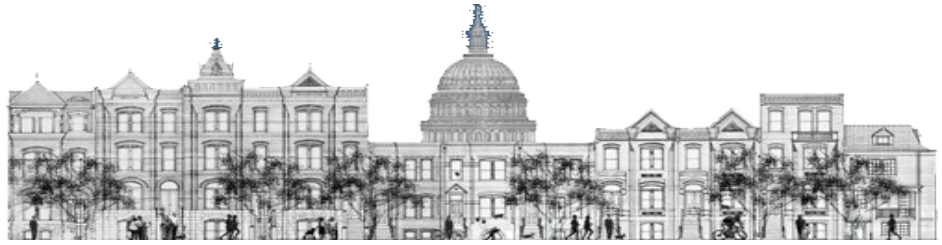


Capitol Hill
Restoration
Society



VIA E-MAIL

July 6, 2023

Amanda Murphy
Deputy Federal Preservation Officer
Office of Railroad Policy and Development
USDOT Federal Railroad Administration (MS-20)
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Washington Union Station Expansion Project:
Supplemental Draft Environmental Impact Statement (SDEIS)

Dear Ms. Murphy,

The Capitol Hill Restoration Society (CHRS) responded to the December 2022 Draft Final Supplemental Assessment of Effects to Historic Properties Report (SAOE) in a letter dated February 6, 2023. In that letter we took exception to the determination of “no adverse effect” to the Capitol Hill Historic District (CHHD).

We continue to believe there is a very high probability of adverse effects to this residential neighborhood by the Federal undertaking, especially regarding vehicular traffic at an expanded Union Station. ANC6C and the National Trust expressed similar concerns. It is critical to understand that the blocks immediately East of Union Station are overwhelmingly residential in nature. Excessive traffic degrades the quality of life of a residential neighborhood in a fundamentally different way than areas dominated by commercial and institutional uses.

The March 2023 SAOE retains a determination of “no adverse effect” to the CHHD despite the contrary assessment of several Consulting Parties. Section 2 “Description of the Preferred Alternative” (and Pages 17 - 21 in particular) describes vehicular circulation around the Station. Section 7.2 of the SAOE (Page

108-109) outlines the Avoidance, Minimization, and Mitigation Strategies. These sections acknowledge the high potential for an adverse effect to the CHHD due to induced traffic and some of the measures the Preferred Alternative proposes to minimize and mitigate these adverse effects.

Nevertheless, the SAOE on Page 21 concludes that “the Preferred Alternative would result in traffic conditions within the Capitol Hill Historic District that are very similar to those that would occur even if the Project was not constructed.” It is impossible to justify that assessment. In addition to the massive Federal and private air rights projects, the 2012 Washington Union Terminal Master Plan envisions a tripling of passengers at WUS (Appendix A, Page 17).

There is more than ample justification to warrant a determination of adverse effect to the Capitol Hill Historic District. We re-state our objection to a determination of “no adverse effect”. Lines 90 through 99 of the Draft Programmatic Agreement (PA) provide little assurance that neighborhood concerns will be given serious attention within a project of this magnitude.

We predict severe congestion along Second Street NE from the addition of a fourth PUDO activity. In the immediate area, PUDO activity for Kaiser Health, Logan School and Station House already have proved to be problematic. We also predict gridlock traffic conditions for the intersection of 3rd and H Streets, NE. At a minimum, the Project Sponsor should be required to engage real-time traffic management that employs GPS or similar navigation technology to direct traffic away from the residential neighborhood. The Programmatic Agreement promises to “coordinate” response to emerging traffic problems among the various involved agencies. However, there appears to be little commitment to traffic mitigation strategies, and no accountable party committed to take action to resolve potential congestion when it inevitably arises, both during and after construction.

We stress that Section 106 of the National Historic Preservation Act requires stakeholder consultation at all steps of the design process to mitigate adverse effects. The Programmatic Agreement needs to include a process for continued meaningful public oversight by interested parties, including the existing “Consulting Parties”. We support the concerns of the Committee of 100 on the Federal City regarding Section 106.

Finally, we wish to record once again our long-standing objection to restricting the EIS to the Federal undertaking with minimal attention to the H Street Bridge and the Federal and Akridge air rights projects. Had the Union Station project been designed as an integrated whole, a far more engaging project could have been

achieved for the estimated \$8.8 billion cost of the Federal portion alone. For example, restoring H Street to its pre-1970s location below the rail yard would open tremendous design opportunities; construction and cost savings; as well as restore the urban fabric harmed by the bridge approaches. However, this was never given serious consideration. We believe that the Preferred Alternative F cannot be fully implemented as outlined without clear enforceable coordination and commitments from all involved parties.

The placement of passenger waiting areas and related circulation below the rail yard is a sad counterpoint to the grand spaces of the historic station and runs counter to what has been done in numerous, modern European train stations. *It is also likely to be a more costly solution.* For the amount of money and effort required, we can and should do better.

Sincerely,



Angie Schmidt, President
Capitol Hill Restoration Society

cc: Charles Allen, Council Member, Ward 6
Andrew Lewis and David Maloney, DC Office of Historic Preservation
Sara Bronin, Advisory Council on Historic Preservation
Mark Eckenwiler, Chair, ANC6C
Eric Hein, Committee of 100 on the Federal City
Robert Nieweg, National Trust For Historic Preservation