



**Independence National Historical Park  
Philadelphia, Pennsylvania**

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**FINDING OF NO SIGNIFICANT IMPACT**

Draft #5, revised January 23, 2007

**Visitor Use and Security: Independence Hall and the Liberty Bell**

**(Old Package Title: Security Fencing and Screening Facilities)**

**Independence National Historical Park**

**INTRODUCTION**

A Modified No Action Alternative (MNAA) is proposed in this Finding of No Significant Impact to replace the former security plan proposed as Alternative B in the July, 2006, Environmental Assessment. The modification is in response to public comments received in July and August, 2006. The MNAA includes both a system of historically accurate chain and bollards (American Institute of Architects, AIA, 1915) to outline the Independence Square visitor use area, and visitor screening at the Liberty Bell Center and near the East Wing on Independence Square. The MNAA eliminates the significant adverse effect to Old City Hall which will be returned to its previous function of educating visitors about the U.S. Supreme Court of the 1790s. The previously proposed 6-foot tall, iron palisade fence will not be built, and the existing bicycle barricades will be removed from Independence Square and from Block 1, the Liberty Bell Center area. Relatively un-intrusive technologies and increased security patrols will supplement the defined secured visitor use area, screening, and existing security patrols. The efficiency of this MNAA system in fulfilling the twin purposes of protecting cultural resources and providing a safe, quality visitor experience will be evaluated annually.

**BACKGROUND**

Independence National Historical Park (INHP) is federal parkland under the jurisdiction of and maintained by the National Park Service (NPS). Spanning about 54 acres on 20 city blocks within the City of Philadelphia, the park preserves and interprets resources associated with the establishment of the United States of America, including: the site of the meetings of the first and second Continental Congresses and the site at which the Declaration of Independence, the Articles of Confederation, and the Constitution of the United States of America were debated and signed. On Independence Square, the Declaration of Independence was read publicly for the first time on July 8, 1776. Most notably, the park manages and displays one of the country's best known and most enduring symbols of freedom and democracy: the Liberty Bell, as named by 1830's abolitionists.

Homeland Security Presidential Directive – 7, one of the national policies developed in response to the September 11, 2001 terrorist attacks on the World Trade Center in New York City and the Pentagon in Washington, D.C., places the responsibility of protecting the nation’s monuments and icons from terrorist attacks on the Department of the Interior. These icons include Independence Hall, a World Heritage site, and the Liberty Bell.

### **PILOT STUDIES FOR SECURITY**

Following the September 11, 2001 terrorist attacks, at the request of INHP, the City of Philadelphia closed the 500 block of Chestnut Street to vehicular traffic. A threat assessment study conducted at the park in 2002 recommended the continued closure of the 500 block of Chestnut Street, as well as both the creation of secure zones around the park’s national icons and the electronic screening of all individuals entering this single secure zone. Visitors were screened once for entry into both the Liberty Bell and Independence Hall, and there was only one screening location.

In response to citizen and local business protests, the City of Philadelphia, as the landowner of record, reversed its earlier decision and reopened Chestnut Street to vehicular traffic on April 1, 2003. With the re-opening of the street, it was necessary for the park to add a second temporary screening facility in the form of a tent on Independence Square. In response to local protests, on March 29, 2004, the park eliminated the tent and implemented a single-screening operation near the Liberty Bell Center, which was combined with a “safe street” crossing operation at Chestnut and 6<sup>th</sup> Streets. This escorted crossing, aided by specialized agents of a contracted security company, eliminated the need for dual screening.

In November, 2005, the Secretary of Interior approved a plan to implement anti-terrorist protection and security at two screening locations, one adjacent to the Liberty Bell Center and one inside the Old City Hall. Old City Hall is owned by the City of Philadelphia and operated by the park under a Memorandum of Agreement (July 14, 1950) that states that the Secretary of the Interior “will exercise reasonable care to prevent damage to, or destruction of, any part of the grounds and buildings or their appurtenances” (Article II (b)).

In response to the Secretary’s decision, on March 1, 2006, INHP implemented another pilot study for the dual-screening approach to security. One temporary security screening facility was installed in Old City Hall, located at 5<sup>th</sup> and Chestnut Streets, in order to inspect visitors to Independence Hall and associated buildings. A second temporary security screening operation and facility for the Liberty Bell Center was built on the east side of 6<sup>th</sup> Street between Market and Chestnut Streets. These temporary visitor screening facilities and anti-terrorism protection measures, including the temporary bicycle barricades and the continuation of specialized security personnel, were designed to enhance protection of Independence Hall and the Liberty Bell from a person-delivered explosive device.

### **THE ENVIRONMENTAL ASSESSMENT**

On June 30, 2006, an Environmental Assessment (EA) for a permanent security plan was released for a 60-day public review period. The EA was distributed to INHP’s community partners, affected parties, public preservation agencies, and traditionally associated

ethnographic groups, and was also made available electronically on the NPS Planning, Environment, and Public Comment web site at <http://parkplanning.nps.gov> and in hard copy at INHP.

The EA evaluated two action alternatives (Alternative A and B) that provided permanent screening facilities and a security fence in various areas around Independence Square and the Liberty Bell Center. The NPS identified alternative B as the preferred alternative in the EA (reference page 15 of the EA). In addition, the no action alternative (maintaining the temporary structures) was assessed.

Approximately 300 communications were received as a result of public comment. Approximately 90 percent of those comments opposed all or parts of preferred alternative. Many commenters opposed any restriction to access in and around Independence Square and the Liberty Bell Center. A Public Comment Analysis Report has been prepared and will be made available for the public's reading on the NPS Planning, Environment, and Public Comment web site at <http://parkplanning.nps.gov> and in printed form.

### **THE REVISED VISITOR USE AND SECURITY PLAN**

In response to the public comments, the NPS has revised its proposal for providing security at Independence Square and the Liberty Bell Center. The revised purpose of taking action at this time is to protect the national icons from a person-delivered backpack bomb in a visitor-friendly way that is compatible with American ideals of freedom and democracy as symbolized by Independence Hall and the Liberty Bell. Following the overwhelming public comment described above, the project objectives were reconsidered and revised as follows:

Improvement of Visitor Use and Security – Because of increased national security concerns for the very visible national icons and because of public response to the EA, the park requires protection against acts of terrorism. The park is now looking to implement a sensitive, relatively non-intrusive security system that will have a reduced impact on historic buildings, landscapes, and the visitor experience. Required security elements include 1) inspection of individuals and their packages entering the Liberty Bell Center and Independence Hall, and 2) the demarcating/outlining and enforcement of a small Independence Square visitor use area where only those visitors who have passed through inspection are permitted access. It is proposed that the visitor use area will be outlined by a less visually-intrusive chain and bollard system that is shown in drawings and photographs in the attachments.

Preservation of Cultural Landscape Quality – The landscaped setting for the national icons is a value that must be balanced against the need for security of the buildings and artifacts themselves, a sentiment expressed by many who commented on the EA. The design and development of any visitor use and security system should be minimal so as maintain the historic quality and feel of the Square. Symmetry is an important design element of the American Institute of Architects (AIA) plan for improving the Square as it exists today after its 1915 implementation.

## **SELECTED ALTERNATIVE**

After considering public comment on the July EA and in consultation with the Department of the Interior, the NPS has decided to implement the MNAA. The modification refers most importantly to the replacement of the formerly proposed six foot high, iron-palisade fence with a less intrusive, 42 inch high chain and bollard system that both accentuates and minimally interrupts the AIA sidewalk patterns. The reduced visual and linear effects of the chain and bollard system respond to positions advanced during the public comment period.

Black chain and collared bollards will be placed on lawn and walkway surfaces to define a secured visitor use area around the south side of the Independence Hall group of buildings in a style and design matching the existing bollards. Approximately 650 linear feet (Figure 1) will be constructed outlining part of the 1915 AIA sidewalk pattern, positioned so as to interrupt the minimum number of walkways. Bollards will be placed at approximately 10 foot intervals as tree protection allows. On grass surfaces, the bollard will be anchored 12 inches into the ground by a system of 1 inch square metal stakes that will be welded to the bollard. This installation technique will not require archeological monitoring because of the lack of below-ground construction excavations. In those 4 locations where the chain and bollards cross paved walkways, above-ground, free-standing, moveable, collared bollards will be used without metal spikes. All bollards will weigh approximately 150 pounds for stability.

Extending north from Congress Hall and from Old City Hall, moveable, on-grade black chain and bollards will meet the existing brown chain and bollards (Figure 2, top right) that stretches along the entire length of the 500 block of Chestnut Street for vehicle protection. The approximate 11 proposed black bollards differ from the existing brown bollards in color and also in design—the brown Chestnut Street bollards lack the ball of the proposed bollards.

The 650 linear feet of new bollard and chain construction will connect to almost 200 feet of existing chain and bollard (Figure 2, left), making maximal use of existing materials. In several locations, existing light posts will form the anchor for the chain, replicating the historic 1915 design and further reducing the need for additional new materials. New additional benches will be placed at key locations for visitor comfort. These mitigations are part of the MNAA proposal.

Other changes that have been incorporated into the MNAA as a result of public comment include the following:

- Remove the temporary, experimental visitor screening facility adjacent to the west wall of the Liberty Bell Center and replace it with inspection of packages, belongings, and individuals at the north entrance of the Liberty Bell Center; restore landscape to the plan designed by the Olin Partnership as part of the Mall Master Plan; and

- Remove the temporary, experimental visitor screening facility within Old City Hall, restoring it to its original condition for interpretive purposes and replace it with inspection of packages, belongings, and individuals near the East Wing of Independence Hall; and

Remove all temporary bicycle barricades around the Liberty Bell Center and on Independence Square. Replace barricades on Independence Square with a system of chain and bollards defining a visitor use area on the Square; and

Reallocate security personnel patrolling the perimeter of the sites; and

Incorporate new technological measures that will provide effective, yet less obtrusive, security; and

Review this security plan including security patrols and technology on an annual basis in cooperation with community partners.

The MNAA is the NPS's selected alternative because it best meets the revised purpose and need, responding to Homeland Security Presidential Directive – 7 by providing visitor screening and improved security while protecting the cultural resources of the park and simultaneously enhancing the quality of the visitor experience. A summary of environmental impacts of the selected alternative is provided in Table A (attached).

## **OTHER ALTERNATIVES CONSIDERED**

The July EA evaluated three alternatives for security fencing and screening facilities at Independence National Historical Park:

**Alternative A – No Action Alternative, Continuation of Temporary Screening Measures.** This alternative is slightly different than the MNAA presented in the Selected Alternative section above.

The no action alternative included maintaining the temporary, experimental visitor screening facilities adjacent to the west wall of the Liberty Bell Center (LBC) and within Old City Hall (OCH). This screening process consisted of airport-like examination of individuals by magnetometer arch and X-ray examination of belongings and packages. Also included was the continued use of bicycle barricades around the Liberty Bell Center and on Independence Square (reference EA pages 13-14, Figures 2 and 3). Bicycle barricades were to be configured from Congress Hall to the American Philosophical Society Hall on Independence Square. Additional bicycle barriers were to remain around the northern perimeter of the Liberty Bell Center and along some of the interior walkways.

**Alternative B – Permanent Screening Facilities (LBC and OCH) and Security Fence (NPS Preferred).** Alternative B, the NPS preferred alternative, included the construction of a permanent visitor screening facility at the location of the existing temporary structure at the Liberty Bell Center and maintaining the existing visitor screening facility within the lobbies of Old City Hall; both facilities were to perform airport-like electronic examination. A six- to seven-foot high, reversible Iron Palisade security fence would be constructed along the major east-west walkway connecting to Congress Hall and the American Philosophical Society Hall on Independence Square, supplementing the existing exterior brick wall. A short run of fencing would be installed to supplement existing protection around the Liberty Bell Center as well.

**Alternative C – Permanent Screening Facilities (LBC and Independence Square) and Security Fence.** Alternative C included the construction of a permanent visitor screening facility on the east side of the Liberty Bell Center. Also, the existing temporary screening facility was to be removed from Old City Hall and an additional permanent visitor screening facility was to be constructed on the grounds of Independence Square south of Congress Hall; both facilities were to perform airport-like electronic examination. A six- to seven-foot high, reversible Iron Palisade security fence was to be constructed along the major east-west walkway connecting to Congress Hall and the American Philosophical Society Hall on Independence Square, supplementing the existing exterior brick wall. A short run of fencing was to be installed to supplement existing protection around the Liberty Bell Center as well.

## **ENVIRONMENTALLY PREFERRED ALTERNATIVE**

The NPS is required to identify the environmentally preferred alternative in its NEPA documents for public review and comment. The NPS, in accordance with the Department of the Interior policies contained in the Departmental Manual (516 DM 4.10) and the Council on Environmental Quality's (CEQ) *NEPA's Forty Most Asked Questions*, defines the environmentally preferred alternative (or alternatives) as the alternative that best promotes the national environmental policy expressed in NEPA (Section 101(b) (516 DM 4.10). In their *Forty Most Asked Questions*, CEQ further clarifies the identification of the environmentally preferred alternative, stating "Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources" (Q6a).

Based on the environmental impact analysis in the July EA, the NPS originally identified alternative C as the environmentally preferred alternative in the EA. After reviewing the environmental impact analysis and upon consideration of the changes made as a result of public comment, the NPS has identified the MNAA as the environmentally preferred alternative because the MNAA elements have either been assessed as part of the other alternatives in the July EA or have been reduced to negligible or minor impacts, thereby best preserving the historic and cultural resources. A summary of the environmental impacts of the MNAA as well as other alternatives evaluated in the EA is provided in the attached Table A.

## **WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT**

The selected alternative will not have a significant effect on the environment as defined in 40 CFR §1508.27. Significance is determined by examining the following criteria:

***Impacts that may be both beneficial and adverse:*** Buildings, landscape, and archeology. The EA originally identified minor to moderate adverse impacts related to the maintenance of the screening facilities at the Liberty Bell Center and Old City Hall. With the implementation of the MNAA, these impacts would no longer occur with the removal of both screening facilities and the implementation of less intrusive inspection screening at the Liberty Bell Center and the East Wing of Independence Hall. Removal of the temporary screening facilities currently in place would result in negligible impacts on the Independence Square cultural landscape and

Old City Hall. Long-term minor adverse impacts (no adverse effect under Section 106) for the bicycle barricades segmenting the square were identified in the EA; replacement of the bicycle barricades with a bollard and chain system would have a long-term minor adverse impact because it would change a character defining feature (spatial organization) of Independence Square (no effect under Section 106).

Like alternative C in the EA, the replacement of the temporary visitor screening facility from Old City Hall by the implementation of visitor inspection near the East Wing would return the Old City Hall to its original condition and would permit its rehabilitation following the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and return the building to its condition prior to the installation of the temporary screening operation. As a result, removal of the screening equipment would be a moderate long-term beneficial impact (no adverse effect under Section 106) to the Old City Hall. Replacement of the bicycle barricades around Independence Square with a bollard and chain system would still have an impact on the historic design of the square, but the measure is easily reversible, is less intrusive than the bicycle barricades, and does not diminish the integrity of the historic district. This is considered a minor long-term adverse impact (no adverse effect under Section 106).

The revised non-excavation installation through the use of spikes will have a negligible effect on archeological resources (no adverse effect under Section 106) and monitoring is not required.

Visitor use and experience. The removal of security screening in Old City Hall would result in long-term moderate beneficial impacts for visitors that value the history represented by the Supreme Court chamber. The bollard and chains would be less intrusive and more visually appealing than the bicycle barricades, and more consistent with the current Independence Square cultural landscape that includes 1915 bollards and chains. Visitors would benefit from being able to move freely through the visitor use area without competing for space from the unscreened public, resulting in a long-term minor beneficial impact. The chains and bollards may still result in a long-term minor adverse impact for those community residents who prefer to move through the park unimpeded by any security. Similar to the LBC, short-term disturbances resulting from large equipment, construction noise, and the moving of dirt would result in short-term minor adverse impacts to visitors during construction.

Health and safety. This is discussed in answer to the following question.

***Degree of effect on public health or safety:*** Implementation of the MNAA would result in long-term moderate beneficial impacts to health and safety due to the use of visitor inspection at the Liberty Bell Center and Old City Hall. There could also be long-term minor adverse impacts as a result of the potential for those people standing in the visitor areas to suffer from heat-related illnesses during the summer months. Implementation of a bollard and chain system across the square and increases in security personnel and technological measures would provide minor to moderate long-term beneficial impacts of enhanced security.

***Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, wetlands, wild and scenic rivers, or ecologically critical areas:*** The NPS prepared this EA because of an identified need to evaluate more permanent and more appropriate facilities to provide the protections mandated by Homeland Security Presidential Direction – 7 for two national icons at the park—the Liberty Bell and Independence Square. The MNAA addresses this need for the action.

***Degree to which effects on the quality of the human environment are likely to be highly controversial:*** Public comment on the July EA was overwhelmingly opposed to the original preferred alternative. In response to public comments, the NPS has thus modified the no action alternative, accounting for the need to address compliance with Homeland Security Presidential Direction – 7 by providing adequate security for Independence Square and the Liberty Bell Center, balanced with the need to address public concern over the restriction of free movement and diminishment of the integrity and symbolism of these national icons. It is possible that some individuals will oppose any measures that restrict access in any way within the square; however, the NPS believes the MNAA represents that best achievable balance between security needs and maintaining public access.

***Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks:*** The risks to the quality of the human environment associated with the selected alternative will be negligible. There were no highly uncertain, unique, or unknown risks associated with implementation of the preferred alternative.

***Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration:*** The selected alternative neither establishes a National Park Service precedent for future actions with significant effects nor will it represent a decision in principle about a future consideration. The MNAA implements security measures that can be reversed if deemed necessary in the future.

***Whether the action is related to other actions with individually insignificant but cumulatively significant impacts:*** Cumulative effects were analyzed in the EA and considered in light of the changes incorporated in response to public comment, and no significant cumulative impacts were identified for the selected alternative. The MNAA will result in a reduction in existing impacts by reducing some visual intrusion in the cultural landscape, improving the visitor experience, and using less intrusive methods for inspecting visitors.

***Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources:*** Impacts to the Independence National Historic Park historic property range from short-term and long-term negligible to moderate adverse impacts during the surface placement of the chain and bollards system. There would be no impairment to the historic structures and districts.

Compliance with Section 106 of the National Historic Preservation Act has been ongoing during the planning process. As part of the consultation process, a copy of the Environmental



Assessment was submitted to the State Historic Preservation Office (SHPO) for review and comment. In a short letter, SHPO commented that more design options should be evaluated.

***Degree to which the action may adversely affect an endangered or threatened species or its critical habitat:*** No endangered or threatened species or critical habitat are present in the project area and, therefore, the selected alternative will have no effect on threatened or endangered species.

***Whether the action threatens a violation of federal, state, or local environmental protection law:*** The selected alternative violates no federal, state, or local environmental protection laws.

## **IMPAIRMENT OF PARK RESOURCES OR VALUES**

In addition to reviewing the list of significance criteria, NPS staff determined that implementation of the preferred alternative would not constitute an impairment of the park's resources and values. This determination is based on a thorough analysis of the impacts described in the EA and this Finding of No Significant Impact, agency and public comments received, and professional judgment in accordance with the National Park Service's *Management Policies, 2006* (August 31, 2006). As described in the EA and this Finding of No Significant Impact, implementation of the selected alternative will result in only negligible to moderate adverse impacts and will not result in major, adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of INHP; (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or (3) identified as a goal in the park's general management plan or other relevant National Park Service planning documents.

## **PUBLIC INVOLVEMENT**

Public involvement for terrorist-oriented security improvements began in 1994 with meetings with the City, and this continues to the present. As part of this process, the park has distributed public information brochures, press releases, and held several meetings with concerned citizens and organizations. (This multi-faceted public involvement is documented in the project's NEPA Administrative Record on file at INHP.) Two public informational meetings were held on March 23, 2004 and February 16, 2006 at the Independence Visitor Center with notification of these meetings through press releases. The meetings were held to provide information on the park's proposed security upgrades, show the initial designs, and solicit public comment. The theme of the meetings was balancing access and security at Independence Hall and the Liberty Bell. At the most recent meeting (February 2006), 28 people signed-in representing various interest groups including: American Philosophical Society, Independence Mall Business and Residents Coalition, Bohlin Cywinski Jackson, Olin Partnership, International Visitors Council, Civil War and Underground Railroad Museum, U.S. Marshals Service, Sons of the American Revolution, Deshler-Morris House Committee, U.S. Mint Police, Wackenhut Security, Center City District, Once Upon a Nation, Hillier Architecture, Christ Church, Independence Hall Association, and Philadelphia Managing Director's Office.

In June 2006, the Draft EA for Security Fencing and Screening Facilities was released to the public for a 30-day comment period. Due to requests from the public, this 30-day comment period was extended until September 1, 2006, for an overall 60 day comment period. The NPS received approximately 300 comments regarding the EA. As a result of public comment, the preferred alternative was changed to the MNAA as identified in the preceding sections. A Public Comment Analysis Report has been prepared and is available on the NPS Planning, Environment, and Public Comment web site at <http://parkplanning.nps.gov>, and is also available in printed form.

**FINDING OF NO SIGNIFICANT IMPACT**

The selected alternative does not constitute an action that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are negligible to moderate in intensity. There are no significant impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. There will be no impairment of INHP resources or values. Implementation of the action will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

**Recommended:**

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Dennis Reidenbach  
Superintendent, Independence National Historical Park      Date

**Approved:**

\_\_\_\_\_  
Chrysandra Walter  
Acting Northeast Regional Director      Date

References used in this FONSI:

1. Independence National Historical Park Security Fence and Screening Facilities Environmental Assessment, July, 2006.

2. Independence National Historical Park Security Fence and Screening Facilities  
Environmental Assessment, Public Comment Analysis Report (draft, revised October, 2006)

Attachments

Figure 1. Bollard locations with detailed layouts of Independence Square, Chestnut Street side and south side (Wallace Roberts & Todd drawing draft #3, sheet LA1.00, revised January 22, 2007).

Figure 2. Existing conditions photographs by Ian Crane, Chief Ranger, INHP, January, 2007).

Figure 3. Details of moveable and anchored bollards (top left) and artist renderings of Independence Square after surface bollards have been placed on walkways and lawn surfaces (Wallace Roberts & Todd drawing draft #3, sheet LA2.00, revised January 22, 2007).

Figure 4. Existing conditions showing the 1915 bollards with light pole anchor as mitigation as proposed in the Selected Alternative section above (photo by Ian Crane, Chief Ranger, INHP, January, 2007).

**TABLE A: SUMMARY OF ENVIRONMENTAL CONSEQUENCES**

Impact Topic	Selected Alternative – Modified No Action Alternative	Alternative A – No Action Alternative	Alternative B – Permanent Screening Facilities (LBC and OCH) and Security Fence	Alternative C – Permanent Screening Facilities (LBC and Independence Square) and Security Fence
<b>Cultural Resources</b>				
Cultural Landscapes	<p>Impacts to Independence Square’s cultural landscape resulting from the MNAA are negligible related to the removal of the screening facilities in OCH and the Liberty Bell Center. Replacement of the bicycle barricades with a bollard and chain system would have a long-term minor adverse impact because it would change a character defining feature (spatial organization) of Independence Square (no effect under Section 106). Cumulative impacts would be long-term minor and adverse (no adverse effect under Section 106). Based on this impact analysis, the MNAA is not likely to result in any impacts that would constitute impairment of the cultural landscape.</p>	<p>Impacts to Independence Square’s cultural landscape resulting from the no action alternative are negligible related to the maintenance of the screening facilities in OCH and the Liberty Bell Center, and long-term minor adverse impacts (no adverse effect under Section 106) for the bicycle barricades segmenting the square. Cumulative impacts would be long-term minor and adverse (no adverse effect under Section 106). Based on this impact analysis, the no action alternative is not likely to result in any impacts that would constitute impairment of the cultural landscape.</p>	<p>Impacts to the Independence Square cultural landscape resulting from the various activities proposed under alternative B range from negligible impacts for the construction of a new screening facility at the Liberty Bell Center and the maintenance of the screening facilities at OCH to short and long-term moderate adverse impacts for the installation of a security fence across the square (adverse effect under Section 106). Cumulative impacts would be long-term, moderate adverse impacts. Based on this impact analysis, alternative B is not likely to result in any impacts that would constitute impairment of the cultural landscape.</p>	<p>Impacts to the Independence Square cultural landscape resulting from the various activities proposed under alternative C range from negligible impacts for the construction of a new screening facility at the Liberty Bell Center and removal of the screening facilities from OCH, to short and long-term moderate adverse impacts (adverse effect under Section 106) for the installation of a security fence across the square and for construction of the new screening facility south of Congress Hall. Cumulative impacts would remain long-term, moderate adverse impacts (adverse effect under Section 106). Based on this impact analysis, alternative C is not likely to result in any impacts that would constitute impairment of the cultural landscape.</p>

Impact Topic	Selected Alternative – Modified No Action Alternative	Alternative A – No Action Alternative	Alternative B – Permanent Screening Facilities (LBC and OCH) and Security Fence	Alternative C – Permanent Screening Facilities (LBC and Independence Square) and Security Fence
Historic Structures and Districts	<p>The MNAA would result in long-term moderate beneficial impacts (no adverse effect under Section 106) for the removal of the screening facilities from Old City Hall and the Liberty Bell Center. Replacement of the bicycle barricades around Independence Square with a bollard and chain system would still have an impact on the historic design of the square, but the measure is easily reversible, is less intrusive than the bicycle barricades, and does not diminish the integrity of the historic district. This is considered a minor long-term adverse impact (no adverse effect under Section 106).</p> <p>Cumulative impacts from ongoing or expected future projects would remain long-term minor adverse impacts (no adverse effect) for use of the bollard and chain, and long-term moderate beneficial impacts to the Old City Hall and the removal of the present screening facilities. Based on this impact analysis, the MNAA is not likely to result in any impacts that would constitute impairment of historic structures or districts.</p>	<p>The no action alternative would result in moderate long-term adverse impacts to OCH (adverse effect in terms of Section 106). Cumulative impacts to historic districts or structures would remain long-term adverse and moderate to the OCH (adverse effect under Section 106). Based on this impact analysis, the no action alternative is not likely to result in any impacts that would constitute impairment of historic structures or districts.</p>	<p>Impacts to the Independence National Historical Park historic property resulting from the various activities proposed under alternative B range from short-term and long-term moderate adverse impacts (adverse effect under Section 106) during construction of the security fence south of Congress to long-term moderate adverse impacts (adverse effect under Section 106) to Old City Hall for the maintenance of the screening facilities in the building's interior. Cumulative impacts associated with alternative B from ongoing or expected future projects would remain long-term moderate adverse impacts (adverse effect under Section 106). Based on this impact analysis, alternative B is not likely to result in any impacts that would constitute impairment of historic structures or districts.</p>	<p>Impacts to elements of the Independence National Historical Park historic district resulting from the various activities proposed under alternative C range from short-term and long-term minor adverse impact (no adverse effect under Section 106) and moderate adverse impacts (adverse effect under Section 106) for the construction of the security fence and the new screening facility to long-term moderate beneficial impacts (no adverse effect under Section 106) for the removal of the screening facilities from Old City Hall. Cumulative impacts associated with alternative C from ongoing or expected future projects would remain long-term moderate adverse impacts (adverse effect) for construction of the security fence and the new permanent screening facility, and long-term moderate beneficial impacts to the Old City Hall for the removal of the present screening facilities. Based on this impact analysis, alternative C is not likely to result in any impacts that would constitute impairment of historic structures or districts.</p>

Impact Topic	Selected Alternative – Modified No Action Alternative	Alternative A – No Action Alternative	Alternative B – Permanent Screening Facilities (LBC and OCH) and Security Fence	Alternative C – Permanent Screening Facilities (LBC and Independence Square) and Security Fence
Archeology	<p>Activities associated with the implementation of the MNAA would require no subsurface excavation only minor ground penetrations that could have adverse long-term negligible impacts to archeological resources. The cumulative impacts to archeological resources associated with the MNAA would be negligible or minor. The MNAA would not result in impairment of archeological resources.</p>	<p>Under the no action alternative, no resources would be disturbed and no impacts would occur. Cumulative impacts under the no action alternative would be negligible or minor (no adverse effect under Section 106). There would be no impairment to archeological resources under the no action alternative.</p>	<p>Activities associated with the implementation of alternative B that would require subsurface excavation or ground disturbing activities would have adverse long-term negligible to moderate impacts (no adverse effect under Section 106) to archeological resources. However, these impacts would be mitigated through archeological data recovery or preservation in place. The cumulative impacts to archeological resources associated with alternative B would be long-term, negligible to minor adverse. Based on this impact analysis, alternative B is not likely to result in any impacts that would constitute impairment of archeological resources.</p>	<p>Activities associated with the implementation of alternative C that would require subsurface excavation or ground disturbing activities could have adverse long-term negligible to moderate impacts (no adverse effect under Section 106) to archeological resources. However, these impacts would be mitigated through archeological data recovery or preservation in place. The cumulative impacts to archeological resources associated with alternative C would be long-term, negligible to minor adverse. Based on this impact analysis, alternative C is not likely to result in any impacts that would constitute impairment of archeological resources.</p>

Impact Topic	Selected Alternative – Modified No Action Alternative	Alternative A – No Action Alternative	Alternative B – Permanent Screening Facilities (LBC and OCH) and Security Fence	Alternative C – Permanent Screening Facilities (LBC and Independence Square) and Security Fence
<p>Visitor Use and Experience</p>	<p>The removal of security screening in Old City Hall would result in long-term moderate beneficial impacts for visitors that value the history represented by the Supreme Court chamber. Security inspections at the Liberty Bell Center and the East Wing would cause long-term minor adverse impacts because of heightened visitor uncertainty, health and safety issues, and the impact on the historical scene. However, security line wait times would decrease, and the availability of interpretive staff to educate visitors about the security process and about park significance would result in some long-term minor beneficial impacts.</p> <p>The bollard and chains would be less intrusive and more visually appealing than the bicycle barricades, and more consistent with the current Independence Square cultural landscape that includes 1915 bollards and chains. Visitors would benefit from being able to move freely through the visitor use area without competing for space from the unscreened public, resulting in a long-term minor beneficial impact. The chains and bollards may still result in a long-term minor adverse impact for those community residents who prefer to move through the park unimpeded by any security.</p> <p>Similar to the LBC, short-term disturbances resulting from large equipment, construction noise, and the moving of dirt would result in short-term minor adverse impacts to visitors during construction. Cumulative impacts would be long-term minor. Based on the impact analysis, the MNAA is not likely to result in any impacts that would constitute impairment to opportunities for enjoyment of the park.</p>	<p>The bicycle barricades would continue to intrude upon the Independence Square cultural landscape and result in long-term minor to moderate adverse impacts to visitor experience depending upon visitor sensitivity to the historic characteristics of Independence Square and the value they place on freely moving throughout the park unimpaired by security structures. Additionally, the presence of the white, temporary screening building next to the LBC would continue to be a long-term moderate adverse impact to visitors approaching the building because of inconsistency with the building and Mall design and it blocks visitor views through the building to the mall landscape. Security screening in the temporary facilities at the LBC and in OCH would also continue to cause long-term moderate adverse impacts because of heightened visitor uncertainty, wait times in security lines, health and safety issues, and the impact on the historical scene. However, the availability of interpretive staff to educate visitors about the security process and about park significance would result in some long-term minor beneficial impacts. Cumulative impacts would be long-term minor to moderate and adverse. Based on the impact analysis, the MNAA is not likely to result in any impacts that would constitute impairment to opportunities for enjoyment of the Park.</p>	<p>The impacts of the security fence would be similar to alternative A, ranging from long-term minor to moderate adverse depending upon visitor preferences related to the need to maintain the historic characteristics of the Square and the value they place on freely moving throughout the park unimpaired by security structures. The new building at the LBC would result in long-term minor adverse impacts because, although it would be compatible with existing architecture, it might continue to block the ability of visitors to see through the LBC to the mall landscape. Impacts related to security screening procedures at OCH would be the same as described in alternative A, but would be long-term moderate beneficial for visitors screened at the LBC because of the improved wait times and fewer health and safety issues. During construction, relocation of the temporary screening facility would result in short-term, moderate adverse impacts to visitors. Cumulative impacts would long-term and minor adverse. Based on the impact analysis, the MNAA is not likely to result in any impacts that would constitute impairment to opportunities for enjoyment of the Park.</p>	<p>Except for impacts associated with OCH and the new security screening facility on Independence Square, visitor use and experience impacts would be the same as alternative B. The removal of security in OCH would result in long-term moderate beneficial impacts for visitors that value the history represented by the Supreme Court chamber. However, for visitors that value the cultural landscape, the intrusion of both the security building and the security fence could result in long-term moderate adverse impacts. Therefore, the adverse visual impacts could offset the beneficial impacts of an improved visitor experience within OCH. Similar to the LBC, short-term disturbances resulting from large equipment, construction noise, and the moving of dirt would result in minor adverse impacts to visitors during construction. Based on the impact analysis, the MNAA is not likely to result in any impacts that would constitute impairment to opportunities for enjoyment of the Park.</p>

Impact Topic	Selected Alternative – Modified No Action Alternative	Alternative A – No Action Alternative	Alternative B – Permanent Screening Facilities (LBC and OCH) and Security Fence	Alternative C – Permanent Screening Facilities (LBC and Independence Square) and Security Fence
Health and Safety	<p>Implementation of the no action alternative would result in long-term moderate beneficial impacts to health and safety due to the use of inspections at the LBC and the East Wing of Independence Hall. The potential for long-term minor adverse impacts as a result of people standing in the heat while waiting in the inspection lines will be mitigated as a result of reduced wait times (quicker inspections), and by the addition of more benches in the shade. Replacement of the bicycle barricades with bollard and chains may result in visitor perception of reduced security, however new technological system improvements would offset this, resulting in a long-term minor to moderate beneficial impact to security. Cumulative impacts under no action alternative would be short-term negligible to minor adverse.</p>	<p>Implementation of the no action alternative would result in long-term moderate beneficial impacts to health and safety due to the continued use of visitor screening at the LBC and OCH. There could also be long-term minor adverse impacts as a result of the potential for those people standing in the visitor screening queues to suffer from heat-related illnesses during the summer months. Long-term minor adverse impacts could also occur from potential conflicts between pedestrians and automobiles and potential tripping hazards when these queues grow too large and disorganized. There could also be long-term moderate adverse impacts as a result of the security inadequacies inherent in the temporary security fencing. Cumulative impacts under no action alternative would be short-term minor adverse.</p>	<p>Implementation of alternative B would result in long-term moderate beneficial impacts to health and safety due to the continued use of security screening at the LBC and OCH. There could also be long-term minor adverse impacts as a result of the potential for those people standing in the visitor screening queues to suffer from heat-related illnesses during the summer months. Long-term minor adverse impacts could also occur from potential conflicts between pedestrians and automobiles and potential tripping hazards when these queues grow too large and disorganized. There would be moderate long-term beneficial impacts with the added security the new fence provides. Cumulative impacts under alternative B would be short-term minor adverse.</p>	<p>Implementation of alternative C would result in long-term moderate beneficial impacts to health and safety due to the continued use of security screening at the Liberty Bell Center and the proposed new visitor screening facility located south of Congress Hall. Long-term minor adverse impacts could result from the potential for those people standing in the visitor screening queues to suffer from heat-related illnesses during the summer months. Long-term minor adverse impacts could also occur from potential conflicts between pedestrians and automobiles and potential tripping hazards when these queues grow too large and disorganized. Moderate long-term beneficial impacts would occur with the added security the new fence provides. Cumulative impacts under alternative C would be short-term minor adverse.</p>