



September 25, 2020

Mr. David Valenstein
Office of Railroad Policy and Development
USDOT Federal Railroad Administration (MS-20 RPD-10)
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Washington Union Station Expansion Project:
Draft Environmental Impact Statement

Dear Mr. Valenstein,

The Capitol Hill Restoration Society (CHRS) appreciates this opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Washington Union Station Expansion dated June 12, 2020. Since early 2016, CHRS's representatives have attended the Consulting Party meetings for this very important project. The massive DEIS document contains a large amount of very useful information and required considerable time to review.

CHRS's primary concerns are the potential effects of the Washington Union Station Expansion on the Capitol Hill Historic District (CHHD). However, we will also comment on compatibility with the historic Union Station and the implications for closely related developments inclusive of Burnham Place, H Street Bridge replacement, and potential federal air rights development. We will refer to the federal Washington Union Station Expansion as WUS, and to the entire project (Washington Union Station Expansion + Burnham Place + federal air rights + H Street Bridge/Tunnel) as the Washington Union Station Projects (WUSPs).

Comments on Urban Plan

CHRS's criticism throughout the WUS EIS process has been the restricted focus on the federal portion rather than the entirety of the WUSPs. We have not altered our position that it is impractical to evaluate the federal portion independent of the other integrated projects. This piecemeal approach fails to convey the potential transformation for this site.

Preferred Alternative A-C is the product of questionable early decisions by FRA. All alternatives considered within the EIS share common elements. Among those common elements are: 1) new passenger concourses below the rail yard; 2) use of the H Street tunnel exclusively for pedestrian access; and, 3) in kind replacement of the H Street Bridge. With those decisions in place, FRA's analysis became a process of moving the federal "project elements" around the site. There is no evidence that FRA seriously questioned these assumptions or considered the implications to the urban design for all the WUSPs.

Below Grade Concourses

Preferred Alternative A-C creates new passenger concourses below the track level and creates a maze of vehicular circulation at the upper deck. Light wells more than 60 feet above and surrounded by buildings as much as an additional 130 feet or more in height purport to illuminate the concourses and retail spaces below the rail yard. The DEIS contains several very attractive illustrations of the below track spaces. They present the design in the best possible light, but also in a way that almost certainly cannot be achieved. The report warns "this compressed, linear space would resemble the concourse's spatial quality of New York Penn Station. Therefore, the proposed concourse datum is lowered to +22', to provide approximately a 13' height clearance under the Run-Through tracks and 20' under the Stub End tracks." (Appendix A-3, P 86). An excavation of this depth could provide two levels of parking below the rail yard, and squanders an opportunity to enliven the passenger concourses with views of the train and platform activities from concourses located above the rail yard.

H Street Bridge

The existing H Street Bridge crests at elevation 82.47'. The DEIS assumes a starting height for Burnham Place nearly 4 feet higher, and with several large openings intended to bring sunlight beyond the rail yard to the H Street Concourse levels below. The District Department of Transportation website (DDOT) does not indicate any provision for the proposed light wells, nor do the graphic representations of the H Street Concourse depict the large piers required to support a new H Street Bridge (See for example Figure 97, Appendix A3, Page 82). It is critically important to fully incorporate the H Street bridge design into the WUSPs and to properly represent it within the Union Station DEIS.

Early in the EIS process FRA apparently gave some thought to integrating the H Street Bridge with the transfer deck required for Burnham Place (Appendix A3b, Page B-77). Unfortunately this concept was rejected, but warrants much further study. The opportunity to utilize the transfer deck above the rail yard - some 16 feet or more in depth - for concourse circulation, parking, and transportation functions promises attractive opportunities to design far more interesting solutions than Preferred Alternative A-C. This possibility is hinted at in renderings depicting an inhabited mezzanine structure (See for example Appendix A3, Figure 63, Page 67).

The urban design as well as pedestrian access to the upper deck would be greatly improved if the H Street Bridge were lowered rather than raised. Similarly, every effort should be made to lower the rail yard and design a transfer deck of sufficient depth to allow new passenger concourses and waiting areas above the rail yard enabling views of the trains and related activities.

Vehicular Circulation

The vehicular circulation pattern is fairly consistent for all of the project alternatives including Preferred Alternative A-C. The deck level circulation (Chapter 3, Page 3-84) does not include the additional roadways for Burnham Place or even a designated pick-up/drop off (PUDO) location. Significant PUDO activity should be anticipated in this area for rail passengers, as well as bus passengers, Burnham Place, and federal air rights development. The proposed circulation degrades significant areas of the sunlit deck and curtails opportunities for activated urban spaces. An “escape” from the snarl of traffic on the East Ramp introduces a very tight U-turn onto F Street and purposefully diverts traffic into the Capitol Hill Historic District. Busses exiting the station must turn east, with no provision for west-bound busses. Automobiles leaving the parking structure and PUDO activity follow a circuitous route if they wish to head west on H Street. In short, the proposed vehicular circulation is unworkable and creates new problems for the local road network that FRA does not attempt to mitigate. Interpretation and analysis of the report’s vehicular traffic conclusions is exceedingly difficult in part because the information is so scattered throughout the report and lacks actual numbers.

Excavation below the rail yard for concourses, retail space, and large waiting areas either side of the proposed H Street concourse is questioned. Spaces below-the-tracks would be far better utilized for vehicular functions (parking, taxi, PUDO) and with an east-west connection between 1st and 2nd St, NE utilizing the H Street tunnel area to facilitate both vehicular and pedestrian access. Greater reliance on the lightly used streets immediately west of Union Station (1st St., and the unit blocks of G St and G Place, NE) could reduce demand and improve vehicular circulation at other areas. Eliminating the proposed parking structure above the deck level opens the possibility for far better uses than a parking structure.

Integration with Historic Union Station

Preferred Alternative A-C proposes an east-west train hall (Concourse A, upper and lower) to replace the existing Claytor Concourse as the connector to the historic station. The DEIS is restrained on how Preferred Alternative A-C integrates into the historic station and areas now occupied by retail activities. Removal of the non-historic Claytor concourse and waiting area is appropriate. The proposed space (See Appendix A3, Figures 61- 68, pages 67-69) seems too vast and detached with little purpose, although the suggested possibility of an inhabited mezzanine structure could help. The proposed H Street Concourse comprises the main waiting areas and is linked to Concourse A by the 1st Street and Central Concourses. These areas are reminiscent of a similar concept at Penn Station in New York. The distance between H Street and Concourse A is about 700 feet (approximately two city blocks) and from the front doors of

the historic station the distance is about 1200 feet (three city blocks). The H Street Concourse waiting areas are a soulless space below a rail yard with no view to absorb the attention of waiting passengers; are 1000 feet+/- from the retail and architecturally interesting areas of the historic station; and are separated by the enormous, disengaged circulation spaces of the train hall. New waiting areas should be closer to the historic station, and incorporate views of rail and passenger activity.

Federal air rights development similar in scale to Burnham Place is not within the scope of the DEIS. Nevertheless, such development is anticipated and conceptual building masses are depicted. However, the appropriate height of both Burnham Place and any federal air rights should not be considered a settled matter. The Union Station North zone - the only place in the District that allows measurement from an artificial structure - opens the possibility for buildings significantly higher than any of the surrounding structures. This height threatens to diminish the District's iconic horizontal skyline. The impact of buildings rising above the skyline need to be understood not only in relation to Union Station, but also in a far broad urban context and image of the city.

Section 4(f) Comments

Chapter 6, Section 6.6.3 acknowledges that “the Capitol Hill Historic District may potentially experience an adverse effect under all Action Alternatives from an increase in peak-time traffic along 2nd Street NE and F Street NE as well as along some residential streets if congestion on H Street NE or Massachusetts Avenue prompts drivers to seek alternative routes to WUS through the neighborhood.” This section further concludes that any resulting traffic is not a “substantial impairment” and therefore “The Capitol Hill Historic District is not discussed further in this Draft Section 4(f) Evaluation.” (Page 6-16, Line 342-343) The Executive Summary discussion of Section 4(f) (Pages ES 62-63) does not even mention the potential adverse effect to the CHHD. Thus, the 4(f) evaluation conveniently concludes that an adverse effect is likely, but recommends no mitigation and evades addressing mitigation measures.

CHRS disagrees with this conclusion and notes that Preferred Alternative A-C directs traffic into the historic district by the proposed East Ramp U turn onto F Street, NE. This stands in direct contradiction to the statement that increased traffic in the historic district is the result of other drivers seeking “alternative routes” due to congestion. The Section 4(f) conclusion also fails to recognize the significant additional burden placed on Third St. to carry Union Station traffic from the new F Street U-turn to H Street and the H Street Bridge.

Missing from the 4(f) analysis is vehicular movement between the various pick-up and drop-off (PUDO) locations. In order to drop off a patron at one location and pick up a new patron at a different location, circulation around Union Station will be generated. Much of that circulation will be through the CHHD. This too stands in direct contradiction to the conclusion that increased traffic in the CHHD is not a direct result of Preferred Alternative A-C. While Section 4(f) ignores traffic diverted into the CHHD, the traffic analysis concludes that the intersection of

3rd and H St., NE (among others) will sink to level of service F because of the station expansion. Missing from both the Section 4(f) and traffic analysis, are actual traffic counts.

Table ES-2 “Passenger and Train Volumes by Service, All Action Alternatives” envisions total daily passengers on Amtrak, MARC, VRE and Intercity bus to more than double with any of the Action Alternatives (Executive Summary, Page ES-21). Additional traffic will also be generated by Burnham Place and any federal air rights development. Even at current passenger levels, the queue for taxis backs up onto nearby streets at both the front and rear of Union Station. Taxis as well as Uber and Lyft services routinely pick-up or drop off passengers near Union Station and return for additional passengers using either Third Street or North Capitol to circle between the front and rear of Union Station. This pattern of vehicular circulation will be multiplied by the increase in passenger volumes, the diversion of traffic onto F Street, NE, and movement between the various PUDO locations. This is a direct adverse impact to the Capitol Hill Historic District.

Conclusions

The report contains a staggering amount of information and is an ominous predictor of the problems ahead. Any recommendation arising from the WUS EIS must provide a compelling argument that the project warrants funding and is an worthwhile improvement. We do not believe the Preferred Alternative meets that requirement. The EIS and Section 106 Review have not focused on achieving the best possible outcome for all the WUSPs. The Union Station expansion projects - inclusive of Burnham Place, H Street Bridge and federal air rights development - must be understood in their entirety. We caution that a Programmatic Agreement resulting from a flawed EIS will result in diminished opportunities for problem solving, create a vehicular fiasco, and limit urban design objectives for federal and private air rights development.

Thank you,



Beth Purcell, President
Capitol Hill Restoration Society

cc: (via email)

Mayor Muriel Bowser, District of Columbia

Councilmember Charles Allen, Ward 6

Andrew Trueblood, Director, DC Office of Planning

David Maloney, State Historic Preservation Officer, DC Office of Planning

C. Andrew Lewis, DC Historic Preservation Specialist

Karen Wirt, Chair, ANC6C

Fredrick Lindstrom, Commission of Fine Arts

National Capital Planning Commission
Rob Nieweg, National Trust for Historic Preservation
Erik Hein, Exec. Director, NCSPO
Beverly Swaim-Staley, USRC
Kirby Vining, Chair, Committee of 100
David Tuchman, Akridge Development
Rebecca Miller, DC Preservation League