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May 8, 2018

USDOT Federal Railroad Administration  
Attn: Amanda Murphy  
Environmental Protection Specialist  
Office of Railroad Policy and Development  
1200 New Jersey Ave., SE MS-20  
Washington, DC 20590

Re: Washington Union Station Expansion Project (WUS SEP)

Dear Sir or Madam,

The Federal Railroad Administration (FRA) has requested comments following the 5th Consulting Parties meeting on April 24, 2018. The Capitol Hill Restoration Society (CHRS) welcomes the opportunity to contribute to this very important project.

The Agenda for the April 24 meeting states that its purpose was to “describe the methods for assessing effects to the identified historic properties within the APE” (Area of Potential Effects). This meeting also included a brief overview of the project concept alternatives that were presented to the public on March 22, 2018. FRA has requested our comments on the proposed “methods for conducting the assessment of effects” on historic properties within the APE that will result from the concept alternatives.

CHRS finds that it is not feasible to evaluate the adequacy of the proposed methodology. The Environmental Impact Statement (EIS) and related Section 106 Review do not include the entirety of the Union Station Expansion. The on-going EIS presages the design not only of the Union Station Rail Terminal expansion, but also of the closely related Burnham Place air rights project and the H Street Bridge reconstruction. FRA has largely ignored the cumulative impact of these three integrally related projects. Alone, each of these projects represents a very significant investment in which the public and the surrounding community have a vital interest.

Taken together, these projects represent a transformation beyond even regional significance.

CHRS is very cognizant of the tremendous complexity of each of these three projects (Union Station Terminal Expansion, Burnham Place, H Street Bridge replacement). Each project taken alone poses complex issues not only in design but also in construction. We understand FRA's desire to simplify the scope of the EIS in order to make it more manageable. However, that simplification also renders the on-going EIS as an expensive, time consuming, but ultimately ineffective exercise. Even worse, the completed EIS is highly likely to hamstring later design opportunities by locking-in sub-optimal design and operational alternatives based on the narrow focus underpinning the EIS process.

We believe that limiting the scope of the EIS and Sections 106 processes will result in missed opportunities that will limit later design options and compromise Union Station's fundamental operational purpose: to accommodate both present and future rail service. We note the following examples of where the on-going process fails to provide useful information as the entire project moves into the design phase:

1. Coordination between the proposed and existing terminals is very weak due to the failure to include the former train shed in the concept alternatives for the expansion. Because the historic train shed is excluded from the project alternatives, the EIS and Section 106 reviews will not include in-depth analysis of that area. This will lead to designs that avoid integration of the existing and expanded train terminal.
2. Analysis of access to the expanded Union Station complex is inadequate. A facility, ostensibly designed as an intermodal hub, must take into consideration the network of roads and transportation options. However, current and projected ridership and trip generation numbers for the various modes of transportation have not been presented. Even more basic is the need for the EIS to take into account the ridership projections of Amtrak, VRE, MARC and High-Speed rail to the south and demonstrate how the proposed design accommodates those projections. At the April 24th meeting we were told a "transportation study" would be available in winter 2019. That is after our 6th meeting this summer or fall when comments on the draft Memorandum of Agreement (MOA or PA) are due, and perhaps even after or coincident with the final, 7th Consulting Parties meeting in spring 2019 when we apparently have a last chance to "consult."
3. Burnham Place with its anticipated 3 million square feet of building area will sit atop the terminal expansion. That Burnham Place is a private investment does not excuse excluding its impacts from this process. These projects are very closely related and need to be fully integrated with each other to be successful. In fact, every proposed development alternative for FRA's proposed expansion envisions some form of air-rights swap, sale, or expropriation between these two interconnected projects.
4. The H Street Bridge doesn't even get a mention in FRA's analysis. The H Street bridge and tunnel have been absent from the public presentations or consulting party

meetings. This overlooks the opportunity to explore reopening the H Street tunnel to vehicular traffic, or perhaps even doing away with the H Street Bridge and returning the street to grade level.

The Washington Metropolitan Area and Washington, DC, in particular, have undergone enormous change in the last few decades with significant new development throughout the District and the region. We are experiencing unprecedented congestion highlighting the urgent need for improved and widely distributed access to public transit. This greatly elevates the significance of this project as the region's single designated multimodal transport hub – a decision that looks back to the conditions that prevailed in the 1980s. Instead the EIS and Section 106 review need to look forward and envision the totality of the transformation proposed for Union Station within the context of a greatly expanded region. It would be ironic if the Washington region's premier intermodal transportation hub were itself to become practically inaccessible.

We thank you for considering our comments.

Sincerely,



Elizabeth Nelson, President

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