

PERIMETER SECURITY
AT WASHINGTON UNION STATION

50 Massachusetts Avenue, NE
Washington, D.C.

Finding of No Significant Impact

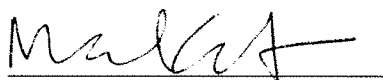
SEP 26 2008

Pursuant to Section 10 of the Commission's Environmental Policies and Procedures, I have evaluated the preliminary and final site development plans for the proposed installation of perimeter security barriers at Washington Union Station in Washington, D.C., as shown on NCPC Map File No. 1.11(38.40)42565. I find that the project would not significantly affect the human environment.

The District of Columbia State Historic Preservation Officer has reviewed the plans in accordance with the requirements of Section 106 of the National Historic Preservation Act and has concurred with the Federal Railroad Administration's determination that the project will have an adverse effect to historic properties but that the changes to cultural components of the environment are very limited and have been addressed by a Memorandum of Agreement executed pursuant to Section 106 of the National Historic Preservation Act by the Federal Railroad Administration, AMTRAK, and the District of Columbia State Historic Preservation Office. Potential impacts or effects were minimized through the design review process for the project. In subsequent consultation and design development, the two proposed planting beds in the bollard line at the curb were removed from the project plans in order to allow for greater pedestrian movement

at the curb. The bollards, which were to have been imbedded in the planted shrubbery, are exposed. A greater formality, which was deemed more consistent with the architectural character of Union Station, was then proposed through the addition of four granite balustrade elements, similar to those in Columbus Plaza, at turning points in the bollard line.

Consequently, after review of the NCPC environmental assessment, I have determined pursuant to Section 102(2)(C) of the National Environmental Policy Act, the Council on Environmental Quality Regulations (40 CFR, Parts 1500-1508), and NCPC's Environmental and Historic Preservation Policies and Procedures that the project would not significantly affect the quality of the human environment.



Marcel C. Acosta
Executive Director

Background

This project has been initiated by the National Railroad Passenger Corporation (AMTRAK) at Union Station for the installation of bollards along the front and sides of Washington Union Station to provide an increased level of security in a manner that does not impact the two historic resources associated with the station (the station itself and Columbus Plaza/Circle). AMTRAK proposes to upgrade the level of security at Union Station using funds provided by the Federal Railroad Administration (FRA), an operating administration within the United States Department of Transportation.

The NCPC has adopted the Environmental Assessment prepared in cooperation with the above noted agencies to assist in decision-making by evaluating the potential impacts on the environment of the proposed site improvements. This environmental documentation is consistent with the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality (CEQ) regulations implementing NEPA [40 Code of Federal Regulations (CFR) 1500-1508], the National Historic Preservation Act (NHPA) of 1966, as amended, and NCPC's Environmental and Historic Preservation Policies and Procedures (adopted April 1, 2004).

The District of Columbia State Historic Preservation Office (DC-SHPO) has reviewed and completed its analysis of the project, concurring with FRA's determination that an adverse effect will result from the undertaking, but that it is limited and being minimized and mitigated. The DC-SHPO has issued its conclusion as required by Section 106 of the National Historic Preservation Act and has completed its compliance review of the project with the execution of a Memorandum of Agreement (MOA), with a stipulation requiring documentation of original features of the train platforms.

The NCPC will announce its finding on the project in compliance with NEPA on its website with the availability of the Finding of No Significant Impact (FONSI). The EA and comments about the EA analysis are information made available for review at NCPC offices in compliance with the requirements of the National Environmental Policy Act (NEPA) and the Commission's implementation of Environmental and Historic Preservation Policies. Additionally, the Tentative Agenda for the Commission's September 4, 2008 meeting contained a notice regarding review of the proposed project. The Tentative Agenda is distributed to over 750 recipients.

NCPC's requirements for a FONSI are set forth in the Environmental and Historic Preservation Policies and Procedures at Section 10(E).

The proposed action

The proposed action is the installation of a series of bollards in front of, and along the east and west sides of Washington Union Station (WUS). In the area directly in front (to the south) of the portico, concrete-filled steel bollards will be placed in the center of the aisle way between the first and second traffic lanes (lanes A and B) – thus providing a roughly 25 foot stand-off from the curbline along the building. The bollards will be painted black to be similar in color to the adjacent street lamps and ornamental rostral columns. Based on a 2005 risk and needs assessment conducted by the U.S. Department of Homeland Security (DHS) and Science Applications International Corporation (DHS-SAIC), it was determined a significant threat exists to occupants of the structure from vehicle-carried explosives. AMTRAK and its security consultants determined that bollard placement would provide an acceptable level of protection for the building and its occupants. All of the lands to be impacted by the project are the property of the United States Department of Transportation and leased to the Union Station Redevelopment Corporation (USRC).

The bollards will each be approximately 2'-6" in height. They will be installed generally at 5'-0" intervals, and each bollard will be set into a continuous, reinforced-concrete mat, roughly 20" in thickness, placed below the finished paving material. The spacing of the bollards is designed to withstand impacts by vehicles of specific calculated weights and velocities approaching the building from various angles, while at the same time directing and accommodating pedestrians crossing between the sidewalk in front of the station and Columbus Plaza. The bollard line consists primarily of fixed bollards installed with the spacing noted. This placement is used across the front of the station, in the median between the first two traffic lanes, and elsewhere around the site. For Metrorail customers using the openings in the west portico, the bollard spacing is 5'-2" or 5'-8" on center.

The principal bollard height of 2'6" with spacing of five feet on center meets the standard for medium level security. It was adopted early in the consultation and analysis process for the Union Station project for two purposes: to minimize visual effects to the historic station and to reduce potential impacts to pedestrian access to the station and along the arcade. In addition, potential visual and access impacts were further minimized or reduced by moving the proposed bollard line in front of the monumental entrance portico away from the curb, to the median between the first two traffic lanes rather than at the curb.

Alternatives considered in the EA review

The EA examines in detail two alternatives; the proposed action, and the no action alternative.

Other Alternatives Considered during project development.

Other alternatives were examined but eliminated in the project concept development and are noted in the EA. The alternative project designs would have some impact on the visual qualities of the historic station.

AMTRAK and USRC investigated such passive measures as closed-circuit television (CCTV) monitoring and increased patrols and guards in front of the building. Although these were implemented, they were not found to be an adequate deterrent to a vehicle laden with explosives traveling at a high rate of speed toward the front portico of the building.

AMTRAK and USRC also investigated several possible means of providing a stand-off in front of the building, including the installation of concrete barriers (also known as "jersey barriers") and the installation of decorative concrete benches, tables, planters and other forms of sidewalk furniture. Preliminary calculations revealed that a typical concrete bench would need to be of such a distorted height and thickness (in order to withstand a vehicular impact) that it would be grossly out of scale and visually inappropriate to the character of the building. Likewise, concrete barriers were considered equally unacceptable because they too would be inappropriate to the scale and character of the building – and they require numerous break points to permit pedestrian movement.

Finally, AMTRAK and USRC investigated the possible use of drop-gate and collapsible concrete slab technologies as a means of providing stand-off in the front of the building. These are only feasible in certain portions of the front of the building. Directly beneath certain areas on the western portion of the front elevation, the top of the WMATA subway tunnel is within approximately 20 inches of the surface, and directly beneath certain areas of the eastern portion of the front elevation, the top of AMTRAK's passenger rail tunnel is within approximately 20 inches of the surface. Drop-gates and collapsible concrete slabs require significantly greater depths than 20 inches to be properly installed; therefore, these solutions were not considered feasible.

Potential impacts

NCPC staff has found no significant or adverse environmental impacts with the proposed action. Those that exist are short term construction effects addressed by mitigation through project construction process actions that are presented in the EA and will be implemented by the District Department of Transportation (DDOT) in the final project plans.

Changes to cultural components of the environment are limited and are addressed by a National Historic Preservation Act, Section 106 review that FRA and AMTRAK have completed with the District of Columbia Historic Preservation Office (DC-SHPO), with a final Memorandum of Agreement signed on July 23, 2008.

The project will not physically alter historic fabric at either of the two identified historic resources – Union Station and Columbus Plaza/Circle. None of the construction for the project will come in contact with Daniel Burnham’s landmark building. The existing concrete sidewalk and curbing (both installed in the 1980s station rehabilitation and not considered to be historic) directly in front of the station will be totally removed and reinstalled to a continuous width of roughly six feet as part of the upcoming Columbus Circle/Columbus Plaza Project. The existing non-original concrete sidewalk and curbing (also installed in the 1980s) on the west side of the station (at the end pavilion and adjacent to the building at the upcoming bicycle transit center) will be removed and reinstalled, in-kind, as part of the bollard installation. Likewise, the existing non-historic concrete sidewalk and curbing (also installed in the 1980s) on the east side of the station will be removed and reinstalled to a continuous width of fifteen feet as part of the upcoming Columbus Circle/Columbus Plaza Project to a point equivalent with the northern edge of the end pavilion. From that point northward to the loading area, the existing non-historic sidewalk and curbing (installed in the 1980s) will be removed and reinstalled, in-kind, as part of the bollard installation.

Other than the sidewalk and curb realignment and materials described herein, there will be no impact on the Columbus Plaza/Circle. The MOA describing the efforts of avoidance and mitigation has been executed by FRA, AMTRAK, and the DC-SHPO.

Standard for evaluation.

Under NEPA, the Council on Environmental Quality (CEQ) regulations, and NCPC Environmental and Historic Preservation Policies and Procedures, an EA is sufficient and an Environmental Impact Statement need not be prepared if the EA supports a finding that the federal action will not significantly affect the human environment. The regulations of the Council on Environmental Quality define “significantly” as used in NEPA as requiring consideration of both context and intensity of impacts as noted by 40 CFR §1508.27.

Applying the standards, factors, and analysis here, the Executive Director must make the assessment of whether approval of the submitted site improvements design will “significantly” affect the human environment based on the EA and the mitigation specified by the EA. As to the factor of the context, this is a site-specific action, and the Executive Director looks at the effects on the locale. In regard to intensity, with the mitigation specified in the EA and exhibited in the design drawings, the proposal minimizes and does not present any major or significant adverse effects.

NCPC is taking a federal approval action on the final perimeter security provisions of the station, requiring adoption of the EA that analyzes attributes and issues of possible environmental impacts, in accordance with Section 102(2)(c) of the National Environmental Policy Act of 1969, and the Environmental Policies and Procedures implemented by NCPC.