



September 28, 2020

David Valenstein
 U.S. Department of Transportation
 Federal Railroad Administration
 Office of Railroad Policy and Development
 1200 New Jersey Avenue, SE
 Washington, DC 20590

RE: *Washington Union Station Expansion Project; Additional Comments on the Draft Assessment of Effects Report and Resolution of Adverse Effects*

Dear Mr. Valenstein:

Thank you for continuing to consult with the DC State Historic Preservation Office regarding the Washington Union Station Expansion Project and for hosting two additional consulting parties' meetings on September 2 and 22, 2020. The first meeting focused on the Draft Assessment of Effects (AOE) Report and the second on the resolution of adverse effects. This letter provides additional comments on each topic in accordance with Section 106 of the National Historic Preservation Act and other applicable laws.

ASSESSMENT OF EFFECTS:

As summarized in the table below, the AOE indicates that the Expansion Project Preferred Alternative A-C will adversely affect three historic properties within the Area of Potential Effect, specifically Washington Union Station, the Washington Union Station Historic Site and the Railway Express Agency (REA) Building. The Capitol Hill Historic District will also be potentially adversely affected. We generally concur with these determinations of effect with the following caveats.

Property	Type of Effect					Determination of Effect
	Physical	Visual	Noise	Vibration	Traffic	
Washington Union Station	✓	✓	✓	✓	✓	Adverse Effect
Washington Union Station Historic Site	✓	✓	✓	✓	✓	Adverse Effect
REA Building	✓	✓	✓	✓		Adverse Effect
Capitol Hill Historic District		✓	✓	✓	✓	Potential Adverse Effect

(Note: Adverse Effects are highlight in red)

Assessment of Effects on Washington Union Station

We agree that adverse visual effects will result due to the visibility of the Expansion Project (and the adjacent Private Air Rights development) from points south, but we also maintain that adverse visual effects will occur on views from the north. Although the northern aspect is not the station's primary



vantage point, it provides an important orienting view of the station's iconic main vault and is a historically significant, well-designed and highly symmetrical elevation that will become more visible and prominent because the Expansion Project will demolish the existing parking garage and establish a major new entrance along the H Street Bridge. Like any new construction project adjacent to a historic building, new additions should be designed to be compatible with their historic contexts in accordance with *Secretary of the Interior's Standards*, including *Standards No. 2 and No. 9* by "not destroying spatial relationships that characterize the property" and in terms of "being compatible with the historic materials, features, size, scale and proportion and massing to protect the integrity of the property and its environment."

As currently proposed, the Preferred Alternative will diminish the integrity of the historic station's design and setting and result in an adverse visual effect from the north because it does not guarantee an adequately sized and centered civic space along the Delaware Avenue axis to protect and frame views to the station's prominent main barrel vault and because the inadequate design gestures that are proposed to address this concern (i.e. the Visual Access and Daylight Access Zones) are too narrow and largely defined by a six-story parking garage and a bus facility which do not provide the civic character essential to achieve compatibility with the historic setting or respond appropriately to the urban design context. When compared to existing conditions, the additional height that could be allowed under the Preferred Alternative is likely to exacerbate these adverse effects.

As stated in our letter of May 17, 2019, we acknowledge that train-related sounds are associated with Union Station, but construction-related noises are not. More than a decade of immediately adjacent construction-related noise is very likely to diminish Union Station's integrity of feeling and association. While such noises may be somewhat muted within the station itself, they will be more perceptible in the building's immediate setting so we believe they should be identified as an adverse effect and closely monitored.

Although traffic congestion at Union Station is already problematic, we contend that the significant increases in traffic that the Expansion Project is projected to generate, either directly or indirectly, combined with the resulting, ever-increasing gridlock meet the criteria of adverse effect by introducing and intensifying visual, atmospheric and audible elements that will further diminish the historic station's integrity of setting, feeling and association. Some of the traffic-related adverse effects may be exacerbated by perpetuating the existing traffic "loop" that currently encircles the historic station rather than sensitively redirecting vehicles onto or below the new deck on the north, and by failing to establish a designated Pick-Up and Drop-Off (PUDO) facility that could lessen traffic effects on Columbus Plaza and other areas of the site.

Assessment of Effects on Washington Union Station Historic Site

The Preferred Alternative would cause the same effects on the WUS Historic Site as on Union Station but we find that additional adverse effects on the historic site would result from other Action Alternatives which propose above-grade parking garages north of the H Street Bridge (i.e. Alternatives C-East, C-West and D) because these facilities will further diminish the integrity of the Terminal Rail Yard's design, setting, feeling and association and interrupt important, character-defining views between the tracks, Union Station and the REA Building.

The additional noise caused by approximately eleven to fourteen years of new construction directly within the WUS Historic Site will also adversely affect the historic property. Noises from jackhammers, pile drivers, and related heavy construction equipment which are not associated with train operations will be audible to station users and rail commuters and will diminish the WUS Historic Site's integrity of feeling and association.

The Preferred Alternative A-C does not reflect the recommendations of multiple planning agencies and consulting parties that the planned number of parking spaces is excessive and does not reflect reasonable demand projections or sound transportation planning principles for a centrally located multimodal transit station. The bulk and location of the planned parking significantly exacerbates the potential for adverse effects on the station through an out-of-character parking garage looming as a backdrop for the historic architecture. It increases reliance on parking ramps fully exposed to view from the front of the station and expands vehicular intrusion into areas intended for pedestrians, even despite recent efforts to improve the amenity of the front plaza immediately adjacent to the Metro entrance.

Expanded reliance on these ramps perpetuates egregious damage to the architectural and historic integrity of the station caused by truncation of the historic train concourse and removal of its public entrances to the station forecourt. These building elements modulated the sculptural composition stepping down from the main vault, shielded utilitarian components of the complex from frontal view, defined pedestrian plazas, and promoted free-flowing customer access to the terminal through multiple entrances. Failure to pursue any amelioration of this disfiguring disruption undermines the purported support for restoring the architectural and historic character of the station. It also fails to recognize significant opportunities to improve station access from the east and enhance multi-modal facilities on the west, such as through expansion of the Metro station entrance and bicycle terminal facilities. In contrast, the claimed benefit of aligning new building elements along First Street as a kind of street wall is historically inappropriate and draws attention to the lack of a satisfactory resolution to this condition.

Assessment of Effects on REA Building

Construction-related noises also have potential to result in an adverse audible effect on the REA Building and should be monitored closely to determine whether they meet the criteria of adverse effect.

Assessment of Effects on Capitol Hill Historic District

The AOE states that the Expansion Project may result in a potential traffic-related adverse effect on the Capitol Hill Historic District. We understand FRA's assertion that insufficient data exists to make a final determination of effect at this point but the Capitol Hill Restoration Society and Advisory Neighborhood Commission 6C have strongly objected to the potential nature of this determination and asserted that the traffic study, which was the subject of discussion during a June 30, 2020 consulting parties meeting, provides sufficient information to determine that an adverse effect will occur. The likely decreases in levels of service on some neighborhood streets and intersections, the anticipated increased number of for-hire and ride share vehicles circulating in the area, and Preferred Alternative recommendations such as the "U-Turn" option from the East Ramp and the right-hand turn out of the bus facility, both of which direct traffic eastward towards the historic district, suggest that the adverse effect is much more probable than potential.

Prior to addressing the resolution of adverse effects, we note that the comments above focus primarily on the Preferred Alternative and are based upon information that has been provided to date. Our determinations of effect may need to be revised as we learn more about what is proposed and review more detailed information relating to the manner in which the Expansion Project will be implemented.

RESOLUTION OF ADVERSE EFFECTS:

Though not an exhaustive list, the following comments outline some of our primary recommendations for how the Preferred Alternative should be revised to avoid and/or significantly minimize as many adverse effects as possible. We are requesting FRA to incorporate these and other consulting party recommendations directly into a Revised Preferred Alternative in advance of, or as part of the Final Environmental Impact Statement, as appropriate, because we consider these revisions essential to respond appropriately to Union Station's significance. We also believe this approach will be more effective than relying upon a Programmatic Agreement if the current Preferred Alternative is adopted and options for meaningful revisions are precluded.

Resolution of Adverse Effects on Washington Union Station and the WUS Historic Site

Avoiding and minimizing adverse effects associated with the proposed new construction are among our top priorities – especially the lack of assurances that a civic space will be provided to protect and frame views to the north side of the historic station. We consider such a civic feature an essential component of a successful design solution for the historic and urban context and for the major new entry that FRA proposes.

With the exception of a small section on the southern end, however, the currently proposed Visual Access Zone (VAZ), which the Preferred Alternative suggests may achieve this important goal, is located almost entirely within the Private Air-Rights Development Area and the responsibility to construct the civic space will rest fully on the private developer. By contrast, we understand that FRA plans to provide daylighting features for the lower concourse within the related Daylight Access Zone (DAZ) despite the fact that it falls entirely within Private Air-Rights. If FRA can ensure that daylighting will be provided within private property, it seems reasonable that FRA can also ensure that civic space will be provided within the whole of the VAZ. Not precluding a private developer from establishing this critically important civic feature does not equate to ensuring that it will be constructed. To avoid the adverse effect, FRA should revise the Preferred Alternative in whatever ways are necessary to guarantee civic space will be integrated into the design.



On a related note, the AOE states that the VAZ "...may be centered on the historic station building." (emphasis added). An off-centered VAZ would significantly diminish the integrity of the historic station's design and setting by skewing views to the main barrel vault. This would defeat the purpose, as would a VAZ that is too narrow to provide meaningful views. To avoid these adverse effects, the VAZ must be centered on the historic station and wide enough to allow users to view as much of the barrel vault as possible. The most effective way to accomplish this appears to be to expand the VAZ into the

portion of the Federal Air Rights east of the currently proposed parking garage and bus facility so that it is centered on the historic station, includes the DAZ, and is wide enough to create the civic space that Union Station deserves.

Furthermore, the currently proposed VAZ/DAZ is going to be largely defined by a six-story parking garage that is not compatible with and does not contribute to the civic character which is so important for the new entrance. We once again request FRA to reduce the amount of parking and revise the Preferred Alternative to remove most or all parking from this area. Since a significantly reduced number of parking spaces could be more easily accommodated below grade than the excessive number FRA currently proposes, we also request FRA to include a below grade parking deck in the Preferred Alternative. While we appreciate that FRA hoped to minimize temporary, indirect adverse effects of a long construction period by eliminating underground parking from the Preferred Alternative, it is much more important to avoid the permanent, direct adverse effects that the above-grade parking garage would cause. In addition to improving civic character, removing parking from the main deck could provide many other benefits such as improving the pedestrian experience, reducing vehicular traffic in the civic space, providing more area for “people friendly” uses, introducing greater flexibility for improved urban design approaches and potentially reducing the height of new construction.

We support the proposed location of the bus facility, but buses do not contribute to civic character any more than parking garages and we remain concerned that the proposed forty bus slips exceed the twenty-five that FRA has identified as necessary. For this reason, we also requesting FRA to eliminate the unnecessary slips and promote better bus management practices to facilitate improved design options for the bus facility and its surroundings.

As referenced earlier, adverse effects on Union Station will also result from the visibility of the Expansion Project (and the adjacent Private Air Rights development) from points south. The intensity of these adverse effects will depend upon the height of new construction on either side of Union Station’s barrel vault and the extent to which incongruous asymmetry or a visually incompatible parking garage disrupts or competes with the historic character of the station. To minimize these adverse effects, we request FRA to work with appropriate entities to develop design guidelines that would apply to all new development, both public and private, north of Union Station. Such guidelines should also address approaches to avoid or minimize adverse interior effects that may result from interior circulation routes or building elements that are inconsistent with historic circulation patterns, predominant visual axes and other character-defining features.

The preferred alternative should also be revised to reflect parking facilities consistent with the recommendations of local and federal planning agencies. Below-grade parking options reflected in other Action Alternatives should be pursued, and the proposed vehicular circulation around the terminal should be revised to avoid and minimize the use of ramps and roads directly encircling the historic building. Alternative treatments of the historic train concourse should also be considered to restore its historic integrity, improve pedestrian access, and enhance intermodal transit facilities

Resolution of Adverse Effects on the Capitol Hill Historic District

We stress the importance of FRA committing to collecting traffic-related data and continuing to evaluate and implement alternative solutions that may avoid or substantially minimize traffic-related effects at both the station and the adjacent historic district.

Mr. David Valenstein

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As previously noted, the list of avoidance and minimization measures listed above is not exhaustive. There are many other adverse effects, including cumulative adverse effects, that will need to be thoroughly addressed through the development of a Programmatic Agreement. However, the recommendations we have cited focus on the avoidance and minimization measures that we consider most urgent at this time, and those that we believe should be addressed through a Revised Preferred Alternative in advance of a Programmatic Agreement. We will provide additional recommendations for avoidance, minimization and mitigation measures as consultation on the Programmatic Agreement continues.

Section 4(f) Evaluation:

The comments provided in this letter relate primarily to the Section 106 and NEPA reviews of the Expansion Project but as the “Official with Jurisdiction” (OWJ) for purposes of the related Section 4(f) review, we clarify that the references to favorable comments in our letters of March 30, 2018 and December 18, 2019 which are cited on pages 6-24 and 6-25 of the DEIS Draft Section 4(f) evaluation should not be taken to indicate that we agree the Expansion Project includes all possible planning to minimize harm to historic properties.

We look forward to continuing our consultation with FRA and all consulting parties toward achieving FRA’s transportation needs while also enhancing the historic character of one of the nation’s most admired historic rail terminals. If you should have any questions or comments regarding any of these matters, please contact me at andrew.lewis@dc.gov or 202-442-8841. Thank you for providing this additional opportunity to comment.

Sincerely,



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cc: Consulting Parties
16-0114