Description of document:	United States Department of the Interior (DOI) Office of Law Enforcement and Security (OLES) Security Assessments for Four National Monuments and/or Icons, 2009-2011
Requested date:	10-June-2012
Released date:	24-July-2012
Posted date:	06-August-2012
Titles of documents:	Security Assessment of the Jefferson National Expansion Memorial Security Assessment of Boston National Historical Park/USS Constitution Security Assessment of the National Mall Security Assessment of the Mount Rushmore National Memorial
Source of document:	Freedom of information Act Request Department of the Interior Office of the Secretary (OS) MS-116, SIB 1951 Constitution Ave., NW Washington, DC 20240 Fax: (202) 219-2374 E-mail: os_foia@ios.doi.gov Online FOIA Request Form

United States Department of the Interior
OFFICE OF THE SECRETARY
Washington, DC 20240

IN REPLY REFER TO:
7202.4-OS-2012-00340

July 24, 2012

On June 10, 2012, you filed a Freedom of Information Act (FOIA) request seeking the following:

> [A] copy of the DOI/OLES Security Assessment for each of the following National Monuments and Icons: Mount Rushmore, National Mall, St. Louis Arch, and USS Constitution.

On June 22, 2012, we acknowledged your request and advised you of your fee status under the FOIA. We are writing today to respond to your request on behalf of the Office of the Secretary. Please find enclosed one CD containing 1 file consisting of 63 pages.

Portions of the enclosed documents have been redacted pursuant to Exemption 6 of the FOIA (5 U.S.C. § 552 (b)(6)) because they fit certain categories of information:

Names

Exemption 6 allows an agency to withhold "personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy." The courts have held that the phrase "similar files" involves all information that applies to a particular person. Hertzberg v. Veneman, 273 F. Supp. 2d 67, 85 n.11 (D.D.C. 2003).

To determine whether releasing requested information would constitute a clearly unwarranted invasion of personal privacy, we are required to perform a "balancing test." This means that we must weigh the individual's right to privacy against the public's right to disclosure.

(1) First, we must determine whether the individual has a discernable privacy interest in the information that has been requested.
(2) Next, we must determine whether release of this information would serve "the public interest generally" (i.e., would "shed light on the performance of the agency's statutory duties").
(3) Finally, we must determine whether the public interest in disclosure is greater than the privacy interest of the individual in withholding.

The information that we are withholding consists of personal information, and we have determined that the individuals to whom this information pertains have a substantial privacy interest in it. Additionally, we have determined that the disclosure of this information would shed little or no light on the performance of the agency's statutory duties and that, on balance, the public interest to be served by its disclosure does not outweigh the privacy interest of the individuals in question, in withholding it. Nat'l Ass'n of Retired Fed. Employees v. Horner, 879 F.2d 873, 879 (D.C. Cir. 1989).

In summation, we have determined that release of the information that we have withheld would constitute a clearly unwarranted invasion of the privacy of these individuals, and that it therefore may be withheld, pursuant to Exemption 6.

Portions of the enclosed documents have been redacted pursuant to Exemption 7 of the FOIA (5 U.S.C. § 552 (b)(7)).

Exemption 7 of the FOIA protects from disclosure "records or information compiled for law enforcement purposes" if such records fall within one or more of seven additional categories. The records withheld under Exemption 7 were compiled for law enforcement purposes and therefore meet the threshold requirement of Exemption 7.

7(C)
Exemption 7(C) protects personal information in law enforcement records where release could reasonably be expected to constitute an unwarranted invasion of personal privacy. Here, releasing records you are seeking would constitute an unwarranted invasion of privacy. Therefore, we are withholding records under Exemption 7(C).

7(E)
Exemption 7(E) protects law enforcement records that "would disclose techniques and procedures for law enforcement investigation or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law." Here, releasing records you are seeking could reasonably be expected to risk circumvention of the law because they disclose techniques and procedures for law enforcement investigation or prosecution. Therefore, we are withholding records under Exemption 7(E).

Cecelia Townes, Attorney-Advisor with the Office of the Solicitor, was consulted in reaching this decision. Cindy Cafaro, Acting Office of the Secretary FOIA Officer, is responsible for making this decision.

Appeal

You may file a FOIA appeal by writing to the FOIA Appeals Officer, U.S. Department of the Interior, 1849 C Street, N.W., MS 6556 – MIB, Washington, D.C. 20240. Your appeal letter must be received no later than 30 workdays after the date of our final response. Your appeal letter must be marked, both on its envelope and at the top of its first page, with the legend "FREEDOM OF INFORMATION APPEAL." Your appeal letter must be accompanied by a copy of your original FOIA request, a copy of this letter, and a brief explanation of why you believe that this decision is in error.

Fees

Your entitlements as an "other-use requester" were sufficient to cover all applicable FOIA charges; therefore there is no billable fee for the processing of this request.

If you have any questions about our response to your request, you may contact Clarice Julka by phone at 202-208-6045, by fax at 202-219-2374, by email at osfoia@nbc.gov, or by mail at U.S. Department of the Interior, 1951 Constitution Avenue, N.W., MS 116 SIB, Washington, D.C. 20240.

Sincerely,

Cindy Cafaro
Office of the Secretary
Acting FOIA Officer

Enclosure

United States Department of the Interior
Office of the Secretary

Report to the Director
Office of Law Enforcement and Security

Security Assessment of the Jefferson National Expansion Memorial

Assessment Dates: April 5 – 6, 2011

Contents

List of Abbreviations and Acronyms

CCTV	Closed Circuit Television
DOI	Department of the Interior
EOD	Explosive Ordnance Detection
EECS	Electronic Entry Control System
IDS	Intrusion Detection Systems
HVAC	Heating, Ventilating and Air Conditioning Systems
JEFF	Jefferson National Expansion Memorial
JTTF	Joint Terrorism Task Force
NCI	National Critical Infrastructure
NPS	National Park Service
OIG	Office of Inspector General
OLES	Office of Law Enforcement and Security
PIV	Personal Identity Verification
SLMPD	St. Louis Police Metropolitan Department
UPS	Uninterrupted Power Supply

Executive Summary

This report documents the findings of a security assessment conducted on the Jefferson National Expansion Memorial (JEFF) by the Department of the Interior (Department) Office of Law Enforcement and Security (OLES) in April, 2011.

This evaluation served to determine if the National Park Service (NPS) is in compliance with the overall requirements established in Department Manual (DM), Part 444 Chapter 2 (444DM2) entitled, "National Critical Infrastructure and Key Resource Security". Generally speaking, 444DM2 sets forth the security requirements the Department deems minimally necessary to safeguard the National Critical Infrastructure and Key Resource assets it owns, operates and/or controls. These requirements are presented in five general categories; *Security Personnel*, *Perimeter Security*, *Access Control*, *Interior Security*, and *Security Planning*. Working directly with NPS personnel, the OLES evaluation focused on assessing the level of compliance within each of these five categories.

At its conclusion, the security assessment revealed that the National Park Service (b) (7)(E)

Background

As a result of Secretarial Law Enforcement Directive 14, the OLES was directed to develop a security policy oversight and compliance program. On April 7, 2006 the Department approved 444DM2, National Critical Infrastructure and Key Resource (CI/KR) Security. This chapter of the Departmental Manual (DM) provides the framework for conducting this and future security assessments at all National Monuments and Icons (NM&I's).

The Department has conducted several security reviews of JEFF since September 11th, 2001. These included the National Monuments and Icons Assessment Methodology review that was conducted in August, 2004. This review was in response to the Department's role in the National Critical Infrastructure Protection Program under Homeland Security Presidential Directive – 7. This methodology rated the ability of the Arch to withstand specific attack scenarios. The review identified potential and real security deficiencies at the Arch. The methodology then discussed proposed enhancement strategies and associated costs that could be implemented to mitigate and/or correct the security deficiencies.

The second review was conducted in June, 2006. This review focused on the security deficiencies identified in the 2004 review, which still remained, and updated the costs for staffing, technology,

equipment to mitigate and/or correct deficiencies.

The third review was conducted in April, 2007, to determine if the security program at JEFF complied with the security minimums established in 444 DM 2.

Photo No. 1 Jefferson National Expansion Memorial (JEFF)

Scope and Methodology

Scope: Directive 14 of the Secretary's law enforcement reforms[1] adopted the recommendations made by the Interior Office of Inspector General in 2002[2] and placed responsibility for DOI security policy oversight and compliance with OLES. By way of implementing this directive, OLES established a Security Division to provide guidance, oversight and support, and ensure compliance with Departmental security policies and procedures.

[1] See *Law Enforcement at the Department of the Interior, Recommendations to the Secretary for Implementing Law Enforcement Reforms*, July 2002.
[2] See Inspector General's Report, *Disquieting State of Disorder: An Assessment of Department of the Interior law Enforcement*, (Report No. 2002-I-0014), January 2002.

In an effort to further implement Directive 14, OLES issued 444DM, Chapter 2, entitled, "National Critical Infrastructure and Key Resource Security." 444DM2 establishes the security requirements deemed minimally necessary to safeguard National Critical Infrastructure and Key Resource assets owned and/or controlled by the Department and was developed in coordination with DOI bureaus and offices in response to the "The National Strategy for the Physical Protection of Critical Infrastructures and Key Assets" (February 2003) and Homeland Security Presidential Directive-7 "Critical Infrastructure Identification, Prioritization, and Protection" (December 2003).

Methodology: During the period of April 6 – 7, 2011, the OLES Security Division conducted a security assessment of the Jefferson National Expansion Memorial to assess the facility's compliance with the security requirements established in 444DM2. Generally speaking, these requirements are presented in five categories; *Security Personnel*, *Perimeter Security*, *Access Control*, *Interior Security*, and *Security Planning*. The evaluation focused on assessing the level of compliance within each of these categories.

The evaluation process consisted of informal interviews and group discussions with NPS personnel; on site examination of facility infrastructure components, physical security systems, and operational procedures; and a review of relevant documentation to include prior risk assessments, Security Guard Post Orders, staffing models, security related standard operating procedures, and physical security infrastructure improvement contracts. Appendix 1 of this report lists evaluation participants.

Findings and Recommendations

Please Note: In an effort to limit repetition in the narrative, where a specific minimum requirement was found to be applicable to more than one general category (b) (7)(E) discussion of the requirement has been confined to a single category.

Security Personnel

(b) (7)(E)

(b) (7)(E)

Perimeter Security

(b) (7)(E)

Photo No. 2 Barriers on Leonor K. Sullivan Boulevard at the base of the Grand Staircase

(b) (7)(E)

Photo No. 3 Vehicle Barrier on Memorial Drive adjacent the Old Cathedral

(b) (7)(E)

[redacted]

[redacted]

[redacted]

(b) (7)(E)

Access Control Security

(b) (7)(E)

(b) (7)(E)

[redacted]

Interior Security

(b) (7)(E)

[redacted]

(b) (7)(E)

Photo No. 4 (b) (7)(E)

(b) (7)(E)

(b) (7)(E)

(b) (7)(E)

[redacted]

Security Planning

(b) (7)(E)

[redacted]

Conclusions

The security assessment found the NPS continues to have a strong security program at the JEFF and is generally in compliance with 444DM2. The systems in place to protect the ICON are effective and it is evident that a significant amount of time and funding have been expended to elevate the level of security. Many of the security enhancements put in place are the result of NPS leadership reviewing the previous security assessment and giving these recommendations funding priority. (b) (7)(E)

[redacted]

(b) (7)(E)

[redacted]

(b) (7)(E)

The OLES security assessment team commends the professionalism of the law enforcement and security staff. Assistant Chief Ranger (b) (7)(C), (b) (6) provided invaluable input into this assessment and displays the behavior of a dedicated law enforcement professional. The high level of physical security at the JEFF is a direct result of authorizing the hiring of a dedicated Physical Secuirty Specialist position, which is a best practice for all Icons. In addition, the support and cooperation of the law enforcement and security programs by the JEFF senior leadership is apparent and should be commended.

One of the keys to a successful security program is the inclusion of security professionals in planning of projects for possible security enhancements. The OLES security assessment team was given the opportunity to review the draft plans for the redevelopment of the Arch Complex Visitors Center. This demonstrates the value that the JEFF senior leadership places in the law enforcement and security programs.

The Office of Law Enforcement and Security remains committed with the NPS to ensure that the appropriate level of security is in place at the Jefferson National Expansion Memorial. In closing, the OLES review team would like to acknowledge the NPS management and the Law Enforcement and Security staff for their assistance in conducting this assessment.

Assessment Participants

Office of Law Enforcement and Security

(b) (7)(C), (b) (6) - Supervisory Special Agent
(b) (7)(C), (b) (6) Security Specialist

National Park Service

(b) (7)(C), (b) (6) – Assistant Chief Ranger
(b) (7)(C), (b) (6) – Physical Security Specialist

United States Department of the Interior
Office of the Secretary

Report to the Director
Office of Law Enforcement and Security

Security Assessment of Boston National Historical Park/USS Constitution Charlestown Navy Yard Boston, MA

Assessment Dates: August 9 – 11, 2011

Contents

List of Abbreviations and Acronyms

BNHP	Boston National Historical Park
CCTV	Closed Circuit Television
CSO	Contract Security Officer
CSF	Contract Security Force
DOI	Department of the Interior
EACS	Electronic Access Control System
ECP	Entry Control Point
EOD	Explosive Ordinance Disposal
FLETC	Federal Law Enforcement Training Center
IDS	Intrusion Detection System
NCI	National Critical Infrastructure
NPS	National Park Service
OEP	Occupant Emergency Plan
OLES	Office of Law Enforcement and Security
PIN	Personal Identification Number
TOC	Telecommunications Operations Center
UPS	Uninterruptable Power Supply
VBIED	Vehicle Borne Improvised Explosive Device
VCA	Video Content Analysis

Executive Summary

This report documents the findings of a security assessment conducted at the Charlestown Navy Yard, Boston National Historical Park (BNHP) by the Department of the Interior (DOI/Department) Office of Law Enforcement and Security (OLES). The evaluation, conducted in August, 2011, served to assess the Park's compliance with the requirements established in Departmental Manual, Part 444 Chapter 2 (444DM2) entitled, "National Critical Infrastructure and Key Resource Security". Generally speaking, 444DM2 sets forth the security requirements the Department deems minimally necessary to safeguard the National Critical Infrastructure and Key Resource assets it owns or controls. These requirements are presented in five general categories; *Security Personnel*, *Perimeter Security*, *Access Control*, *Interior Security*, and *Security Planning*. Working directly with National Park Service (NPS) Law Enforcement Rangers, the OLES assessment focused on assessing the park's level of compliance within each of these five categories.

At its conclusion, the assessment revealed that the NPS, in partnership with the Department of the Navy, has implemented a wide range of security enhancements throughout the Park. These enhancements include, but are not limited to: (b) (7)(E) [redacted]

(b) (7)(E) [redacted].

Background

Established in 1800, the Charlestown Navy Yard in Boston, Massachusetts, served the Department of the Navy with distinction, especially proving its worth in our nation's wars, until its closing in 1974. The men and women of its workforce built more than 200 warships and maintained and repaired thousands.

In 1974, pursuant to enabling legislation (16 United States Code, Section 410z), Boston National Historical Park (BNHP) was created. The park's enabling legislation includes approximately 30 acres of the Charlestown Navy Yard within which resides the USS Constitution (Refer to Photo No. 1), a commissioned US Naval ship which is under the exclusive jurisdiction of the Department of Defense, United States Navy. The USS Constitution's mission is to promote the US Navy and America's naval heritage through educational outreach, public access, and public demonstrations.

As a result of Secretarial Law Enforcement Directive 14, the OLES was directed to develop a security policy oversight and compliance program. On April 7, 2006 the Department approved 444DM2, National Critical Infrastructure and Key Resource (CI/KR) Security. This chapter of the Departmental Manual (DM) provides the framework for conducting this and future security assessments at all National Monuments and Icons (NM&I's).

The Department has conducted several security reviews of the BNHP's Charlestown Navy Yard since September 11th, 2001. These included the National Monuments and Icons Assessment Methodology review that was conducted in July, 2003. This review was in response to the Department's role in the National Critical Infrastructure Protection Program under Homeland Security Presidential Directive-7. This methodology reviewed the NPS's responsibility for the protection and security of the area surrounding the USS Constitution. The methodology then discussed proposed enhancement strategies and associated costs that could be implemented to mitigate and/or correct the security deficiencies.

A manpower specific review was conducted by OLES in February, 2004 to determine the NPS deployment of manpower in its efforts to achieve an effective level of security for the USS Constitution and to develop possible alternatives.

The second security review was conducted in May, 2006. This review focused on the security deficiencies identified in the 2004 review, which still remained, and updated the costs for staffing, technology, equipment to mitigate and/or correct deficiencies.

Photo No. 1: USS Constitution

Scope and Methodology

Scope Directive 14 of the Secretary's law enforcement and security reforms[1] adopted the recommendations made by the Interior Office of Inspector General in 2002[2] and placed responsibility for DOI security policy oversight and compliance with the OLES. By way of implementing this directive, the OLES established a Security Division to provide guidance and oversight of Department security operations, and to monitor and support bureau compliance with Departmental law enforcement and security, policies and procedures.

In an effort to further implement Directive 14, the OLES issued Departmental Manual, Part 444 Chapter 2, entitled, "National Critical Infrastructure and Key Resource Security". 444DM2 establishes the security requirements deemed minimally necessary to safeguard National Critical Infrastructure and Key Resource assets owned and/or controlled by the Department and was developed in coordination with DOI bureaus and offices in response to the "The National Strategy for the Physical Protection of Critical Infrastructures and Key Assets" (February 2003) and Homeland Security Presidential Directive-7 "Critical Infrastructure Identification, Prioritization, and Protection" (December 2003).

Methodology During the period of August 9-11, 2011, personnel from the OLES Security Division conducted a security assessment at the Charlestown Navy Yard, BNHP, to assess the Facility's compliance with the security requirements established in 444DM2. Generally speaking, these requirements are presented in five categories; *Security Personnel*, *Perimeter Security*, *Access Control Security*, *Interior Security*, and *Security Planning*. The evaluation focused on assessing the Park's level of compliance within each of these categories.

The evaluation process consisted of informal interviews and group discussions with NPS personnel and U. S. Navy officers assigned to the USS Constitution; the on-site examination of facility infrastructure components, physical security systems, and operational procedures; and a review of relevant documentation to include security force operating procedures, security staffing models, and facility security policies and procedures. Appendix 1 of this report lists evaluation participants.

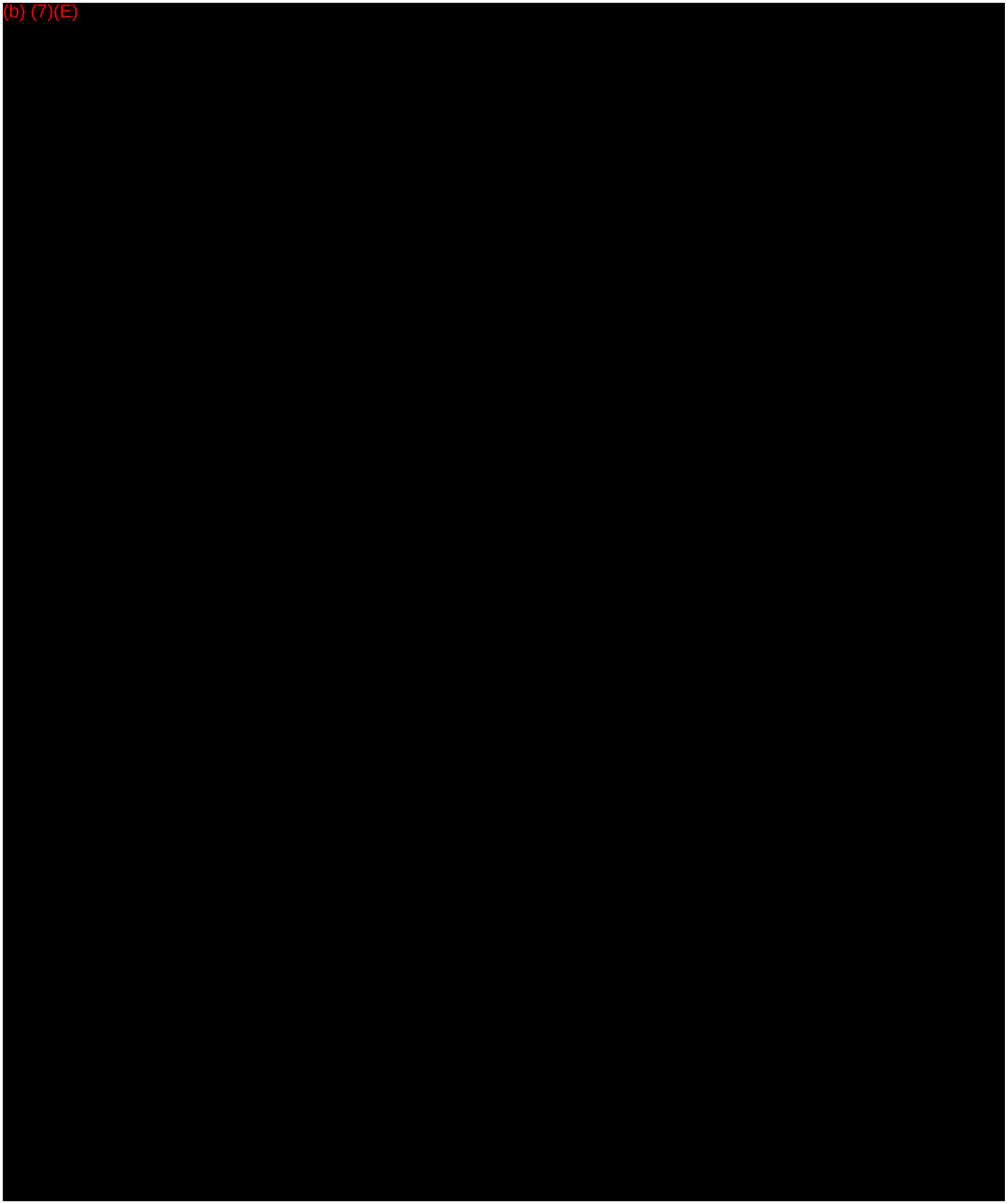
Findings and Recommendations

In an effort to limit repetition in the narrative, where a specific minimum requirement was found to be applicable to more than one general category [redacted], discussion of the requirement has been confined to a single category.

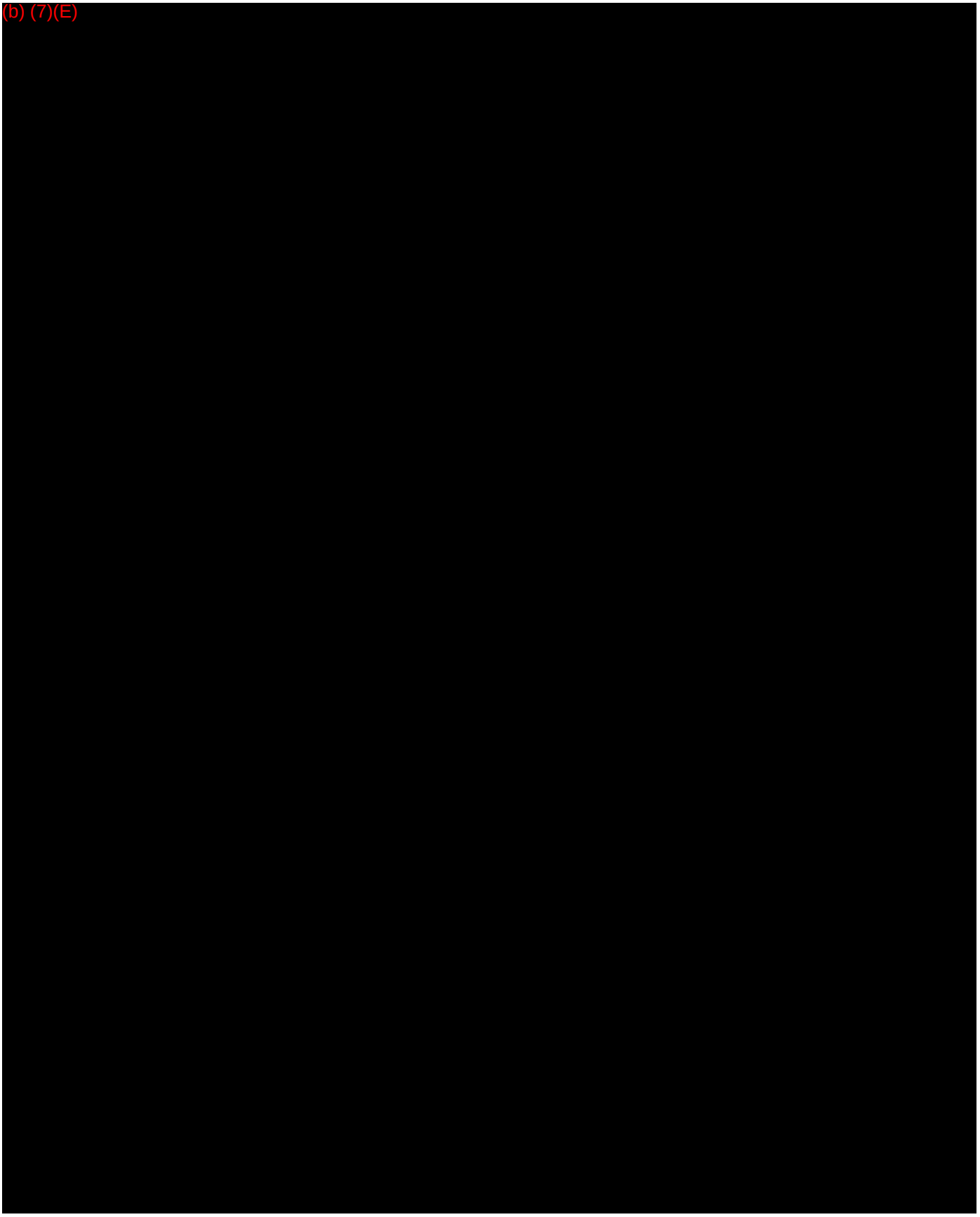
Security Personnel

[1] See *Law Enforcement at the Department of the Interior, Recommendations to the Secretary for Implementing Law Enforcement Reforms*, U.S. Department of the Interior, July 2002.
[2] See *Disquieting State of Disorder: An Assessment of Department of the Interior law Enforcement*, Inspector General's Report, (Report No. 2002-I-0014), U.S. Department of the Interior, January 2002.

(b) (7)(E)



(b) (7)(E)

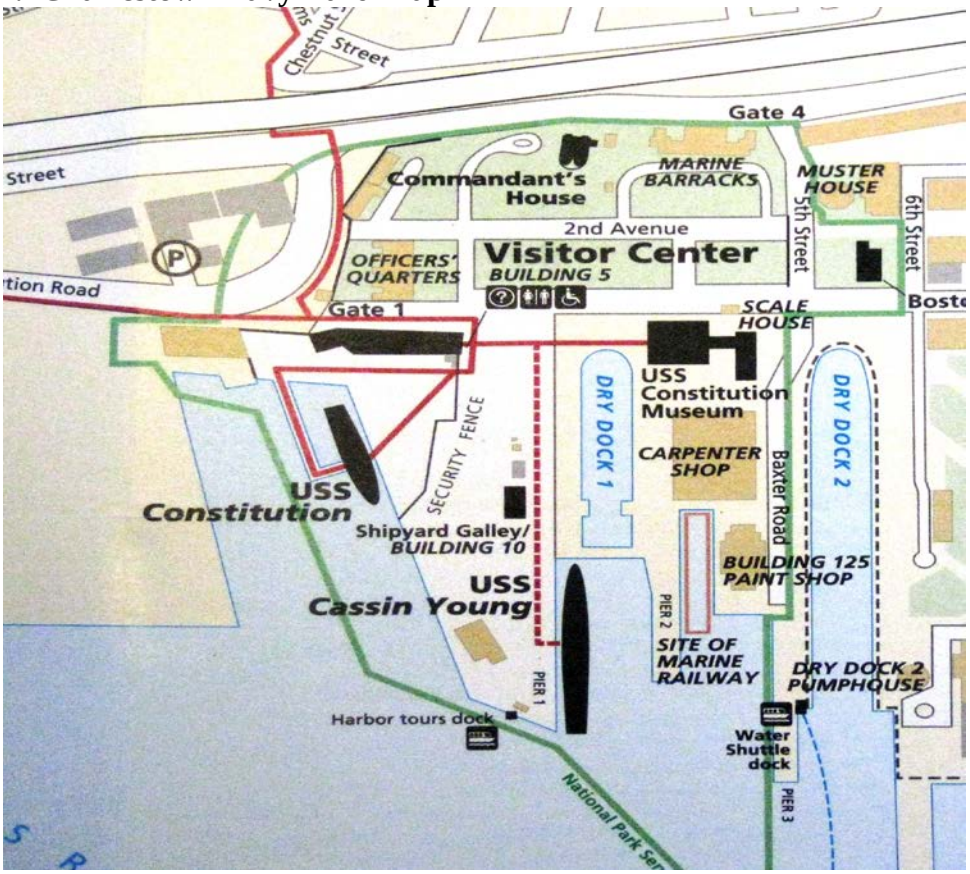


Perimeter Security

(b) (7)(E)

[redacted]

Photo No. 2: Charlestown Navy Yard Map



(b) (7)(E)

[redacted]

(b) (7)(E)

[redacted]

Photo No. 3: Main Vehicle Entrance Wedge Barriers

(b) (7)(E)

[redacted]

Photo No. 4: Vehicle Access Gate to Restricted Area Adjacent USS Constitution

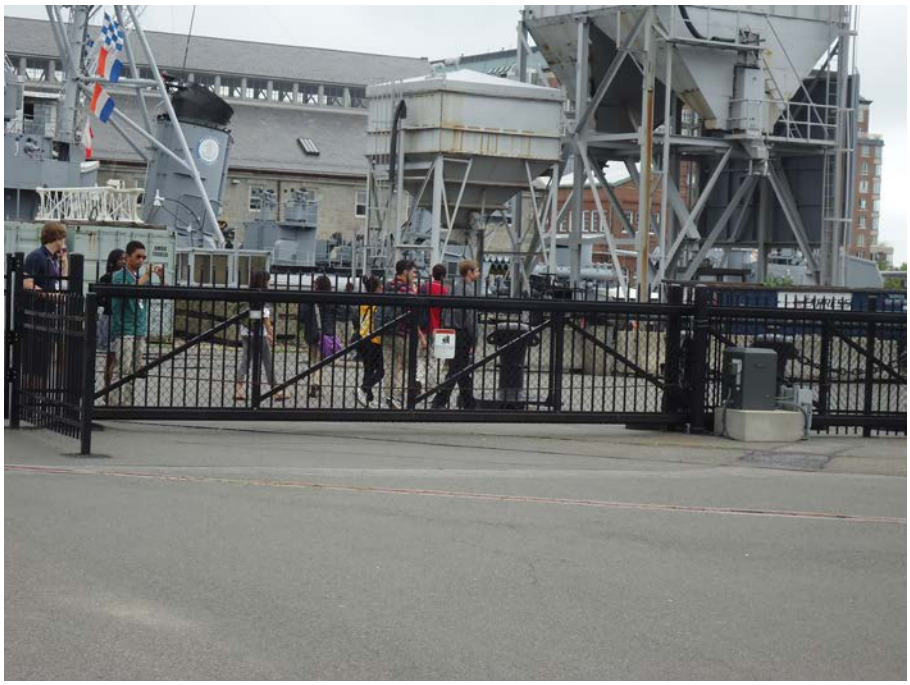


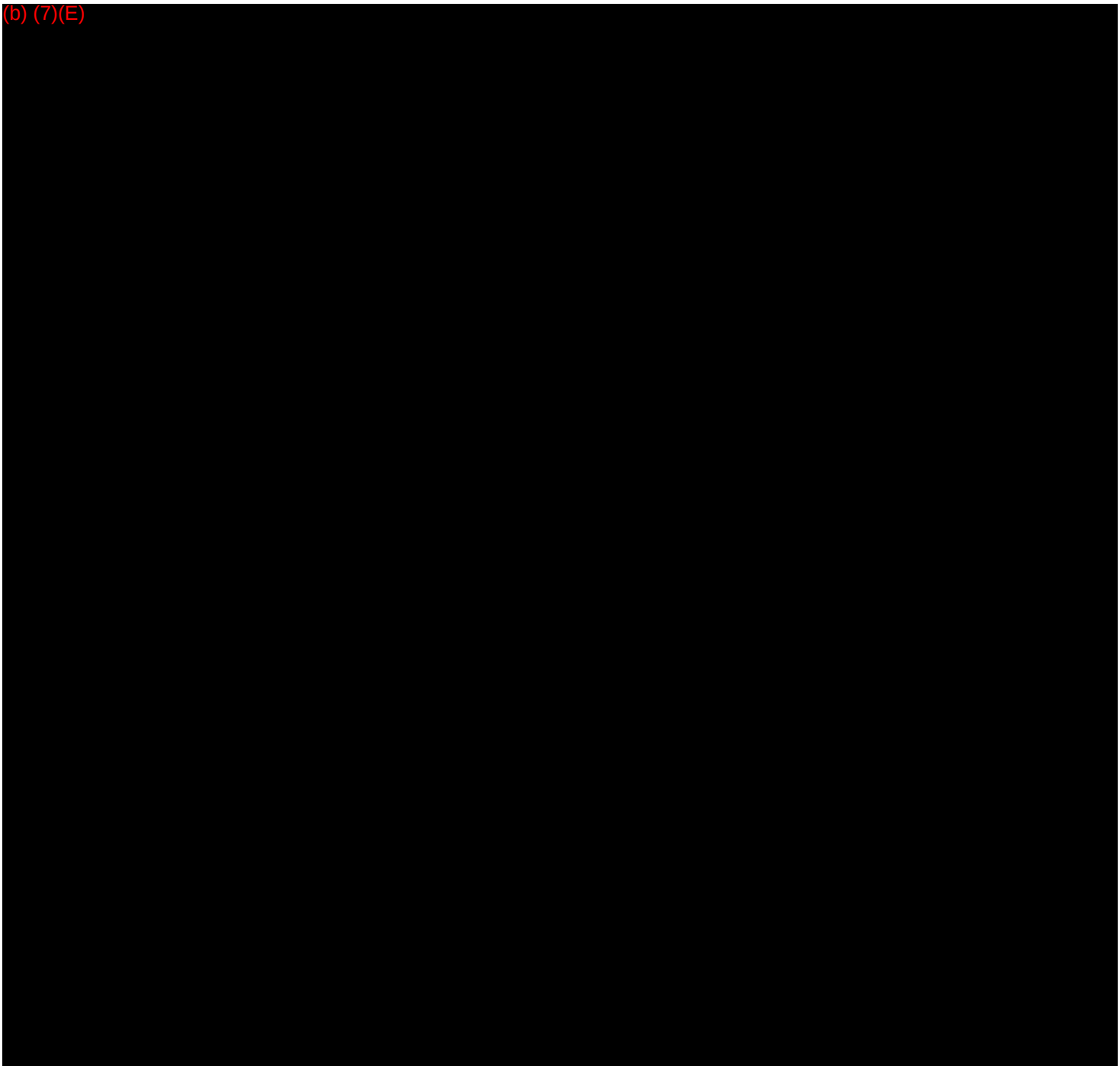
Photo No. 5: Pedestrian entrance adjacent Scale House

(b) (7)(E)

Access Control Security

(b) (7)(E)

(b) (7)(E)



Interior Security

(b) (7)(E)

(b) (7)(E)

Security Planning

(b) (7)(E)

CONCLUSIONS

The security assessment found the NPS continues to have a strong security program at the Charlestown Navy Yard and is generally in compliance with 444DM2. The systems in place to protect the Park and the USS Constitution are effective and it is evident that a significant amount of time and funding have been expended to elevate the level of security. Many of the security enhancements put in place are the result of NPS leadership reviewing the previous security assessment and in cooperation with the U. S. Navy, giving these recommendations funding priority. (b) (7)(E) [redacted]

[redacted]

[redacted]

The OLES security assessment team commends the professionalism of the law enforcement and security staff. Chief Ranger (b) (7)(C), (b) (6) [redacted] provided invaluable input into this assessment and displays the behavior of a dedicated law enforcement professional. The physical security program at BNHP is enhanced by assigning a dedicated LE Physical Security Specialist position to the park, which is a best practice for all Icons. In addition, the support and cooperation of the law enforcement and security programs by BNHP senior leadership is apparent and should be commended.

One of the keys to a successful security program is the inclusion of security professionals in planning of projects for possible security enhancements. The planned move of the USS Constitution to dry dock at the Charlestown Navy Yard provides unique challenges, but also opportunities. The planning for this major move of an invaluable National Icon within the Navy Yard can serve as an opportunity for the Navy and NPS to resolve jurisdictional issues and develop a cooperative security plan for the eventual return of the USS Constitution to Pier One.

The Office of Law Enforcement and Security remains committed with the NPS to ensure that the appropriate level of security is in place at BNHP and the USS Constitution. In closing, the OLES review team would like to acknowledge the NPS management and the Law Enforcement and Security staff for their assistance in conducting this assessment.

Appendix 1

Security Assessment: Principal Participants

Department of the Interior - Office of Law Enforcement and Security

- (b) (7)(C), (b) (6) - Supervisory Special Agent
- (b) (7)(C), (b) (6) – HSPD7/NIPP Coordinator

National Park Service

- (b) (7)(C), (b) (6) – Deputy Superintendent
- (b) (7)(C), (b) (6) – Chief Ranger
- (b) (7)(C), (b) (6) Safety & Security Specialist

United States Department of the Interior
Office of the Secretary

Report to the Director
Office of Law Enforcement and Security

Security Assessment of the National Mall

Assessment Dates: May 25 – 26, 2010

Contents

List of Abbreviations and Acronyms

CCTV	Closed Circuit Television
COR	Contracting Officer's Representative
COTR	Contracting Officer's Technical Representative
DOI	Department of the Interior
EOD	Explosive Ordnance Detection
EECS	Electronic Entry Control System
IDS	Intrusion Detection Systems
JTTF	Joint Terrorism Task Force
NCI	National Critical Infrastructure
OIG	Office of Inspector General
OLES	Office of Law Enforcement and Security
UPS	Uninterrupted Power Supply
USPP	United States Park Police

Executive Summary

This report documents the findings of a security assessment conducted on the National Mall (Washington Monument and the Lincoln and Jefferson Memorials) by the Department of the Interior (Department) Office of Law Enforcement and Security (OLES) in May 2010. This is the fourth review conducted by OLES of the National Mall, the first being completed in September 2004.

This evaluation served to determine if the United States Park Police (USPP) is in compliance with the overall requirements established in Department Manual (DM), Part 444 Chapter 2 (444DM2) entitled, "National Critical Infrastructure and Key Resource Security". Generally speaking, 444DM2 sets forth the security requirements the Department deems minimally necessary to safeguard the National Critical Infrastructure and Key Resource assets it owns, operates and/or controls. These requirements are presented in five general categories; *Security Personnel*, *Perimeter Security*, *Access Control*, *Interior Security*, and *Security Planning*. Working directly with USPP personnel from the Homeland Security Division and Icon Protection Branch, the OLES evaluation focused on assessing the National Mall's level of compliance within each of these five categories.

At its conclusion, the evaluation revealed that the USPP have implemented many of the recommendations from the previous assessments. Among the actions taken, (b) (7)(E) [redacted]

[redacted]

Background

Following the terrorist attacks of September 11th, 2001, the Washington Monument, the Lincoln Memorial, and the Jefferson Memorial (see photo 1) were designated by the National Park Service (NPS) as National Icons. The monument and memorials are located on or adjacent to the National Mall in downtown Washington D.C. While there are numerous monuments and memorials throughout the National Capital Parks, the current assessment was focused solely on the Washington Monument and the Lincoln and Jefferson Memorials, referred to in this report as the "National Mall".

The Department has conducted three previous security assessments on the National Mall since September 11th, 2001. The first was the "National Monuments and Icons Assessment Methodology," conducted in September, 2004. This assessment was in response to the Department's role in the National Infrastructure Protection Plan developed under Homeland Security Presidential Directive – 7. This methodology rated the ability of each of the three Icons on the National Mall to withstand specific

attack scenarios. (b) (7)(E) [redacted].

Photo 1: National Mall (Lincoln Memorial, Jefferson Memorial, and Washington Monument)

The second review was conducted in April, 2006. This review focused on the security deficiencies identified in the 2004 review, determined which still remained, and updated the costs for staffing, technology, equipment, etc. to mitigate and/or correct these deficiencies. The third review, conducted in March 2007 focused on security deficiencies related to 444DM2 and any issues not addressed in previous reports.

The USPP are responsible for law enforcement and security on NPS lands within Washington, D.C. and its environs. This includes security at the three Icons on the National Mall; the Washington Monument, the Lincoln Memorial, and the Jefferson Memorial. The majority of the funding for capital improvements for security comes from the National Park Service (NPS).

Scope and Methodology

Scope: Directive 14 of the Secretary's law enforcement reforms[1] adopted the recommendations made by the Interior Office of Inspector General in 2002[2] and placed responsibility for DOI security policy oversight and compliance with OLES. By way of implementing this directive, OLES established a Security Division to provide guidance, oversight, support and compliance with Departmental security policies and procedures.

In an effort to further implement Directive 14, OLES issued 444DM , Chapter 2, entitled, "National Critical Infrastructure and Key Resource Security." 444DM2 establishes the security requirements deemed minimally necessary to safeguard National Critical Infrastructure and Key Resource assets owned and/or controlled by the Department and was developed in coordination with DOI bureaus and offices in response to the "The National Strategy for the Physical Protection of Critical Infrastructures and Key Assets" (February 2003) and Homeland Security Presidential Directive-7 "Critical Infrastructure Identification, Prioritization, and Protection" (December 2003).

Methodology: During the period of May 25 through 26, 2010, the OLES Security Division conducted a security assessment of the National Mall to assess the facility's compliance with the security requirements established in 444DM2. Generally speaking, these requirements are presented in five categories; *Security Personnel*, *Perimeter Security*, *Access Control*, *Interior Security*, and *Security Planning*. The evaluation focused on assessing the level of compliance within each of these categories.

The evaluation process consisted of informal interviews and group discussions with USPP personnel from the Homeland Security Division and Icon Protection Branch; on site examination of facility infrastructure components, physical security systems, and operational procedures; and a review of relevant documentation to include prior risk assessments, Security Guard Post Orders, staffing models, security related standard operating procedures, and physical security infrastructure improvement contracts. Appendix 1 of this report lists evaluation participants.

[1] See *Law Enforcement at the Department of the Interior, Recommendations to the Secretary for Implementing Law Enforcement Reforms*, July 2002.
[2] See Inspector General's Report, *Disquieting State of Disorder: An Assessment of Department of the Interior law Enforcement*, (Report No. 2002-I-0014), January 2002.

Findings and Recommendations

Please Note: In an effort to limit repetition in the narrative, where a specific minimum requirement was found to be applicable to more than one general category ((b) (7)(E)), discussion of the requirement has been confined to a single category.

Security Personnel

(b) (7)(E)

Photo 2: Icon Protection Efforts of the USPP and Contract Security Guards on the National Mall

Perimeter Security

(b) (7)(E)

[redacted]

Photo 3: Jersey Barriers at the Jefferson Memorial

(b) (7)(E)

Photo 4: (b) (7)(E)

(b) (7)(E)

(b) (7)(E)

illumination.

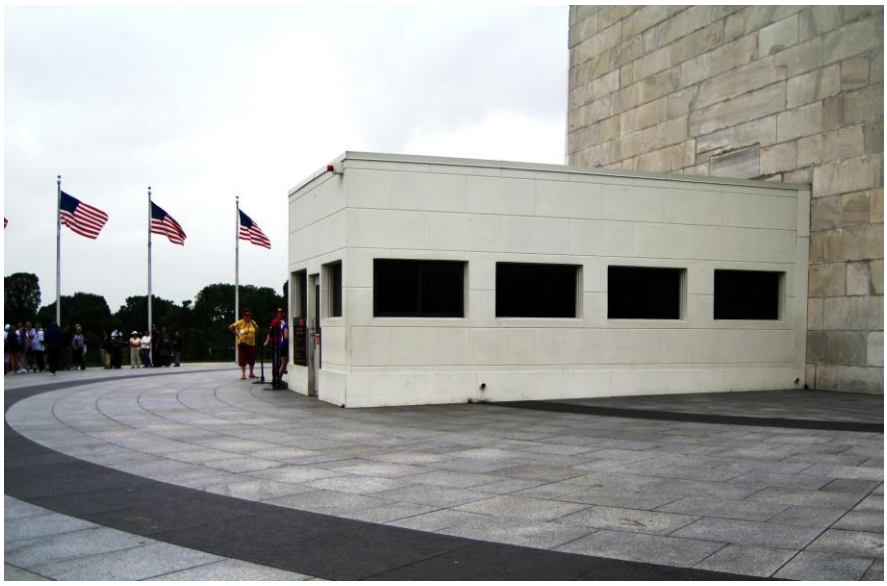
Photo 5: (b) (7)(E)

Access Control Security

(b) (7)(E)

[redacted]

Photo 6: Washington Monument Screening Facility



(b) (7)(E)

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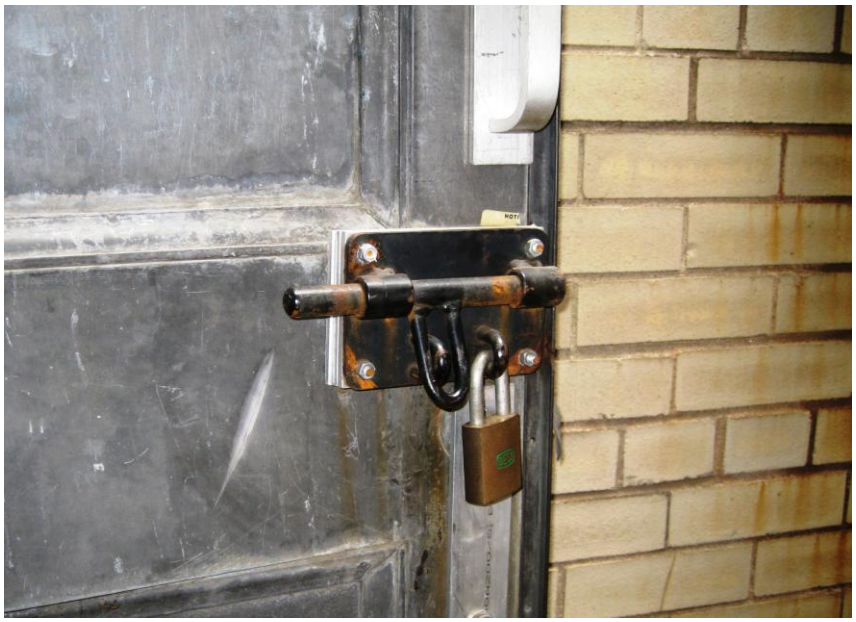
(b) (7)(E)

Photo 7: (b) (7)(E)



(b) (7)(E)

(b) (7)(E)

Security Planning

(b) (7)(E)

Conclusions

The USPP are attempting to achieve full compliance with all aspects of 444DM2. Many security procedure improvements and equipment upgrades have been completed and others are being implemented on an ongoing basis. The USPP Homeland Security Division is fully dedicated to ensuring an appropriate level of security on the National Mall and they continue to work to find better ways of protecting these irreplaceable Icons. With additional funding, the

recommendations contained in this report are easily achievable.

The NPS controls the funding for all security related capital improvements on the National Mall. The USPP, working with the NPS, has submitted security related capital improvement funding requests into the NPS Project Management Information System (PMIS) for review and approval. Unfortunately PMIS does not contain a system to prioritize security related funding requests for National Critical Infrastructures.

(b) (7)(E)

OLES applauds the USPP Homeland Security Division for their dedication and proactive attitude in protecting the National Mall and its Icons. We encourage the USPP to continue their pursuit of security improvements at the three Icons on the National Mall by implementing the recommendations identified in this report. OLES remains committed to working with the NPS and USPP to ensure that appropriate security measures are in place at the three Icons on the National Mall and will continue to assist in whatever manner is deemed appropriate.

Appendix 1

Assessment Participants

Office of Law Enforcement and Security

(b) (7)(C), (b) (6) - Assistant Director, Security
(b) (7)(C), (b) (6) Security Specialist
(b) (7)(C), (b) (6) – Security Specialist

United States Park Police

(b) (7)(C), (b) (6) – Commander, Icon Protection Branch
(b) (7)(C), (b) (6) – Commander, Central District
(b) (7)(C), (b) (6) – Commander, Training Branch
(b) (7)(C), (b) (6) – Commander, Icon Protection Unit
(b) (7)(C), (b) (6) – Supervisor, Icon Protection Unit

Department of Homeland Security

NMI (b) (7)(C), (b) (6)

United States Department of the Interior
Office of the Secretary

Report to the Director
Office of Law Enforcement and Security

SECURITY ASSESSMENT OF THE MOUNT RUSHMORE NATIONAL MEMORIAL

Assessment Dates: July 13–15, 2009

Law Enforcement Sensitive – For Official Use Only

Contents

List of Abbreviations and Acronyms

CCTV	Closed Circuit Television
COR	Contracting Officer's Representative
COTR	Contracting Officer's Technical Representative
DOI	Department of the Interior
EOD	Explosive Ordnance Detection
EECS	Electronic Entry Control System
FLETC	Federal Law Enforcement Training Center
IDS	Intrusion Detection Systems
JTTF	Joint Terrorism Task Force
LE	Law Enforcement
MORU	Mount Rushmore National Memorial
NCI&KR	National Critical Infrastructure and Key Resource
NM&I	National Monument and Icon
NPS	National Park Service
OIG	Office of Inspector General
OLES	Office of Law Enforcement and Security
UPS	Uninterrupted Power Supply
WASO	Washington Support Office

Executive Summary

This report documents the findings of a security assessment conducted at the Mount Rushmore National Memorial (MORU) located near Keystone, South Dakota. The assessment was conducted by the Department of the Interior's (DOI) Office of Law Enforcement and Security (OLES) in conjunction with National Park Service (NPS) representatives on July 13-15, 2009. The evaluation served to assess the Park's compliance with the requirements established in Departmental Manual, Part 444 Chapter 2 (444DM2) entitled, "National Critical Infrastructure and Key Resource Security". Generally speaking, 444DM2 sets forth the security requirements the Department deems minimally necessary to safeguard the National Critical Infrastructure and Key Resource (NCI&KR) assets it owns or controls. These requirements are presented in five general categories; *Security Personnel*, *Perimeter Security*, *Access Control*, *Interior Security*, and *Security Planning*. Working directly with NPS personnel from the Washington Support Office (WASO), the Mid-West Regional Office and MORU, the OLES evaluation focused on assessing the Memorial's level of compliance within each of these five categories.

At its conclusion, the evaluation revealed the NPS (b) (7)(E)

Background

The Department of the Interior formally designated MORU as a National Monument and Icon (NM&I) and it ranks among the top ten DOI National Critical Infrastructures and Key Resources. MORU is located in the Black Hills of South Dakota approximately 27 miles southwest of Rapid City. The Memorial, a 1,278 acre park, was completed in 1941 and transferred to the full control of the NPS in 1942. Visitation to the Memorial fluctuates seasonally, with winter averages of approximately 1,500/day and summer averages of approximately 25,000/day.

Mount Rushmore, described by President Franklin Delano Roosevelt in 1936 as "The Shrine of Democracy," is recognized internationally as a symbol of the United States' unique form of self-government. As a centerpiece of tourism, MORU is extremely important to the State of South Dakota.

The primary resource at MORU is the massive granite sculpture of Presidents Washington, Jefferson,

Theodore Roosevelt and Lincoln. Secondary cultural resources include the 12-foot high sculptor's model contained in the historic studio building as well as the sculptor's residence.

Other assets include:

The visiting public
3,000 person amphitheater
5,200 square foot visitor center/museum
1,150 car parking structure
45,000 square foot concessions complex

Because of its significance as a national symbol of the United States, the numerous domestic and foreign dignitaries that routinely visit, the remote location and the difficult terrain, MORU creates a significant and unique security challenge.

Photo 1: Mount Rushmore with Greenpeace Protest Banner (July 8, 2009)

Scope and Methodology

Scope: Directive 14 of the Secretary's Law Enforcement Reforms[1] adopted the recommendations made by the Interior Office of Inspector General in 2002[2] and placed responsibility for DOI security policy, oversight and compliance with OLES. By way of implementing this directive, OLES established a Security Division to provide guidance and oversight of the DOI and bureau/office security operations.

In an effort to further implement Directive 14, OLES issued 444DM2, entitled, "National Critical Infrastructure and Key Resource Security" that establishes the security requirements deemed minimally necessary to safeguard National Critical Infrastructure and Key Resource assets owned and/or controlled by the Department. The requirements were developed in coordination with DOI bureaus and offices in response to the "The National Strategy for the Physical Protection of Critical Infrastructures and Key Assets" (February 2003) and Homeland Security Presidential Directive-7 "Critical Infrastructure Identification, Prioritization, and Protection" (December 2003).

Methodology: Prior OLES MORU security assessment reports, specifically the 2004 report titled National Monument and Icon Assessment Report, Mount Rushmore National Memorial; the 2004 Mount Rushmore Security Staffing Review; and the 2006 Review/ Update of the NM&I Security Assessment, Mount Rushmore, were reviewed as part of this evaluation.

During the period of July 13-15, 2009, the OLES Security Division, assisted by the NPS Security Program Manager and personnel from OLES Law Enforcement Division, NPS Midwest Regional Office, and MORU, conducted a security assessment at the Memorial to assess the facility's compliance with the security requirements established in 444DM2. Generally speaking, these requirements are presented in five categories: *Security Personnel*, *Perimeter Security*, *Access Control*, *Interior Security*, and *Security Planning*. The evaluation focused on assessing the Memorial's level of compliance within each of these categories. In an effort to limit repetition in the narrative, where a specific minimum requirement was found to be applicable to more than one general category (b) (7)(E) discussion of the requirement has been confined to a single category.

The evaluation process consisted of informal interviews and group discussions with NPS personnel from MORU; on site examination of facility infrastructure components, physical security systems, and operational procedures; and a review of relevant documentation to include prior risk assessments. Appendix 1 of this report lists the personnel who participated in the evaluation.

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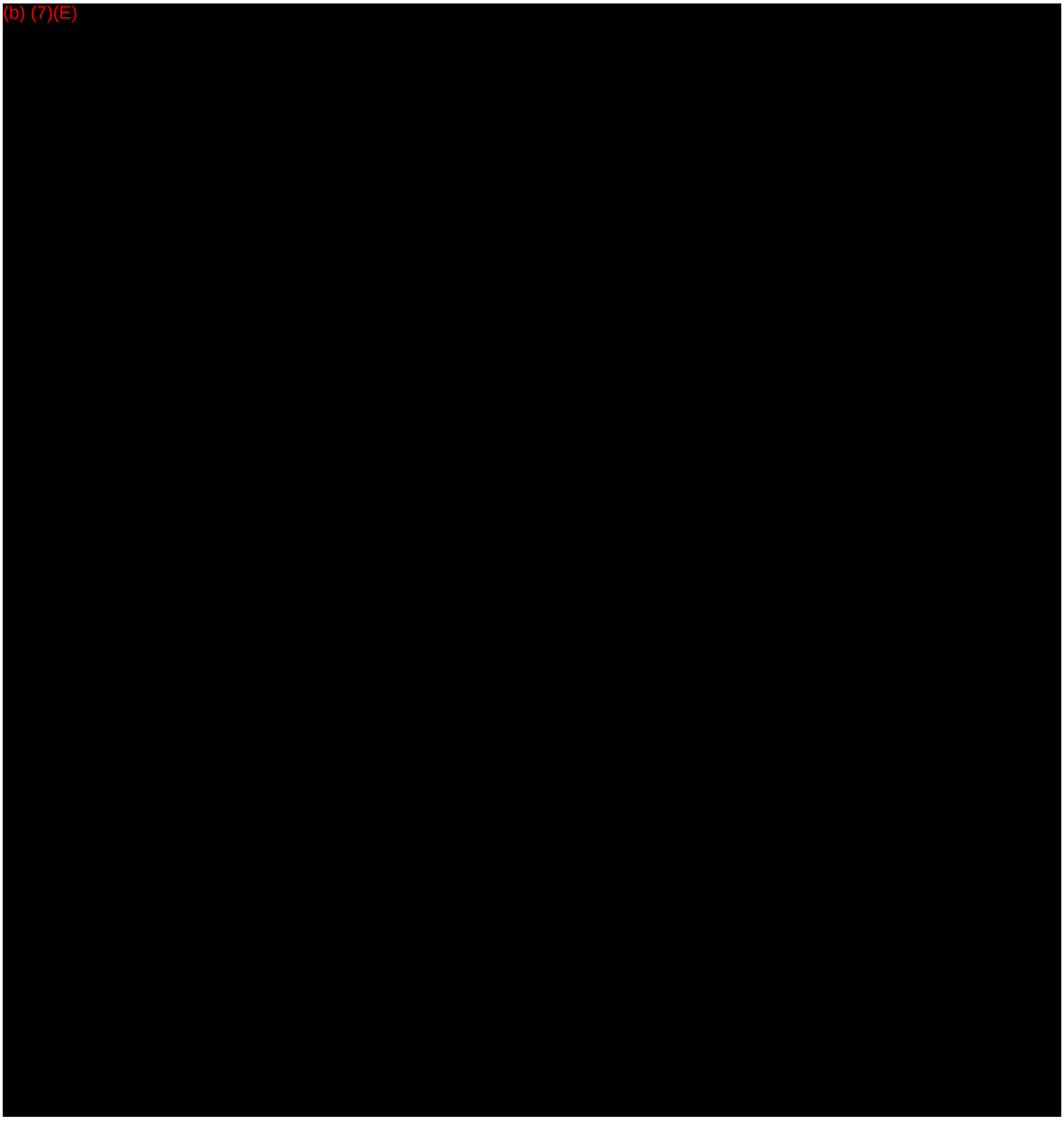
[1] See *Law Enforcement at the Department of the Interior, Recommendations to the Secretary for Implementing Law Enforcement Reforms*, July 2002.

[2] See Inspector General's Report, *Disquieting State of Disorder: An Assessment of Department of the Interior law Enforcement*, (Report No. 2002-I-0014), January 2002.

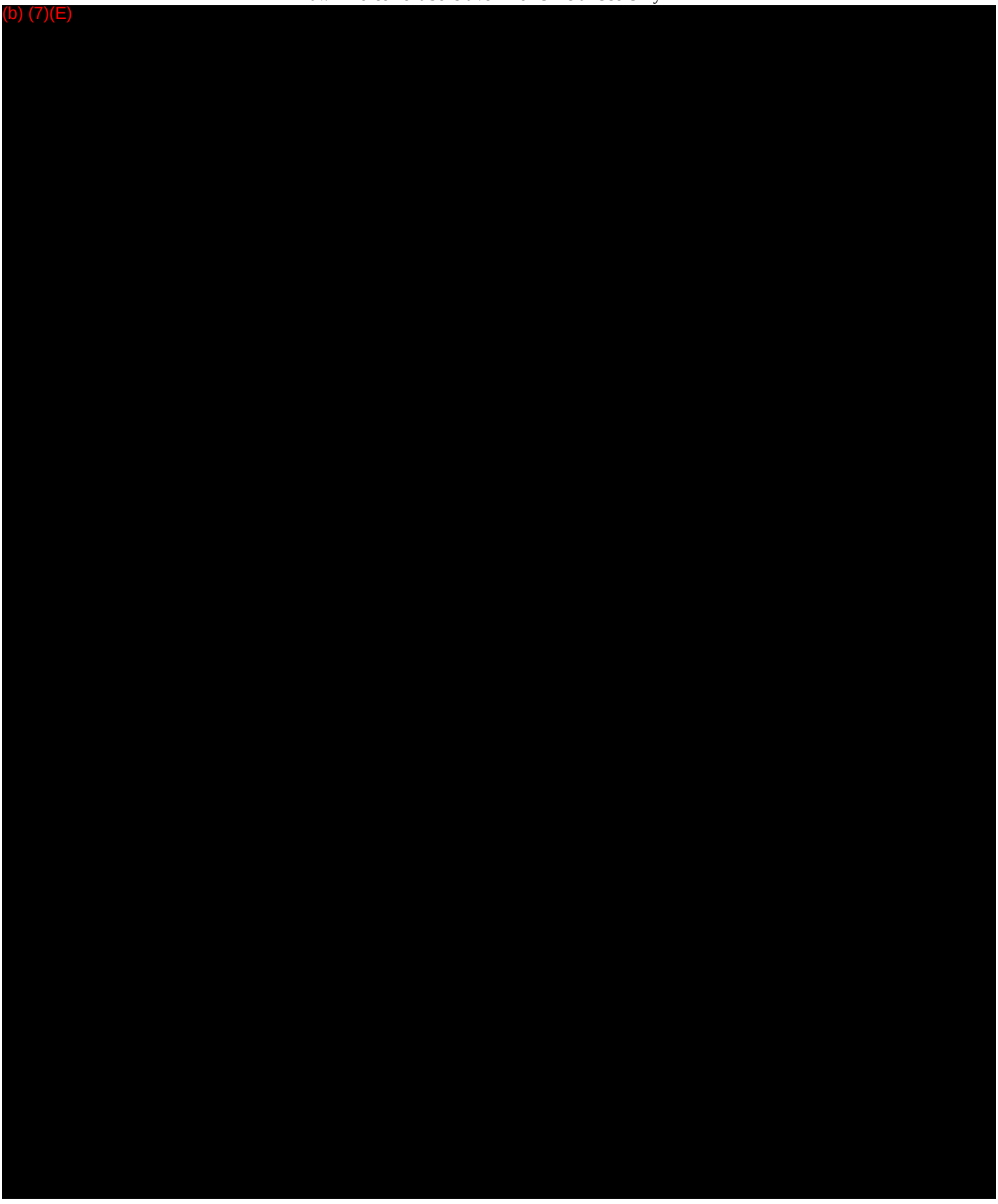
Findings and Recommendations

Security Personnel

(b) (7)(E)



(b) (7)(E)



(b) (7)(E)

Perimeter Security

(b) (7)(E)

(b) (7)(E)

[redacted]

(b) (7)(E)

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(b) (7)(E)

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(b) (7)(E)

Photo 3: (b) (7)(E)

(b) (7)(E)

(b) (7)(E)

(b) (7)(E)

[redacted]

Photo 4: Vehicular Gate

(b) (7)(E)

Access Control Security

(b) (7)(E)

Interior Security

(b) (7)(E)

[redacted]

Security Planning

(b) (7)(E)

[redacted]

Other

(b) (7)(E)

[redacted]

Conclusions

As detailed in the preceding *Findings and Recommendations* narrative, the NPS has previously made several security enhancements at MORU. (b) (7)(E) [redacted]

[redacted]

The OLES review team would like to acknowledge NPS management and employees for the assistance provided in conducting this review.

Appendix 1

Assessment Participants

Office of Law Enforcement and Security

(b) (7)(C), (b) (6) - Assistant Director, Security
(b) (7)(C), (b) (6) - Security Specialist
(b) (7)(C), (b) (6) - Senior Special Agent, Law Enforcement

National Park Service

(b) (7)(C), (b) (6) - Security and Intelligence Program Manager, WASO
(b) (7)(C), (b) (6) - Midwest Regional Chief Ranger
(b) (7)(C), (b) (6) - Mount Rushmore Chief Ranger