

WASHINGTON MONUMENT GROUNDS
REVISED DESIGN CONCEPT PLANS FOR VISITOR AND SECURITY IMPROVEMENTS
(WASHINGTON MONUMENT LODGE ADDITION)
Between 14th and 17th Streets and Constitution Avenue, NW and the Tidal Basin
Washington, D.C.

Report to the National Park Service

April 4, 2002

Abstract

The National Park Service (NPS) has requested approval of a revised design concept for an alteration to the Monument Lodge. The Monument Lodge is a part of the overall permanent security improvements to the Washington Monument Grounds. The design concept for the overall security improvements was approved by the Commission at its February 7, 2002 meeting. As a condition of the February 7th approval, the Commission stated that if there were any substantial changes to the Monument Lodge or other elements of the overall design concept, NPS would resubmit the affected element for revised concept approval. Therefore, the current proposal for alterations and an addition to the Monument Lodge is submitted for Commission review.

Authority

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

Commission Action

The Commission:

- **Approves, in concept**, the construction of an addition to the Washington Monument Lodge, Washington Monument Grounds, between 14th and 17th Streets and Constitution Avenue, NW and the Tidal Basin, Washington D.C. The concept submission is shown on NCPC Map File No. 1.42(38.00)-41015.
- **Reiterates** its request from its February 7, 2002 meeting that **prior to** submitting preliminary site and building plans, NPS should submit a revised Development Concept

Plan incorporating proposed changes and additions to the currently approved Plan of 1993, a completed National Environmental Policy Act document, and a record of significant progress in the Section 106 historic preservation consultation with all parties.

- **Requests** that:

- Prior to advancing the design of the underground visitor center or the associated above ground addition to the Monument Lodge, NPS complete a study of anticipated visitor circulation patterns to determine necessary queuing and program space, and stairway, entry and exit capacity of the underground visitor center. This study should be included with the revised Development Concept Plan for the Washington Monument Grounds.

- Any addition to the Monument Lodge be compatible in style and historic character to the Lodge and designed in a manner that results in a structure that is not visually larger than the existing Lodge, so as to not dominate the scale and massing of this historic building.

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BACKGROUND AND STAFF EVALUATION

DESCRIPTION OF PROPOSAL

The NPS has submitted a revised design concept for alterations to the Monument Lodge. The Monument Lodge is one of the elements that was included in the Design Concept Plan previously approved by the Commission. This revised design concept is being submitted in response to the Commission's February 7, 2002 action regarding modifications and changes to the Monument Lodge. At the time the Commission reviewed the overall design concept, it was assumed by NPS that the Monument Lodge was adequate to accommodate visitor access to and from the visitor center and the Monument. However, NPS indicates that the anticipated volumes will require an addition to the Lodge.

Site

The Monument Lodge is located on axis with the Washington Monument and is bounded on the east by the sidewalk of 15th Street. The north, south, and west sides are bounded by the Washington Monument Grounds.

Program

The primary program for the Lodge is to provide access for visitors going either to the Washington Monument or to the underground visitor center. The Lodge would contain a ranger information station, entry lobby, and two elevators. The proposed addition would contain stairs that lead down to the visitor center. No visitor screening would take place in the Lodge—that

function would take place in the underground visitor center. Other activities programmed for the underground visitor center include ticketing, visitor store, restrooms, and exhibits.

Design

The design concept submitted by NPS includes the depiction of a glass structure attached to the west side of the Monument Lodge approximately the same size as the existing Lodge. Although of a much smaller scale, this addition is shown stepped in a manner similar to the existing glass restaurant on the National Air and Space Museum.

PREVIOUS COMMISSION ACTION

At its February 7, 2002 meeting, the Commission:

- Approved the Design Concept Plan for visitor and security improvements to the Washington Monument and its grounds with the understanding that any substantial changes to the Monument Lodge or other elements of the design concept be resubmitted for “concept” approval prior to the submission for preliminary site and building plan review.
- Required that, prior to submission of preliminary site and building plans, NPS submit a revised Development Concept Plan incorporating proposed changes and additions to the currently approved Plan of 1993, a completed National Environmental Policy Act (NEPA) document, and a record of significant progress in the Section 106 historic preservation consultation with all parties.
- Requested that NPS recognize and accept the Commission as a “cooperating agency” in the preparation process for the NEPA document as identified in Council on Environmental Quality guidance issued in 48 Fed. Reg. 34264 (1983), concerning the joint use of NEPA documents, and that the document identify and reflect the cooperative statute of NCPC as required by 40 CFR 1501.5, 1501.6 and CEQ guidance issued September 25, 2000.

EVALUATION

Staff recommends approval, in concept, of constructing an addition to the Monument Lodge. As staff understands, the Lodge and any addition would provide entrance to the underground visitor center as originally proposed in the 1993 Concept Development Plan for the Washington Monument Grounds. Staff does, however, believe that it is premature to advance any design for adding to the Lodge absent several important pieces of information that include:

- An assessment of existing and new visitor circulation patterns on the Monument Grounds as well as the anticipated number of visitors coming to the proposed underground visitor center.

- The revised Development Concept Plan that was requested by the Commission at its February 7, 2002 meeting. The Commission understood that this revised plan would be submitted prior to the submission of preliminary site and building plans.
- An identification of the area that this facility would serve. Is it limited to the Washington Monument Grounds or would it serve all of West Potomac Park?
- An assessment of access, egress, and emergency exit needs associated with levels of visitor services needed to serve the identified visitor demand.

Staff believes that it is critically important to have the above mentioned information before advancing proposals for the underground visitor center and associated addition to the Monument Lodge. With the overall security improvements proposed for the Washington Monument Grounds, staff questions whether or not it is appropriate to house potentially large groups of tourists underground. For example, the location of actual ticketing may not have to be housed underground. That activity can take place above ground and therefore remove the need for visitors to go underground to purchase tickets for different entry times to the Washington Monument.

Initially, NPS indicated that the Lodge would be sufficient to allow visitor access to the underground visitor center. However, NPS believes that the Lodge is too small to accommodate the stairway needed for anticipated visitors, resulting in the current submission. The location of the stairway outside of the existing Lodge, would respect its historic fabric and keep alterations to the building at a minimum. NPS should consider providing additional points of entry into a possible addition because many of the visitors will be coming to the underground visitor center without necessarily visiting the Monument.

Although the underground visitor center is not part of the current submission, NPS should, as mentioned, reexamine visitor and tourist movements in this part of the Mall. Once visitors to this end of the Mall become aware that there is a visitor center, staff believes that there will be larger volumes of people coming to the center for the restrooms, comfort from the elements, and to make purchases.

If it is determined that an addition to the Monument Lodge is necessary, care should be taken to provide an addition that does not visually dominate or detract from the existing Lodge. Also, any addition should respect the simple rusticated character and modest scale of the Lodge and be kept simple in its design.

COORDINATION

Coordinating Committee

The Coordinating Committee reviewed this item at its meeting on March 13, 2002 and forwarded the proposal to the Commission with the statement that the project has been coordinated with all agencies participating. The participating agencies were NCPC; the District of Columbia Office

of Planning; the Department of Public Works; the General Services Administration; the National Park Service; and the Washington Metropolitan Area Transit Authority.

CONFORMANCE

National Environmental Policy Act

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

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

Staff review of the prior NPS NEPA documentation, during the initial submission of the concept in January 2002, found the sufficiency of the environmental determination adequate and applicable to the submission phase, but only in the context of concept review. In the examination of the current revised NPS submission for conceptual approval, no substantial environmental condition is sufficiently altered to revise the previous conclusion. Similarly, because the additional elements to the current submitted Design Concept Plan are within the same context and intensity as the January information, which was a concern of the Commission, the Park Service has revisited its NEPA determination. NPS has determined that an environmental assessment (EA) will be prepared in accordance to CEQ implementing regulation guidance to address the potential environmental impacts of the planned preliminary project design. NPS has invited the Commission, as a cooperating agency, to participate in the preparation process for the EA as identified in CEQ guidance issued at 48 Fed. Reg. 34264 (1983) concerning the joint use of NEPA documents. At the current time, NPS estimates potential availability of the EA, which would be open to a 30-day public comment period, by early April 2002. Commission staff will review and report on the information of the EA during the preliminary design review of the project at the Commission's June 6th meeting.

National Historic Preservation Act

Measuring Situated about 500 feet to the east of the monument itself on the east-west axis of the Mall, the Monument Lodge is a small one-story rectangular building that was constructed in 1888 as the monument neared completion. 43' x 24', the Lodge is built of rusticated ashlar blocks laid in random courses that impart a rustic appearance in keeping with the nature of the building and its date of construction. On the east (front) facade, a long shallow porch is flanked by two marble Doric columns. A three-sided bay is centered on its west façade. A large lean-to

addition, constructed on the west façade in 1963, obscures this projecting bay and will be removed as part of the proposed project.

According to the architect, the genesis of the style of the depicted addition is a glass conservatory of the High Victorian Gothic style of the second half of the nineteenth century. The advantages of this approach are that the glass walls would allow the new structure to be readily distinguished from the historic fabric of the Monument Lodge; that the west façade of the Lodge would be discernible from both inside and outside the addition; and that the glass enclosure would allow natural light to penetrate the structure and down the stairs. The stepped profile of the roof and walls, reminiscent of a nineteenth-century conservatory, is meant to create a smaller mass that would not be visible from the east (from 15th Street, for example).

However, the style and character of the depicted conservatory addition seem too refined, and too faceted, for the simple rusticated character and modest scale of the Lodge. The English High Victorian Gothic style is of the same time period as the Lodge but from a different design vocabulary. Staff urges NPS to consider other historical models for the addition as it continues to develop the design.

As proposed, the sills of the windows in the bay on the west façade of the Lodge would be cut down to the floor to provide access to the addition. This constitutes a loss of historic fabric that should be avoided if possible, but that may be found acceptable, given the proposed change in the use of the Lodge and provided that the character-defining features of the Lodge remain.

The proposed interior alterations to the Lodge will need to be carefully considered by NPS as design development and historic preservation review proceed. Any proposed changes must be weighed against the value of retaining and protecting historic interior fabric, including the tile floor. The two proposed elevators would be new elements in the Lodge, as would be the ranger's information desk. NPS should specify which interior features would be removed to accommodate these changes and identify original interior fabric.

NPS is serving as the lead federal agency for the historic review required under Section 106 of the National Historic Preservation Act. With the support of the Advisory Council on Historic Preservation, the D.C. State Historic Preservation Office, and NCPC, NPS has elected to follow alternate procedures toward completion of its Section 106 responsibilities. A draft Programmatic Agreement (in the process of being signed) details both the substance and the process of the historic preservation review that will take place over the coming months as the project proceeds through the stages of review. As each component of the project is developed and submitted to any of the public review bodies, NPS will provide copies of the plans to all of the signatories and concurring parties, who will have the opportunity to review them early in the review cycle and request a meeting of all the parties to discuss their historic preservation concerns. NPS will schedule the meeting and consider the expressed concerns, documenting its response. As a result of these early meetings, NPS and the Commission will be aware of public concerns in advance of hearing testimony at our meetings.

The Programmatic Agreement states that the goals to be achieved to the extent possible are the Secretary of the Interior's Standards for the Rehabilitation of Historic Properties. The Standards, first promulgated in 1976 and most recently updated in 1992, are used by NPS, other federal agencies, and State Historic Preservation Officers to ensure that projects receiving federal money or tax benefits are reviewed in a consistent manner.

The Programmatic Agreement calls for the *rehabilitation* of the Washington Monument and Grounds, in recognition of the fact that new features will be introduced into the setting. (The Standards, with accompanying Guidelines for both Buildings and for Cultural Landscapes, address four types of treatment: preservation, rehabilitation, restoration, and reconstruction.) *Rehabilitation* is defined by NPS as "the act or process of making possible a compatible use of the property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural or architectural values."

"When repair and replacement of deteriorated features are necessary; when alterations or additions to the property are planned for a new or continued use; and when its depiction at a particular period of time is not appropriate, Rehabilitation may be considered as a treatment. Prior to undertaking work, a documentation plan for Rehabilitation should be developed." (Heritage Preservation Services, NPS)

The Standards for Rehabilitation are:

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible,

- materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
 8. Significant archaeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
 9. New additions, exterior alterations or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
 10. New additions and adjacent or related new construction shall be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The staff looks forward to consultation on the application of the Standards to the proposed Lodge addition under the terms of the Programmatic Agreement. At this early concept stage, the staff believes that the proposed Lodge addition appears to meet in general terms the relevant Standards, particularly Standard #10, governing the reversibility of the proposed addition. As the Lodge addition is designed, NPS should ensure that the proposal meet, in particular, Standards #1, 2, and 9, governing the compatibility of the new use for the historic structure; the retention of historic building fabric; the differentiation of new work from old; and the compatibility of the new work with the architectural character of the old.

NPS should continue to study the architectural means of achieving the proposed program requirements of the Lodge, and design an addition that would best preserve the historic character as well as the historic fabric of the Lodge. A simpler style may better serve both the character and the fabric of the Lodge. NPS should provide more information on the anticipated use of the building by the public and indicate how it intends to prevent or alleviate alterations to and wear on the historic fabric. Further, the construction of an addition to the Lodge constitutes an alteration to a historic structure and to the Monument Grounds that was not anticipated in the selected concept scheme. The cumulative effect of the proposed addition, of the skylight, and of other new features on the Grounds will need to be considered (and the Secretary's Standards applied) as the design of all the elements proceeds to the preliminary stage.

The D.C. Historic Preservation Review Board reviewed the proposed Lodge addition at its February 28, 2002 meeting. The Board adopted the staff report, which included the following analysis of the proposed changes to the Lodge:

Alterations to the Monument Lodge: The plans represent a superb opportunity for enhancement of the historic Monument Lodge, which is marred by an ugly addition and needs a more suitable use. Rehabilitation of the lodge should be accomplished in accordance with the Secretary of the Interior's Standards, retaining and restoring historic features, both interior and exterior. The "greenhouse" addition is an appropriate means of adapting the building to new use, but it should be installed in a way that is reversible with minimum damage to historic fabric.