

URBAN DESIGN SECURITY OBJECTIVES AND POLICIES

ADDENDUM TO THE NATIONAL CAPITAL URBAN DESIGN AND SECURITY PLAN
National Capital Region

Submission by the Interagency Security Task Force

April 28, 2005

Abstract

The Interagency Security Task Force (Task Force) reconvened in May 2004 to address implementation issues associated with the National Capital Urban Design and Security Plan (Plan). In conjunction with its urban design and security consultants, the Task Force recently drafted supplemental policies to address new and outstanding issues that have arisen since the Plan's release in October 2002.

In February 2005, the Commission released proposed urban design security policies for a 60-day review and comment period that closed on April 8, 2005. Federal agencies and interested parties from the public provided verbal and written comments. Staff reviewed the comments and drafted recommended changes. The Task Force met on April 12 to review a summary of the substantive comments and staff's suggested changes. The objectives and policies in Attachment 1 reflect staff recommended changes, as well as comments received from the Task Force.

The objectives and policies cover issues related to physical perimeter security and mobility; urban landscape contextual design; barrier placement and design; and vehicular and pedestrian controls. The document also includes definitions for various terms used in the policies. These security design objectives and policies should be considered by federal agencies to address important city planning and design issues when it is necessary to construct physical perimeter security in urban areas; and used by the Commission as guidelines when evaluating and making decisions on proposed security projects.

Commission Action Requested

Adoption of the urban design security policies pursuant to 40 U.S.C. § 8721 et. seq.

Executive Director's Recommendation

The Commission:

Adopt the urban design security objectives and policies as an addendum to the National Capital Urban Design and Security Plan.

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BACKGROUND

DESCRIPTION OF PROPOSAL

Urban Design Security Objectives and Policies

The proposed security design objectives and policies will supplement the National Capital Urban Design and Security Plan and should be used by federal agencies to address important city planning and design issues when it is necessary to construct physical perimeter security in urban areas. Theses policies are intended to balance the need for perimeter security with the need to protect public space by keeping it open, accessible and attractive. They are intended to clarify, refine and articulate the Commission's position on urban design and counter-terrorism security in urban environments and should be used to guide federal agencies and the Commission during the planning, design, and evaluation of individual perimeter security projects.

The objectives and polices encourage a multi-faceted approach that extends beyond physical perimeter security and reinforces the importance of design quality in the nation's capital where it is important to respect community identity and a culture of democracy. They strive to balance the use of building perimeter security with the functional and visual quality of public space, paying attention to:

- (1) the monumental core's historic resources and the democratically-inspired design principles inherent in D.C.'s historic city plan;
- (2) the District's and surrounding region's need for mobility, mixed use development and activated street level activity to protect and enhance its economic vitality; and
- (3) the importance of protecting public space from the adverse impacts of perimeter security to ensure that residents, workers and visitors maintain their rights to access, use, and enjoy the grace and beauty of public space in the capital and the region.

A general summary of the policies is outlined below:

- The security measures policies promote using risk management strategies that are effective for different threat conditions and minimize the placement and impact of security barriers on public space. The selection of appropriate operational, procedural and physical protective measures should differ for various communities based on specific development patterns and operational resources. Urban conditions may require more operational security measures and sensitive building design to minimize the impact of physical security barriers on public space; whereas, suburban or campus-like conditions may make more use of physical design strategies, such as greater standoff distances.
- The **perimeter security and mobility policies** strive to balance security with the needs of the region's multi-modal transportation system to ensure safety and efficient mobility for residents, workers and visitors throughout the national capital region.
- The **physical perimeter security policies** address barrier placement and design; urban landscape contextual design; vehicular and pedestrian controls and comprehensive streetscape design.

Applicability

These polices apply to permanent and temporary physical perimeter security projects for existing buildings and new construction. The objectives and policies will be used to review development plans for perimeter security projects within urban settings in the National Capital Region. In accordance with the Commission's existing in-lieu of zoning authority, they will be used to evaluate physical perimeter security proposals on federally owned land within the District of Columbia and other public projects in the central area, and to make recommendations on federal projects in National Capital Region.

Background

Since adoption of the National Capital Urban Design and Security Plan in October 2002, the Commission has gained considerable experience applying the Plan to site specific projects. While the Plan has certainly helped to improve the design of perimeter security projects, the Commission has encountered challenging implementation issues, such as: continued street and sidewalk closures; requests for physical security measures for threats other than bomb-laden vehicles; excessive building setbacks and the reduction of active ground floor uses; and undesirable use of and placement of security barriers in public space. Collectively, these issues are incrementally impacting the quality of public space in the nation's capital and the integrity of Washington's historic plan, thereby warranting further review and consideration.

In response, the Commission re-convened the Task Force in May 2004 as a forum to discuss and provide direction on these challenging implementation issues. Some of the issues simply involved clarifying existing Plan provisions; others involved developing a more through understanding of threat and risk assessments, explosive blast analysis and various risk

management strategies. The Task Force's research and discussion revolved around the following questions and associated issues:

- 1. Should perimeter security measures expand beyond protection from bomb-laden vehicles to package, suicide and chemical threats and what can we reasonably protect?
- 2. How do agencies apply level of protection criteria and is applied consistently?
- 3. What policies are necessary to clarify the security design guidelines contained in the Plan to address outstanding issues not identified in the Plan?
- 4. What are the new issues need to be addressed since the Plan's adoption?

Previous Commission Action

In May 2004, the Commission reconvened the Interagency Security Task Force to address new and outstanding issues related to implementation of the National Capital Urban Design and Security Plan.

In January 2005, the Commission approved the release of the proposed objectives and policies for a 60-day stakeholder and public review and comment period.

CONSULTATION

While researching implementation issues, NCPC staff met with the Department of Homeland Security (Information Analysis and Infrastructure Protection Division, the Federal Protective Service, the Federal Emergency Management Agency; and the Interagency Security Committee) and the Department of State to learn about anti-terrorism issues associated with risk assessments and risk management decisions. The proposed policies were prepared in consultation with the Commission's urban design consultants Gensler, Inc., including Gensler's security expert subcontractors, Weildlinger Associates and Post, Buckley, Schuh and Jernigan.

The policies were distributed for review and comment to federal agencies, local government officials in the National Capital Region, and to members of the public who have identified themselves as interested parties. Notice was posted in the federal register, on NCPC's TAI (tentative agenda items) and web site. Two discussion meetings were held to solicit feedback; one for the public and one for federal agencies, and several presentations were made at various federal forums that included various departments from 22 federal agencies, including the Federal Facilities Council, GSA's Perimeter Security Workshop, the Joint Federal Committee, and a design peer review workshop.

The 60-day review and comment period ended on April 8, 2005. Attachment 2 contains a summary of the substantive verbal and written comments received and staff's proposed responses, as well as a copy of the letters received as of April 25.

- Nine letters were received from federal agencies regarding the policies. These letters were received from DOD, DOS, DOJ (FBI), DOI, Smithsonian, NASA, DHS-NCR, FEMA and GSA.
- Three letters were received from local governments supportive of NCPC's initiative. These letters were from Prince George's County Council Member; Montgomery County Department of Park and Planning; City of Alexandria's City Manager.
- Four organizations/citizens provided written comments (Lindsley Williams, American Society of Landscape Architects, the Public Space and Management Corporation housed at the Downtown BID, and EDAW).

These comments included concerns expressed by DOD, DOJ and the Smithsonian about the policy addressing standoff distances; DOI and DOS about the street closure policies; and some concerns were raised about the policy addressing the addition of street-front uses when increased standoff distance is needed in new construction. In response to these comments, the introductory language was amended to: reference other security criteria (ISC, DOD); state that the purpose of the proposed policies; and clarify their intent to be used as guidelines to address important city planning and design issues, in addition to other security criteria, when designing for security in urban areas.

Staff also addressed many other comments from federal agencies, the local governments and the interested public that suggested changes to improve clarity and readability of the proposed policies. Staff also added a terminology section that defines terms used in the policies, as suggested by several responders.

CONFORMANCE

Comprehensive Plan

The proposed policies complement and supplement the policies contained in the Comprehensive Plan for the National Capital: Federal Elements.

National Capital Urban Design and Security Plan

All but one of the objectives complements or clarifies existing goals in the Plan. A new objective encourages a broader, multi-faceted approach to protective measure choices to help reduce reliance on physical perimeter security.

The Plan currently addresses physical perimeter security measures to protect against the threat of bomb-laden vehicle attack. While maintaining the focus on physical perimeter security, new proposed policies address protection from other methods of explosive delivery (bomb-laden persons, baggage, etc.), as well as others threats that impact public space design such as chemical, biological and radiological terrorism. The Plan also currently addresses mobility and urban physical perimeter security; however, more explicit policies are proposed to clarify and strengthen application of the Plan. Barrier placement and design, urban landscape contextual design, and vehicular and pedestrian control policies have been drafted to clarify existing text contained in the Plan and to explain design concepts inherent in the Plan's illustrations.