

CAPITOL HILL RESTORATION SOCIETY

P.O. Box 15264 Washington, DC 202.543.0425

November 15, 2012

Ms. Beverley Swaim-Staley, President
Union Station Redevelopment Corporation
Ten G Street, NE, Suite 504
Washington, DC 20002

Dear Ms. Swaim-Staley:

The Capitol Hill Restoration Society (CHRS) appreciates the opportunity to comment on the September 10, 2012, proposal for alterations to the Main Hall of Union Station. As we noted in our initial comment letter, Union Station is one of Washington's great buildings, not only for its setting and architecture, but also for the magnificent interior spaces of the Main, East, and West Halls and the historic Concourse, all of which so dramatically convey the early- to mid-20th-century experience of travel.

We agree with the Federal Railroad Administration that penetrating the floor of the Main Hall with two openings for pairs of escalators to and from the downstairs retail constitutes an adverse effect on the majestic Main Hall. CHRS has maintained for over two years that any proposed alterations should restore the original unobstructed views of the Main Hall and eliminate, or at the very least substantially reduce, impediments to the flow of pedestrians through the space. We believe the best way to achieve these goals would be to remove the Center Café, as well as existing planters and retail kiosks, and not install escalators so that pedestrians can move freely and unimpeded through the Main Hall in all directions and easily see where they're going. We also advocate removing retail from the Main Hall and designing and placing such needed items as the information kiosk and seating in such a way that they create minimal impediments to pedestrian circulation and allow visitors to fully experience more of the original intention of the stunning and dramatic Hall. Wayfinding would be much easier if and when the Main Hall and colonnaded passages are unobstructed by retail, cafes, kiosks, pylons, and other physical and visual clutter. CHRS remains opposed to penetrating the Main Hall floor for escalator access to the lower level.

As noted by a number of persons at the September 10 consulting parties meeting, the current proposal with two sets of escalators wrapped by short glass safety enclosures is a great improvement over both the intrusive and inappropriate initial proposal and the mid-2011 proposal. Along with others, CHRS too is glad the idea of a raised central café has been eliminated, along with the earlier proposed elevators and the luxury modular units. However, it is inescapable that removing substantial pieces of the Main Hall floor to insert two sets of escalators still introduces significant obstacles to pedestrian circulation and changes the historic nature and experience of the Hall. With the expected large increases in visitors to the Station, it seems counterproductive and short-sighted to remove three obstacles (Center Café and planters) and then add two more. As the State Historic Preservation Office (SHPO) and others have noted, re-establishment of the north-south and east-west pedestrian axes is crucial to recapturing both more efficient pedestrian movement and unobstructed sight lines.

Should USRC and FRA choose to move forward with installing the escalators, every effort should be made to minimize their size, scale, and profile. While CHRS appreciates efforts made to date to scale down the design of the current proposal, with the short, transparent escalator surrounds, we find the soaring pylons with moving LED lights proposed between the escalators to be totally incompatible with the Main Hall in materials, appearance, form, scale, and movement. Even with their relatively narrow profile, they extend much too high and intrude far too much into the spatial volume of the historic Hall. Their out-of-character, colored, moving lights would distract pedestrians from the grand architecture and are completely unacceptable. We recommend that USRC continue to explore signage options, in consultation with SHPO and other consulting parties such as CHRS, to identify alternatives and compare their effects and appropriateness. CHRS is very interested in signage and wayfinding throughout the Station, especially in its historic portions, and looks forward to seeing possibilities and, if feasible, a mock-up of the proposed pylons and other possibilities.

Mitigation

Given the considerable adverse effects the proposal would have on this historic icon, the mitigation measures also need to be considerable and, to the maximum extent possible, directly mitigate the adverse effects. While CHRS generally supports the mitigation measures proposed in FRA's June 2012 letter, the Assessment of Effect, and the September 2012 consulting parties meeting, we note that some of them further the project's goals (removal of the Center Café and planters will expedite circulation and access) or have been ignored since being called for by consulting parties over two years ago to guide this project and others (preparation of a Historic Preservation Plan for Union Station). Accordingly, we offer the following key observations and recommendations regarding project mitigation for consideration and inclusion in the Memorandum of Agreement.

- Removal of the Center Café is crucial to restoring the full spatial volume of the Main Hall, and along with removal of the planters will greatly expedite pedestrian flow.
- A Historic Preservation Plan, as recommended from the outset by SHPO, ACHP, NCPC, and other consulting parties, ideally would have been completed by now to guide this project and other planned and potential projects. We recommend a commitment to prepare one, along with establishment of a timetable for its review and completion, and we encourage engaging the Union Station Preservation Coalition in the review and comments.
- One of the most important mitigation measures is the provision for reversing the escalator installations and restoring the Main Hall floor. CHRS strongly supports this measure and recommends that the MOA include a timeframe for removal and/or clearly defined measures, actions, or circumstances that would serve to trigger such removal and restoration.
- Because the 1985 MOA needs to be updated, the MOA for the current project should stipulate development by time certain of a Programmatic Agreement to guide restoration, rehabilitation, maintenance, and commercial development of and in the Station. The PA should retain the critical heart and essence of the 1985 MOA, including that all preservation work meet the Secretary of the Interior's Standards for Rehabilitation, and that major entrances to the historic

spaces provide the building user with an opportunity to view, understand, and experience the grandeur of the space (Stipulations 1,2 & 3.f.).

- The 1985 MOA includes a provision (Stipulation 2) requiring that interior work meet the Secretary of the Interior's Standards for Rehabilitation. While this was intended to guide interior restoration, we suggest that it would not be inappropriate for the escalator project to meet the Standards, since it proposes to undo the floor restoration that was carried out in accordance with the MOA.
- The 1985 MOA also requires in Stipulation 3.a. that design criteria be developed and applied for interior redevelopment installations, including signs and kiosks. While this MOA no doubt did not anticipate future floor penetrations for escalators in the Main Hall with tall lighted pylons, neither should its provisions be ignored. Assuming that such design criteria were developed, we wonder whether the current proposal – which is intended for interior redevelopment purposes – meets those criteria. If no such criteria exist, or if existing criteria need updating for current needs, we recommend that the MOA require them, or their update, and that they be applied to this project.
- The Selection of Preferred Design Study in the Assessment of Effects asserts that the existing elevator will be made more visible and accessible, with more effective signage. We recommend that this commitment be included in the MOA.
- The Assessment of Effect asserts that “The commercial viability of the station is inextricably linked to its success as an inter-modal transportation hub. Only if Union Station is commercially sustainable can it continue to operate as a transportation terminal.” This is tied to the need for the Main Hall escalators because the lower level’s “function as commercial and retail space necessitates more points of entry and a stronger visual connection to the first floor.” In other words, no escalators = insufficient commercial success to keep the station operating. However no sufficiently persuasive evidence has been produced to convince us that without the escalators, the retail would not succeed. Although USRC’s October 31, 2012, letter to the DC Preservation League (DCPL) broadly asserts that the proposed changes would benefit “Union Station itself through an increase in funding available to USI to handle the day-to-day operations, maintenance, insurance, and repairs of the Station”, no specific evidence has demonstrated exactly how improved commercial success would equate to additional revenue dedicated to maintenance, repair, and restoration, and to what degree. While the letter says USRC and Ashkenazy jointly contribute to the Capital Maintenance Reserve Fund for repair and restoration of historic fabric and other structural Station needs, it does not affirmatively state that increased profits resulting from the expanded escalator access would increase the level of Ashkenazy’s contributions.

Except for removal of the Center Café and planters and potential later removal of the escalators, no proposed measure directly and physically mitigates the adverse effects on the Main Hall. We ask that the MOA stipulate that a designated measure of increased profits be made available for maintenance, repair, renovation, and restoration of historic portions of Union Station so the harmed historic Main Hall will directly benefit from the project’s anticipated commercial success.

- We suggest that the MOA provide for SHPO to work with USRC to develop and prioritize a list of restoration-related capital improvements.

- CHRS fully supports preparation and submission of a National Historic Landmark nomination for Union Station; preparation of a brochure on the historic of the Station; and preparation of an interpretive exhibition program.

CHRS looks forward to seeing drafts of the MOA and providing comments on its stipulations.

Sincerely,

Shauna Holmes

Shauna Holmes
Chair, Historic Preservation Committee

Cc: David Maloney, DC SHPO
Andrew Lewis, DC SHPO
Louise Brodnitz, ACHP
Nell Ziehl, National Trust for Historic Preservation
Rebecca Lewis, DC Preservation League
John Sandor, DC Preservation League
Erik Hein, Committee of 100 on the Federal City
William Wright, Committee of 100 on the Federal City
Thomas Luebke, Commission of Fine Arts
David Zaidain, NCPC
David Valenstein, Federal Railroad Administration
Lisa Klimko, Union Station Redevelopment Corporation
Emily Eig, Traceries