



Government of the District of Columbia

Advisory Neighborhood Commission 6C

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September 22, 2020

Mr. David Valenstein
Office of Railroad Policy and Development
USDOT Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Union Station Expansion Project Section 106 Comments

Dear Mr. Valenstein:

We are writing to provide Section 106 National Historic Preservation Act comments pertaining to the Washington Union Station expansion project Draft Environmental Impact Statement (DEIS). As you know, ANC 6C is strongly opposed to any expansion project proposal that includes a massive above-ground parking and bus structure. We are further concerned that the plans to date do not solve the circulation problems that currently plague access to Union Station even under today's conditions. While we believe more analysis is necessary, the DEIS's traffic analysis already demonstrates that traffic problems will worsen under all Action Alternatives. We thus disagree with the finding that the project will only "potentially" have an adverse effect on the Capitol Hill Historic District. We believe an adverse effect on the Capitol Hill Historic District is a certainty and must be addressed.¹

As you know, ANC 6C supports the overall goals of the expansion project. Improvements in the rail passenger experience at Washington Union Station are sorely needed. The station should be expanded to accommodate the increase in passenger rail travel expected, and desired, over the next 20 - 100 years. Nevertheless, one of the stated goals of the project is to "enhance integration with the adjacent neighborhoods, businesses, and planned land uses," and all of the Action Alternatives as laid out in the DEIS will fail to achieve this goal.

ANC 6C has made clear our view that a new above-ground parking garage should not be built. Such a structure is not needed and will preclude the development of vibrant urban placemaking. We have also raised our continuing concerns about circulation issues arising from plans for pick up and drop off and from inadequate connections with other modes of transportation such as walking, biking and public transit.²

¹ On September 9, 2020 at a regularly scheduled, duly noticed monthly meeting of ANC 6C, conducted on the WebEx platform, with a quorum of 6 out of 6 commissioners and the public present, the above-mentioned item came before us. The commissioners voted unanimously, 6:0:0, to send this letter to express our continued concerns regarding the Union Station Expansion Project.

² See, e.g., ANC 6C testimony of July 14, 2020.

These issues are themselves related to our concerns about the adverse effect the Action Alternatives will have upon the Capitol Hill Historic District and the historic Washington Union Station.

As we detailed in the analysis found in our March 20, 2020, letter to you and the executive director of the Union Station Redevelopment Corporation, the number of parking spaces should be justified and kept to a minimum. This will help minimize private vehicles traveling to the station and reduce the traffic congestion projected in the neighborhood. Likewise, intercity bus slips should be kept to a number that will ensure intercity buses remain a complementary transportation mode at the station and do not overwhelm the historic residential streets to the north and east.

The DEIS's Preferred Alternative A-C, however, provides for a 1600-car parking garage and allows for 40 bus slips in a two-level bus facility. Preferred Alternative A-C sends all intercity buses east on H Street NE, including buses bound for southern and western destinations, without clearly addressing how these buses will travel through the historic district. In addition, we are concerned that Preferred Alternative A-C sends automobiles down the proposed eastern ramp from the deck south of H Street on to F Street NE and the residential streets in the Capitol Hill Historic District. These concerns are in addition to the issue raised in the DEIS of automobile drivers prompted by traffic congestion seeking alternative routes to the station through these residential streets. We believe the seeking of alternative routes will certainly occur and have adverse effects.

Finally, ANC 6C considers historic Union Station to be one of the crown jewels of our area. We are concerned that the Section 106 analysis has found all Action Alternatives will have an adverse effect on the station, as well as on the station site and the nearby REA building. Although the DEIS repeatedly refers to the Visual Impact Zone and Daylight Access Zone on the deck south of H Street NE as one of the advantages of Preferred Alternative A-C, the DEIS also indicates that these zones are actually in the private air rights and are "not part of the project" but the project "would not preclude them." This treatment is insufficient. Raising the concept of these zones, to be created or maintained by another party, does not solve the historic preservation problem, or fulfill FRA's responsibilities, especially when Preferred Alternative A-C establishes a zone of revolving vehicles going through the same area.

ANC 6C thus urges the FRA to work in a constructive and creative manner prior to the issuance of a Final EIS with District of Columbia government officials, the owner of the private air rights, and other stakeholders to achieve an overarching vision and new preferred alternative for the Union Station project and the area as a whole that will truly meet the goals of the project and result in a world class transportation center that can be a model for the country and the world. We look forward to continuing to work with you to realize these important goals.

Thank you for giving great weight to the recommendations of ANC 6C.

On behalf of ANC 6C,



Karen Wirt
ANC 6C Chair

Cc: The Honorable Eleanor Holmes Norton
Mayor Muriel Bowser
Chairman Phil Mendelson
Council Member Charles Allen
Andrew Trueblood, OP
Jeff Marootian, DDOT
C. Andrew Lewis, SHPO
Johnette Davies, Amtrak
Marcel Acosta, NCPC
Beverley Swaim-Staley, USRC