered significant to the local, state, or national history of the United States.

A draft of identified assets was shared with interested parties and local preservation organizations including the New York State Historic Preservation Office, the New Jersey State Historic Preservation

Office, the New York City Landmarks Preservation Commission, and the Tribal Historic Preservation Officers of the Delaware Tribe of Indians, and the Stockbridge-Munsee Community Band of Indians. Their comments and those of a wider circle of NPS preservation professionals, including curators, archeologists, landscape architects, and historians were taken into account during the development of a final list of assets and attributes. The New York City Landmarks Preservation Commission must review and approve changes to city landmarks under local law; the State and Tribal Historic Preservation Officers have review authority under federal and state laws for actions by federal agencies, including the National Park Service, to ensure that they will not adversely affect National Historic Landmarks.

Determination of Impacts

During the identification of potential assets and attributes, a draft chart showing how potential assets and attributes might be affected by the proposal to construct a new museum on Liberty Island was also circulated for discussion among the organizations listed above. As the asset list was finalized, the potential impacts were further analyzed and circulated among a broader group of NPS preservation specialists for review and comment. These comments were used to develop a chart showing impacts to OUV and local, state, and nationally important assets using the ICOMOS *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties*.

According to this guidance, the significance of the effect of change – i.e. the overall impact – on an attribute is a function of the importance of the attribute and the scale of change. This can be summarized for each attribute using a nine-point scale with “neutral” as its center point. The following chart shows how the scale is intended to be used indicate the impact of change on attributes that convey OUV.

Table 1 Scale and severity of change/impact on OUV assets (ICOMOS 2011)

VALUE OF HERITAGE ASSET	SCALE & SEVERITY OF CHANGE/IMPACT				
	No Change	Negligible change	Minor change	Moderate change	Major change
For WH properties Very High – attributes which convey OUV	SIGNIFICANCE OF EFFECT OR OVERALL IMPACT (EITHER ADVERSE OR BENEFICIAL)				
	Neutral	Slight	Moderate/ Large	Large/very Large	Very Large

For assets that do not convey OUV, a second chart is suggested by the guidance. This chart is reproduced below.

Table 2 Scale and severity of change/impact for other heritage assets (ICOMOS 2011).

For other heritage assets or attribute	SIGNIFICANCE OF IMPACT (EITHER ADVERSE OR BENEFICIAL)				
	Neutral	Slight	Moderate/ Large	Large/very Large	Very Large
Very High	Neutral	Slight	Moderate/ Large	Large/very Large	Very Large
High	Neutral	Slight	Moderate/ Slight	Moderate/ Large	Large/Very Large
Medium	Neutral	Neutral/Slight	Slight	Moderate	Moderate/ Large
Low	Neutral	Neutral/Slight	Neutral/Slight	Slight	Slight/ Moderate
Negligible	Neutral	Neutral	Neutral/Slight	Neutral/Slight	Slight

In the case of the Statue of Liberty, assets that conveyed OUV, but as part of the setting of the primary asset were analyzed using Table 2 because most reviewers distinguished a large difference between the primary assets (in this case the Statue of Liberty, her pedestal and Fort Wood on which the pedestal sits) and other aspects of the setting.

Site History and Description

Outstanding Universal Value

The OUV Statement for the Statue of Liberty was adopted by the World Heritage Committee in 2014 and is reproduced below.

Brief synthesis

The Statue of Liberty, a hollow colossus composed of thinly pounded copper sheets over a steel framework, stands on an island at the entrance to New York Harbor. It was designed by sculptor Frédéric Bartholdi in collaboration with engineer Gustave Eiffel, and was a gift from France on the centenary of American independence in 1876. Its design and construction were recognized at the time as one of the greatest technical achievements of the 19th century and hailed as a bridge between art and engineering. Atop its pedestal (designed by American architect Richard Morris Hunt), the Statue has welcomed millions of immigrants to the United States since it was dedicated in 1886.

The Statue is a masterpiece of colossal statuary, which found renewed expression in the 19th century, after the tradition of those of antiquity, but with intimations of Art Nouveau. Drawing on classical elements and iconography, it expressed modern aspirations. The interior iron framework is a formidable and intricate piece of construction, a harbinger of the future in engineering, architecture, and art, including the extensive use of concrete in the base, the flexible curtain-wall type of construction that supports the skin, and the use of electricity to light the torch. Édouard René de Laboulaye collaborated with Bartholdi for the concept of the Statue to embody international friendship, peace, and progress, and specifically the historical alliance between France and the United States. Its financing by international subscription was also significant. Highly potent symbolic elements of the design include the United States Declaration of Independence, which the Statue holds in her left hand, as well as the broken shackles from which she steps.

Criterion (i): This colossal statue is a masterpiece of the human spirit. The collaboration between the sculptor Frédéric Bartholdi and the engineer Gustave Eiffel resulted in the production of a technological wonder that brings together art and engineering in a new and powerful way.

Criterion (vi): The symbolic value of the Statue of Liberty lies in two basic factors. It was presented by France with the intention of affirming the historical alliance between the two nations. It was financed by international subscription in recognition of the establishment of the principles of freedom and democracy by the United States of America's Declaration of Independence, which the Statue holds in her left hand. The Statue also soon became and has endured as a symbol of the migration of people from many countries into the United States in the late 19th and the early 20th centuries. She endures as a highly potent symbol – inspiring contemplation, debate, and protest – of ideals such as liberty, peace, human rights, abolition of slavery, democracy, and opportunity.

Integrity

Within the boundaries of the property are located all the elements necessary to understand and express the Outstanding Universal Value of the Statue of Liberty. The Statue has been maintained through its lifetime with no major change. Deformations related to the galvanic interaction of metals were corrected in an extensive restoration undertaken for its centennial in 1986, which included reproducing the original deteriorated torch, which is now preserved in the museum. There have been periodic updates to the internal mechanical and security systems. The 5.95 ha property is of sufficient size to adequately ensure the complete representation of the features and processes that convey the property's significance, and does not suffer from adverse effects of development and/or neglect. There is no official buffer zone for the property, but its island location within the urban setting provides equivalent protection. The property, which is the whole of Liberty Island, also houses a number of administrative structures.

Authenticity

The Statue of Liberty is authentic in terms of its location and setting, form and design, materials and substance, use and function, and spirit and feeling. The Statue's design and purpose have been preserved from the time of its construction. The interior iron strapwork supporting the metal skin was replaced in 1986 with stainless steel that will prevent corrosion. All repairs were made with great fidelity to the original design and materials. Periodic mechanical, circulation, and security

updates have not affected the sculptural and symbolic values of the monument, and have been done to ensure the safety of visitors. There is a formal monitoring program for the property. The known and potential threats to the authenticity of the property include pollution, severe weather, and large numbers of visitors.

Protection and management requirements

The Statue of Liberty is owned by the Government of the United States of America. The Statue was designated as a National Monument in 1924 (the National Monument additionally includes Liberty Island [1937] and Ellis Island [1965]), and is administered by the National Park Service. These measures give it the highest possible level of protection. The existing General Management Plan (1982), which addresses physical preservation and interpretation, has been supplemented in recent years by a comprehensive study on life-safety and emergency management (2009), the recommendations of which have been implemented. The Statue receives a large number of visitors, and has substantial professional staff and facilities that include a Visitor Information Center, an exhibit on the Statue's history, and the nearby Ellis Island Immigration Museum. Access is by ferry, which includes security screening of visitors; maintaining the security of the property is an ongoing concern.

Sustaining the Outstanding Universal Value of the property over time will require continuing to monitor and manage the known and potential threats, including pollution, severe weather, and large numbers of visitors.

Other Historic Designations

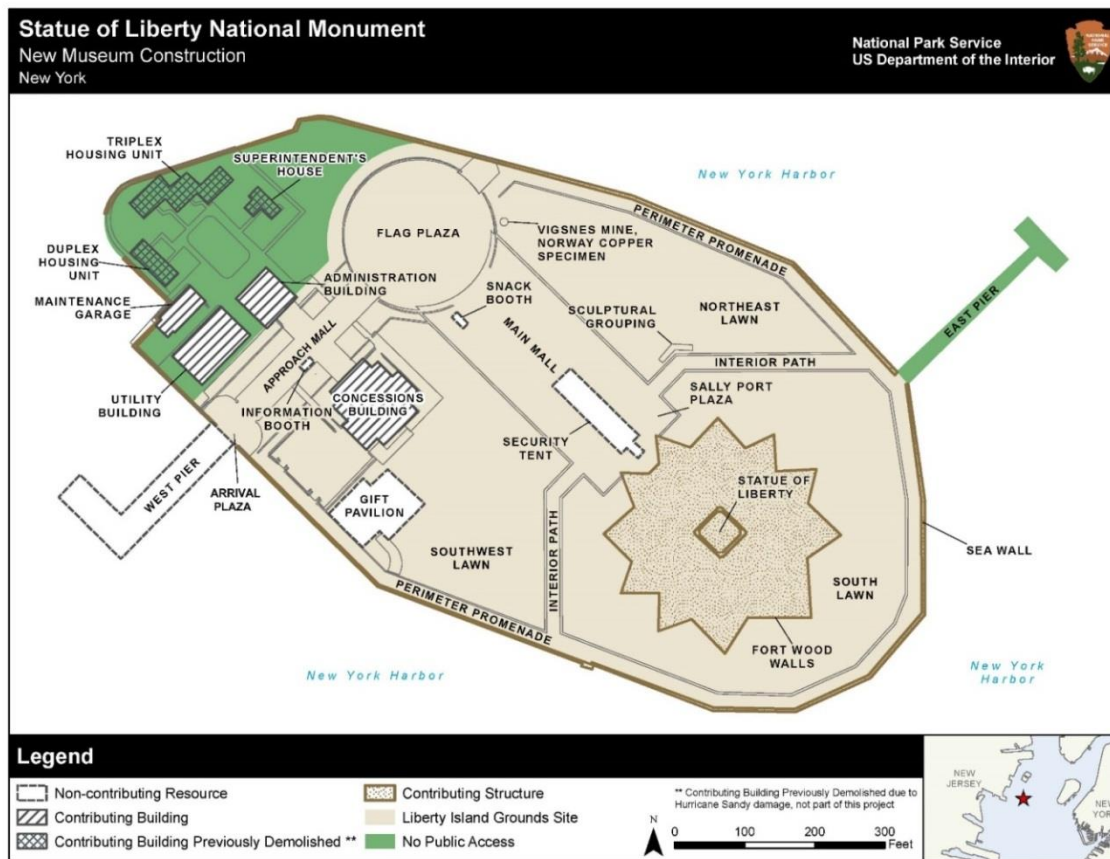
The Statue of Liberty is also listed in the United States National Register of Historic Places. The original listing included just the Statue, its pedestal and Fort Wood, the star-shaped fort on which it stands. In June of 2016, the listing is expected to be updated to create a historic district on Liberty Island. Liberty Island Historic District is significant at the national level under Criterion A in the areas of Politics/Government, Social History, and Conservation and Criterion C in the areas of Art, Architecture, and Engineering. The District will be significant under Criterion D at the state level in the areas of Prehistoric and Historic-Non-Aboriginal Archeology. The Statue of Liberty, consisting of the copper statue of Liberty Enlightening the World, its Pedestal, and the Fort Wood Walls, is the district's most important resource. Resources identified as contributing to the pending district are out lined in Table 3 and depicted on Figure 1.

Table 3 Resources identified as contributing and non-contributing to the Liberty Island National Register District*

Resource Name	National Register Property Type	Year Built
Contributing Resources		
Statue of Liberty Enlightening the World	Structure	1886
Fort Wood Walls	Structure	1811
Seawall	Structure	1842–1950
Administration Building	Building	1941
Concessions Building	Building	1941
Superintendent's House (DEMOLISHED)	Building	1952
Triplex Housing Unit (DEMOLISHED)	Building	1952
Duplex Housing Unit (DEMOLISHED)	Building	1952
Utility Building 2012	Building	1957
Liberty Island Grounds	Site	1939–1957
<i>Historic Associated Features</i>		
Primary Circulation System	Feature	1940-1952, altered 1986
Secondary Circulation System	Feature	1941-1952
Plantings	Feature	1940-1956
Shell Midden Site	Site	c. 1000 A.D.
Historic Midden #1 Site	Site	c. 1794–1811
Non-Contributing Resources		
Maintenance Garage	Building	1986
Gift Pavilion	Building	2010
Snack Booth	Building	c. 1998
Information Booth	Building	2012
West Pier	Structure	1951, rebuilt 1986, repaired 2014
East Pier	Structure	c. 1965, rebuilt 2013
Security Tent	Structure	2002–2004
Sculptural Grouping	Object	1984
Vigsnes Mine, Norway Copper Specimen	Object	1986

* Adapted from *Statue of Liberty National Monument New Museum Construction Environmental Assessment* (May 2016).

Figure 1 Pending Liberty Island National Historic District



The Statue of Liberty is also a New York City Landmark.

Background

The colossal statue, Liberty Enlightening the World, more commonly known as the Statue of Liberty, was designed by Frederic-Auguste Bartholdi and completed in 1886. The Statue of Liberty is made of a thin skin of molded copper plates attached to a steel and iron skeleton that was conceived by French engineer Gustave Eiffel. It sits on top of a Beaux Arts-style pedestal designed by prominent U.S. architect Richard Morris Hunt. The pedestal sits on a massive concrete base within the walls of the former Fort Wood, an 11-point, star-shaped military fortification that was developed in the early nineteenth century as a component of the harbor defense system designed to protect New York City from naval attack.

The Statue is located on Liberty Island, a 5.14-hectare island located in New York Harbor, .9 kilometers east of the coast of Jersey City, New Jersey, and 2.66 kilometers southwest of Manhattan. A seawall that was begun in the early nineteenth century and expanded over time extends around most of the perimeter of Liberty Island. All other vestiges of the former military base that once surrounded the Statue were removed between 1939 and 1957 when the NPS redeveloped and expanded the island according to a Master Plan. The development included the

construction of a new Administration Building, Concession Building, employee housing complex, and a landscape (Liberty Island Grounds) that was designed to enhance the visitor experience and create a more appropriate park-like setting for the Statue. Primary and secondary circulation systems guided visitors from the landing dock to the back of the Statue where they could enter Fort Wood and the pedestal on their way to climb the helical stair inside the Statue. Paths also guided visitors around the perimeter of the Fort to appreciate views of the Statue from all angles, New York City, and New York Harbor.

Notable alterations to the Statue and Master Plan include changes between 1984 and 1986 to replace the armature inside the Statue, to clean the Statue's copper skin and replace corroded areas, to replace the torch with a reproduction of the original, and to widen and redesign the approach and main malls that lead visitors to the Statue base. Additionally, the original paving materials were changed from light colored stone or asphalt to red brick, new tree and grass panels were added to the malls, and the central axis between the two malls was enlarged and changed from rectangular to circular. A maintenance building was added behind the Administrative building in an area of the island closed to the public.

Both the Administrative and Concessions buildings have received additions, and in 1972 an addition was added to the base of the pedestal and Fort Wood was filled in to create the American Immigration Museum (this museum closed in 1991 and the space now houses critical utilities for the Statue). The existing museum area, including the main Statue of Liberty exhibit, was designed as part of the 1986 restoration project.

After the terror attacks on New York City in 2001, a secondary screening tent was added to the island. Additionally, a temporary gift pavilion was built behind the statue near the Concessions building.

Between 2009 and 2010 the interiors of the Statue and pedestal were updated to replace stairs with more even treads and code-compliant handrails, add a second enclosed staircase within the pedestal for emergency egress, and replace the elevator. Additionally, a second external stair case was created at the base of the pedestal to help with emergency egress and a new stair was built from the terreplein level of Fort Wood to ground level to replace temporary wooden fire evacuation stairs.

In 2010, Hurricane Sandy inundated most of Liberty Island causing the NPS to replace and move most utilities to prevent future inundation, fix damage caused by the storm, and enhance restored features. Additionally, the housing units were demolished since they could not be reused due to high danger of future flood risks.

Description of Proposed Development

The NPS is proposing to construct a new 1,858-square-meter museum on Liberty Island that could accommodate up to 500 visitors at any one time. The proposed museum would be located in the northwest portion of the island adjacent to the Administration Building. The steps of the building would also serve as a seating area to view the Statue or activities that may occur in the Flag Plaza. The vegetated living roof terraces and landscaping would provide a green area for reduced rain water runoff, and improve energy performance of the building. Access to the new facility would be provided by a ramp designed with a 1:20 slope. The museum would be constructed on a raised concrete foundation so that the first floor would be above the base flood elevation. The museum is being designed to achieve, at a minimum, the NPS' requirement for a Leadership in Energy and Environmental Design (LEED) Silver certification. The roofline of the proposed museum would be predominantly below the top of the Fort Wood wall at an elevation of 14.5 meters above sea level. The siting and design of the museum facility was guided by the existing landscape and the dimensions and geometry of the Approach Mall and Main Mall. Overall, the new museum was designed to preserve the views of the Statue and of the island when approaching on or disembarking from the ferries. See Figure 2 for the proposed location of the museum and Figure 3 for a preliminary concept drawing of the museum.

The new museum would include the following proposed plan elements:

- museum exhibits
- immersive theater
- bookstore and restrooms
- administration space, including storage, locker rooms, staff restrooms, break room, and offices
- mechanical/support space, including a mechanical room and an audiovisual/information technology room
- a vegetated green roof
- exterior stairs edging the Flag Plaza

The exhibit space would include exhibits on the history of the Statue, including her creation, initial construction and later restoration, evolving meanings, and global impact. Exhibits exploring the ideas of liberty as inspired and represented by the Statue also would be included.

The construction period for the proposed action is estimated to be 24 months, depending on weather, and would not require the closure of the monument. While the park would remain open throughout the entire construction period, construction activities could necessitate the brief closure of some park areas; however, most of these areas are already closed to the public (e.g., the administrative area) or are areas that have been closed for park use in the past (e.g., the western half of Flag Plaza). Some park closures would occur when the original torch is moved from its current location to the new museum. Construction is scheduled to commence once fundraising efforts are completed.

Once the main Statue of Liberty museum exhibit is moved out of the Pedestal, a portion of the existing museum space in the Pedestal would be repurposed. Currently, the Pedestal includes the torch lobby (88.9 square meters), the torch exhibit on the balcony (8.8 square meters), and the main museum exhibit area (157.4 square meters) for a total of 255 square meters of existing museum space. The torch lobby and balcony would continue to house some type of interpretive exhibits for the public, but the main museum exhibit area would be converted back into administrative space.

Figure 2 Proposed location of new museum.



Figure 3 Conceptual rendering of proposed museum.



Assessment and Evaluation of Impact

The following chart contains seven columns that were used to document the evaluation of assets and attributes on Liberty Island and provides a short description of each asset. Assets that do not convey OUV are lumped into Visitor Support, Administrative Support, and Archaeological Site categories. Column 2 briefly describes each asset. Column 3 identifies what physical characteristics of an asset or attribute conveys OUV. Column 4 notes the integrity of each asset and documents major changes to the asset. Column 5 indicates if an asset has historical importance outside of the World Heritage framework. Column 6 ranks the importance of each asset. Finally, column 7 provides a color coded impact assessment. The explanation of the impacts follows the table.

Table 3. Impact Analysis

Asset	Description & Local Listings	Attributes Conveying OUV	Integrity/changes	Other Importance	Importance	Magnitude of Change to OUV
Statue	<p>The sculptural component of the Statue is a 152-ft, 2-inch-tall female figure executed in thin copper sheeting using the repoussé technique.</p> <p>The Statue’s interior is hollow and is dominated by Gustave Eiffel’s exposed, riveted wrought iron frame that supports the copper skin, which is visible throughout the interior of the sculpture.</p>	Copper skin Eiffel Structure Stola Shackles Torch Tablet Crown	High The copper skin and Eiffel structure have high integrity. <ul style="list-style-type: none">• Torch reproduced 1986• Interior stairs replaced 2011• Copper repairs and interior cleaning 1985-1986	National Register Listed (USA)	Very High	None
Pedestal	Completed in 1886, the gray granite pedestal was designed by nationally prominent architect Richard Morris Hunt in the Beaux Arts style. A viewing balcony can be accessed near the top of the pedestal.	Statue support	High <ul style="list-style-type: none">• Interior stairs changed in 2011• Interior cleaning	National Register Listed (USA)	Very High	None
Fort Wood	<p>The walls are the ramparts of an eleven-point, star-shaped, stone masonry, earth, and rubble military fort that was originally constructed in 1811 as part of the development of the Second American System of New York Harbor fortifications. The fort is a variant on the trace Italienne (Italian plan) of the sixteenth century but lacks the retiring flanks that would make the points into true bastions conforming to the trace Italienne model. Fort Wood retains the scarp (outer walls) and parapets of its ramparts.</p> <p>Atop the ramparts and behind the parapet is the Grand Promenade. This open terrace area approximates the former level of the fort’s missing terreplein and is set atop the fort’s earth fill.</p>	Star shape Stone walls Statue support	High <ul style="list-style-type: none">• New exit made through wall into lobby interior in 2013	National Register Listed (USA)	Very High	None
Island setting	Statue is located on an island in New York harbor and a boat is needed to arrive at the site.	Setting	High		Very High	None
Grounds	Statue rising from a lawn and grove by trees with a system of primary and secondary paths to lead visitors to and around the Statue	Setting	High: Trees and lawn <ul style="list-style-type: none">• Statue setting among lawns and trees intact• New more salt tolerant tree species planted in 2016 Low/Medium: Circulation system <ul style="list-style-type: none">• Changes made in 1986 to paving materials, width of paths, addition of tree and grass panels, and the enlargement and change in shape of the flag plaza(main) and main mall have deteriorated the original design of the grounds, however most of the paths remain in the same locations• Fencing installed around Statue lawn in 2016	Contributing to National Register Listed Property (USA)	Medium/High	Neutral/Slight
Views to Island from New York City/Harbor	<p>The Statue is visible from a great distance and stands alone.</p> <ul style="list-style-type: none">• View from ferry routes	Setting	High		Medium/High	Neutral/Slight
Views within and from the Island	<p>From:</p> <ul style="list-style-type: none">• East along Approach Mall toward flagpole with New York Skyline in background• View along main mall to rear of Statue• Views out from terreplein• Panoramic views of New Jersey and New York from perimeter path	Setting	High		Medium	Neutral/Slight

Asset	Description & Local Listings	Attributes Conveying OUV	Integrity/changes	Other Importance	Importance	Magnitude of Change to OUV
Visitor Support	<ul style="list-style-type: none">Administration BuildingConcession BuildingGift PavilionScreening FacilityPiersInformation and concession booths	Does not convey OUV	Low <ul style="list-style-type: none">These buildings/structures were added to the island between the 1930s and 2011.Older buildings have undergone significant changes to their interiors and some exterior changes from 1986 onward.The piers have both been rebuilt and reconfigured, although they remain in their original locations.	Administrative and Concession buildings are contributing to National Register Listed Property (USA)	Medium/High for Administrative and Concessions Buildings Negligible for all others	None
Administrative Support	<ul style="list-style-type: none">Utility BuildingHousing units (Duplex, Triplex, Superintendent’s House)Maintenance Garage	Does not convey OUV	Low: <ul style="list-style-type: none">Utility Building expanded in 1986.Housing damaged beyond repair during Hurricane Sandy and subsequently demolished.Maintenance Garage: Not significant on a local state or national level.	Utility Building and Housing are contributing to National Register Listed Property (USA)	Low/Medium for Utility Building Negligible for all others	None.
Archeological Sites	<ul style="list-style-type: none">Shell Midden Site c. 1000 A.D.Historic Midden #1 Site c. 1794–1811	Does not convey OUV	Medium <ul style="list-style-type: none">Archeological surveys have excavated portions of both sites, but portions are still likely to contain information about the past.	Contributing to National Register Listed Property (USA)	Medium	None.

The proposed museum has been sited to avoid direct impacts to most known historic resources. However, there are three assets that convey OUV that could be affected by the proposed museum. These include:

- Liberty Island Grounds
- Views to Liberty Island from New York City and New York Harbor
- Views within and from the Island

All three assets are part of the setting of the Statue. Although they help convey OUV, they are not the primary resource and were analyzed as assets of other historical significance

Grounds

The new museum will be a large new addition to the grounds. However, it is sited on the back/administrative side of the island adjacent to a portion of the primary circulation system that was completely reconfigured in 1986. Mitigation measures will reduce the visibility and impact of the building. The new building will not affect the front view of the Statue rising from a lawn and surrounded by trees.

As a result, the impact to OUV will be neutral to slight.

Views to Liberty Island from New York City and New York Harbor

The proposed Statue of Liberty Museum may be visible from various vantage points off-island. The most important views are from Manhattan, Ellis Island, and the ferries that take visitors to the Liberty Island. Views from Ellis Island and the ferry would be minimally impacted because the building would have some vegetative screening and because the view of the Statue and the New York Skyline so dominate the land and sea scape, that people's attention will continue to fix on them instead of the museum. Additionally, the museum's location has been planned to minimize the length of time ferry passengers approaching from the north and east would see the building. Using exterior cladding materials that are subdued in color and tone and optimizing tree placement would also help minimize the length of time ferry passengers would see the building. Appendix B views 1 and 2 show expected views from the ferry. Secondary views, such as from Liberty State Park would be minimally affected because Liberty State Park is located off axis from the Statue. The building will be visible, but the Statue would still dominate the view. Finally, the building will not be visible from most vantage points in New York harbor.

As a result, impacts on views to the island will be neutral to slight because the primary views would not be affected or be affected for very short periods of time and the Statue would still dominate the view shed.

Views within and from the Island

Bartholdi chose Liberty Island because the location satisfied two major criteria for placement of the Statue—it could be seen from a great distance and it could stand alone. The 1999 draft Cultural Landscape Report for Liberty Island identified four major groupings of important views from the

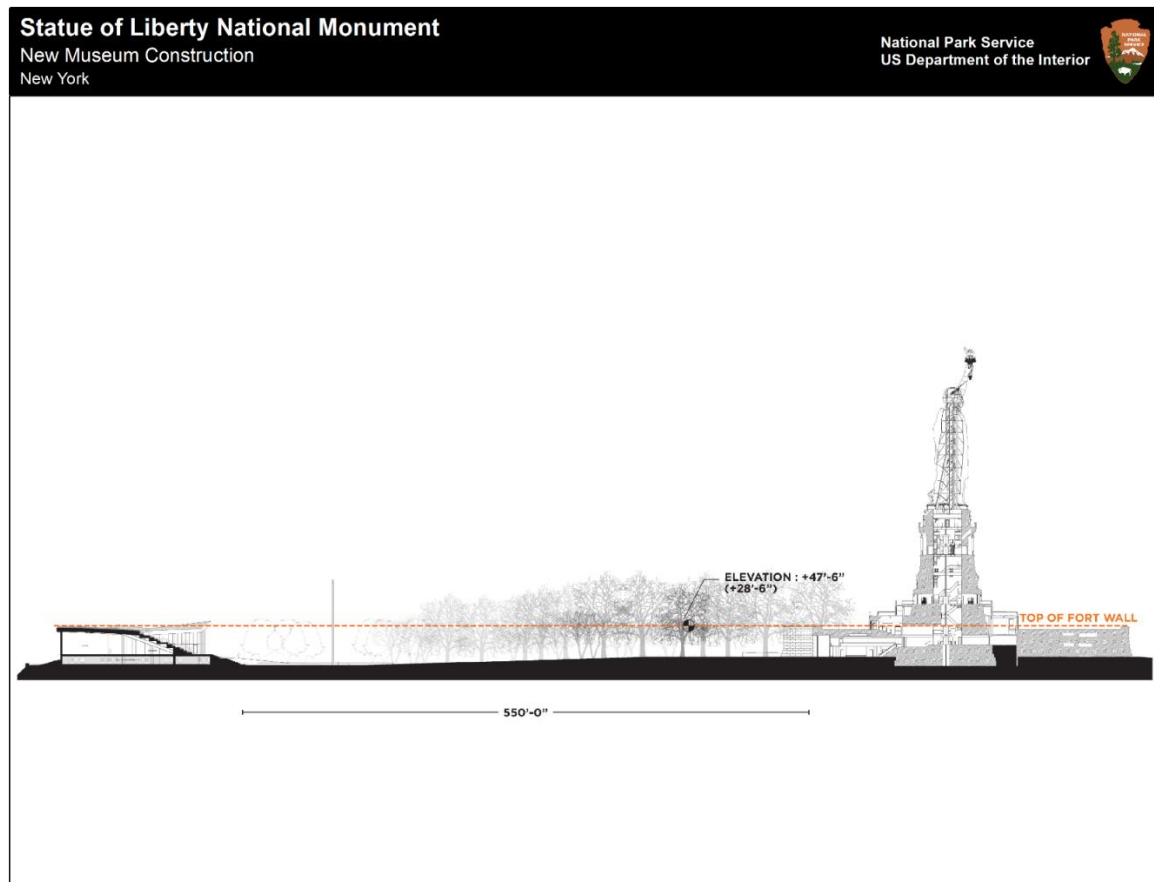
island outward, with the most important being frontal views. These views were so important to the National Park Service that visitors are routed around the island to experience them.

An important view corridor adjacent to the proposed museum site looks east from the Approach Mall toward the flagpole with the New York skyline in the background and Ellis Island off to the northeast (Berg 1999). The narrow, tree-framed view corridor was intended to open up as the visitors reach the Main Plaza, now the Flag Plaza. This view from the Flag Plaza to the New York Skyline will not change as a result of this project. Appendix B, view 3 shows the proposed view to Manhattan.

Views of the Statue from the island will not be impacted because the proposed museum site is in an area not currently accessible to visitors. Views off the island from the pedestal or the Fort Wood terreplein would be minimally affected. The museum would be visible to people looking off island from behind the Statue, but because the museum roof will be below the level of the terreplein walls, it will not impede previous view sheds (see Figure 4).

As a result, the impact to OUV from changes to views off and from within the island will be neutral to slight.

Figure 4 The majority of the proposed museum will be lower than the walls of Fort Wood.



Alternatives Considered and Mitigation Measures

Early consultation with the New York and New Jersey State Historic Preservation Offices and resource professionals defined the appropriate location for the new museum and eliminated other locations for their unacceptable impacts on the Statue's setting.

These alternatives included:

New Pedestal Museum

Creating a new larger museum in the Pedestal of the Statue was considered. This alternative would eliminate any new, visible construction on Liberty Island that could impact views or the Statue setting and it would consolidate visitors at the Statue, which is the natural attraction point on the island. While a new, larger museum in the Pedestal would allow more visitors to experience it than can experience the current museum, due to occupancy codes for the Statue and the Pedestal, the number of visitors would still be limited to a small portion of the overall visitors to the island. Additionally, all visitors to Liberty Island would have to be screened before entering the monument, requiring an increase to the size of the screening operation facilities. Items such as liquids, strollers and backpacks would continue to be prohibited. The alternative would also require constructing new openings in the Fort Wood walls for entrances, require moving recently installed utilities, and the Statue would need to be closed during construction. This was not deemed to be a feasible alternative because it would require many expensive changes and benefit few visitors.

Wingwalk Museum

Under this alternative, two park pavilions with landscaped, occupied roofs along the Interior Paths behind the Statue would be constructed. The two pavilions would minimize the amount of new construction required and would provide visitors with a non-linear experience. However, the alternative would impact views to and from the Statue more than the current alternative. It would also impact archeological resources dating to the military and prehistoric occupations of the island, which are significant on a local level, as well as disrupt the Statue setting. This alternative was reviewed and rejected by preservation professionals and not considered further.

Plaza Museum with Access through the Administrative Building

Under this alternative, the new museum would be constructed at its currently proposed location, but public access to the museum would be through the Administrative Building instead of the currently proposed stairs along the Flag Plaza. Under this alternative it would be difficult to move the public from the Administration Building up to the appropriate level needed to enter the museum because the floor of the museum needs to be at an elevation of 5.8 meters to place it above the base flood elevation. In addition, having visitors walk through the Administration Building would disrupt the operational functions of the building. For these two reasons, this alternative was not considered further.

Consultation also resulted in a number of requirements for minimizing impacts to the Statue setting and views to and from the island. These included:

- siting the building within the administrative core of the island behind the Statue
- keeping the building roof at or below the height of the Fort Wood walls
- ensuring that the new construction deferred to the Statue and respected the historic building and landscape elements that the NPS determined to be contributing features to the island's National Register eligibility
- providing for continuing review of design plans by the State Historic Preservation Offices of New York and New Jersey, the New York City Landmarks Preservation Commission and the Tribal Historic Preservation Officers of the Delaware Tribe of Indians and Stockbridge-Munsee Community Band of Mohican Indians.

NPS is currently working with the consulting parties listed above and the Advisory Council on Historic Preservation (an independent federal agency that administers the process by which State and Tribal Historic Preservation Officers review federally funded projects to avoid adverse effects on historic properties) to work out additional mitigation measures to minimize the impact that the new museum would have on the setting of the Statue of Liberty. Some of the mitigation measures include:

- using low reflective glass to prevent glare on windows,
- pushing the building as far back on the site as possible given the limited space on the island
- using colors that reflect the colors of buildings on the island, but in slightly darker tones to help the building further recede in prominence
- minimizing the bulk of the building through design

As design proceeds, the consulting parties will continue to review plans and advise designers on ways to minimize the impact of the building on the landscape.

Summary and Conclusions

In conclusion, because the building will be properly sited in the administrative area of Liberty Island behind the Statue, and because the building will not interfere with important sight lines, the proposed museum on Liberty Island will have neutral to slight impacts on the OUV of the Statue of Liberty. Additionally, the construction of the new museum will allow the 80% of visitors to the island who are not able to access the current museum, to see the original Statue torch, as well as tools and molds used to build the Statue and her skin. The new museum will allow a larger number of visitors to better appreciate the art and engineering of the Statue as well as her symbolic value, and to do so in greater safety and comfort.

Bibliography

ICOMOS “Guidance on Heritage Impact Assessments for Cultural World Heritage Properties,” ICOMOS, Paris, France, 2011.

National Park Service “Draft Cultural Landscape Report for Liberty Island, Statue of Liberty National Monument,” 1999.

National Park Service “Draft Statue of Liberty Historic District National Register Nomination,” 2015.

National Park Service *Statue of Liberty National Monument New Museum Construction Environmental Assessment*, compiled by Louis Berger Associates, May 2016.

Glossary of Terms

Advisory Council on Historic Preservation (ACHP): An independent U.S. federal agency that promotes the preservation, enhancement, and productive use of U.S. historic resources. The ACHP serves as the primary federal policy advisor to the President and Congress; recommends administrative and legislative improvements for protecting our nation's heritage; advocates full consideration of historic values in federal decision making; and reviews federal programs and policies to promote effectiveness, coordination, and consistency with national preservation policies.

National Park Service (NPS): The National Park Service is a bureau of the U.S. Department of the Interior and is charged with the management of the State of Liberty.

National Register of Historic Places: A list maintained by the U.S. Secretary of the Interior of historic properties significant on the national, state, or local level. The listed properties derive protection and oversight in accordance with U.S. law. U.S. federal agencies must consult with local preservation authorities prior to impacting historic properties listed in the register.

State Historic Preservation Officer (SHPO): Preservation professional appointment by the Governor of a state to administer national and state historic preservation programs on the state level. Each SHPO must maintain qualified staff as may be necessary for such purposes.

Tribal Historic Preservation Officer (THPO): Preservation professional appointed by a U.S. federally recognized tribe to administer national historic preservation programs on tribal land and consult with federal agencies regarding federal actions that could impact historic properties that U.S. Indian tribes may have an interest in.

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Appendix A: Studies and reports on the Statue of Liberty and its setting

All reports are available for review from the Statue of Liberty. Some reports are labeled limited distribution because they contain sensitive information that should not be divulged to the public.

Class*	Title (date)	Type**	Summary
AR	Archeological Investigations in Support of the New Museum Construction, Statue of Liberty National Monument (2016)	P/LD	Archeological investigations undertaken by heavy equipment to locate potential buildings and/or prehistoric buried ground surfaces. Although building foundations related to the war department era on the island were discovered, no significant associated archeological resources were discovered.
NR	Statue of Liberty Historic District National Register Nomination (2015)	D	This nomination updates the 1986 National Register nomination and is expected to be accepted as official in June 2016
AR	<i>Archeological Monitoring Life and Safety Upgrades Statue of Liberty National Monument Liberty Island, New York City, New York</i> (2013)	P/LD	Monitoring of upgrades at the Statue of Liberty, including excavation for two exits within the Fort Wood Walls. Interior features of Fort Wood were recorded prior to being infilled again.
HSR	<i>Liberty Enlightening the World, Statue of Liberty National Monument, New York, New York Historic Structure Report</i> (2011)	P	Outlines the history of the Statue of Liberty, its construction and repair and provides a detailed description and condition assessment of the pedestal and Statue.
AR	<i>Phase IA-IB/II Archeological Assessment Install Power and Communications Lines for the Perimeter Security Project, Statue of Liberty National Monument New York County, New York</i> (2010)	P/LD	Results of a survey in advance of a project to install communication lines on the island Two historic midden site dating to the military occupation of Fort Wood were discovered and recommended for avoidance.
HSR	<i>Fort Wood Historic Structure Report</i> (2010)	P	Provides a detailed history of development and use for Fort Wood as well as recommendations for future treatment
HSR	<i>Liberty Island Seawall Historic Structure Report</i> (2008)	P	Outlined the history of building campaigns that enlarged and protected the shores of Liberty Island, including the various construction techniques used between the late 18 th century and 1950 when the island took its current shape. The seawall was determined to be eligible for listing in the National Register of Historic Places
AR	<i>The Ground Beneath Her Feet: The Archeology of Liberty Island, Statue of Liberty National Monument, New York, New York</i> (2003)	P	Popular report summarizing the results of archeological research on Liberty Island.
AR	<i>Archeology of a Prehistoric Shell Midden, Statue of Liberty National Monument,</i>	P	Extensive research report covering several excavation seasons of a prehistoric shell midden site on Liberty Island near the Main or Approach Mall..

Class*	Title (date)	Type**	Summary
	<i>New York (2002)</i>		
AR	<i>Ground Truthing the Geophysical Investigations: An Evaluation of the Remaining Archeological Resources, Liberty Island National Monument, New York, New York (2001)</i>	P/LD	55 half-meter test pits were excavated to ground truth geophysical excavations from 1999. Remnants of past military buildings and ground surfaces were discovered. Recommendations for future management were made.
CLR	<i>Cultural Landscape Report for Liberty Island, Statue of Liberty National Monument (1999)</i>	D	Provides greater detail than the CLI on important landscape features and potential treatment options. Character-defining features are identified and explained.
AR	<i>Liberty Island Archeological Overview and Assessment, Statue of Liberty/Ellis Island National Monument New York, New York (1998)</i>	P/LD	Documentary research and compilation of known information about the potential for archeological sites on Liberty Island with management and testing recommendations.
CLI	<i>National Park Service Cultural Landscape Inventory (1996)</i>	UP	Preliminary inventory of important landscape features on Liberty Island. It determined that the landscape was eligible for listing in the National Register of Historic Places for its association with National Park Service planning efforts to transform the island from a military outpost to a National Park.
NR	Statue of Liberty National Register Nomination (1986)	P	Outlines the significance of the Statue of Liberty, pedestal and Fort Wood for inclusion in the U.S. National Register of Historic Places.

Class

AR=Archeological Report
CLI=Cultural Landscape Inventor
CLR=Cultural Landscape Report
HSR=Historic Structure Report
NR=National Register Nomination

**Type

D=Draft
P=Published Report
P/LD=Published Report with limited distribution
UP=Unpublished Report

Appendix B: Views

Appendix B is provided as a separate document.

