

The Committee of 100 on the Federal City



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Amanda Murphy
Environmental Protection Specialist
Federal Railroad Administration
1200 New Jersey Ave., SE
Washington, DC 20590

Dear Ms. Murphy:

The Committee appreciates the opportunity to comment on the preliminary concepts for the Union Station Environmental Impact Statement (USEIS). While we view the concepts as interesting and as a useful exercise to see what will fit on the footprint of property for which the Federal Railroad Administration (FRA) has jurisdiction, but we will be reserving judgment on the quality of these concepts until more information is available as to which concept better meets public goals. We will instead focus these comments on the need for more underlying information that is needed to drive the decisions on alternatives.

To that point, the Committee of 100 on the Federal City is concerned with how best to ensure that Union Station continues to serve first as a transportation hub for the City and Region, and secondly provides a positive anchor for community development in northeast Washington, DC. We have an overriding concern for the sensitive development of the area, so that the historic building is not impacted. Our concerns mirror the goals of Congress when they enacted PL. 97-125 in 1981. Congress' goals are stated today in 40 U.S.C. 112:

"SEC.112. The Secretary of Transportation shall provide for the rehabilitation and redevelopment of the Union Station complex primarily as a multiple-use transportation terminal serving the

Nation's Capital, and secondarily as a commercial complex, in accordance with the following goals:

- "(a) Preservation of the exterior facade and other historically and architecturally significant features of the Union Station building;
- "(b) Restoration and operation of a portion of the historic Union Station building as a rail passenger station, together with holding facilities for charter, transit, and intercity buses in the Union Station complex;
- "(c) Commercial development of the Union Station complex that will, to the extent possible, financially support the continued operation and maintenance of such complex; and
- "(d) Withdrawal by the Federal Government from any active role in the operation and management of the Union Station complex as soon as practical and at the least possible Federal expense consistent with the goals set forth in subsections (a) through (c) of this section.

The information presented at the October 19 meeting was vague and ambiguous in a number of areas, making it difficult to assess the concepts in light of clear Congressional goals. Following are our three primary concerns with the concepts, which will be the focus of our detailed comments:

1. The number of passenger rail tracks shown in the meeting exhibits were not vague, however, and clearly show fewer tracks than the current number, rather than more as proposed in the Union Station Master Plan (2012) to accommodate planned expansion of MARC, VRE, and Amtrak to 2040.
2. Little to no information was provided on access to the Metrorail station, increased auto traffic, and safe access for pedestrians, except for a very generalized Preliminary Screening chart. In answer to a question at the Meeting, the presenter said that WMATA buses would not be accommodated in the bus facility.
3. Given the lack of clarity about the transportation needs being met by the expansion, it is hard to evaluate the appropriateness of the proposed alignments of the new building masses (concourse, parking, train shed, bus zone, etc.) and their impacts not only on the historic station itself, but on its historic function as a train station.

It is not clear why the number of tracks would be reduced rather than increased, but accommodating three million square feet of development of the air rights is one such possibility. It could also occur for other reasons such as the changing placement of parking – a link between station and development functions. At the same time, the project sponsors have gone to great lengths to limit the scope of the EIS to on-site owner (FRA) interests and not to include consideration of the Burnham Place development in the EIS.

To maintain the position that development is not a driving factor in the USEIS, the sponsors must provide a clear and convincing rationale for decreasing the number of rail tracks serving the station and the growing north and south rail traffic. In terms of accommodating the other modes of access to the station, more information is needed before the public can understand how the concepts compare with each other and their individual impacts. There could be valid reasons not to accommodate all WMATA buses serving the station, but no information for excluding the major transit provider was presented.

The comments which are attached describe our concerns in detail.

Again, we appreciate the opportunity to meet and review the options and look forward to responses to these primary concerns. Please contact Monte Edwards at 202-543-3504 or Monte.Edwards@verizon.net or Sarah Campbell at 202-841-6272 or sccampbell@verizon.net if you have specific questions or other concerns.

Sincerely,



Nancy MacWood, President

Attachments (1):

Committee of 100 Comments

Cc: Councilmember Cheh

Director Dormsjo

Ms. Chamberlin, DDOT Project Manager

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