



Thomas Jefferson Memorial

Targeted Accessibility Improvement Program

ASSESSMENT OF EFFECT

May 2018



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NATIONAL MALL AND MEMORIAL PARKS

**THOMAS JEFFERSON MEMORIAL
TARGETED ACCESSIBILITY IMPROVEMENT PROGRAM**

*Assessment of Effects
Under Section 106, National Historic Preservation Act*

May 2018

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CONTENTS

I. Introduction	1
II. Alternatives	3
No-Action Alternative	3
NPS Preferred Alternative	3
III. Identification of Cultural Resources	6
Area of Potential Effect	6
Cultural Context	6
Identification of Historic Properties	7
IV. Assessment of Effects	11
Methodology	11
Assessment of Effects	11
V. Avoidance, Minimization, and Mitigation Measures	15
VI. Conclusion	16
VII. References	17
Appendix A: Figures	
Appendix B: Photographs	

LIST OF FIGURES

- Figure 1. Project Vicinity
- Figure 2. East Elevation Levels
- Figure 3. Overall Site Plan
- Figure 4. Accessible Parking Area Demolition Plan
- Figure 5. Accessible Parking Area Improvements Plan
- Figure 6. Sloped Walkways Demolition Plan
- Figure 7. Sloped Walkways Improvements Plan
- Figure 8. Sloped Walkways Sections
- Figure 9. Sloped Walkway Wall Detail
- Figure 10. Walkway Surface Replacement Plan
- Figure 11. Interior Floor Plans
- Figure 12. Lower Level Demolition Plan
- Figure 13. Lower Level Improvements Plan
- Figure 14. Portico/Chamber Level Demolition Plan
- Figure 15. Portico/Chamber Level Improvements Plan
- Figure 16. Project Area and Area of Potential Effect

I. INTRODUCTION

The Thomas Jefferson Memorial (the Memorial), is located within National Mall and Memorial Parks in Washington, DC and is administered by the National Park Service (NPS). Commissioned by an Act of Congress in 1934, the Thomas Jefferson Memorial is the nation's premier monument to its third president. In 1937, the Thomas Jefferson Memorial Commission chose John Russell Pope as the architect for the Memorial. Based on the plan developed by the McMillan Commission in 1901-1902 (McMillan Plan), Pope designed a Neoclassical white marble memorial modeled after the Roman Pantheon, which faces north towards the White House. The site for the Memorial was low, swampy land created from fill from river dredging. In 1939, President Franklin Delano Roosevelt laid the cornerstone of the Memorial, and the building was officially dedicated on April 13, 1943, the bicentennial of Jefferson's birth. The surrounding 19.2-acre landscape is a cultural landscape designed by 19th century landscape architect Frederick Law Olmsted, Jr. The views and vistas from the Memorial are also significant, with a direct visual line to the White House with additional thought put into its relationship between the Washington Monument and Lincoln Memorial (NPS 1981 and 2004). The project location is shown on figure 1; all figures are included in appendix A.

The National Park Service proposes to undertake improvements at the Memorial as part of the Targeted Accessibility Improvement Program, which encourages holistic principles of Universal Design during the visitor experiences and at the Memorial facilities. To address the experience holistically, the project must improve both physical and programmatic accessibility from entry to exit for a broad range of abilities. Proposed actions include creating two sloped walkways connecting the Tidal Basin plaza level to the lower level (see figure 2 for levels of the Memorial shown from the east elevation); modernizing the existing elevator and improving the associated ramps to meet current accessibility code; improving interior accessibility including restrooms, bookstore, gift shop, doors, and handrails; improving the designated accessible parking area; improving signage for clarity and wayfinding; and creating accessible interpretive exhibits.

The purpose of this project is to remove or reduce barriers to access and improve the experience of all visitors to the Memorial. The visitor experience at the Memorial includes arrival at and use of the facilities in and around the Memorial (such as parking spaces, sidewalks, restrooms, food kiosk, and wayfinding and orientation) and utilization of accessible routes to the Memorial. Through this project, the National Park Service strives to make the experiences and facilities of the Memorial accessible to visitors with mobility, sensory, and cognitive disabilities through the application of principles of Universal Design. The seven principles of Universal Design are as follows: equitable use, flexibility in use, simple and intuitive, perceptible information, tolerance for error, low physical effort, and size and space for approach and use.

This project is needed because the Memorial currently only has one accessible route to the statuary chamber level (chamber level), which is over 1,000 feet long and winding. This route requires visitors to use a ramp on the south side of the Memorial to a sidewalk leading to the lower level entrances on the northwest or northeast sides. If coming from the Tidal Basin (north side), visitors must travel all the way around the Memorial to the south side ramp and then back toward the north along the sidewalk leading to the lower level entrance. Visitors then follow a ramp to the lower level and take the elevator to a non-compliant ramp to reach the chamber level. While some accessibility accommodations are provided throughout the Memorial, a number of interior elements are not universally accessible. The project is also needed because the designated accessible parking spaces

for the Memorial are often blocked by buses and because there is no access aisle next to the spaces that is protected from traffic.

The National Historic Preservation Act of 1966, as amended (NHPA) requires that the effects of any federal undertaking or action on historic properties be taken into account. The proposed accessibility improvements at the Jefferson Memorial would be a federal undertaking and therefore subject to Section 106 of the National Historic Preservation Act. This assessment of effect report is intended to meet the requirements of Section 106 of the National Historic Preservation Act. The National Park Service will be conducting compliance under the National Environmental Policy Act separately, but concurrently to this assessment of effect.

II. ALTERNATIVES

NO-ACTION ALTERNATIVE

Under the no-action alternative, current management of the Memorial would continue and the National Park Service would continue to maintain the structure and grounds as needed, in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

Under the no-action alternative, visitors requiring accessible parking spaces would continue to use the designated accessible spaces located along East Basin Drive SW south of the Memorial. Visitors using these spaces would continue to lack an access aisle protected from traffic and may continue to find buses blocking the parking spaces.

Visitors would continue to access the site from either the Tidal Basin plaza on the north side of the Memorial or the parking area along East Basin Drive SW on the south side of the Memorial. Visitors unable to use the stairs to the chamber level at the Tidal Basin would continue to access the chamber level by travelling on the existing sloped walkway on the south end of the Memorial leading to the doors to the lower level where an elevator is available to the chamber level. The ramps on the interior of the Memorial would continue to not meet current accessibility code.

On the interior, access to the elevator would continue to be through a set of historic metal doors and a set of glass double doors. Once at the portico level, the existing ramp from the elevator to the chamber would continue to be non-compliant with current accessibility code. The existing exhibit area on the lower level would remain unchanged and the exhibits would include limited accommodations for accessibility. The gift shop and the bookstore would remain in their current configurations with counters lacking accessible accommodations.

NPS PREFERRED ALTERNATIVE

The following describes the actions that would take place under the NPS preferred alternative, which is also the proposed action. See figure 3 for an overall site plan.

Under the NPS preferred alternative, two parallel van-accessible parking spaces would be created in the same areas as the existing designated accessible parking spaces adjacent to the existing food kiosk. The existing concrete sidewalk would be removed to allow for the existing parking spaces in this location to be widened by 4 feet (figure 4). A new sidewalk would be created with lower pavement grades and a flush transition from the access aisle to the sidewalk. Ramps would be constructed on either end of the sidewalk in this area leading to the existing pavement grade. All existing site furnishings and signage would be relocated as required to accommodate the new sidewalk. See figure 5 for a plan view of the proposed accessible parking area improvements.

Under the NPS preferred alternative, two sloped walkways would be created on the north side of the project area, one each on the east and west side of the Memorial, that connects the Tidal Basin plaza level with the lower terrace level. See figures 6 and 7 for plan views of the proposed demolition and improvements for the sloped walkways. These walkways would be located outside of the historic terrace planter, adjacent to the terrace retaining wall (figure 7). The sloped walkways would be 8 feet wide with a maximum slope of no more than 4.75 percent and a

maximum cross slope of no more than 1.5 percent, as shown on the cross-sections on figure 8. The walkways would be surfaced with an exposed aggregate concrete, using a smaller aggregate than that of the existing walkways. Handrails would be installed on both sides of the walkways for increased accessibility. On the outside edge of each of the sloped walkways, a 6-inch high granite-clad cast-in-place curb wall would be constructed with a slope matching the walkways (see detail on figure 9). In order for the sloped walkways to connect from the Tidal Basin plaza level to the lower terrace level, two or three sections of the existing capstone must be removed from the historic terrace wall on each side of the Memorial and moved into museum collections (figure 6). The walkway alignment would be coordinated with the capstone location of the terrace wall. A change in the ground material would be implemented at this location to highlight the removed portion of the capstone wall. The approximate location is shown on figure 6, but the exact connection location would be determined through additional fieldwork and survey during a future design phase. Because the capstones would be stored, the walkways would be reversible. To meet the accessibility requirements for the existing walkway throughout the site, select portions of the concrete pavement sections would be removed and replaced in kind, as shown on figure 10. Two existing floodlights would be relocated adjacent to the proposed sloped walkway.

To accommodate the proposed sloped walkways, some vegetation would be removed. The upright Japanese Yews plantings located where the slope walkway would meet the Tidal Basin plaza on the both side of the Memorial would be removed. New upright Japanese Yews (three on each side of the Memorial) would be planted just outside the sloped walkway to flank both sides of the Memorial steps, consistent with the original landscape design by Olmsted, Jr. On the lower terrace level, an approximately 10-by-10-foot area of existing holly hedge material would be removed on both the east and west sides of the Memorial.

On the lower level interior of the Memorial, the existing accessible route would be improved. See figure 11 for interior floor plans. The historic metal doors would remain open during operation to meet accessibility requirements. Automatic door openers would be installed on the interior non-historic glass double doors. The existing handrails would be extended 12 inches along the wall to meet accessibility code. In the gift shop and bookstore, the service desks would be replaced with counters that include portions that are configured for wheelchair accessibility. The existing elevator would be modernized for improved reliability through the replacement of several mechanical parts and fixtures. See figures 12 and 13 for plan views of the proposed demolition and improvements for the lower level.

The men's, women's, and family restrooms would be rehabilitated for improved accessibility. Vestibules would be installed at both the men's and women's room entrances and automatic door openers would be installed on all doors into the restrooms. Multiple fixtures in the restrooms would be relocated to comply with accessibility standards. Toilet partitions would be reconfigured to provide both accessible and ambulatory stalls with doors swinging outward. Fixtures in the accessible stalls and the family restroom (pulls, grab bars, toilet paper dispensers, coat hooks) would be relocated at accessibility-compliant heights and locations.

Existing exhibits would be redesigned to include more accessible experiences such as tactile models, audio descriptions, and interpretive elements that provide a better visitor experience for all visitors. On the lower level, existing exhibit components and non-historic walls surrounding the exhibit support spaces would be removed. New finished space, including flooring and ceilings would be

created to facilitate new exhibits. Coordination with an exhibit design team would continue throughout this process and through future design phases of the project.

The elevator lobby, which is located at an elevation that spans both the portico level and the chamber level (shown on figure 11), would be modified to meet accessibility code. See figures 14 and 15 for plan views of the proposed demolition and improvements for the portico and chamber levels. The floor level of the lobby would be raised by 4 inches, allowing the ramp to the statuary chamber to be modified for improved cross slope and running slope that meet accessibility requirements. A second ramp would be created that provides access to the portico level. The existing non-historic ramp, flooring, and handrails would be removed. The US Park Police office door at this location would be removed and reinstalled to accommodate the raised floor. The floor inside the office would also be raised by 4 inches to meet the raised floor of the lobby. The proposed raised floor and ramps would be constructed and installed in a manner that is fully reversible. The historic metal doors would remain open during operation to meet accessibility requirements.

Opposite the elevator lobby on the eastern side of the portico level, the existing gift shop/bookstore would be rehabilitated into an interpretive exhibit space with accessible exhibits such as tactile models, audio descriptions, and other interpretive elements. The exterior historic metal door into the vestibule would remain open during operation to meet accessibility requirements. The interior non-historic glass doors would be removed and replaced with new doors with automatic door openers.

Accessible signage would be provided throughout the lower, portico, and chamber levels to provide information and wayfinding for visitors. Additional wayside exhibits on the exterior of the Memorial would also be installed; specific design and content would be developed in coordination with the exhibit design team. Specific locations for signage and wayside exhibits would be developed in coordination with the exhibit design team during a future phase of the project.

A secure construction staging area for staging of equipment and materials would be established and enclosed with fencing on the east side of the Memorial. Access to the secure staging area would be via a new security gate that would be constructed at the east entrance from East Basin Drive SW, set back at a distance to be aligned with the existing security gate at the west entrance. A portion of the staging area along East Basin Drive SW would be outside the secure area for contractor vehicle parking. The specific location and extent of the construction staging area would be determined during future project phases and may include portions of the lawn, the circular roadway, and terraced walkways on the southeast side of the Memorial.

III. IDENTIFICATION OF CULTURAL RESOURCES

AREA OF POTENTIAL EFFECT

According to Section 106 regulations (36 CFR 800), an area of potential effect is defined as the geographic area or areas in which an undertaking may directly or indirectly cause alterations in the character or use of historic properties if such properties exist. The area of potential effect is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

The area of potential effect for this project includes the entire project area plus the area from which the proposed changes to the exterior of the Memorial would be visible, as shown on figure 16. This includes the Thomas Jefferson Memorial, the Tidal Basin, several monuments and memorials along the banks of the Tidal Basin, and associated cultural landscapes. These are described under the “Identification of Historic Properties” section below.

CULTURAL CONTEXT

In 1934, the Thomas Jefferson Memorial Commission was appointed by Congress to create a memorial to the third US President in Washington, DC. The site was chosen the same year, based on the McMillan Plan, which marked the site for a great memorial on the scale of the White House, the Washington Monument, and the Lincoln Memorial. John Russell Pope was chosen as the architect of the Memorial and, in the spirit of the McMillan Plan, his design called for a monolithic pantheon of large dimensions facing the White House. His design would have transformed the Tidal Basin into a series of reflecting pools flanked by formal rows of trees and rectangular terraces. The US Commission of Fine Arts and the National Capital Parks and Planning Commission had a number of objections to this design including the scale and design of the Memorial and the elaborate landscaping plan, which would require removal of the already significant Tidal Basin and associated cherry trees (NPS 1981 and 2004).

After the untimely death of Pope in 1937, Daniel P. Higgins and Otto R. Eggers became the architects of the Memorial and redesigned it to address many of the commissions concerns. Their design retained the significance and integrity of the Tidal Basin and cherry trees and adjusted the location and scale of the Memorial for compatibility with the other monuments in the area. The Commission of Fine Arts still objected to the Pantheon design of the Memorial, but the Thomas Jefferson Memorial Commission took the case directly to President Franklin D. Roosevelt who overrode the authority of the Commission of Fine Arts and ordered construction to begin (NPS 1981 and 2004).

Construction began in 1938 and Frederick Law Olmsted, Jr. was chosen as the project’s landscape architect. A ceremony was held in 1939 in which President Roosevelt laid the cornerstone of the Memorial and in 1943, on the bicentennial of Thomas Jefferson’s birth, the Memorial was dedicated. In 1947, the original plaster statue sculpted by Rudolph Evans was replaced with the bronze statue that exists today (NPS 1981 and 2004).

Two major landscape projects were carried out in the 1970s that added several yews and *Zelkova* trees, which resulted in somewhat of a departure from the original Olmsted, Jr. landscape scheme (NPS 2004). In 1975, the Memorial was first made accessible as part of a project to commemorate

America's Bicentennial. The rehabilitation efforts included modifying an original planter at the south of the Memorial to create two separate planters that contained accessible sloped walkways, which allowed visitors with mobility impairments or using mobility assistive devices to reach the lower terrace level. On the interior of the Memorial, accessible toilet facilities were provided, an elevator was installed, and other repairs were made. At this time, the only accessible entrance to the lower level was along a ramp at the west entrance. In the 1980s, the dwarf inkberry plants that made up the hedge on the terrace level were replaced with an equal number of Japanese holly plants (NPS 2004).

Landscape restoration was undertaken in the 1990s, which returned many of the plantings to the original design and removed plantings installed for the Bicentennial celebration (NPS 2004). During this time, the Memorial underwent a major rehabilitation in which the lower level was expanded to include accessible restrooms, an exhibit, replacement of the elevator, two sloped walkways from the exterior doors to the lower level, and a ramp from the portico level to the chamber level. During this effort, the lower level of the Memorial became accessible from both the east and west entrances. The 1990s rehabilitation of the interior of the Memorial is the layout visitors experience today.

IDENTIFICATION OF HISTORIC PROPERTIES

Efforts to identify historic properties included a review of information provided by the National Park Service, supplemented by other published and unpublished sources, primarily National Register of Historic Places (National Register) nomination forms, cultural landscape inventories, and landscape overview reports.

Thomas Jefferson Memorial

The Thomas Jefferson Memorial is listed in the National Register both individually and as a contributing resource to the East and West Potomac Parks Historic District (NPS 1981 and 2000). It is significant as America's foremost memorial to its third president, as an original adaptation of Neoclassical architecture, and as a key landmark in the monumental core of Washington DC in accordance with the McMillan Plan.

The Memorial was originally designed by John Russell Pope and later modified by his successors, David P. Higgins and Otto R. Eggers. It is of Neoclassical style modeled after the Roman Pantheon, which influenced Jefferson's design of his two most famous buildings, Monticello and the University of Virginia Rotunda. The Memorial is a circular, open-air limestone monument with a shallow dome and circular peripteral Ionic colonnade. It sits on a series of granite stepped terraces and is supported by concrete piles of the Memorial's undercroft carried down 80 feet below the mean water line of the Tidal Basin. A flight of granite steps and platforms flanked by granite buttresses leads from the Tidal Basin plaza to a portico topped with a 10-foot triangular pediment raised 62-feet above the floor. The Memorial has 54 unfluted Ionic columns 43-feet tall and 5 feet 3 inches in diameter. The interior of the statuary chamber is finished in Georgia marble and is dominated by Rudolph Evans' bronze statue of Thomas Jefferson, which stands in the center. Adorning the walls on the interior of the chamber level are five quotations from Jefferson's writings that illustrate the principles to which he dedicated his life. An engraved frieze encircles the chamber interior topped by a dentiled cornice and an Indiana limestone dome standing 103 feet above the floor. The lower region of the dome is coffered and contains lights for the statue, while the upper region of the dome has a smooth surface (NPS 1981). An elevator installed in 1975 is located on the northwest corner of the chamber level and a non-historic gift shop/bookstore is located on the northeast corner.

The lower level of the Memorial is currently accessed via the elevator from the chamber level or two doors, one each on the east and west sides of Memorial at the terrace level. Historic exterior doors remain at these entrances. In 1975, restrooms, a bookstore, and the elevator were installed on the lower level. A second major renovation occurred in the 1990s that reconfigured the lower level to its current floor plan. This renovation included expanded restrooms and the installation of the exhibit space, the bookstore, and the gift shop (NPS 2004).

Thomas Jefferson Memorial Landscape

The landscape of the Jefferson Memorial is considered a component landscape of the West Potomac Park Landscape. The Memorial landscape was designed by landscape architect Frederick Law Olmsted, Jr., who was also involved in designing and planning for the city as part of the McMillan Plan. The landscape is dominated by the Memorial itself, which is described above. Other contributing structures within the landscape are the stylobate wall and terrace walls that create the circular levels and walkways surrounding the Memorial. According to the cultural landscape inventory, the Memorial and related walls have high integrity and retain original materials and design. The refreshment kiosk south of the Memorial is considered a non-contributing resource to the landscape (NPS 2004).

Circulation throughout the site is facilitated by the walkways from the Tidal Basin to the east and west, the former roadway to the south, the circular roadway (now a pedestrian walkway), and terrace walkways around the Memorial. Pedestrian circulation patterns have remained relatively the same since construction, though the addition of accessible routes and some change in materials have resulted in some loss of integrity. Vehicular circulation patterns were changed when the parking area south of the Memorial and the circular roadway were closed to vehicles. The approach roads and existing parking area along East Basin Drive SW have retained integrity. The existing pedestrian walkways throughout the site are considered contributing resources to the landscape (NPS 2004).

Land use has somewhat changed within the landscape since the Memorial was dedicated as a commemorative site. Recreational use of the land has been added to the area over the years and public events such as the Cherry Blossom Festival occur within the landscape. The site is used informally for passive recreation such as strolling and picnicking, and it is often the backdrop for weddings and photography. Active recreation such as jogging and road races also occur within the landscape. However, despite the addition of recreation into the landscape, the Memorial landscape maintains high historic integrity of land use as a commemorative landscape (NPS 2004).

Spatial organization of the landscape retains a high level of integrity from the original design. On a larger scale, the Memorial remains as one of the cardinal points on the north-south axis of the McMillan Plan and retains its location on the south bank of the Tidal Basin at the southeast corner of West Potomac Park. On a smaller scale, the spatial organization and topography of the grounds, the raised terraces on which the Memorial sits, and the landscaping all remain intact and retain a high level of integrity (NPS 2004).

The vegetation within the landscape has been altered several times throughout the decades since the original design by Frederick Law Olmsted, Jr. Recent landscape rehabilitation efforts have restored some vegetation to the original design. Today, according to the cultural landscape inventory, some of the plantings remain historically correct in terms of species and location. However, many original flowering shrubs and tree species have been lost. Overall, and as a result of recent rehabilitation

efforts, the original concept of the plantings within the landscape retain a high level of integrity, and most of the plantings are considered contributing features of the landscape. The *Zelkova* trees planted inside the circular roadway are considered non-contributing features and have resulted in a decrease in integrity (NPS 2004).

Small-scale features have generally low integrity and are considered non-contributing elements. These features include flood lights, globe lights, bollards, post and chain fencing, signage, and trash receptacles (NPS 2004).

Views and vistas to and from the Memorial are important aspects of the cultural landscape and were considered as part of the original McMillan Plan and design for the Memorial grounds. The vistas from the Memorial to the White House and Washington Monument remain as intended by the McMillan Plan. The vista to the Lincoln Memorial is obscured by vegetation, though it remains visible in winter when the trees lose their leaves. Views across the Tidal Basin also remain as originally planned. The view from the Memorial southward, however, has been diminished by the elevated Interstate 395 and the 14th Street Bridge. Views of the Memorial from other important landmarks including the White House, Washington Monument, and across the Tidal Basin remain as originally planned. Overall, the historic integrity of views and vistas remains high (NPS 2004).

West Potomac Park

West Potomac Park is listed in the National Register as part of the East and West Potomac Parks Historic District. It is also a documented cultural landscape that includes component landscapes such as the Jefferson Memorial landscape and the Tidal Basin landscape. It comprises a large portion of the monumental core of Washington, DC and provides recreational space for residents and tourists. West Potomac Park is generally situated between the Potomac River and the Washington Monument. It is characterized by broad expanses of open space framed by mature landscape plantings and views of major memorials. Numerous nationally-recognized memorials are located within this district including the Jefferson Memorial, which is located on the southern end of West Potomac Park. West Potomac Park has evolved into a designed landscape with prominent monuments and memorials while retaining space for both passive and active recreation (NPS 2000 and 2004).

The land now known as West Potomac Park was originally a combination of shoals and swamp land. Beginning in 1834, the land was reclaimed through fill dredged from the Potomac River. In 1897, Senate Bill 3307 established that the entire reclaimed area, including the Tidal Basin, was to be used as a public park for recreation of the people. The park's monumental character was shaped by the McMillan Plan, which extended the grand axis of the National Mall westward into West Potomac Park and established formal termini where the Lincoln Memorial and the Jefferson Memorial now stand. The landscape of West Potomac Park is the cumulative effort of a century of work by noted architects, landscape architects, planners, engineers, and artists (NPS 2000 and 2004).

Tidal Basin Landscape

The Tidal Basin, at about 110 acres in size, was constructed in the 1800s to use the tides of the Potomac River to flush silt and sediment from the Washington Channel. It is considered a component landscape of the West Potomac Park landscape (NPS 2004). It is an irregularly shaped body of water averaging 6 feet deep with a structural seawall forming the basin. The Tidal Basin is considered a contributing

resource of the East and West Potomac Parks Historic District for its association with the efforts to reclaim the Potomac Flats and for its significance as one of the most important projects undertaken by the US Army Corps of Engineers in the late 19th century (NPS 2000).

One of the most notable features and a major character-defining component of the Tidal Basin landscape is the cherry trees planted along its banks. Three thousand cherry trees were donated to the city by the mayor of Tokyo in 1911 and planted around the Tidal Basin in 1912 (NPS 1996). Several memorials and monuments sit along the banks of the Tidal Basin including the Thomas Jefferson Memorial, the Martin Luther King, Jr. Memorial, the Franklin Delano Roosevelt Memorial, the George Mason Memorial, the John Paul Jones Memorial, the Floral Library, the Japanese Pagoda, the Japanese Lantern, and the Site of the First Cherry Tree Planting.

The land surrounding the Tidal Basin was created as part of West Potomac Park and was to be used as a public park for recreation for the people (NPS 2000). Today, pedestrian paths wind around the entirety of the Tidal Basin, connecting the numerous commemorative sites. Paddle boat rentals are located on the east side of the basin, and baseball fields are located along the southwest side. The Tidal Basin landscape continues the historic balance of recreation and commemorative landmarks.

Archeological Resources

No archeological resources are present within the area of potential effect. The land on which the Thomas Jefferson Memorial sits was created by the US Army Corps of Engineers in the late 1800s by reclaiming tidal flats on the east shore of the Potomac River. Additionally, the grounds of the Memorial were previously disturbed for construction of the Memorial itself. Because the land consists primarily of dredged fill from the bottom of the Potomac River and that land has been previously disturbed, no intact archeological resources are present in the project vicinity.

IV. ASSESSMENT OF EFFECTS

The assessment of effects on historic properties that are presented in this section respond to the requirements of Section 106 of the National Historic Preservation Act. In accordance with the regulations implementing Section 106 (36 CFR 800, Protection of Historic Properties), effects on historic properties were identified and evaluated by (1) determining the area of potential effect; (2) identifying historic properties present in the area of potential effect that are either listed in or eligible to be listed in the National Register; (3) applying the criteria of adverse effect to affected historic properties; and (4) considering ways to avoid, minimize, or mitigate adverse effects.

METHODOLOGY

Under Advisory Council on Historic Preservation regulations, a determination of either adverse effect or no adverse effect must be made for affected historic properties eligible for or listed in the National Register. An undertaking is considered to have an adverse effect when it may “alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association.” (36 CFR 800.5[1]). In the case of an adverse effect determination, the Advisory Council on Historic Preservation must be notified and provided the opportunity to comment.

Adverse effects also include reasonably foreseeable effects that could occur later in time, be farther removed in distance, or be cumulative (36 CFR 800.5, Assessment of Adverse Effects). A determination of no adverse effect means the proposed action would not diminish the integrity of the historic property in a manner that alters any characteristics of the property that qualify it for the National Register. Potential adverse effects on historic properties from the undertaking could include rehabilitation of historic structures, removal or replacement in kind of any historic material, and the introduction of new features that are inconsistent with any historic structures or cultural landscapes present.

The Thomas Jefferson Memorial is listed in the National Register and is eligible based on criterion A for its association with the McMillan Plan and the development of the monumental core of Washington, DC, criterion C as an original adaptation of Neoclassical architecture, and criteria consideration F as America’s foremost memorial to its third president. Contributing resources within the project area include the Memorial, the stylobate and terrace walls, pedestrian circulation routes, and much of the vegetation. These are described in detail under “Identification of Historic properties” above. While there has been change within and around the project area since the Memorial’s dedication in 1947, the Memorial and its landscape retain a high level of historic integrity. The historic character and integrity of the Memorial and its landscape could be diminished by relocation, destruction, major design changes, introduction of new structures or circulation, and the use of historically-incompatible materials and methods in repair and maintenance.

ASSESSMENT OF EFFECTS

The impacts of the no-action alternative and the NPS preferred alternative in the environmental assessment are summarized below. The analysis of effects on historic structures and districts and

cultural landscapes was based on a review of previous studies, consideration of the proposed design concepts, and other information provided by the National Park Service.

No-Action Alternative

Under the no-action alternative, the National Park Service would not implement any changes to the exterior or interior of the Memorial or its grounds. The National Park Service would continue to maintain, preserve, and protect the Memorial and its landscape under current management practices and in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. The historic character would remain unchanged and the property would retain its integrity of location, design, setting, materials, workmanship, feeling, and association. There would be no loss of character-defining features, and the property would remain eligible for listing in the National Register. Because no action would be taken under this alternative, the no-action alternative would not constitute an undertaking under Section 106.

Conclusion. The no-action alternative would *not constitute an undertaking* under Section 106.

NPS Preferred Alternative

The NPS preferred alternative would have *no adverse effect* on historic properties.

Historic Structures. The installation of two sloped walkways would result in a change in appearance of the Memorial. The sloped walkways would require removal of a few Japanese upright yew plantings as well as the introduction of new materials on each the east and west side of the Memorial. These sloped walkways would somewhat detract from the historic appearance of the Memorial and introduce walkways in an area that historically was managed lawn. However, the sloped walkways would be designed to maintain the symmetry of the Memorial and would follow the existing terrace wall to maintain the circular character of the historic walkways. The walkways would be of compatible design in terms of materials, color, scale, and design to minimize the visual disturbance. The sloped walkways would also be reversible. New Japanese upright yew plantings would be added on both sides of the Memorial in planting locations that are documented as part of the original landscape design by Olmsted, Jr., which would slightly improve the integrity of the planting scheme.

Some historic material of the granite terrace wall capstone would be removed in order to connect the sloped walkways with the terrace walkways. However, the sloped walkways would be designed in such a way that only the wall capstone would need to be removed and would be carefully stored and retained in the museum collections. This would prevent loss of the historic material and allow the sloped walkways to be fully reversible. There would be a change in the ground material at this location that would highlight the portion that was removed and allow the new sloped walkway to be differentiated from the historic materials.

On the lower level interior, modifications to improve accessibility would result in changes in the appearance of the exhibit space as well as the introduction of modern materials. The addition of handrails, automatic door openers, and modern elevator fixtures would result in visual changes to the interior of the lower level. However, although the fixtures would be somewhat noticeable (i.e. the handrails would be longer than the existing and automatic door openers would be visible), they would not be so intrusive as to detract from the overall visual appearance of the lower level. Additionally, the lower level has been heavily altered during the 1970s and 1990s when the elevator,

gift shop, bookstore, and exhibit spaces were added and renovated. The elevator, restrooms, gift shop, and bookstore are non-original features to the Memorial and, therefore, alterations would not result in diminished historic character or loss of historic materials. The walls to be removed around the exhibit support spaces are not historic, and therefore their removal would not result in a loss of historic material. Historic doors would remain in place.

On the portico level, the proposed ramps from the elevator to the portico and to the chamber would result in visual changes due to the alteration of the flooring and introduction of new materials. However, these ramps would be designed to be compatible with the historic character in terms of color, material, and design. They would be installed in a manner that retains the existing historic fabric and that would be fully reversible. The existing ramp and handrails on this level are non-historic and their removal would not result in a loss of historic material. The alteration of the existing gift shop/bookstore into an exhibit space would not result in changes to the historic materials and the historic door would remain in place. While interpretive exhibits have not historically been located in this area, it has been previously altered for the existing gift shop/bookstore. Additionally, this space is not visible from the statuary chamber or the portico and, therefore, the introduction of new materials and exhibits would not alter the historic character of these areas or the Memorial overall.

To the extent practicable, all preservation and rehabilitation work at the Memorial would conform to the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and would be done in such a way as to minimize effects on and allow preservation of the existing historic fabric.

Cultural Landscapes. Changes to the appearance of the Memorial discussed under “Historic Structures” above would result in the same changes to the appearance of the Jefferson Memorial Cultural Landscape.

The sloped walkways would result in slight changes to the overall pedestrian circulation patterns of the Memorial landscape, which retains a high level of integrity. See figure 3 for an overall site plan showing the exiting walkways. However, these walkways would maintain the circular and symmetrical patterns of the existing circulation routes and would not change or remove any of the existing circulation patterns. This change in pedestrian circulation pattern would be very small when compared to the overall circulation patterns, which would continue to retain a high level of integrity.

The proposed improvement to the designated accessible parking area to the south of the Memorial would result in slight visual changes to the area and a slight change in the sidewalk approaching the Memorial along East Basin Drive SW. However, this area is located in front of the refreshments kiosk, which is considered a non-contributing resource to the landscape. The changes in the sidewalk and related improvements such as signage would not obstruct the view of the Memorial from this area. The area would continue to be somewhat screened from view from the Memorial grounds due to vegetation. The area is already reserved for parking and bus drop-off; therefore, these improvements would not result in a change in use or circulation patterns.

Signage and proposed wayside exhibits throughout the site would result in visual changes to the Memorial, but signs would be designed to be compatible with the existing signage and the overall historic character of the Memorial in terms of location, color, materials, and scale. Specific locations for signage and wayside exhibits would be chosen during future design phases, and locations would be chosen to minimize visual distraction while remaining conspicuous for visitors.

To the extent practicable, all preservation and rehabilitation work within the Memorial's cultural landscape would conform to the *Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes* and would be done in such a way as to minimize effects on and allow preservation of the existing historic fabric.

Visual changes to the Memorial exterior and grounds from the installation of the sloped walkways and changes in vegetation on the north side of the project area could result in indirect effects on West Potomac Park and the Tidal Basin landscape by changing the views into the project area. However, these changes would be very small when compared with the overall view of the Memorial and its landscape. The changes would only be noticeable from areas along the Tidal Basin that are closest to the project area. The changes would likely not be noticeable from most of West Potomac Park located outside of the Tidal Basin. Changes proposed for the designated accessible parking area south of the Memorial would result in views of the Memorial from parts of West Potomac Park to the south. However, this area is located in front of the non-contributing refreshments kiosk and has been previously developed with parking spaces, bus drop-off areas, and Interstate 395. The change in sidewalk and pavement would not detract from the overall view of the south side of the Memorial. None of the proposed changes or additions to the landscape would introduce a visual element that is incompatible, out of scale, in great contrast, or out of character with the character and aesthetics of the Memorial and its surrounding landscape. Therefore, these visual changes would result in no adverse effect on West Potomac Park or the Tidal Basin cultural landscape.

Construction activities would result in effects on the historic setting of the Memorial, the Memorial cultural landscape, and the cultural landscapes of West Potomac Park and the Tidal Basin. Activities and equipment/materials staging in the construction staging area would result in visual and noise disturbance within the Memorial landscape. Noise from construction may carry into the historic settings of the landscapes of West Potomac Park and the Tidal Basin (and the memorials within), particularly into the area adjacent to the project area, and could disturb the commemorative atmosphere. However, these noise disturbances would be limited to the duration of construction activities, and noise mitigation measures would be taken. Additionally, these landscapes are located within urban environments where busy roadways, frequent traffic, and construction noise are often part of the surrounding atmosphere. Construction equipment, materials, and activities within the project area would result in changes to the views into the project area from areas along the Tidal Basin and areas south of the Memorial. However, these would be temporary visual disturbances lasting only the duration of construction and would result in no long-term changes. Therefore, construction activities would result in no adverse effect on the historic setting of the Memorial or the associated cultural landscapes.

Conclusion. The NPS preferred alternative would have *no adverse effect* on historic properties within the area of potential effect.

V. AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES

During the alternatives development process, the NPS preferred alternative was refined through internal scoping and agency consultation in order to avoid or minimize potential effects. The elements selected as the NPS preferred alternative were chosen because they met the project purpose and need while avoiding or minimizing effects on the historic property.

The National Park Service met several times with consulting parties, including the District of Columbia State Historic Preservation Office, the National Capital Planning Commission, and the US Commission of Fine Arts, the Advisory Council on Historic Preservation, and other consulting parties in order to gather their input on the NPS preferred alternative and refine the design accordingly. These consultations will continue throughout the design process.

Several mitigation measures have been developed to ensure long-term preservation of the historic resources at the Memorial during the implementation of the proposed accessibility improvements. These mitigation measures include the following:

- Instruct contractor employees on the sensitivity of the general environment and monitor their activities. Staging of construction equipment would be restricted to identified previously disturbed areas to avoid impacts on cultural resources.
- Use the minimum size equipment needed to complete the actions laid out in the alternatives. Minimally intrusive methods may be specified to minimize damage to cultural resources.
- Replace any vegetation damaged by construction activities in-kind, consistent with existing documentation of historic planting schemes and landscape design.
- Follow the *Secretary of the Interior's Standards for the Treatment of Historic Properties* for all preservation and rehabilitation efforts to historic structures, to the extent practicable.
- Remove terrace wall capstones in a manner that allows them to be properly stored and preserved in the museum collections. Physical changes to the Memorial would be fully reversible to the extent practicable.

VI. CONCLUSION

The National Park Service proposes to undertake improvements at the Memorial as part of the Targeted Accessibility Improvement Program. Improvements include creating two sloped walkways connecting the Tidal Basin plaza level to the lower level; modernizing the existing elevator and improving the associated ramps to meet current accessibility code; improving interior accessibility including restrooms, bookstore/gift shop, doors, and handrails; improving the designated accessible parking area; improving signage for clarity and wayfinding; and creating accessible interpretive exhibits. Historic properties within the area of potential effect where actions would directly occur include the Thomas Jefferson Memorial and its associated cultural landscape. Additional historic properties within the area of potential effect include the West Potomac Park cultural landscape and the Tidal Basin cultural landscape. The cultural landscapes encompass historic resources and their related spatial relationships, views and vistas, vegetation, and circulation routes.

The rehabilitation and preservation efforts under the proposed undertaking would constitute *no adverse effect* because changes to the Memorial would be relatively small when compared to the overall historic integrity and character that would remain, and many of the proposed changes would be fully reversible. The exterior sloped walkways would be compatible with the historic character in terms of color, material, design, scale, and placement in order to minimize the visual disturbance and change to pedestrian circulation patterns. Small portions of vegetation would be removed but new plantings consistent with the original planting design by Olmsted, Jr. would be added. On the interior, most changes would occur within areas previously altered for visitor services such as the elevator, restrooms, and gift shop. Though historic material of the terrace wall capstones would be removed, they would be removed intact and stored properly in museum collections. Many of the proposed changes would be fully reversible, including the exterior sloped walkways and the interior ramps on the portico level. Construction activities would result in temporary noise disturbances to the other properties within the area of potential effect but would not result in adverse effects on those properties.

To the extent practicable, all treatments would follow the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and measures are in place to mitigate effects on historic properties within the area of potential effect. The proposed undertaking has been refined through coordination with the District of Columbia State Historic Preservation Office, the National Capital Planning Commission, and the Commission of Fine Arts, the Advisory Council on Historic Preservation and other consulting parties. The National Park Service will continue to consult and coordinate with these agencies throughout the design process.

VII. REFERENCES

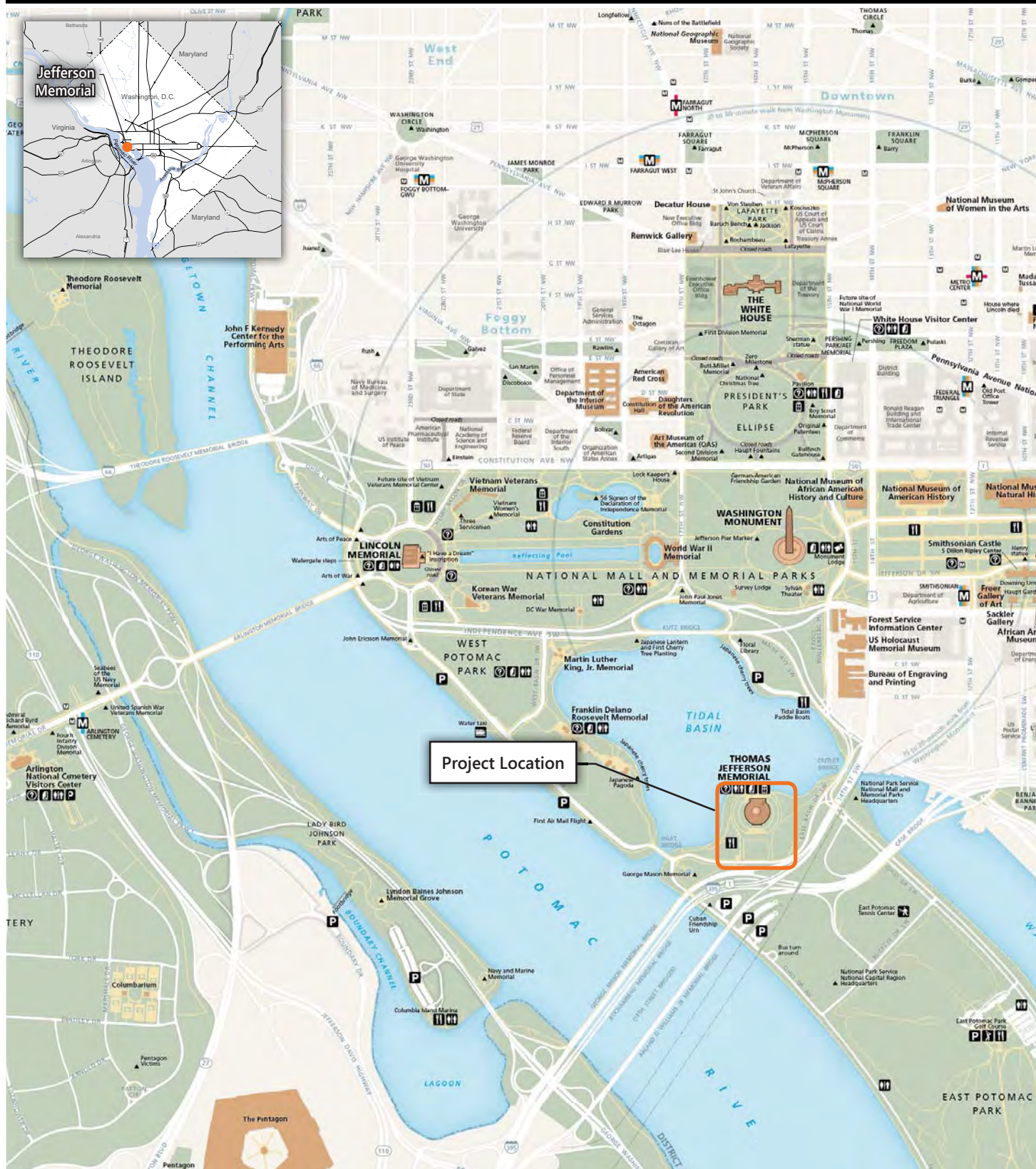
National Park Service (NPS)

- 1981 National Register of Historic Places Inventory–Nomination Form for Thomas Jefferson Memorial.
- 1996 Landscape Overview, Thomas Jefferson Memorial, Washington, DC.
- 2000 National Register of Historic Places Inventory–Nomination Form for East and West Potomac Parks Historic District.
- 2004 Cultural Landscapes Inventory, Thomas Jefferson Memorial.

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APPENDIX A: FIGURES

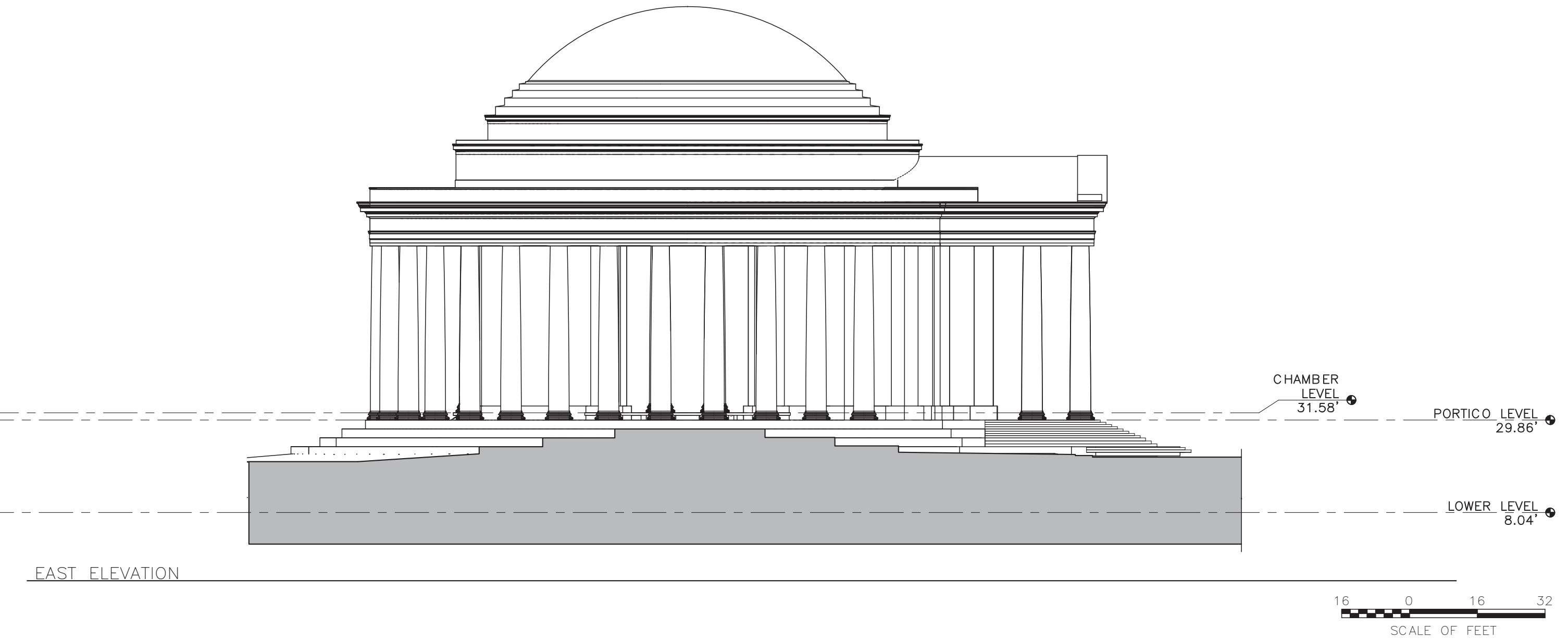
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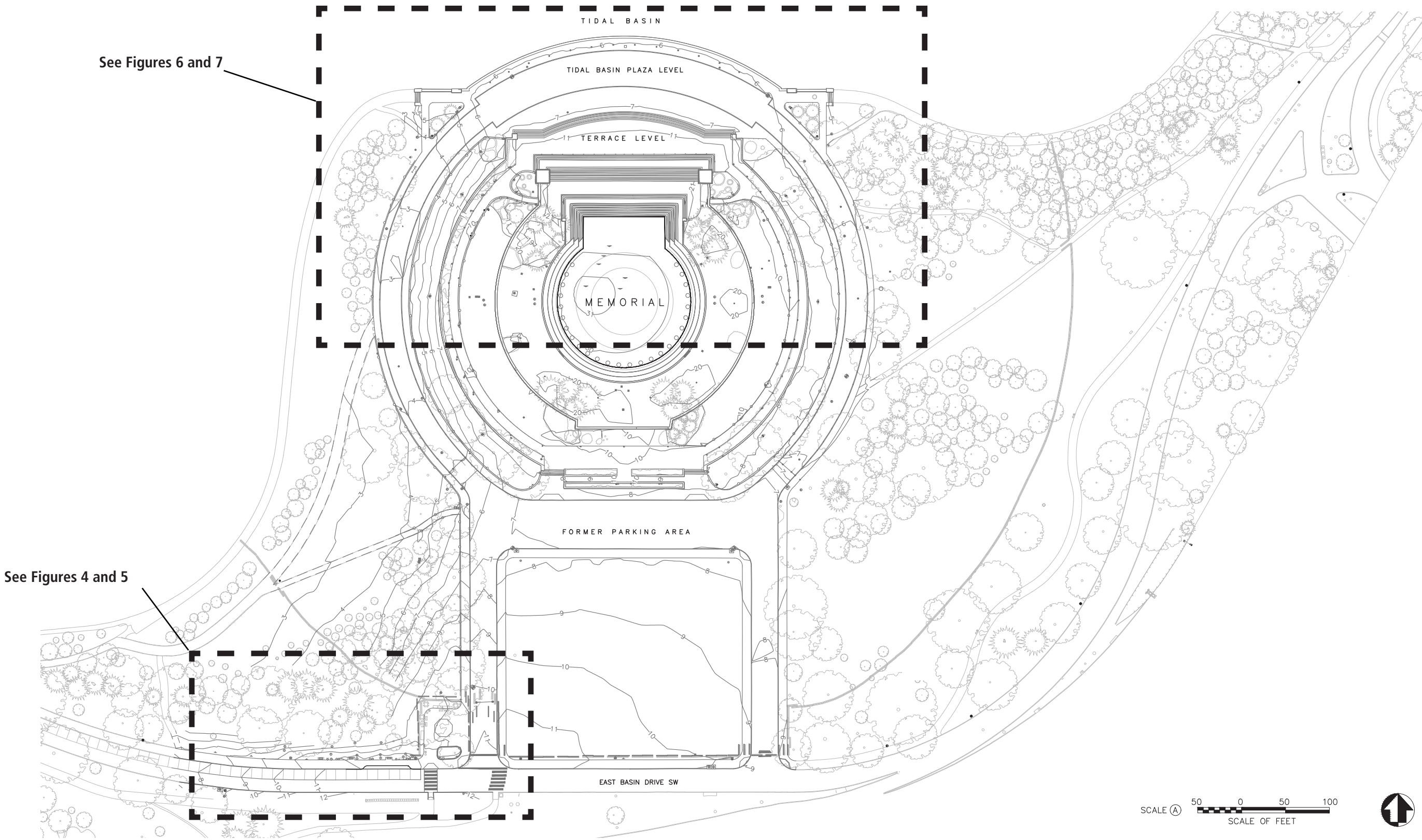


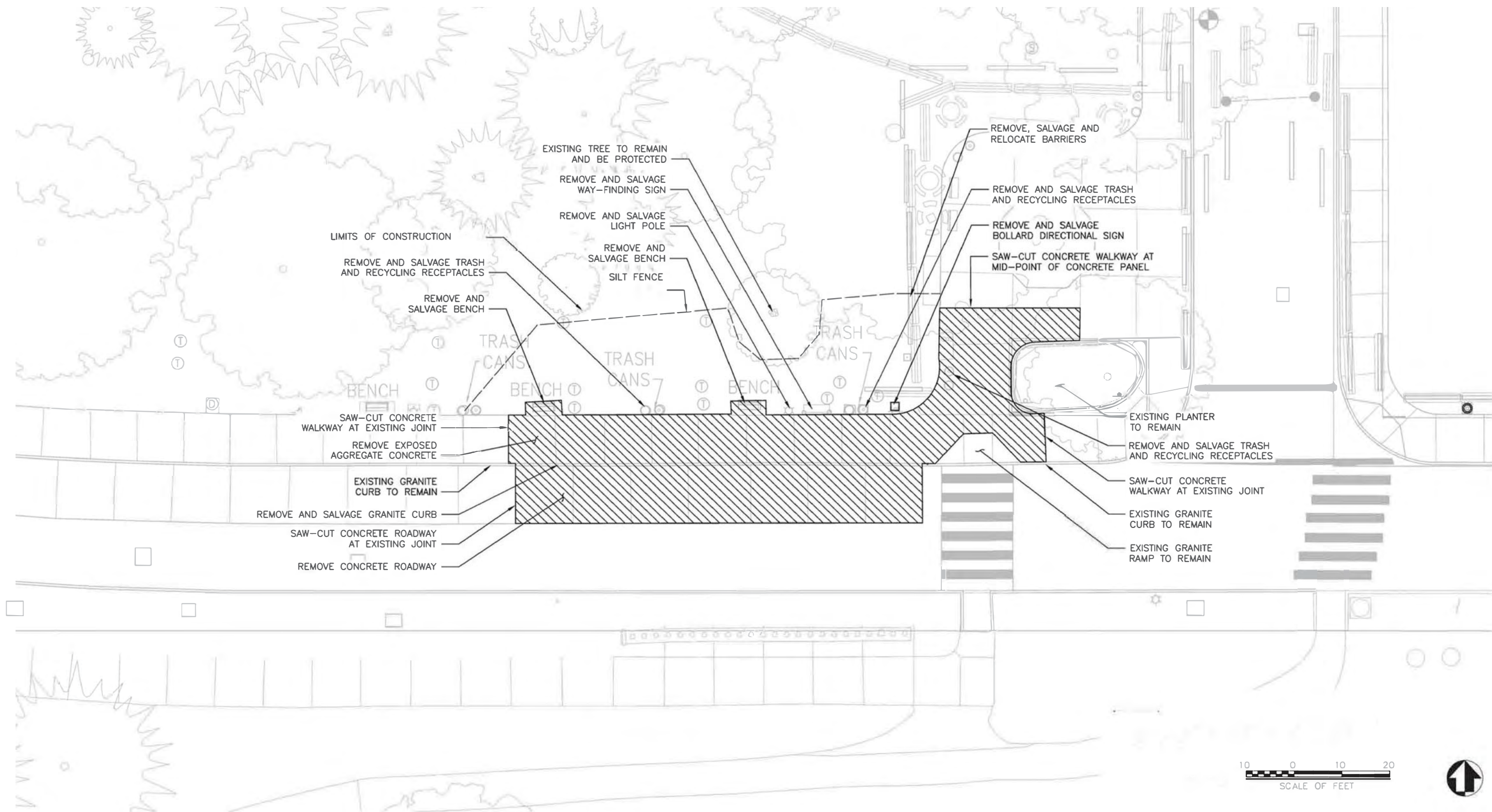
Thomas Jefferson Memorial
Targeted Accessibility Improvements Program
Assessment of Effect

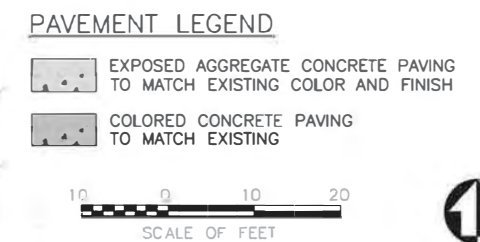
FIGURE 1

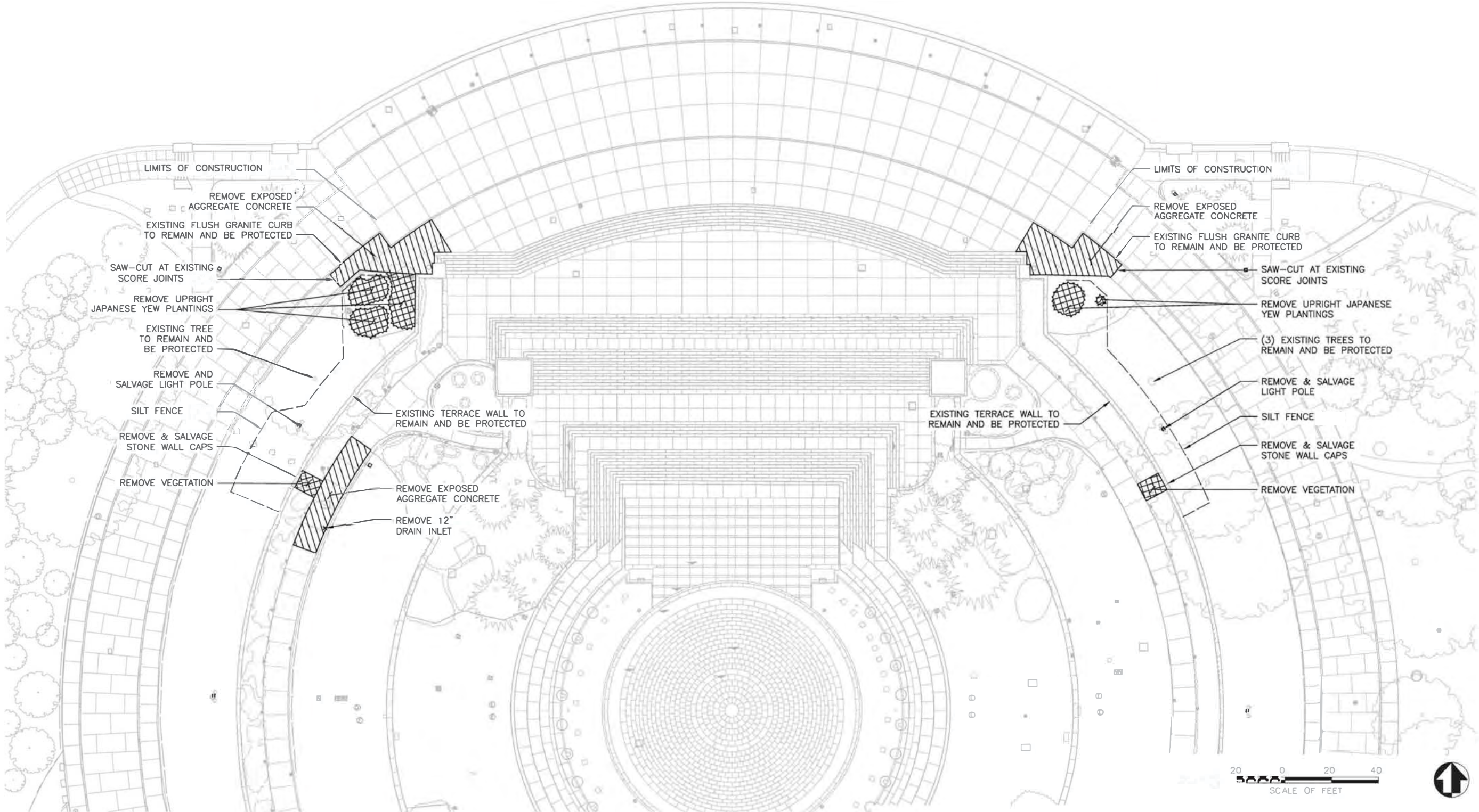
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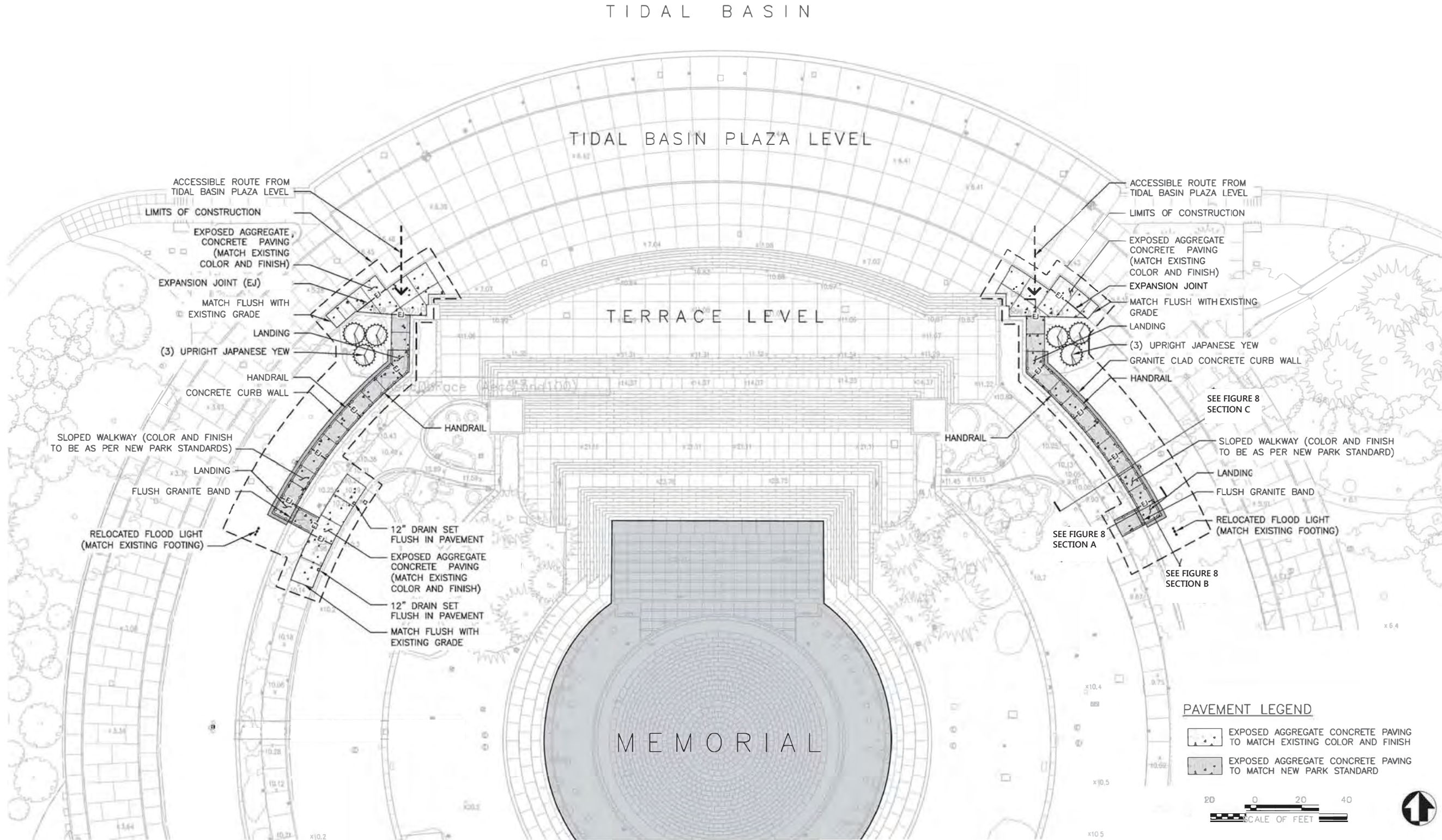


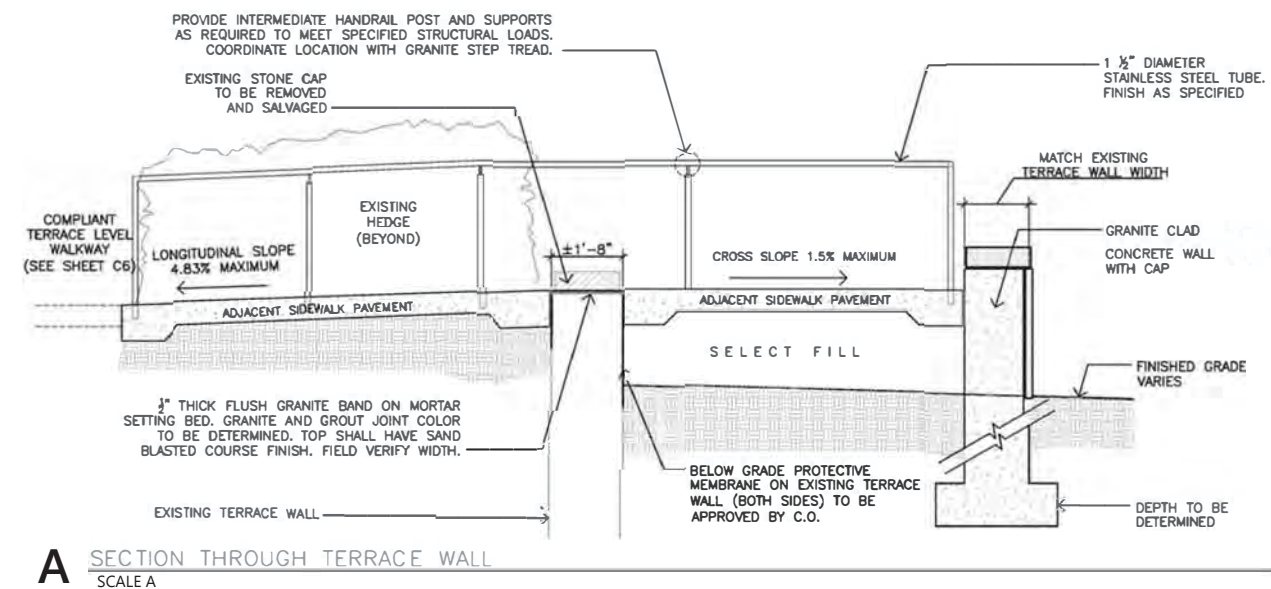




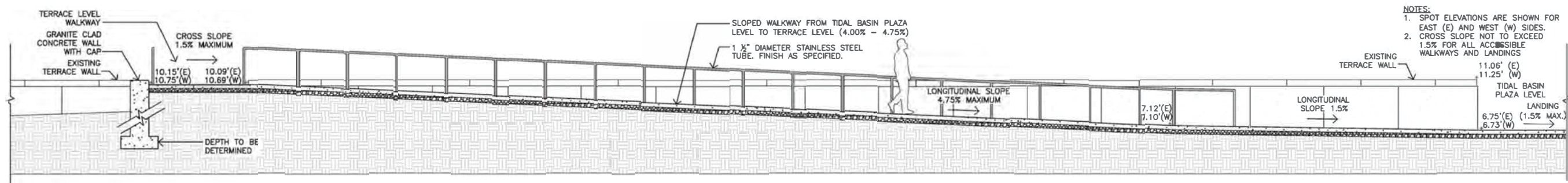




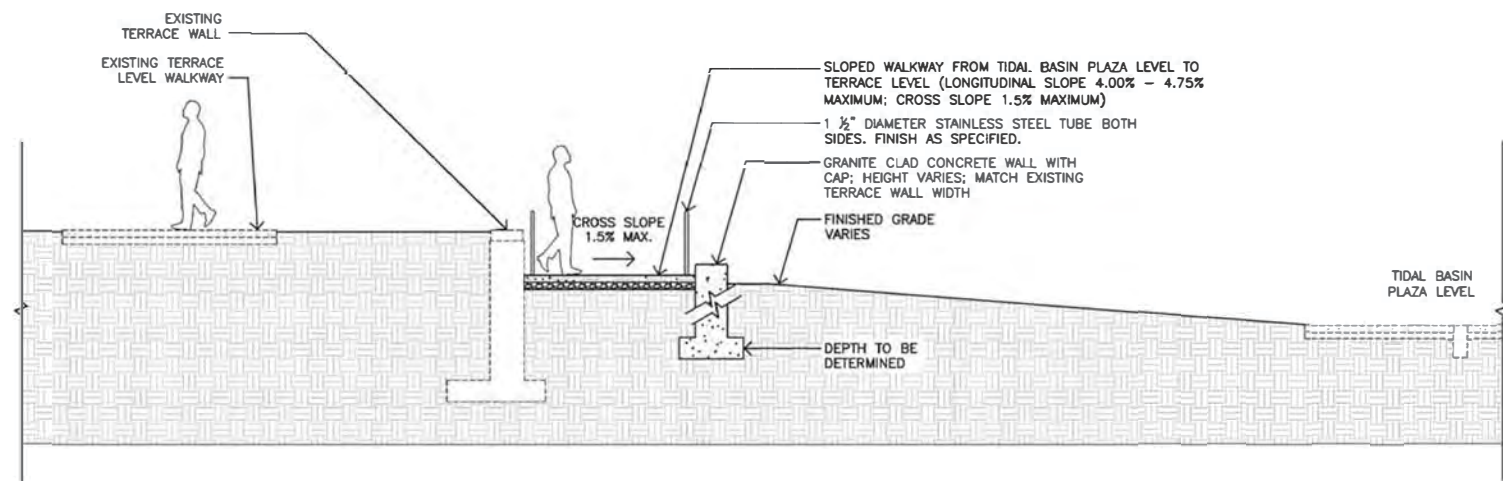




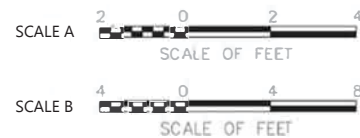
A SECTION THROUGH TERRACE WALL
SCALE A

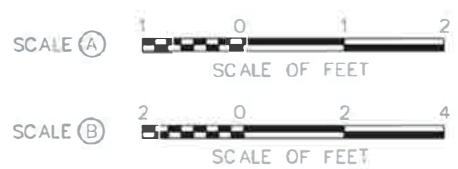
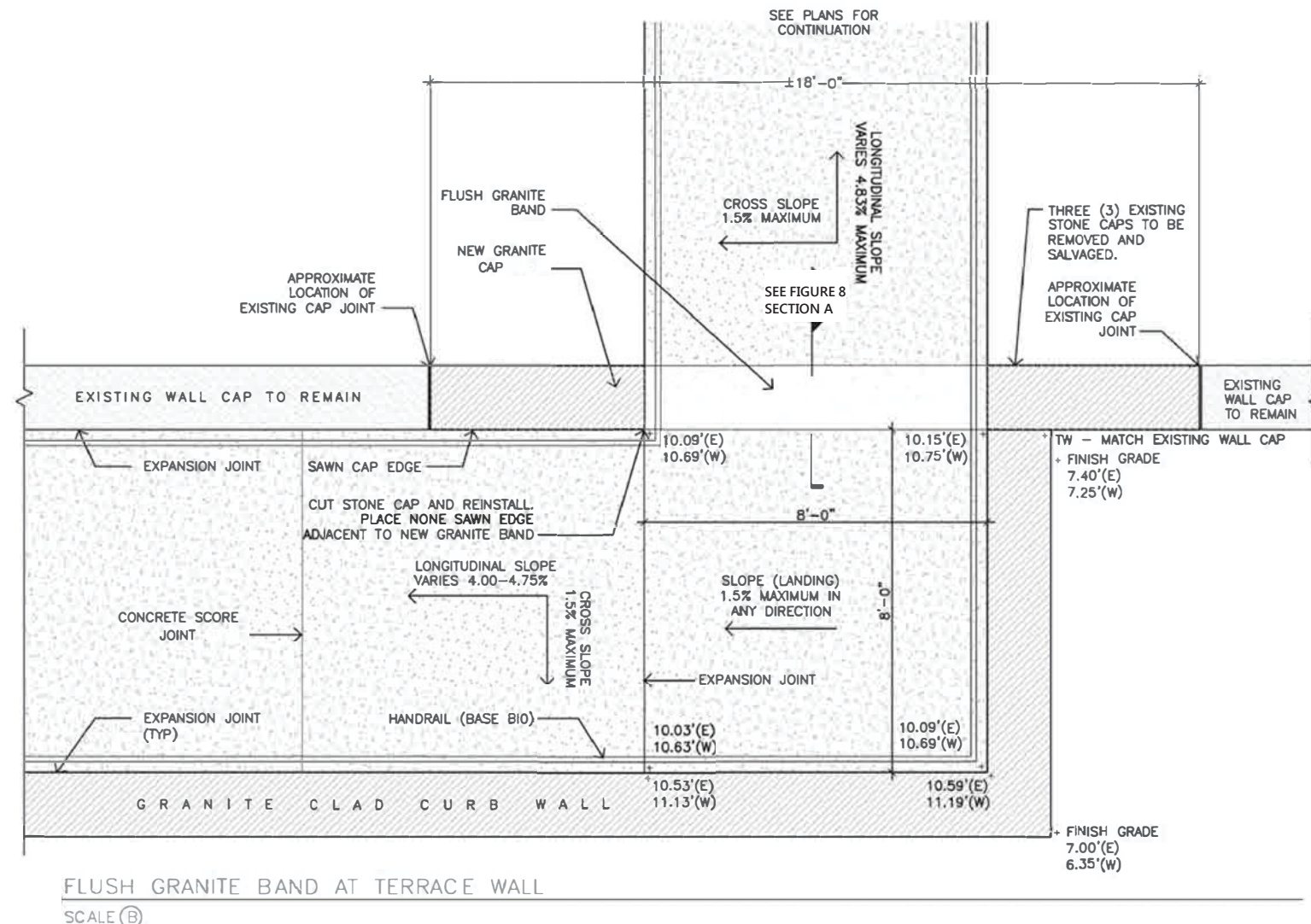
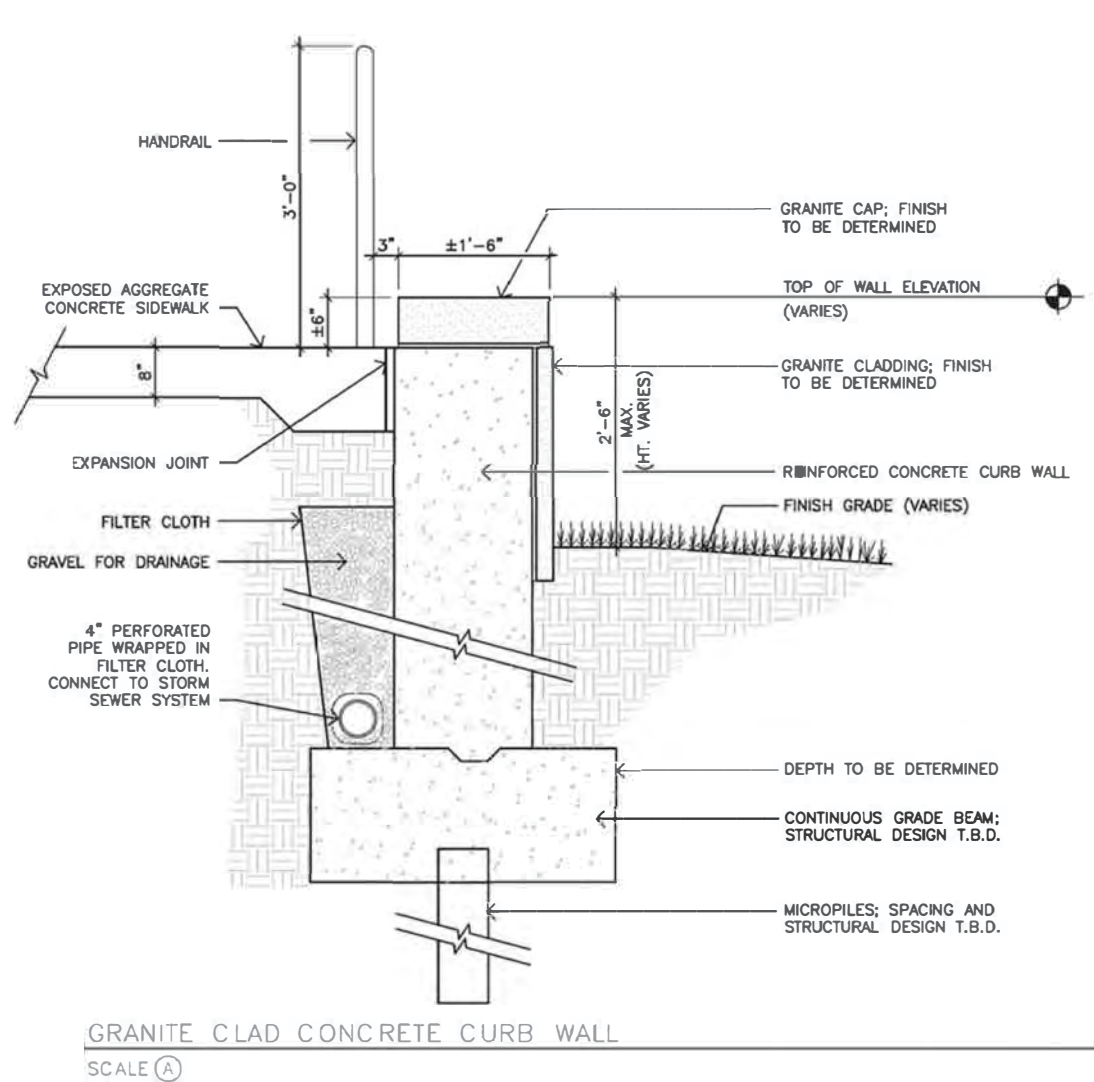


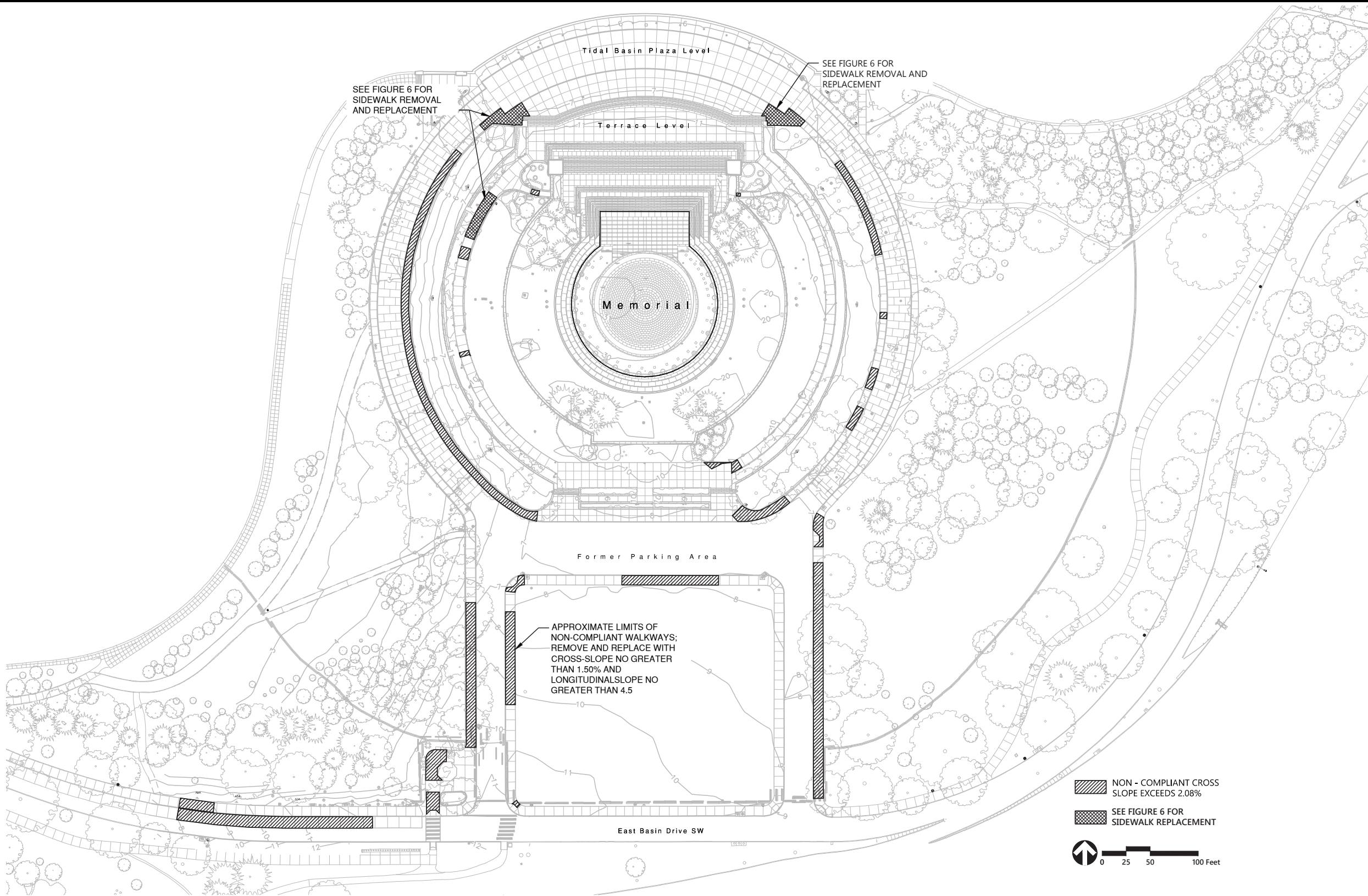
B LONGITUDINAL SECTION THROUGH SLOPED WALKWAY FROM TIDAL BASIN PLAZA LEVEL
SCALE B

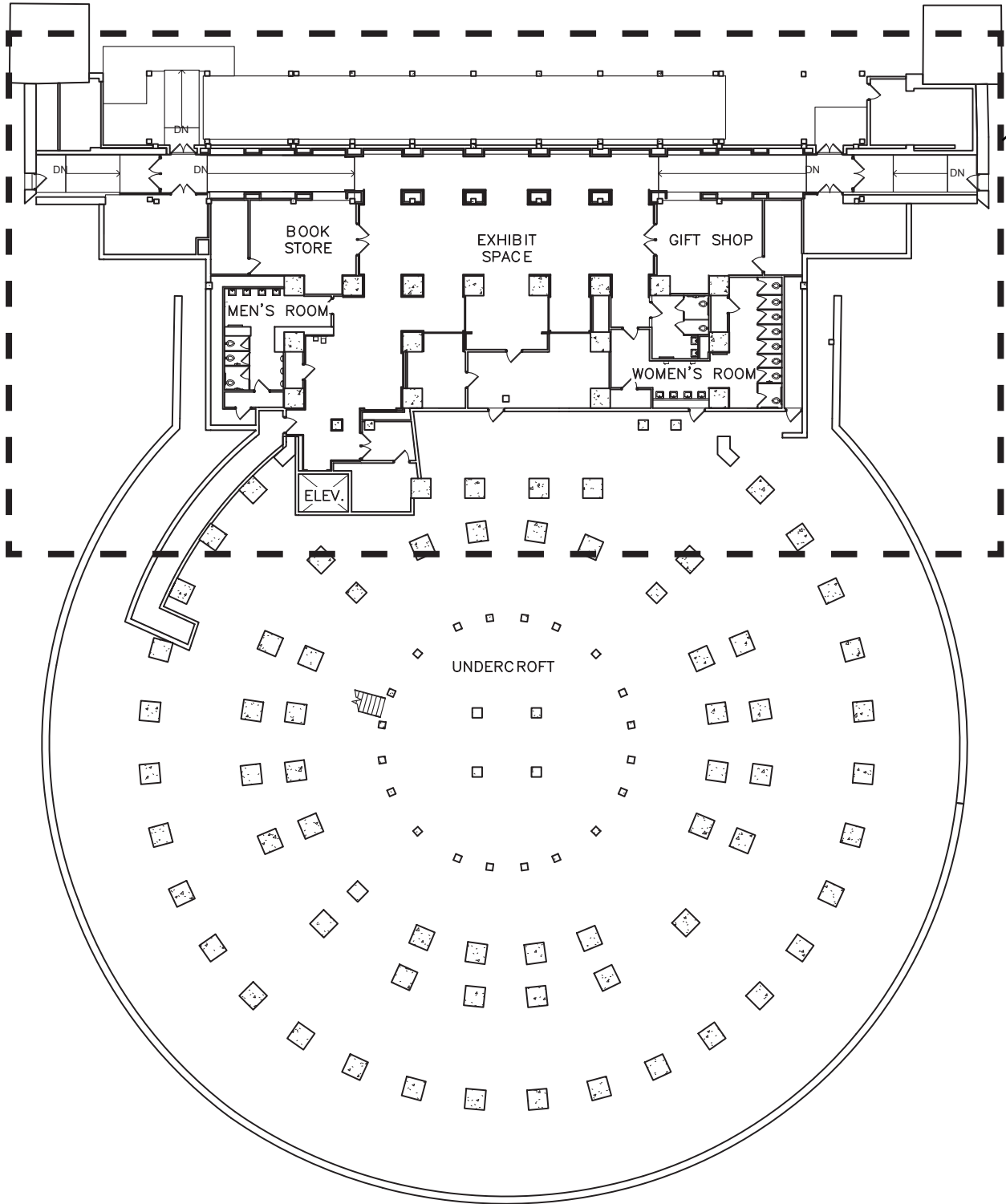


C CROSS SECTION THROUGH SLOPED WALKWAY FROM TIDAL BASIN PLAZA
SCALE B



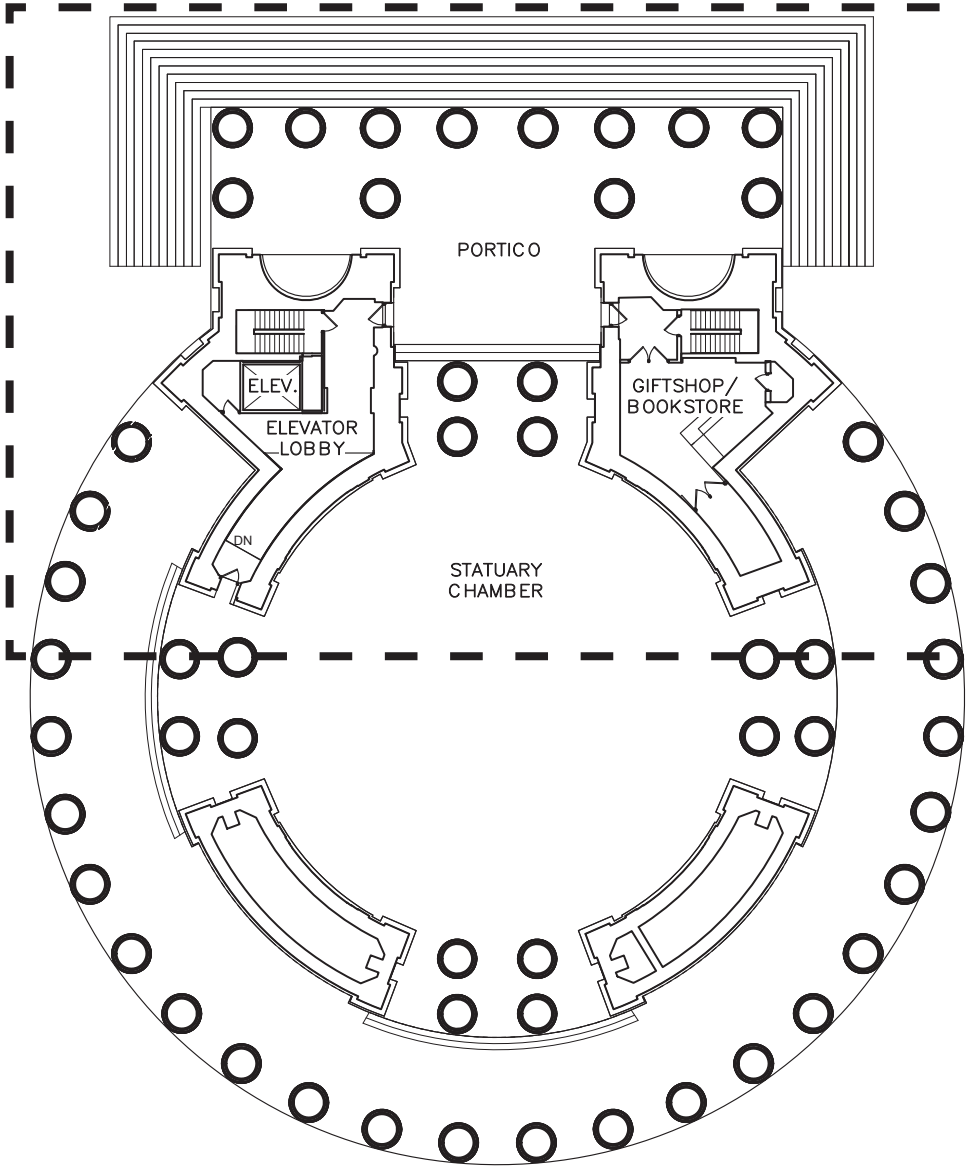






SEE FIGURES 13 AND 14

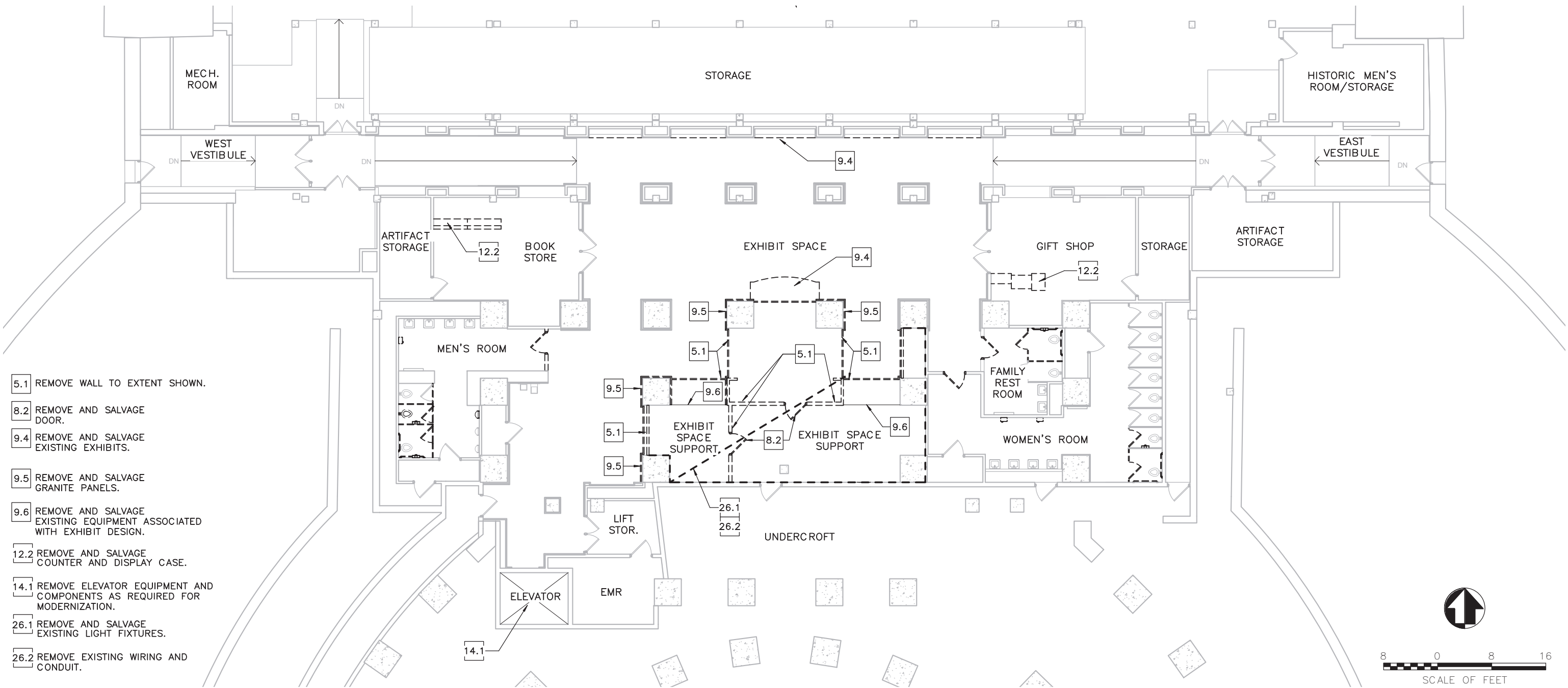
LOWER LEVEL

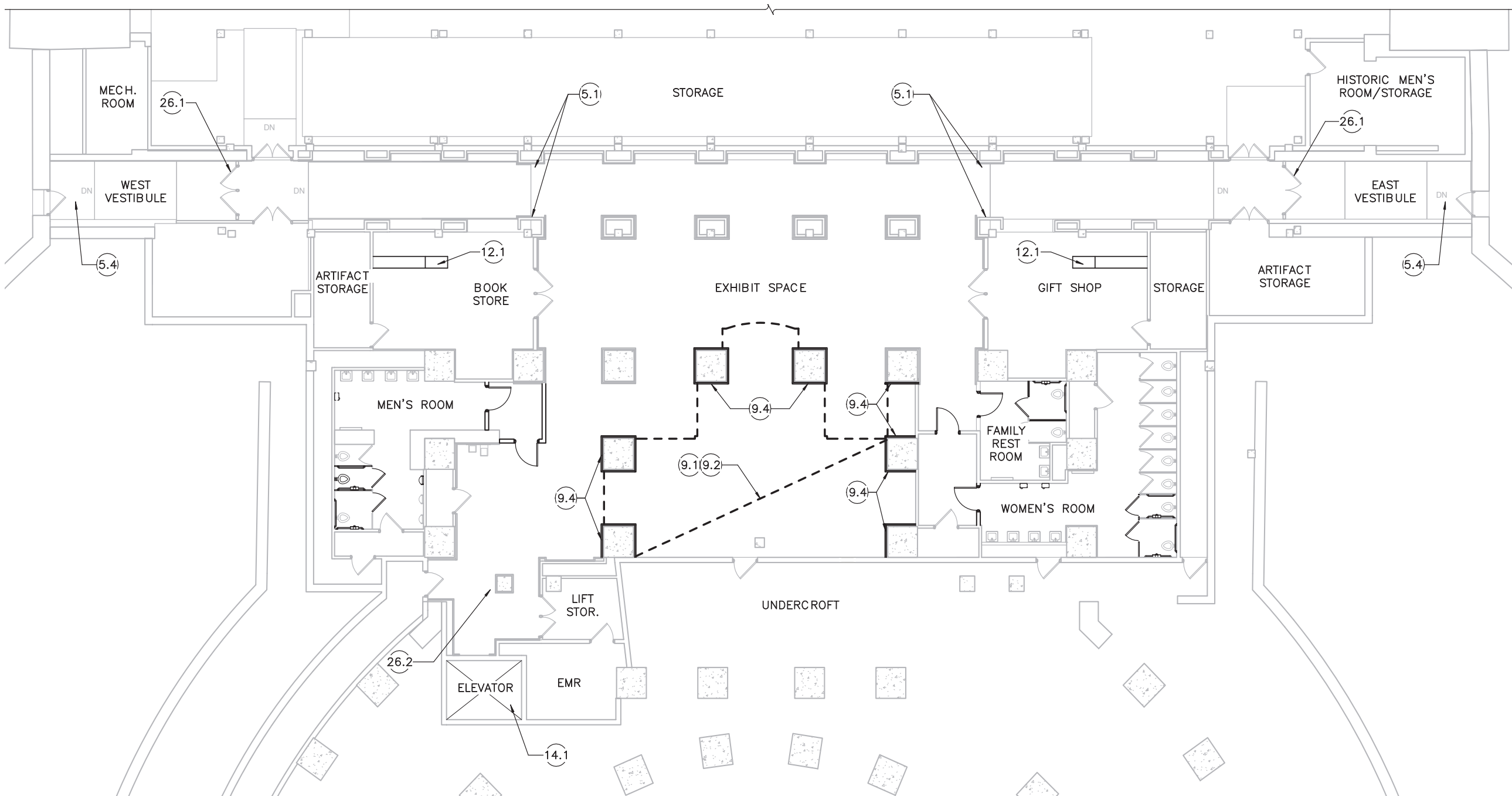


SEE FIGURES 15 AND 16

CHAMBER LEVEL

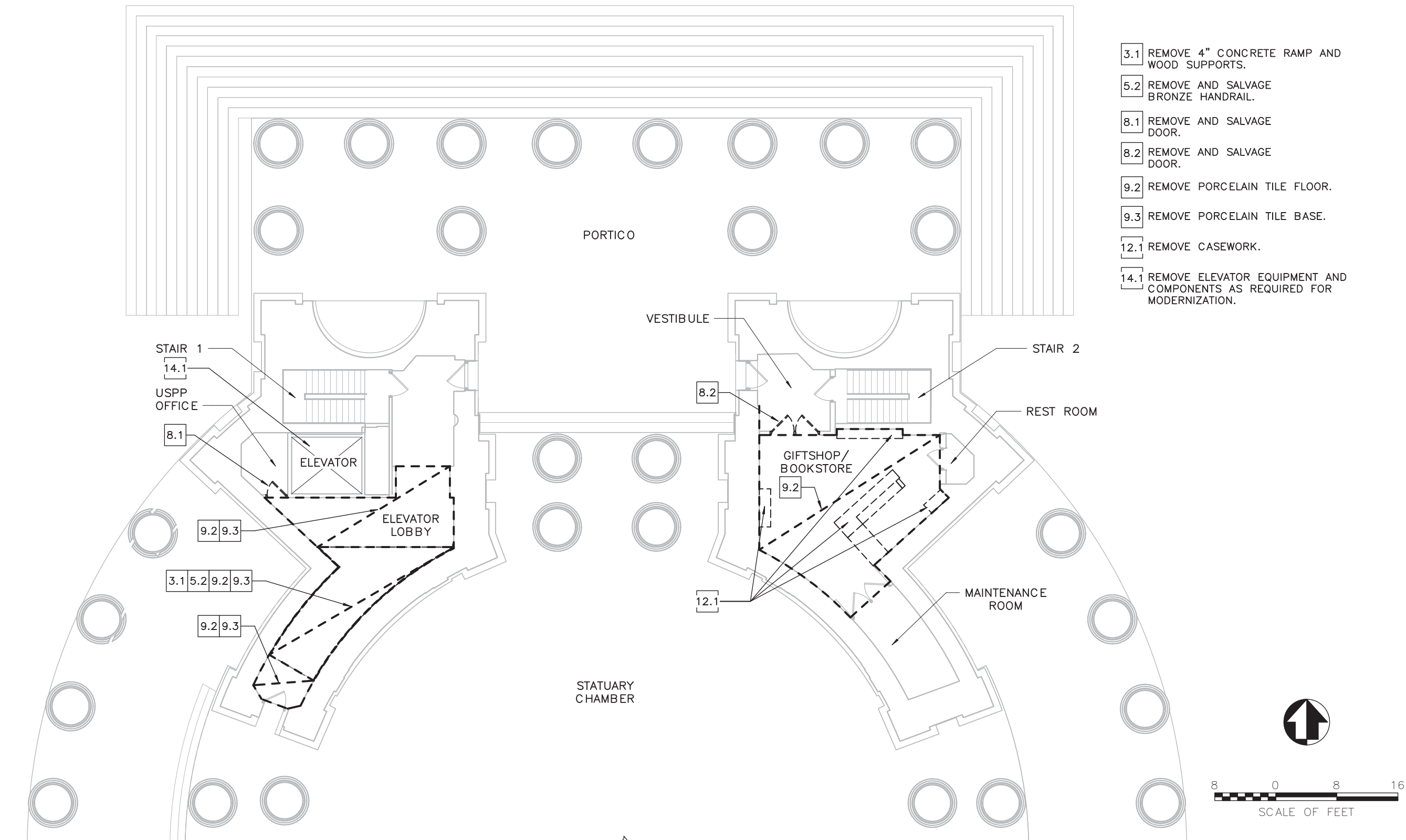






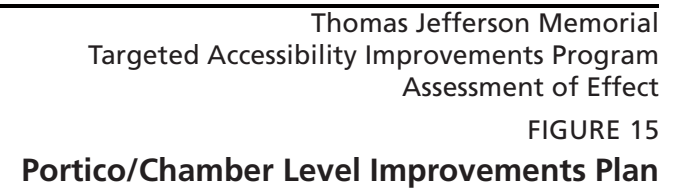
- | | | |
|---|--|---|
| (5.1) PROVIDE BRONZE HANDRAIL EXTENSION TO MATCH, BEYOND THE BOTTOM EDGE OF RAMP. | (9.1) PROVIDE DROP CEILING AND LIGHTING TO MATCH EXISTING CEILING. | (14.1) MODERNIZE ELEVATOR. |
| (5.4) PROVIDE WALK-OFF GRATES. | (9.2) PROVIDE PORCELAIN TILE FLOOR. | (26.1) PROVIDE AUTOMATIC DOOR OPENERS. |
| | (9.4) PROVIDE GYPSUM BOARD TO WRAP COLUMNS (COORDINATE WITH EXHIBIT DESIGN). | (26.2) PROVIDE LIGHTING TO MEET REQUIREMENTS FOR ILLUMINATION LEVELS AT ELEVATOR LANDING SILLS. |
| | (12.1) PROVIDE CASEWORK AND ACCESSIBLE SERVICE COUNTERS. | |





Thomas Jefferson Memorial
Targeted Accessibility Improvements Program
Assessment of Effect

FIGURE 14
Portico/Chamber Level Demolition Plan



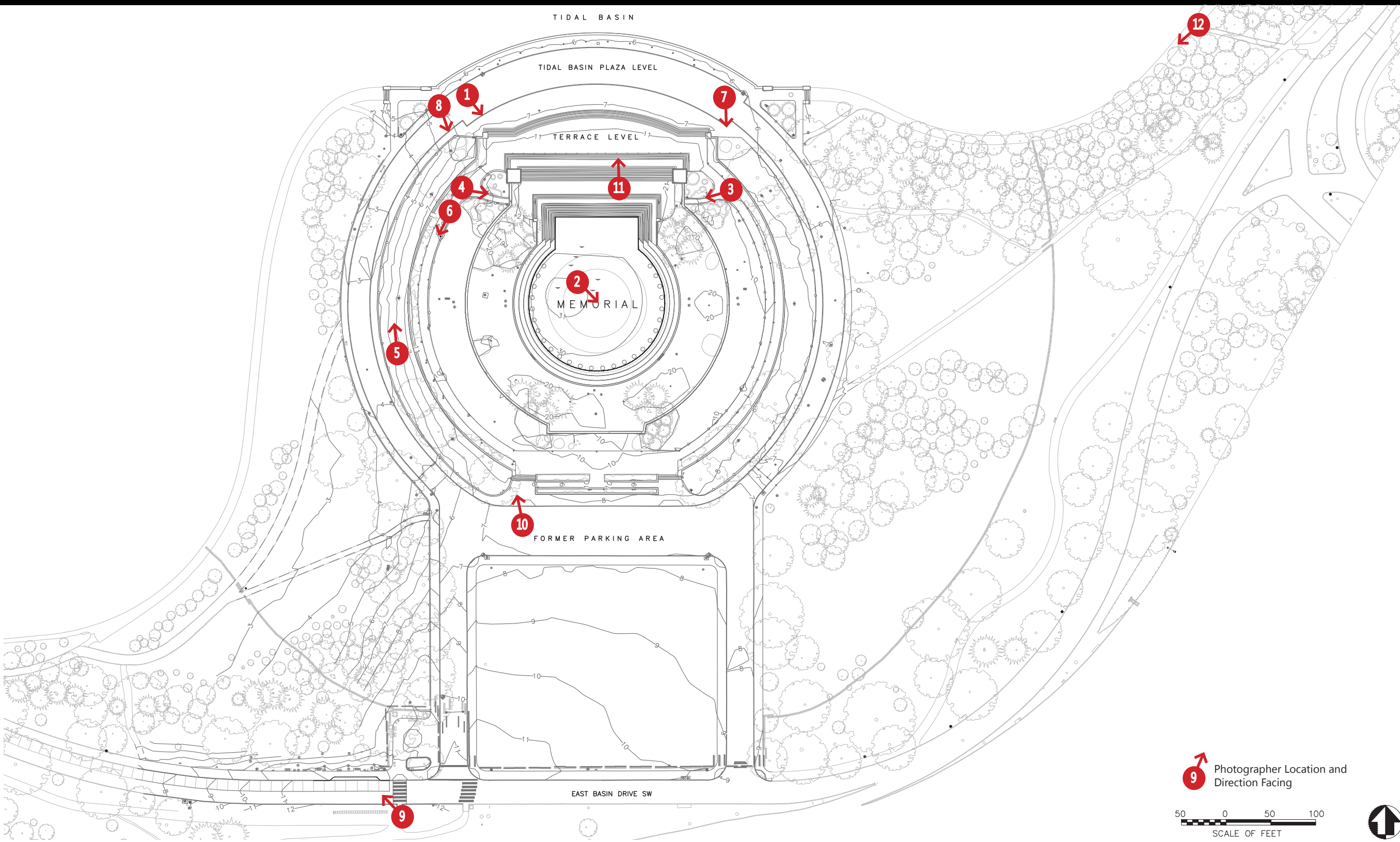


Thomas Jefferson Memorial
Targeted Accessibility Improvements Program
Assessment of Effect

FIGURE 16
Project Area and Area of Potential Effect

APPENDIX B: PHOTOGRAPHS

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9 Photographer Location and
Direction Facing

50 0 50 100
SCALE OF FEET





3. National Mall and Memorial Parks, Thomas Jefferson Memorial, Washington, DC. East door to lower level from the lower terrace level. Photographer facing W, June 2017.



4. National Mall and Memorial Parks, Thomas Jefferson Memorial, Washington, DC. West door to lower level from the lower terrace level. Photographer facing E, June 2017.



5. National Mall and Memorial Parks, Thomas Jefferson Memorial, Washington, DC. View of circular roadway on left and lower terrace wall on right. Photographer facing N, June 2017.



6. National Mall and Memorial Parks, Thomas Jefferson Memorial, Washington, DC. View of lower terrace walkway with upper terrace wall on left. Photographer facing S, June 2017.



7. National Mall and Memorial Parks, Thomas Jefferson Memorial, Washington, DC. View of east side of Memorial with landscaped vegetation. Lower terrace wall shown at center right, upper terrace wall at right, and Tidal Basin plaza in foreground. Photographer facing S, June 2017.



8. National Mall and Memorial Parks, Thomas Jefferson Memorial, Washington, DC. View of west side of Memorial and landscaped vegetation. Lower terrace wall and upper terrace wall shown at left and Tidal Basin plaza in foreground. Photographer facing S, June 2017.



9. National Mall and Memorial Parks, Thomas Jefferson Memorial, Washington, DC. Existing location of designated accessible parking spaces. Photographer facing NW, June 2017.



10. National Mall and Memorial Parks, Thomas Jefferson Memorial, Washington, DC. Entrance to sloped walkway on south side of the Memorial. Photographer facing N, June 2017.



11. National Mall and Memorial Parks, Thomas Jefferson Memorial, Washington, DC. Vista from portico level with Tidal Basin at center and Washington Monument in distance. Photographer facing N, June 2017.



12. National Mall and Memorial Parks, Thomas Jefferson Memorial, Washington, DC. View of the Memorial from Tidal Basin walkway. Photographer facing SW, February 2017.



As the nation's principal conservation agency, the Department of the Interior has responsibilities for most of our nationally owned public lands and natural resources. This includes fostering wise use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historic places, and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people. The department also promotes the goals of the Take Pride in America campaign by encouraging stewardship and citizen responsibility for American Indian reservation communities and for people who live in island territories under US administration.