

**FINDING OF NO SIGNIFICANT IMPACT
FOR
THE METROPOLITAN BRANCH TRAIL
WASHINGTON, DC**

The Federal Highway Administration (FHWA), the lead agency, in conjunction with the District Department of Transportation (DDOT) and in cooperation with the National Park Service (NPS), proposes the construction of a multi-use trail facility from Fort Totten to Takoma generally following the path of the Metro's Red Line. In accordance with the National Environmental Policy Act of 1969 (NEPA) and the Council of Environmental Quality (CEQ) regulations (40 CFR 1500-1508), the FHWA and DDOT prepared an Environmental Assessment (EA). FHWA's Environmental Impact and Related Procedures indicate under §§771.117 Categorical Exclusions that the construction of bicycle or pedestrian lanes, path, and facilities is an action that meets the criteria to be considered a categorical exclusion. However, with consideration for the area of interest – NPS lands, this EA was prepared to be consistent with NPS NEPA requirements. This included analysis of the context, duration, and intensity of impacts related to the sections of the MBT that utilize NPS land as required by Director's Order 12: Conservation Planning, Environmental Impact Analysis and Decision-making (NPS 2001).

This EA analyzed the potential impacts resulting from constructing and operating portions of the MBT on sections of land owned by the NPS within the area north of Fort Totten (Reservation 451 West), the area east of Fort Totten (Reservation 451 East), the Community Gardens (Reservation 497), and Tacoma Park (Reservation 531). The EA was released for agency and public review on November 15, 2010. Subsequently, a Final EA was prepared to fully address all agency and public comments received and identifies FHWA/DDOT's Preferred Alternative and options after consideration of public and agency comments.

The proposed action would result in the construction of a multi-use trail facility to provide safe non-motorized transportation and recreational opportunities to the residents and visitors of the District of Columbia (the District). The MBT will link people to jobs, schools, commercial and recreation areas and various Metro stations. The MBT will help to complete a regional network of trails by joining the Capital Crescent Trail in Silver Spring, the National Mall near Union Station and the proposed Fort Circle Parks trail. In addition, the proposed spur of the MBT at Fort Totten will form a link in the East Coast Greenway network of trails.

The project needs are a culmination of a decade of planning, research, and consensus building. The Washington Area Bicyclist Association (WABA) and the Coalition for the Metropolitan Branch Trail (CMBT) produced the *Metropolitan Branch Trail Concept Plan* in 1999. The plan, endorsed by public officials, business and property owners and trail enthusiasts, detailed a trail intended to provide the residents of Washington and their northern and eastern neighbors with an alternative to driving between the many communities of the Northeast quadrant. The MBT's proposed alignment intersects with seven Metro Stations, making it an effective facility for connecting neighborhood residents to mass transit.

PREFERRED ALTERNATIVE AND OPTIONS

Based on the impact analysis prepared by this EA, alternatives A1, B1, C1 and/or C2 are the environmentally preferred alternatives. These alternative alignments would best fulfill park responsibilities as trustee of this sensitive habitat; ensuring safety; healthful, productive, and aesthetically, and culturally pleasing surroundings; and attaining a wider range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences.

This EA evaluated three areas where the MBT would be located on or adjacent to NPS land, which included:

- Area A – Area north of Fort Totten

- Area B – Prince George’s County Spur (area east of Fort Totten)
- Area C – Piney Branch Road (Takoma Park).

Elements common to all alternatives include:

The trail would be 10-12 feet wide where possible if built as a separated side path. Signage and trail markings, lighting, and call boxes would also be provided as needed for each segment of trail on park property, coordinated with NPS to meet NPS standards. In general, to avoid impacts to wildlife on NPS property, lighting in or around natural areas would be avoided or minimized and directed downward. All requests to increase lighting on NPS land would need to be individually considered (area by area, trail segment by segment) for the overall impacts on park lands.

- Waysides with seating and shade are also proposed at appropriate locations, such as overlooking the Fort Totten Metro tunnel, at the DC/MD border in Takoma, to the east and west of the Community Gardens, and along the Spur.
- The DDOT assumes all maintenance responsibility and costs for trail segments on park lands.
- Education and interpretive measures would be implemented and could involve various efforts including directional signage to historic areas of interest along NPS lands.

Preferred Area A1 Alignment (Area north of Fort Totten)

Area A1 alignment begins at the Fort Totten Trash Transfer Station, proceeds along the tracks to NPS lands, then around Fort Totten Metro Station, along 1st Place to the intersection of Riggs Road, where it crosses at-grade, and up a widened sidewalk along Riggs Road beyond the retaining wall. It then proceeds from Riggs Road on the existing social path (NPS land) to Kennedy Street, on Kennedy and 1st Streets to Madison Street, on 1st Street or adjacent NPS land to New Hampshire Avenue, on McDonald Place to Blair Road, and on NPS land adjacent to Blair Road in the area of the Community Gardens to Oglethorpe Street.

Preferred Area B1 Alignment (Prince George’s County Spur - east)

Area B1 alignment begins at the Fort Totten Metro Station and proceeds to South Dakota Avenue along 1st Place/Galloway Street. It then proposes a 10-12 foot hard surface trail along Gallatin Street toward the DC/MD border. At the DC/MD border a new 10-12 foot trail of approximately 220 feet would be constructed. This would connect Gallatin Street to the currently constructed Prince George's County trail in Maryland.

Preferred Area C1 and/or C2 Alignment (eastern and western alignment in Takoma area)

Eastern Alignment (Alternative C1): The eastern alignment would follow Eastern Avenue past Cady-Lee Mansion either on the western sidewalk or as an on-street bike lane (with sharrows). It would then cross Piney Branch Road at-grade.

Western Alignment (Alternative C2): The western alignment would cross Piney Branch Road on a bridge to the west of the tracks – to be constructed – or descend to Piney Branch Road using a switchback alignment. Stairs on both sides of Piney Branch Road are proposed.

ALTERNATIVES CONSIDERED BUT NOT SELECTED

In addition to evaluating the Preferred Alternatives, the EA and Final EA considered the No-Action Alternative and three additional Alternatives under Area A (Alternatives A2, A3, A4), one additional Alternatives under Area B (Alternative B2), and one additional Alternative under Area C (Alternative C3). Further alternatives were considered but not retained for detailed analysis.

Under the No Action Alternative, no MBT alignments would be developed on any NPS lands.

The following provides a description of each proposed alternative considered but not selected for Area A, Area B, and Area C.

Area A has four alternative alignments that cross NPS Reservations 451 West and 497, including the area north of Fort Totten and the Community Gardens, respectively. Reservation 451 W includes NPS land located in the reservation west of the CSX and Metro rail tracks. In general, Area A alignments all begin at the Fort Totten Trash Transfer Station, proceed along the tracks to NPS lands, then around Fort Totten Metro Station, along 1st Place to the intersection of Riggs

Road, where they cross at-grade, and up a widened sidewalk along Riggs Road beyond the retaining wall. They then differ by how they reach their end point at the intersection of Oglethorpe Street and Blair Road. The following is a brief description of the key elements for each Area A2, Area A3, and Area A4 alignment alternative from Riggs Road north:

- **Alternative A2** is identical to alternative A1 with the exception of the proposed trail section between Riggs Road and Madison Street. Instead of using the social path/Kennedy/1st Street route, alternative A2 would proceed to Madison and 1st Streets via the wooded NPS land paralleling the CSX tracks.
- **Alternative A3** differs from alternative A1 by proceeding down South Dakota Avenue (instead of McDonald Place) and on the service road through Community Gardens to Oglethorpe Street, then up to Blair Road on Oglethorpe Street.
- **Alternative A4**, like alternative A2, would proceed through the wooded area on NPS land adjacent to the CSX tracks to Madison and 1st Streets, then would proceed down South Dakota Avenue (instead of McDonald Place) and on the service road through Community Gardens to Oglethorpe Street, then up to Blair Road on Oglethorpe Street.

Area B includes two alternative alignments that cross NPS Reservation 451 East, which includes NPS land east of the CSX and Metro rail tracks. In general, Area B alignment alternatives begin at the Fort Totten Metro Station and proceed to South Dakota Avenue along an alignment that will be determined at a future date. They then proceed to Gallatin Street and along or on Gallatin Street to the DC/MD border near the intersection of Gallatin Street and 16th Street. Both consist of constructing new trail for approximately 220 feet from Gallatin Street across NPS land to the Prince George's County Connector trail north of St Ann's driveway; however:

- **Alternative B2** proposes to construct/stripe and follow on-road bike lanes along Gallatin Street to the Prince George's County Border.

Area C includes three alternative alignments that cross NPS Reservation 531. Reservation 531 exists at the intersection of Eastern Avenue and Piney Branch Road.

- **Alternative C3** would follow a path on an elevated structure adjacent to the Metro tracks (but not attached) running behind cooperative apartments on Eastern Avenue

and the Cady-Lee Mansion. The trail would pass between the Metro tracks and the Cady-Lee Mansion, crossing Piney Branch Road on a newly-constructed bridge.

ANALYSIS OF SIGNIFICANT IMPACT

Impacts of the MBT alignment alternatives were assessed in accordance with four overarching environmental protection laws and policies that guided the DDOT in this action: NEPA, and its implementing regulations; the *USDOT FHWA Environmental Impact and Related Procedures*, the *National Parks Omnibus Management Act of 1998* (NPOMA) including the *Director's Order 12: Conservation Planning, Environmental Impact Analysis, and Decision Making*; and the *NPS Organic Act*. Using the above guidance, impacts to the identified resources were analyzed in terms of their context, duration, and intensity.

Through the internal scoping process it was determined that the following resource areas would not be impacted by the proposed alternatives and were removed from consideration in the EA: Geohazards, Water Resources, Air Quality, Unique Ecosystems, Biosphere Reserves, World Heritage Sites, Sacred Sites/Native American Concerns, Environmental Justice, and Park Management and Operations.

Impacts from construction and operating the MBT were analyzed for the following resource topics: Soils, Vegetation, Wildlife and Wildlife Habitat, Threatened, Endangered Species of Special Concern, Cultural and Historical Resources, Viewsheds, Land Use, and Visitor Use and Experience.

Based on the impact analysis presented in *Table A* of the Final EA, the operating project would not result in significant impacts.

The preferred alignments include:

- No impairment of soils
- No impairment of vegetation
- No impairment of wildlife or wildlife habitat

- No impacts to threatened, endangered or species of special concern
- No impairment of cultural or historic resources (as concurred upon by the District of Columbia Historic Preservation Officer (DC HPO) on November 23, 2010). One exception would be the minor short- and long-term adverse impacts to the Cady Lee Mansion from an expected increase in pedestrian traffic.
- No impairment of viewsheds with the exception of minor impacts due to sidewalk adjustments, waysides, crossing improvements and lighting as well as a potential bridge in Alternative C2.
- No use of 4(f) properties.
- Beneficial impacts to land use by improving pedestrian connections and increased recreational activities with minor adverse impacts due to converting natural zone areas to paths.

The project would result in some adverse effects during construction. A summary of these effects, and an evaluation of their significance per the CEQ guidance, is provided in the following paragraphs. A detailed analysis of these effects is provided in the Final EA.

Soils: Negligible short- and long-term adverse impacts to soils are expected from trail construction with moderate long-term impacts from Alternative B1. Based on the analysis in the EA, the direct impacts to soils, do not meet the level for “significance” per the CEQ definition for either context or intensity. Therefore, a higher classification of NEPA documentation or study is not required.

Vegetation: Minor short- and long-term adverse impacts to vegetation are expected including the removal of exotic and invasive species and some trees with moderate long-term impacts from Alternative B1. Based on the analysis in the EA, the direct impacts to vegetation, do not meet the level for “significance” per the CEQ definition for either context or intensity. Therefore, a higher classification of NEPA documentation or study is not required.

Wildlife and Wildlife Habitat: Negligible short- and long-term adverse impacts to wildlife and wildlife habitat are expected due to the urban nature of the area. Based on the analysis in the EA,

the direct impacts to wildlife and wildlife habitat, do not meet the level for “significance” per the CEQ definition for either context or intensity. Therefore, a higher classification of NEPA documentation or study is not required.

Cultural and Historic Resources: Negligible short- and long-term adverse impacts are expected as the trail would be quite distant from the Fort Totten earthworks. Based on the analysis in the EA, the direct impacts to cultural and historic resources, do not meet the level for “significance” per the CEQ definition for either context or intensity. Therefore, a higher classification of NEPA documentation or study is not required.

Land Use: Short-term minor adverse impacts to local traffic may occur during the construction of the potential bridge. Based on the analysis in the EA, the direct impacts to land use, do not meet the level for “significance” per the CEQ definition for either context or intensity. Therefore, a higher classification of NEPA documentation or study is not required.

Visitor Use and Experience: Short-term minor impacts caused by inconvenience to visitors during construction may occur. Based on the analysis in the EA, the direct impacts to visitor use and experience, do not meet the level for “significance” per the CEQ definition for either context or intensity. Therefore, a higher classification of NEPA documentation or study is not required.

MITIGATION MEASURES

The following mitigation measures would be implemented to mitigate or minimize adverse impacts of the Preferred Alternative options:

- The removal of trees will be limited as much as possible.
- *Erosion and Sediment Control Plans* would be created and would be especially important around the Fort Totten Metro Green Line tunnel and the wooded area just to the north of the tunnel, where moderately steep slopes occur.
- A *Maintenance of Traffic Plan* will be created and used by the contractors to minimize traffic impacts and disruption to residential areas and parkland during construction.

- DDOT will consult with the DCSHPO if any solar lighting is to be installed within the Takoma Park Historic District or if the bridge near the landmark Cady-Lee Mansion is proposed.

AGENCY CONSULTATION

As part of the planning process for the Met Branch Trail – Rock Creek EA, DDOT conducted agency coordination as detailed in the Final EA. Coordination included project scoping, consultation with resource agencies in accordance with Section 7 of the Endangered Species Act of 1973, consultation with the DC HPO and NPS in accordance with Section 106 of the National Historic Preservation Act of 1966 (NHPA), and individual meetings. DDOT held multiple meeting with NPS beginning in 2004.

In accordance with Section 7 of the of the Endangered Species Act, a coordination letter from the U.S. Fish and Wildlife Service (FWS), received November 30, 2010, determined that; “except for the occasional transient individuals, no proposed federally listed endangered or threatened species are known to exist within the project impacts area.”

DDOT met with the DC HPO during project initiation and officially initiated the NHPA Section 106 process in October of 2010. On December 10, 2010 a tour of the entire project was given to DC HPO staff. On December 17, 2010 DC HPO submitted a letter (included in Appendix B of the Final EA) stating that the Metropolitan Branch Trail would have “no adverse effect” on historic properties.

Agency letters and comments received in response to circulation of the EA are included in Appendix B of the Final EA.

PUBLIC INVOLVEMENT

Three public meetings were held to present trail alternatives to the public and to obtain community feedback. Meetings were held in June 2004 for trail sections in the Brookland area, Rhode Island Metro Station area, and the Fort Totten area. The meeting held for the Fort Totten

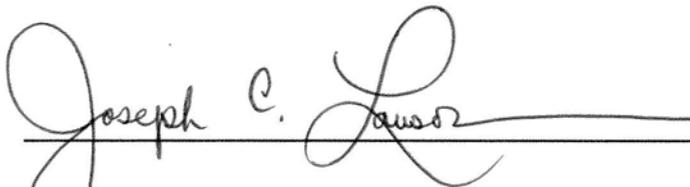
area included public scoping for the environmental assessment process. The public was updated of the project in 2010, via email, trail and neighborhood listserv notification.

Prior to the release of the Draft EA, a notice of availability and a request for comments was distributed through a variety of outlets including the DDOT, National Park Service, Met Branch Trail (www.metbranchtrail.com) websites as well as hard copies made available at NPS and DDOT offices and the MLK Library. Six (6) comments were received and responses to those comments are contained in Appendix A of the Final EA.

CONCLUSION

The FHWA has determined that the Preferred Alternative and options will not have a significant impact on the natural, human or built environment as defined by CEQ. This Finding of No Significant Impact (FONSI) is based on the findings of the proposed project's Final EA, and comments submitted during preparation of the EA. The Final EA has been evaluated by the FHWA, using CEQ regulations and FHWA and NPS guidelines, and determined to adequately discuss the need, environmental issues, and impacts of the proposed project and appropriate mitigation measures. It provides sufficient evidence and analysis for determining that an environmental impact statement is not required. The FHWA takes full responsibility for the accuracy, scope, and content of the attached EA.

Approved:



9/21/11

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Date