

FINDING OF NO SIGNIFICANT IMPACT
Columbus Plaza/Columbus Circle Rehabilitation Project
Union Station, Washington, DC
April 2009

The District of Columbia Department of Transportation (DDOT), in conjunction with the National Park Service (NPS), the Union Station Redevelopment Corporation (USRC), and the Architect of the U.S. Capitol (AOC), and in cooperation with the National Capital Planning Commission (NCPC), has prepared an environmental assessment (EA) that evaluates the rehabilitation of Columbus Plaza/Columbus Circle, south of Union Station, located in Washington, D.C. The rehabilitation project proposes to improve access and circulation patterns in and around Columbus Plaza for pedestrians, taxis, bicyclists, private vehicles, commercial vehicles, Metrobuses, private motor coaches, and the many tour buses with permanent stops at Union Station.

The project proponents, DDOT, NPS, USRC, AOC and the NCPC, identified the Proposed Action as the preferred alternative in the EA as the No Build Alternative would not solve any of the access and circulation problems caused by the current configuration and would not meet the purpose and needs of the project. This alternative will be implemented with mitigation measures described in the EA.

The project proponents received no substantive comments on the EA during the public comment period, which was from January 6, 2009 to February 4, 2009. Therefore, the Proposed Action remains the preferred alternative and will be implemented.

ALTERNATIVES

The EA evaluated two alternatives: the No-Build Alternative and the Proposed Action.

No Build Alternative

Under this alternative, no rehabilitation of Columbus Plaza would occur. Widening or shifting of existing roads to add turn lanes or provide for better vehicular and pedestrian movement would not be implemented. Existing roadways would be maintained to preserve connectivity. Existing National Park Service maintenance and landscaping tasks would continue in Columbus Plaza. Existing pedestrian walkways around and through Columbus Plaza would be maintained with no changes.

Action (THE ALTERNATIVE SELECTED FOR IMPLEMENTATION)

The Proposed Action consists of improvements to the roadways, sidewalks, landscaping, streetlights, and traffic lights in Columbus Plaza and around Columbus Circle. Primary elements in the Proposed Action include widening Massachusetts Avenue along the southern edge of Columbus Plaza; eliminating the interior semi-circular access road and parking in front of the Columbus Memorial Fountain; reconfiguring access to Columbus Circle on the east and west ends of Union Station; constructing wheelchair/bicycle ramps (depressed curbs) at all pedestrian crosswalks in accordance with the Americans with Disabilities Act (ADA); creating safer

pedestrian crossings; creating connections from the Metropolitan Branch Bike/Pedestrian trail to the new Bike Station west of Union Station (separate project) and providing access across Massachusetts Avenue to the National Mall further south; removing the existing metal fence and shrub hedge along the southern perimeter of Columbus Plaza; extending walkways and maintaining the existing radial pattern; installing grass sod between the walkways; implementing subsurface repairs including pipe replacement, and mechanical and electrical system upgrades to the NPS mechanical room for the fountains in Columbus Plaza; restoring or repairing brick walkways and granite curbing with in kind materials in Columbus Plaza; re-establishing the historic granite curb that delineates the perimeter of Columbus Plaza flush with adjacent paving/grass area; expanding traffic islands/pedestrian refuges in Massachusetts Avenue and add streetscaping that will not affect the view from Columbus Plaza to the state flagpoles; installing additional pedestrian lighting to the interior of Columbus Plaza particularly along the new walkways built in the former interior roadway area; improving lighting to illuminate Columbus Memorial Fountain and the three American flags in front of Union Station; modifying three existing streetlight systems; modifying existing five traffic signals; and providing new traffic signals at two intersections.

PUBLIC INVOLVEMENT

A 30-day public review and comment period of the EA was conducted from April 25, 2008 to May 27, 2008. A second review and comment period was held from January 6, 2009 to February 4, 2009 after additional design changes based on comments from review agencies. The EA was distributed to federal and DC government agencies and other stakeholders; was made available for public inspection through the Planning, Environment, and Public Comment (PEPC) web-based software of the NPS and was available for public review at the Public Informational Meeting/Open House held on January 8, 2009. Notice of availability of the EA for review was posted in Union Station to provide an opportunity for commuters and facility users to participate in the meeting and comment on the proposed project. This public review ended February 4, 2009.

The public comments received did not change the impact analysis or the conclusions in the EA.

Summary of Public Meeting

On January 8, 2009, a Public Informational Meeting/Open House was held at the Columbus Club Room in Union Station from 3:30 p.m. to 5:00 p.m. The meeting consisted of two parts: a formal presentation of the proposed design changes to Columbus Circle/Columbus Plaza and an informal question and answer session, after which attendees could peruse environmental documentation and talk individually with NPS and consultant representatives. The attendance sheet was signed by 14 people, with one written comment being submitted.

Pertinent Comments on the EA

Eight comments were received during the public comment periods (in 2008 and 2009) from private citizens/individuals, the Architect of the Capitol, the Union Station Redevelopment Corporation and the D.C. Office of Planning. One comment on the EA was received through

PEPC. One comment focused on issues related to traffic (the width of Massachusetts Avenue); two comments regarded pedestrian accommodation (the construction of raised crosswalks and signalized pedestrian crossings); four comments questioned the landscape and design (creation of park-like space, hardscape in the medians, the planting beds interior to Columbus Plaza, and the symmetry and safety of the walkways); one comment regarded water quality (DC Office of Planning would like to see what LID (low impact development) practices will be required during construction).

The comments were not substantive. Pertinent comments are included below with responses:

Comment: What is the significance of the rose bed planting to the original design of the plaza? If the rose plant is a guide to pedestrian movement, and not an original part of the plan, is there an alternative bedding plant that could be explored? The roses collect trash, appear to be labor intensive, and perhaps require chemical treatment for rose related infestations, molds. A small hedge could edge the plaza with the greater area of the bed being converted to turf - but again what was the original plan for the areas that are now maintained as rose beds?

Response: This comment reflects a question on the no action alternative. This project will not remove or replace the existing rose beds in Columbus Plaza and the NPS will continue to maintain them. However, this decision does not preclude the NPS from deciding to remove the rose beds in the future. The rose bed was not a part of the original design plan for Columbus Plaza which included brick paving and grass panels.

Comment: Thank you for inviting the public. I wonder why there is a walkway (marked 'x') [far left radial extending from plaza] that does not lead to a crosswalk or traffic signal. It is symmetrical - there's a corresponding walk that does lead to a safe crossing - but it may lead pedestrians to take an unsafe shortcut. Also, will the rose beds be saved? They break up the brick plaza, look lovely, and so much brick/roadway are so hot in the summer.

Response: That walkway was included in the design at the request of NPS for symmetry; however, we agree that a crosswalk should be established for the walkway in question and will be incorporated into the final design. The rose beds will be retained as part of this project; however NPS may remove them at some later date.

Comment: Please correct the name of the group that organizes the annual Columbus Day celebration. Also, can the new walkways accommodate vehicles for unloading for the event?

Response: References in the EA text to "Knights of Columbus" are changed to the correct organization involved in Columbus Day celebrations, to read the "National Columbus Celebration Association." This change affects EA pages 3-5, 3-10, 3-11, 3-16, 3-17, and 4-2. The NPS will continue to work with the National Columbus Celebration Association in regards to the staging of their annual event. The walkways will have a reinforced concrete base and can accommodate authorized vehicular use.

Comment: USRC (agency clarification to the EA) indicated that it will not be permitted to transfer acreage to DDOT as part of this project.

Response: In the EA, Table 2. PROPOSED CHANGES OF JURISDICTION, text in Section 3.2.2 and Figure 14 are revised to reflect no land transfer from USRC to DDOT, formerly proposed for 0.017 acre. DDOT will now only gain 0.773 acre (from NPS); will lose 0.016 (to NPS) and 0.190 ac. (to AOC) for a net difference of 0.567 acre. The change in acreage transfer will not affect the project design. Revisions to Table 2 from the EA appear below.

Acreage From-	Acreage To-				Total Lost
	DDOT	NPS	USRC	AOC	
DDOT	---	0.016	---	0.19	0.206
NPS	0.773	---	---	0.163	0.936
USRC		---	---	---	0
AOC	---	---	---	---	0
Total Gained	0.773	0.016	0	0.353	
NET DIFFERENCE	0.567	-0.92	0	0.353	

DECISION

The project proponents' decision is to select the Proposed Action to rehabilitate Columbus Plaza/Columbus Circle, along with the mitigation measures specified herein. The Proposed Action is chosen because it improves pedestrian safety, separates vehicles and pedestrians at critical bottleneck locations, creates new intersections to improve vehicular flow, re-designs lane widths and traffic signalization patterns, and rehabilitates and enhances the historic characteristics of Columbus Plaza.

The No-Build alternative does not meet purpose and need, and would not correct the existing safety concerns or alleviate the traffic congestion in and around Columbus Plaza/Columbus Circle.

Two additional projects are scheduled for construction at Union Station: the proposed Bike Station located on the west portico of Union Station between 1st Street and Union Station, and the installation of security bollards in front of Union Station. These two projects have identified no environmental impacts. No significant impacts will result from the cumulative effects of the Proposed Action and the other actions.

Mitigation and Monitoring

Mitigation measures are specific actions that when implemented reduce environmental impacts of the Proposed Action. The following mitigation measures were incorporated into the impact analysis and will be implemented with the project.

Traffic and Transportation. Maintenance of traffic (MOT) plans have been prepared for the 95 percent design completion. Any adverse impacts will be minimized through the use of Best Management Practices (BMPs) and the maintenance and protection of traffic.

Construction will be accomplished in phases defined within the maintenance of traffic plans. There will be no designated detours associated with construction. Travel lanes will be maintained throughout construction, including access lanes in front of Union Station. Traffic control shall be accomplished in accordance with the *Manual of Uniform Traffic Control Devices*. Work shall be performed between 7 AM and 4 PM. The Contractor shall not work at night, on weekends, or holidays unless approved by the Engineer.

The Construction Contractor shall maintain the proper and safe flow of pedestrian traffic within and adjacent to the project area at all times, including across Columbus Plaza. Sufficient traffic controls to ensure pedestrian safety at project area intersections will be included in the final design.

Land Use and Socioeconomics. The minor land use changes are the result of land jurisdictional changes; any transfers will be reviewed and approved by appropriate federal agencies.

Air Quality. Construction activities will be conducted in accordance with DDOT's *Design and Engineering Manual* and *Standard Specifications for Highways and Structures* to minimize temporary air quality impacts from construction.

The District provisions to control airborne particulates include the use of watering and cover materials, and the application of desiccants (drying agents) such as calcium chloride. These measures have proven effective in limiting the amount of local inhalable particulate (PM₁₀) that result from the use of construction equipment. PM₁₀ levels will be elevated in the vicinity during construction. Implementation of effective countermeasures will be included in the final contracts to limit the impacts of inhalable particulates caused by construction. Provisions for this work effort will be included in the specifications for the final design.

Noise and Vibration. Temporary vibration of construction activities in close proximity to the Columbus Memorial Fountain, and the east and west bowl fountains, will be somewhat more pronounced than the daily vibration impacts caused by buses and other traffic in the interior circulation roadway. Mitigation measures to address the potential impacts caused by vibration during the construction phase of the project include installation of crack/joint monitors in several key points on Columbus Memorial Fountain; regular monitoring of these cracks/joints for signs of stress or failure; immediate cessation and reevaluation of work activities if structural failures become apparent; providing appropriate drainage and staging areas away from Columbus Memorial Fountain during construction; and limits to the proximity of heavy equipment to Columbus Memorial Fountain during construction.

The plan for protection and monitoring of the Columbus Memorial Fountain and Columbus Plaza, developed by the Construction Contractor, must be submitted to NPS as part of the NPS permitting process. The protection and monitoring plan must be approved by NPS and fully installed and accepted by NPS prior to start of construction on NPS property. The plan must include a method for stabilizing and isolating any or all stone work, walls and monument

statuary which are within the construction limits, and, in the opinion of NPS, may be affected by construction activity. The Construction Contractor shall install a stand-alone measurement and control device approved by NPS which is capable of monitoring structural integrity such as crack width, tilt and vibration. The Contractor shall notify NPS prior to installation of the monitoring equipment. If progressive or accidental damage occurs to the historical structures in the NPS area, work must stop immediately and NPS must be notified. Construction will not resume until the NPS has visited the site and approved repairs and the Contractor's proposal to complete unfinished work based on the new structural conditions.

A plan for the protection and monitoring of the rostral columns and balustrades, under the jurisdiction of the USRC, and will be developed by the Construction Contractor. The plan and notification procedures for any unanticipated or accidental damage will be approved by USRC prior to construction.

The applicable local codes for construction activities are contained in Title 20 of the D.C. Municipal Regulations (DCMR) and will be used to mitigate any significant construction noise levels. Construction noise and vibration effects can be made more tolerable by contractor sensitivity in selecting less noisy or reverberant techniques and equipment, controlling hours of operation, and following government codes and equipment standards.

Parklands. Pedestrian access through Columbus Plaza, and access to Columbus Memorial Fountain for the annual Columbus Day ceremony (organized by the National Columbus Celebration Association), may be restricted during project activities. Mitigation measures to alleviate decreased access to Columbus Plaza include establishing alternate pedestrian routes across Columbus Plaza, and providing temporary access to Columbus Memorial Fountain for the annual Columbus Day ceremony.

Visual and Aesthetics. Construction activities and the location of staging areas may temporarily impact the visual and aesthetic elements intrinsic to Columbus Plaza. Any adjacent construction staging areas must be mitigated through approved visual screening.

Significance Criteria

The Proposed Action will not have a significant effect on the human environment. This conclusion is based on the following examination of the significance criteria defined in 40 CFR Section 1508.27.

1. Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts which require analysis in an EIS. The Proposed Action will not have any direct or indirect impacts on farmland or any established community, population or planned community development; there will be no water quality impacts; no impacts will occur to wetlands; there will be no water body modification and no impacts to wildlife. In addition, the Proposed Action will not impact floodplains, wild and scenic rivers, coastal barriers, coastal zones, threatened or endangered species, or hazardous waste sites; there will be no energy impacts. Impacts to traffic and transportation, cultural resources, parklands and Section 4(f)/Section 6(f) resources, and visual and aesthetic elements will be

beneficial and long term. There will be minor changes in land use (although land use will continue to be for transportation and parkland within the project area) as a result of removal of the circulation roadway and jurisdictional land transfers between the involved agencies (DDOT, NPS, USRC, and AOC). These changes will result in overall improvements for pedestrian and vehicular traffic.

2. The degree to which the proposed action affects public health or safety. There will be a beneficial impact to public safety because the proposed rehabilitation will allow safe pedestrian and bicycle access to Union Station, the National Mall, and associated facilities, including the National Postal Museum and the Administrative Offices of the U.S. Courts (Thurgood Marshall Building).

3. Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetland, wild and scenic rives, or ecologically critical areas. Three architectural resources listed in the National Register of Historic Places occur in the project area: Union Station, Columbus Plaza, and the City Post Office. There will be no changes to Union Station or the City Post Office as a result of this project. No changes will occur to the historic elements within the plaza, other than improvements which will preserve the integrity of Columbus Plaza and provide for improved functioning of the Columbus Memorial fountains. Beneficial effects to Columbus Plaza will occur by increasing the park-like setting within the Plaza, preserving the open character of the plaza, and reinforcing the design, style, and materials essential to the planning principles of the City Beautiful Movement as promulgated by Daniel Burnham.

4. The degree to which effects on the quality of the human environment are likely to be highly controversial. The EA analysis and public comments do not indicate that any effects presented in the EA are controversial.

5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks. The EA analysis and public comments do not indicate that any effects are highly uncertain or involve unique or unknown risks.

6. The degree to which the action may establish a precedent of future actions with significant effects or represents a decision in principle about a future consideration. The proposed action does not establish a precedent for future actions with significant effects or represent a decision about a future consideration.

7. Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant effects. Significance cannot be avoided by terming an action temporary or breaking it down into small component parts. The proposed action will be coordinated with plans to install security bollards in front of Union Station and construct the Bike Station on the west side of Union Station, and when analyzed in conjunction with these projects, the impact result is cumulatively not significant.

8. Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may

cause loss or destruction of significant scientific, cultural, or historical resources. The rehabilitation project will not adversely affect the three architectural resources listed on the National Register of Historic Properties that are in the project area: Union Station, Columbus Plaza, and the City Post Office. Beneficial effects to Columbus Plaza will occur by increasing the park-like setting within the plaza and preserving the open character of the plaza. The beneficial effects will be consistent with the mandates of the National Historic Preservation Act. The District of Columbia Historic Preservation Office (DCHPO) reviewed and concurred with the finding of No Adverse Effect for the proposed project on March 18, 2008. In further consultation with the DCHPO on November 6, 2008, design revisions were considered additional enhancements to the historic character of Columbus Plaza and continue to represent beneficial effects.

9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973. No known endangered, threatened, special concern or candidate species will be affected by the project.

10. Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment. The Proposed Action does not violate any federal, state or local environmental protection laws.

FINDINGS

The proposed rehabilitation project will result in beneficial effects to Columbus Plaza/Columbus Circle; minor impacts will occur but will be mitigated by measures identified in this document. The selected alternative complies with the Endangered Species Act, the National Historic Preservation Act and Executive Orders 11988 and 11990. Based on a review of the facts and analyses conducted in support of the NEPA, Section 4(f), and Section 106 processes, the agencies have concluded that implementation of the Proposed Action will not have a significant impact, either by itself or when considered cumulatively with other past, present or reasonably foreseeable future projects. The agencies have determined that the Proposed Action does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, in accordance with the National Environmental Policy Act of 1969 and the regulations of the Council on Environmental Quality (40 CFR 1508.9), an environmental impact statement is not needed and will not be prepared.

4-18-09
Date

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April 17, 2009
Date

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