

WASHINGTON
UNION STATION
STATION EXPANSION

Draft Environmental Impact Statement for Washington
Union Station Expansion Project

**Appendix A3f – Final
Concept Development and
Evaluation Report Appendix F:
*Partner Comments on Concepts***



U.S. Department of Transportation
Federal Railroad Administration

July 13, 2016

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Appendix F

Partner Comments on Concepts

July 13, 2016

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Introduction

Over the course of the concept development and evaluation process, several meetings and workshops were held to present draft concepts to the Partners. As described in the Concept Development Report, nearly 12 meetings helped to inform the design and planning process and identify design goals and objectives. The final three meetings were the forum to share the range of concepts for the programmatic elements:

- **Partner Workshop - April 12, 2016**

The design team presented Evaluation Criteria which was organized into prioritized program drivers and other planning considerations. Rail and bus are considered central drivers. The design team facilitated a sifting process by which the range of programmatic arrangements could be winnowed to fewer options and decisions for the Partners.

- **USRC, Amtrak, and FRA Workshop - April 26, 2016**

Following the Partner Workshop, another workshop with FRA, USRC, and Amtrak was conducted to review the evaluation criteria and sifting process by which a reasonable range of alternatives could be identified that would be appropriate for FRA's consideration and selection of alternatives for the EIS process.

- **Stakeholder Coordination Meeting - May 24, 2016**

This final meeting provided Akridge with the opportunity to comment on the range of concepts.

As a reaction to the content presented at these workshops and meetings, the Partners provided written feedback on several occasions, which has been included in this Appendix for FRA reference. This feedback includes five items of correspondence:

F.1 Akridge letter to FRA dated April 19, 2016, offering feedback on concepts presented at Partner Workshop #9)

F.2 USRC memorandum dated May 9, 2016 providing comments on the concepts presented at the USRC, Amtrak, and FRA Workshop.

F.3 Akridge letter to FRA dated June 1, 2016 (offering feedback on concepts presented the Stakeholder Coordination Meeting)

F.4 USRC memorandum to FRA dated June 28, 2016 providing a summary of the preferred comments as proposed in the Draft Concept Development Report.

F.5 Amtrak Draft Concept Comments email to FRA dated June 29, 2016 clarifying the Amtrak IID team's position on the initial, draft concepts as proposed in the Draft Concept Development Report.

This report is a summary of the Concept Development process and documents the concepts that were informed by a series of meetings, Partner Workshops, and a full range of technical analysis. However, not all the options and studies described within this report will advance into the next stage of design, for a variety of reasons. For example, the ABGT is no longer being considered as a project element. Please refer to the Executive Summary for a description of the current status of the ABGT options.

Technical Clarifications to Comments

The following preface provides technical clarifications to specific statements and queries provided in a series of letters issued in response to various workshops held with the Partners, as they may be relevant to reviewing the CDR.

F.1 Akridge letter to FRA dated April 19, 2016

I.1. BP ground floor uses (at the H Street level or “podium level”) are impossible to build. These include building lobbies, retail, and loading and parking entrances. The SEP indicates the potential for limited BP ground floor use. It is clear that ground floor use is compromised, but it is not necessarily impossible. Lobbies, retail and service access could be incorporated to some extent into the perimeter of the bus facility.

II. A bus facility in the southwest is a viable option
Based on the developing bus programming, the Bus Southwest no longer meets the required bus capacity. Refer to Section 4.4 of the CDR for additional issues with respect to capacity, circulation and other operational limits.

III.A. Buses on south – smaller facility
Based on the developing bus programming, a smaller facility would not meet the required bus capacity.

III.A.3. Congestion within the BP property road network, depending upon the extent of bus passenger pick-up and drop-off activities
There would be limited impact to the BP roadway network since the access ramp would be independent.

III.B. Buses north of Eye Street NE
The footprint of the proposed facility is around the south side of Eye Street. The ultimate N-S dimension will depend on the final bus program.

F.2 USRC memorandum dated May 9, 2016

General clarification: The memo states that there are seven (7) final concepts. However, based on further discussion with the Partners, the final concepts are as indicated in the final report.

From USRC Comments:

Above-ground parking on the north side of the site does not seem to meet the needs of the most prominent parking user, an Amtrak user, as the information is understood today. Refer to the latest parking section in the report for the parking number and station access. Access from H Street Concourse via First Street, Second Street and the center of the concourse would provide direct access for Amtrak passengers.

F.3 Akridge letter to FRA dated June 1, 2016

I.3) Incorporation of surface transportation components will require changes to the concepts
Refer to the CDR for surface transportation concerns, such as private vehicle and taxi pick-up and drop-off, streetcar and Metrobus access, and station parking access and loading. SEP will coordinate BP access in the next phase of design. The “development zones” are intended to include associated roadways to be developed at a later stage. Columbus Circle (the roadway) is considered for future use, and the potential usage is indicated in the report Section 1.4.

I.5) The North-South Train Hall as shown prevents sufficient opportunity for placemaking
The Train Hall design illustrated in the report does not indicate the actual geometry and configuration of train hall. Further, Appendix B: Supporting Urban Design and Open Space outlines the various opportunities for meaningful placemaking, one of which is an indoor grand civic space that occupies a large proportion of the site. Train hall design will be further developed in the next phase of design.

F.4 USRC memorandum to FRA dated June 28, 2016

No clarifications required

F.5 Amtrak Draft Concept Comments email to FRA dated June 29, 2016:

1. We support the bus terminal on the southwest and the north side of the project, however we do have some constructability concerns with the bus program on the north side. We hope that this will be clarified as we develop more feasibility information through the Terminal Infrastructure program.

2. We do not prefer the buses on the east side as we believe this will be a construction feasibility concern due to the complexities of tracks on the east side as well as the potential phasing of any development.

An overbuild program with buses on the southeast side does not present a more challenging condition for structural integration than privately developed buildings. The approach to the transfer structure would be similar in both cases. The same holds true for the southwest and north bus options. There is agreement that the geometry of structure could be more complex as a result, but this would be true of for any type of overbuild.

4. We prefer the north-south orientation of the train hall. In our view, this provides for a more prominent expansion of the station as having a landmark civic element expanding from the current station towards H Street. This will also provide, in our view, better daylighting and visual experiences from the tracks below to the train hall above. While the north-south orientation of the Train Hall does provide the opportunity to create a "landmark civic element" closer to H Street, the configuration provides daylighting to only some tracks in the middle, but not the entire area of tracks and platforms. Refer also to report sections that clarify impacts of an expanded bus program or above-grade parking on the extent of the N-S Train Hall.



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April 19, 2016

Mr. David Valenstein
Chief, Environmental and Planning Division
USDOT Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear David:

Thank you for the opportunity to provide comments regarding the Washington Union Station Expansion Project (the "Project"). As you are aware, Akridge is the owner of 14 acres of air rights (called "Burnham Place" or "BP" herein), immediately above and adjacent to the Project. We note that several of the Project concepts assume that our property rights are available for Project-related facilities. This letter describes Akridge's assessment of the potential impacts to Burnham Place of preliminary Project concepts developed by the Union Station Redevelopment Corporation (USRC) and Amtrak through the Master Development Plan consultant team led by Beyer Blinder Belle (the "MDP Team").

To assess the broad level impacts to Burnham Place of various Project concept elements, we ask three primary questions. How does the element impact...

1. *what buildings we can construct?* This assessment includes how much square footage, what types of building uses and in what configuration, and what quality of products we can create. That quality is substantially impacted (positively or negatively) by the visual impacts of station facilities, and by station elements generating vehicular traffic on BP property;
2. *what can be built adjacent to these buildings?* Primary concerns here include how pedestrians and vehicles will access our buildings from the surrounding streets and neighborhoods, what amount and quality of open spaces we can create, and where BP occupants can park; and
3. *when can each component of Burnham Place be built?* Based on previous studies, it is highly likely the east side of BP will be built prior to the west (the east being commonly referred to as "Phase 2") and therefore is of greater value. As a result, we consider the potential impacts of the Project on the proportion of BP which may be built during Phase 2.

In reviewing the preliminary Project concepts, we believe one program element in particular has the greatest potential adverse impact on Burnham Place: the location and sizes of bus facilities. While we are not unwilling in the future to consider some reasonable commercial agreement under which we would provide for the use of some BP property for a bus facility, any such use needs to be compatible with Akridge's ability to develop Burnham Place as a commercially viable project.

Applying the criteria above, and as discussed further below, unfortunately the proposed placement of a bus facility in the southeast portion of the BP property is fundamentally incompatible with our plans for Burnham Place. We will not transact for the property rights needed to create a bus facility in that location.

Below, we describe our assessment of the options now being considered for bus facilities including an explanation for why the southeast bus facility option is not feasible. We also set forth some recommendations to study additional options which may have less detrimental impacts to Burnham Place and may fulfill the Project's Purpose and Need.

I. A bus facility in the southeast renders Burnham Place infeasible

One option under consideration is to locate bus functions above the tracks, east of the existing garage in a north-south orientation (see Exhibit A-1: "Bus Terminal At Southeast"). This location is entirely inside of the property rights owned by Akridge. Applying our principle assessment criteria above, siting a bus facility in this location would effectively *eliminate* Burnham Place for the following reasons:

1. BP ground floor uses (at the H Street level or "podium level") are impossible to build. These include building lobbies, retail, and loading and parking entrances
2. Locating commercial or residential functions on top of buses *and* trains may not be marketable, and/or may not be acceptable from a security and threat vulnerability standpoint
3. Buses eliminate the ability to locate BP parking in a structural transfer truss below the H Street level
4. After accounting for one or two bus levels and a structural transfer truss above, the remaining available building height yields buildings of insufficient size to be marketable
5. There is no room adjacent to the bus facility to construct a road during Phase 2. Even if buildings could be built in this location, there would be no access to them
6. There is no ability to create any open spaces as part of Phase 2 south of H Street
7. Delivering sufficient building density and high-quality open spaces in this location during Phase 2 is a linchpin to the quality, character and vision of Burnham Place that are integral to its economic viability. These adverse effects in aggregate could create insurmountable obstacles to the commercial viability of developing the BP property north of H Street as well.

The BP design team has studied various sized bus facilities in this location, including those developed by the MDP Team and other potentially smaller facilities (narrower or single story). All of these facilities have the equivalent detrimental impact on Burnham Place. We therefore cannot agree under any conditions to provide the property that would be needed for such a facility at that location.

II. A bus facility in the southwest is a viable option

One option under consideration for the Project is to reconstruct a bus or a bus and station parking facility in a portion of the area currently occupied by the station garage. Depending upon this configuration, portions of the BP property along H Street NE may be required for a portion of or access to the facility. We agree with the MDP Team's assessment that this is a

viable concept and would be willing to further consider a potential transaction transferring the property rights that would be needed for this concept to be further assessed.

However, we disagree with the conclusion in Workshop 9 which labels this option as having “insufficient compatibility” because it would require a temporary plan to operate a bus facility while the new facility is being built (see Exhibit A-2: “Draft Concept Rankings Based on Evaluation Criteria”). We do not believe that the requirement for a temporary bus facility should disqualify any option or Project concept. Furthermore, we believe accommodating future bus facilities *inside* of the property currently controlled by the Project Proponents should be included in at least one alternative for the Project, if not all of the alternatives that will be considered in the EIS. To do otherwise suggests that in order to meet the Project’s Purpose and Need, all viable options require the use of private property to adequately accommodate bus service. We believe this conclusion would be unjustified.

Using strategies detailed within Section III.A. below, we recommend considering smaller bus facilities in the southwest location. We also recommend ‘wrapping’ above-podium vehicular uses with other uses to the greatest extent possible in order to avoid visual incompatibility with the historic station building, surrounding neighborhoods and BP.

III. Variations of some additional bus options studied by the MDP Team may be less detrimental to BP

The MDP Team has presented many additional configurations for bus facilities during Partner Workshops, the majority of which are located wholly or in part within BP property. It is difficult, if not impossible, to assess the potential impacts of all potential bus facility configurations located within BP, without a clear understanding of where and in what dimensions all major Project program components would be located. Nonetheless, we recommend that FRA explore the bus facility configurations listed below (see Exhibit B-1: “Smaller Bus Facilities at Locations Currently Under Consideration,” and Exhibit B-2: “Additional Bus Location Opportunity Areas”). Some of these configurations may yield solutions with a less detrimental impact on BP as well as fulfill the Project Purpose and Need.

A. Buses on south – smaller facility

Workshop 9 included a bus facility oriented east-west, integrated above Concourse A with a Train Hall expanded north of the concourse, as shown in Exhibit A-3 “Bus Terminal at South.” This concept also includes an approximately 600-foot long, 40-foot tall bus ramp within the eastern edge of Burnham Place. The primary impacts to BP of this configuration include:

1. Removal of buildable area and potentially service road access in the southeast portion of the BP property
2. Visual impacts to buildings located at the eastern and southern edges of the BP property
3. Congestion within the BP property road network, depending upon the extent of bus passenger pick-up and drop-off activities

Some of these impacts may be substantially decreased by exploring bus facilities in this location, which have a smaller physical or visual footprint (as shown in Exhibit B-1). This

change could be accomplished by one or more of the following adjustments to a facility *in this location*:

- Serve fewer total buses
- Serve fewer types of buses
- Minimize the inclusion of bus services which require significant passenger waiting and amenity spaces, private car, taxi and shared ride pick-up and drop-off
- Minimize the inclusion of long dwell-time or layover buses
- Explore different proportions of sawtooth versus head-in slips
- Explore different proportions of active versus layover spaces

Not only could a smaller facility in this location impact Burnham Place less adversely, but this option would also dramatically improve the rail concourse and Train Hall for passengers and visitors both inside and outside the station.

B. Buses north of Eye Street NE

Workshop 9 also included options to locate buses throughout the entirety or a portion of BP's property north of H Street, as shown on Exhibit A-4: "Bus Terminal at North." For similar reasons we describe regarding the southeast bus option, we believe Project concepts which utilize nearly the entire amount of BP property north of H Street call into question the viability of the entire BP project. We suggest that concepts which limit bus facilities to areas within BP property north of Eye Street may have a less detrimental impact, as noted on Exhibit B-1. In addition, regarding various northern bus concepts explored to date, we have found:

- Commercial and residential uses do not appear viable atop bus facilities in this area
- Station or BP parking could be vertically compatible with bus facilities (at a considerably lower cost than building equivalent parking below tracks)
- Bus and parking facilities should be 'wrapped' and visually screened by other uses to the greatest extent possible to prevent negative visual impacts to BP and the surrounding neighborhoods

IV. Exploring additional areas as part of the bus program solution

To date, the MDP Team has primarily focused its efforts on bus facility locations inside of Akridge or FRA property between the existing station and K Street NE. Given the broad array of bus types that may require accommodation in the future, we recommend that other locations be explored to serve one or more bus types, as shown on Exhibit B-2, and described below. These locations could fulfill some or all of the bus facility needs, depending upon many factors.

A. First Street NE between Massachusetts Avenue NE and G Street NE

DDOT has recently reconstructed First Street between Massachusetts Avenue and G Street, and this area will likely see additional reconfigurations in the future. WMATA has plans to reconstruct the Metrorail entrance and east side sidewalk in this location, and Amtrak has studied relocating the station's east loading dock as part of the Project to facilitate track and

platform reconstruction. This section of First Street also has some of the highest pedestrian volumes of any area surrounding the station.

In the future, portions of the First Street right-of-way, at or below grade, could be used to accommodate bus and/or taxi and shared ride services. If the east station loading dock is relocated, this block could be limited to buses, taxis, pedestrian and bicycles (or some subset of these modes).

Advantages of this location for bus functions include: proximity to Metrorail and the historic station; potential station connections at or below grade; and access via routes other than H Street NE, a street with many competing demands.

B. Union Station east garage ramp area

The area directly east of the station, controlled by FRA and USRC, is currently used (in part) as an access ramp to the existing parking garage. The MDP Team has studied opportunities for various vehicular uses at and below grade in this area for taxi and below-grade parking ramps as part of the Project. Amtrak has also contemplated a road north of this area to provide maintenance access to the First Street Tunnel.

With ingress from H Street and egress in front of the station or looped back to H Street, this area currently occupied by the garage ramp (and/or below it) could serve bus functions. Advantages to this location include: proximity to the historic station and Concourse A; potential station connections at or below grade; opportunity to consolidate other station vehicular functions; and a redistribution of station functions to the east, whereas the majority of functions now occur at the south or west.

C. Union Station Drive (lanes in front of the station)

As FRA contemplates and evaluates different options for future configurations of taxis, pick-up and drop-off and bus facilities in and around the station, it is likely that activities in front of the station will change. As part of this analysis, we recommend an evaluation of all of the vehicular activities in this area which may suggest different types or quantities of buses are best suited for this area, as part of the full package of bus facility options. This area has the obvious advantage of proximity to the historic station as well as access via routes other than H Street NE and an access pattern utilizing existing streets.

D. Properties west of First Street between G Street NE and K Street NE

While like Burnham Place, areas west of First Street are not part of the Project site area, properties in this area, at or below grade, could be conducive to a bus facility location. Properties in this area have close proximity to Metrorail, and in some cases the historic building; some of these properties have direct adjacency to the H Street NE right-of-way, which would provide useful access to other station functions studied by the MDP Team including below-track station parking; some potential facilities in this location could connect to North Capitol Street, a popular bus route to and from points north of the city; and a bus facility could be combined with station parking in this area at a fraction of the cost to build parking below tracks. We recommend study in this area as well, although we are not in a position to offer any views as to the availability of the property that would be needed in any of these locations for a bus facility.



V. Additional BP property rights needed for various concepts

Implicit within many Project concepts currently under consideration depicting various program elements (i.e., Train Hall, Taxi, Concourse, etc.), BP property rights are needed. These rights would be used for Project facilities, vehicular or pedestrian access to the station, or for view corridors. Within the framework of criteria and principles described at the outset of this letter regarding BP feasibility and compatibility, we would be willing to offer you further views on the feasibility of these concepts as we learn more.

Thank you once again for the opportunity to provide comments on behalf of Burnham Place regarding concepts currently under consideration for the Project. Please do not hesitate to contact me if further clarifications on any of the points or concepts in this letter can be helpful to the Project. We look forward to learning more in the future regarding Project concepts, as they progress.

Sincerely,

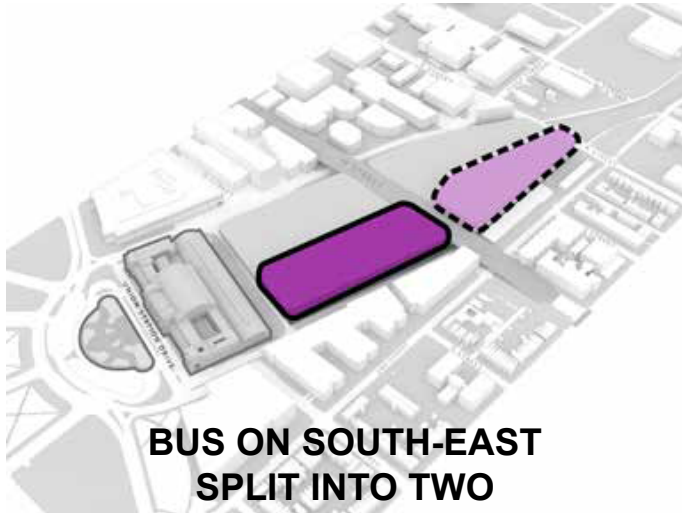
A handwritten signature in blue ink, appearing to read "David Tuchmann", is written over a horizontal line.

David Tuchmann
Vice President, Development

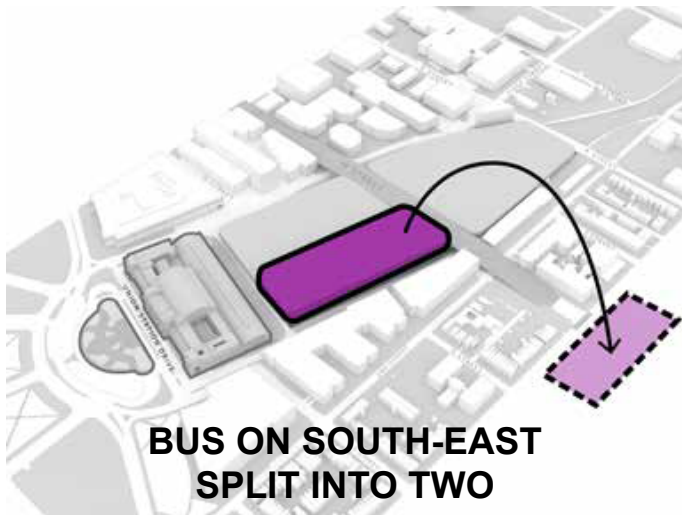
CC: Ms. Michelle Fishburne, Federal Railroad Administration (via E-mail)
Ms. Beverley Swaim-Staley, Union Station Redevelopment Corporation (via E-mail)
Ms. Lezlie Rupert, Union Station Redevelopment Corporation (via E-mail)
Mr. Stephen Gardner, Amtrak (via E-mail)

Attachment: Bus Option Exhibits

Exhibit A-1
Bus Terminal at Southeast



**BUS ON NORTH
FULL NORTH OF**



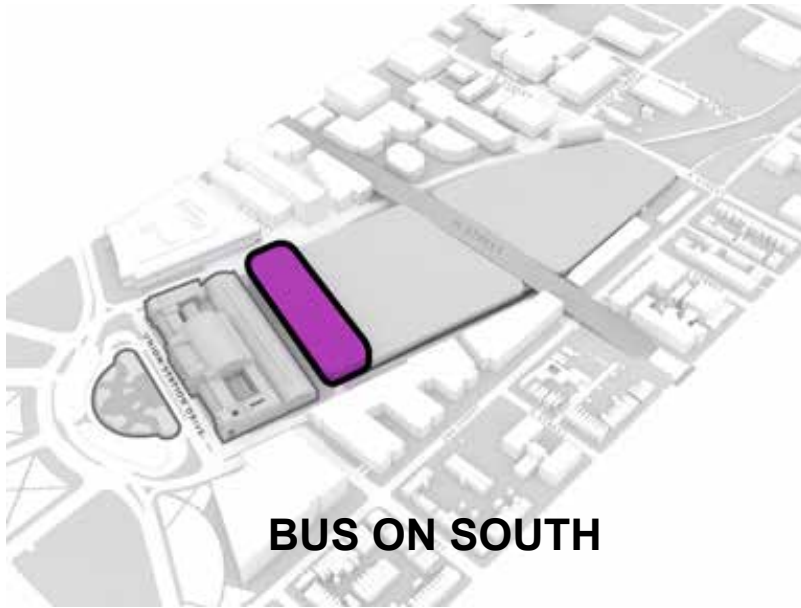
**BUS ON NORTH
PART OF NORTH O**

Source: Workshop 9, Part 1 Final Draft, April 12, 2016, Beyer Blinder Belle/Grimshaw Architects: Excerpted from page 21/73

Exhibit A-2
Draft Concept Rankings Based on Evaluation Criteria

SOUTHWEST - PARKING ABOVE	SOUTHEAST - PARKING ABOVE	SOUTHWEST - PARKING BELOW	SOUTHEAST - PARKING BELOW	SOUTH - PARKING BELOW	
Green	Green	Green	Green	Green	RAIL
Green	Green	Green	Green	Green	BUS
Green	Green	Green	Green	Green	PUBLIC PARKING
Green	Green	Green	Green	Green	HSR
Green	Green	Green	Green	Green	METRO
Green	Green	Green	Green	Green	STREETCAR
Green	Green	Green	Green	Green	TAXIS
Green	Green	Green	Green	Green	BICYCLES
Green	Green	Green	Green	Green	PROXIMITY OF TRANSFERS - INTERMODALITY
Green	Green	Green	Green	Green	WAYFINDING
Yellow	Yellow	Yellow	Yellow	Yellow	SPATIAL QUALITY
Yellow	Yellow	Yellow	Yellow	Yellow	DAYLIGHTING
Green	Green	Green	Green	Green	PASSENGER AMENITY
Yellow	Yellow	Yellow	Yellow	Yellow	VISITOR AMENITY
Yellow	Yellow	Yellow	Yellow	Yellow	NATIONAL CAPITAL FACTOR
Green	Green	Green	Green	Green	ENVIRONMENT / SUSTAINABILITY
Yellow	Yellow	Yellow	Yellow	Yellow	HERITAGE / HISTORIC FABRIC
Green	Green	Green	Green	Green	LINKAGES / ACCESS / WAYFINDING
Green	Green	Green	Green	Green	COMMUNITY / NEIGHBORHOOD
Yellow	Yellow	Yellow	Yellow	Yellow	OPEN SPACE
Yellow	Yellow	Yellow	Yellow	Yellow	SERVICES LOGISTICS
Yellow	Yellow	Yellow	Yellow	Yellow	DEVELOPMENT OPPORTUNITY - PLACEMAKING
Yellow	Yellow	Yellow	Yellow	Yellow	INSTITUTIONAL FEASIBILITY
Yellow	Yellow	Yellow	Yellow	Yellow	OFF SITE LAND ACQUISITION
Yellow	Yellow	Yellow	Yellow	Yellow	SAFETY & SECURITY
Red	Green	Red	Green	Yellow	IMPACT ON EXISTING OPERATION DURING CONSTRUCTION
Yellow	Yellow	Yellow	Yellow	Yellow	COMPLEXITY OF DEMOLITION
Yellow	Yellow	Yellow	Yellow	Yellow	COMPLEXITY OF NEW CONSTRUCTION
Yellow	Yellow	Yellow	Yellow	Yellow	COST
Yellow	Yellow	Yellow	Yellow	Yellow	CONSTRUCTION DURATION

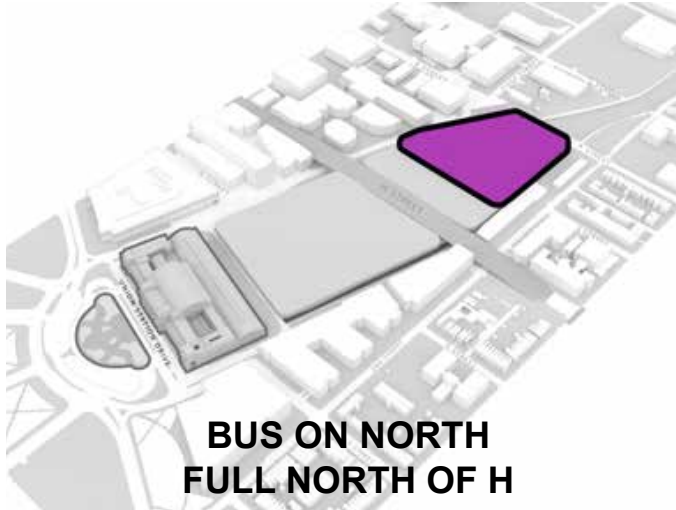
Exhibit A-3
Bus Terminal at South



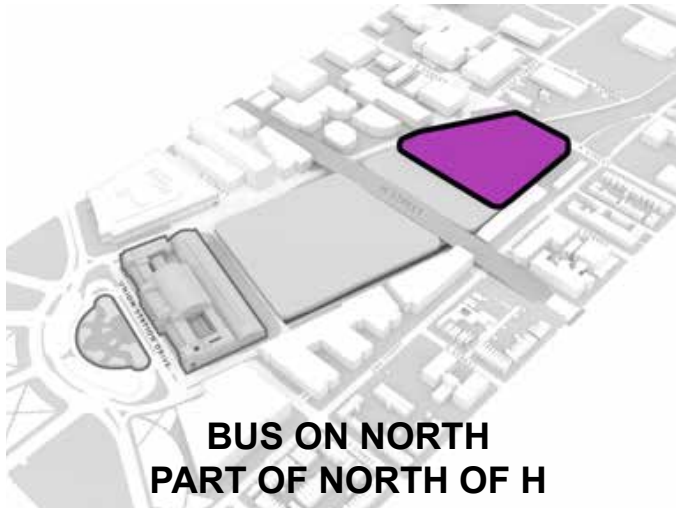
Source: Workshop 9, Part 1 Final Draft, April 12, 2016, Beyer Blinder Belle/Grimshaw Architects: Excerpted from page 21/73

**BUS ON SOUTH-WEST
NEW STRUCTURE**

Exhibit A-4
Bus Terminal at North



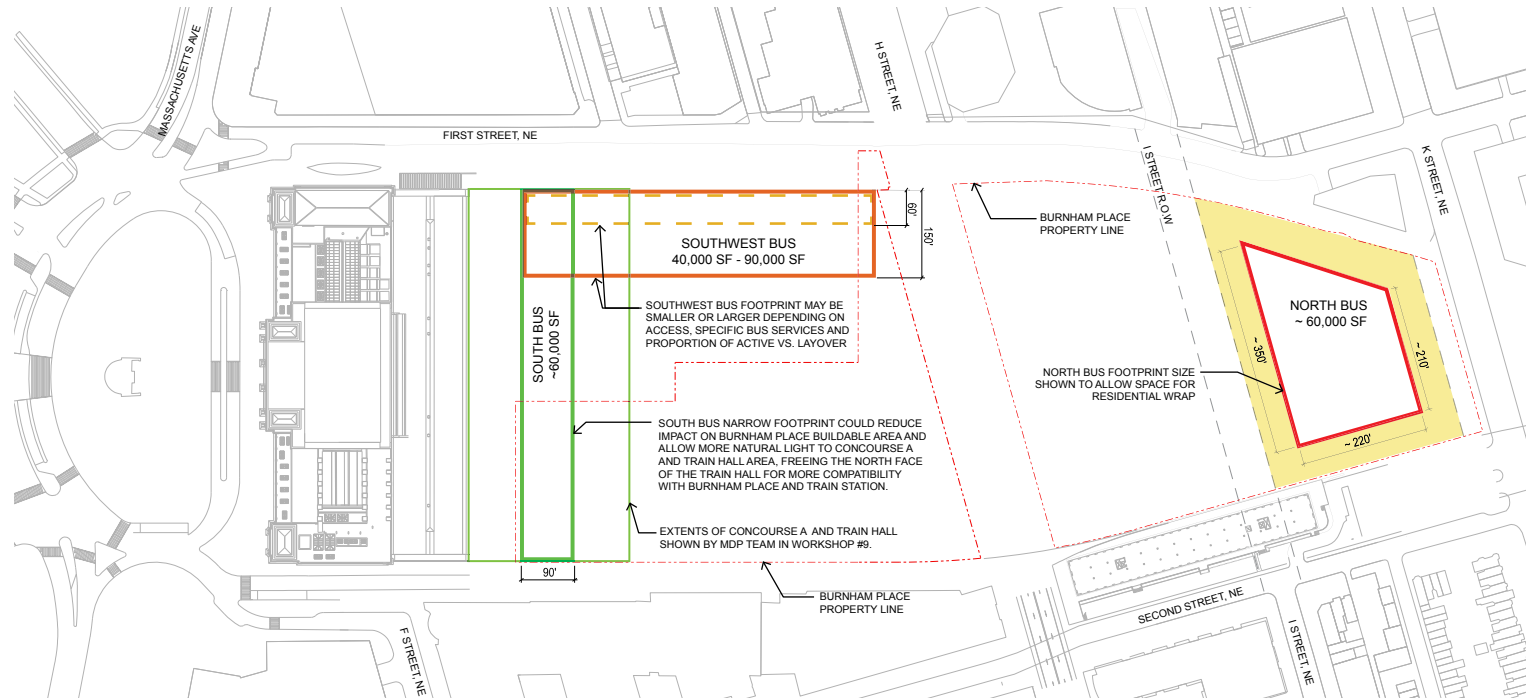
BUS ON SOUTH



**BUS ON SOUTH-WEST
NEW STRUCTURE**

Source: Workshop 9, Part 1 Final Draft, April 12, 2016, Beyer Blinder Belle/Grimshaw Architects: Excerpted from page 21/73

Exhibit B-1 Smaller Bus Facilities at Locations Currently Under Consideration



XP-07 Main Level-Opt 14 30x55 FOR BUS LOCATION OPTIONS.dgn 4/19/2016 3:55:47 PM SCALE 1:160

NOTE: DIMENSIONS INDICATED SHOW BUS FACILITIES WITH SMALLER FOOTPRINTS THAN THOSE CURRENTLY UNDER CONSIDERATION. THESE FACILITIES MAY HAVE LESS DETRIMENTAL IMPACT ON BURNHAM PLACE AND OTHER STATION FUNCTIONS.

LEGEND

POTENTIAL RESIDENTIAL WRAP

BURNHAM PLACE

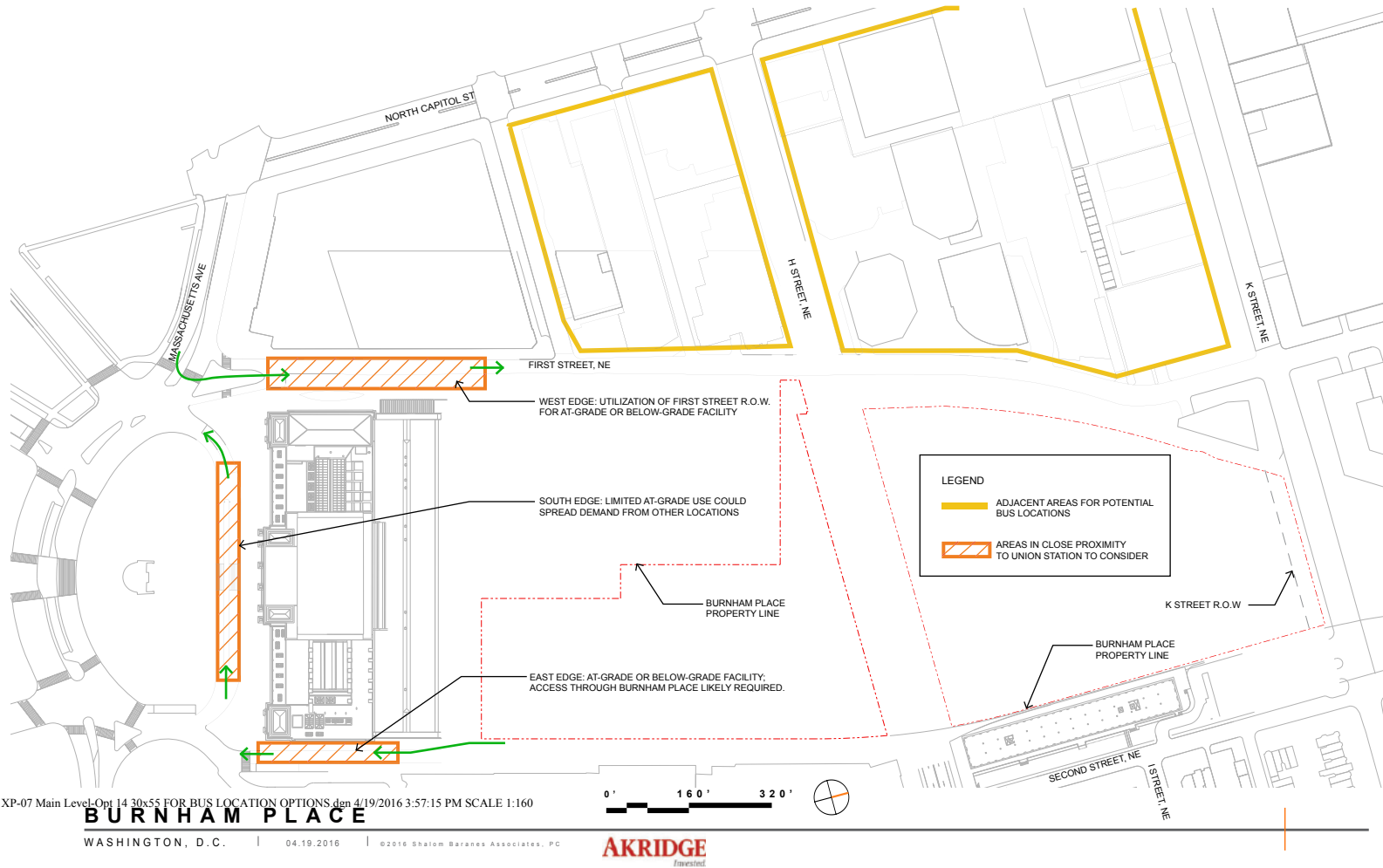
WASHINGTON, D.C. | 04.19.2016 | ©2016 Shalom Baranes Associates, PC



AKRIDGE
Investment

Source: Shalom Baranes Associates, April 19, 2016

Exhibit B-2
 Additional Bus Location Opportunity Areas



Source: Shalom Baranes Associates, April 19, 2016

MEMO

DATE: May 9, 2016
TO: Beverley Swaim-Staley
Nzinga Baker
Jessica McVary
Doug Harnsberger
FROM: Lezlie Rupert
RE: USRC Comments on Workshop 10 concepts for the Washington Union Station Expansion Project

This memorandum is to communicate Union Station Redevelopment Corporation's (USRC) comments on the concepts developed for the Washington Union Station Expansion Project.

The design team held a workshop (workshop 10) on April 26th, 2016 with the Federal Railroad Administration (FRA), USRC and Amtrak to update the federal lead agency and the project proponents on the concept development process for the Washington Union Station Expansion Project ("the Project"). At the end of the workshop, any comments on the concepts were requested by May 6, 2016. Lezlie Rupert sent a note to the participants stating such and also submitted additional information on all bus concepts created to-date that was not reviewed during workshop 10 (but referenced).

Public law 97-125 (December 29, 1981), the act creating USRC, Section 112 states that "the Secretary of Transportation shall provide for the 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 façade 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 of 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 language above is repeated in the *Sublease Agreement Between The United States Of America as Lessor and Union Station Redevelopment Corporation as Lessee, dated as of October 31, 1985* in Article 5. As such, it is important for all multi-modal functions that exist today at Union Station be available in a future redeveloped, expanded Union Station.

On May 2, 2016, USRC held an internal meeting attended by Beverley Swaim-Staley, Jessica McVary, Doug Harnsberger and Lezlie Rupert to discuss USRC's reactions to the concepts. Below is the feedback and direction from USRC that is to be offered to the design team as it moves toward creation of a concepts report.

The concepts report has the restriction of describing five (5) concepts. The concept report's contents is to meet FRA's needs and expectations which were defined in the Level of Design (LOD) memo dated April 5, 2016 and created between FRA and the consultant team during the refinement of the work plan and expectations for the EIS requirements. Additionally, the design team submitted a draft table of contents for the concept report to FRA, USRC and Amtrak on April 5, 2016. FRA will host a meeting with Akridge on May 24, 2016 to discuss the state of the concepts. The draft concept report will be submitted to FRA, USRC and Amtrak on June 14, 2016. The current schedule dictates any comments to be given by June 28, 2016, so that the final submission to FRA can be made July 12, 2016. FRA will consider the concepts and select the ones to be shared with stakeholders, cooperating agencies, consulting parties, the Community Communications Committee (CCC) and the public. The current schedule holds that the public meeting will be held in early September, so the various stakeholder meetings are likely to occur in late July and August.

USRC understands that the consultant team previewed 7 final concepts in the following grouping:

- Above-ground parking
 - Southwest bus facility location with a central train hall
 - Southeast bus facility location with a central train hall
 - East/west bus drop-off with north bus facility for layover with an east/west train hall
- Below-ground parking
 - Southwest bus facility with a central train hall
 - Southeast bus facility with a central train hall
 - East/west bus facility on top of the expanded concourse A with an east/west train hall
 - East/west bus drop-off with north bus facility for layovers with an east/west train hall

USRC further understands that the levels required for underground parking are dependent on the sizing and location of the Amtrak back-of-house needs, taxi queuing and loading space requirements (parking analysis document, dated 4/18/16). (USRC understands that Amtrak will update its assumptions and information for the size of its back-of-house needs in the Terminal Infrastructure Plan scope of work. To-date, Amtrak has directed the design team to base the sizing assumptions from the Concept Feasibility report (dated July 13, 2015 and a joint document between USRC, Amtrak and Akridge (the owner of the air rights over Amtrak's rail terminal) This information is forthcoming and is not known at this point in concept development.)

During workshop 10, additional data needs related to parking and bus requirements were identified to be completed prior to the submission of the concepts report. VHB (the sub-consultant lead for the EIS) asked USRC to request additional information from Union Station Parking Garage (USPG), to which USPG has agreed. Additionally, USRC understands that VHB has received information on the bus industry from the Northeast Corridor Future (NEC) team within FRA to help explain possible needs for a bus facility at Washington Union Station. The parking methodology will be updated as ridership forecasts are better understood.

USRC Comments to Workshop 10 materials:

- USRC has maintained throughout the life of this project that Washington Union Station is a multi-modal transportation hub and that retaining all of the existing modes at the future station is important.
- The additional information regarding bus needs must be shared with FRA, USRC and Amtrak to understand which bus configuration could work best for the site and meet the needs.
- Above-ground parking on the north side of the site does not seem to meet the needs of the most prominent parking user, an Amtrak user, as the information is understood today.
- USRC advocates merging two of the concepts to maintain the central concourse with an a / b design option for a bus facility on the southwest or southeast dependent on which design option best meets the needs for the project.
- Concepts could be arranged as follows:
 - o Concept 1: Above-ground parking:
 - Central Train Hall Option 1: Southwest Bus Facility
 - Central Train Hall Option 2: Southeast Bus Facility
 - o Concept 2: Below-ground parking
 - Central Train Hall Option 1: Southwest Bus Facility
 - Central Train Hall Option 2: Southeast Bus Facility
 - o Concept 3: Below-ground Parking
 - East/West Train Hall with pick-up/drop-off bus facility south of H and bus layover facility north of H

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601 Thirteenth Street, NW, Suite 300 North, Washington, DC 20005
T 202.638.3000 Akridge.com

June 1, 2016

Mr. David Valenstein
Senior Advisor
USDOT Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear David:

The following letter represents Akridge's response to the concepts presented at the "Stakeholder Coordination Meeting" of May 24, 2016. In general, we believe many Station Expansion Project (the "SEP") concepts presented diagrammatically could allow for a successful realization of Burnham Place. In order to achieve this outcome, Akridge believes that continued coordination will be required between our two projects. The two project teams will particularly require coordination for elements where the SEP and Burnham Place intersect: pedestrian and surface transportation access and circulation; and technical engineering specialties such as structural, mechanical and civil engineering.

Below and attached, we provide:

- I. Overarching comments regarding the concepts presented
- II. Recommendations for adjustments and clarifications to the concept diagrams
- III. Discussion of the coordination process moving forward

I. Overarching Comments Regarding Programmatic Concepts

As we have shared in previous communications, we apply consistent criteria to assess the impacts to Burnham Place of proposed SEP concepts: development potential (the quality and quantity of what we can build); adjacencies (site access, circulation and place-making opportunities); and project feasibility (phasing, constructability, costs, and timing). Accordingly, we have the following five comments regarding the nine SEP concepts:

1) A bus facility in the southeast is incompatible with Burnham Place

The two concepts which include a bus facility in the southeast section of the project on Burnham Place property eliminate our ability to feasibly develop Burnham Place. Please see our April 9, 2016 letter regarding this topic. For this reason, we do not provide further comments here to concepts which show buses located in this area.

2) Alternative sizes for the bus facility should be considered within the concepts

All concepts include what the SEP consultant team characterizes as the "maximum-sized" bus facility. Maximum-sized bus facilities constrain and negatively impact the quality of the SEP and of Burnham Place. In order to not present the public with a false premise, (to include a bus facility in the SEP requires including a maximum-sized facility) we believe it is critical to show as sub-options or additional concepts, small- and medium-sized bus facilities. This addition would allow comparisons of

impacts between alternatively-sized bus programs. Shown at the maximum size, the bus facilities in all configurations are highly detrimental to Burnham Place. Impacts include visual, noise, traffic, opportunity cost of space, and detracting from place-making. All of these impacts directly lead to a reduction in the quality and value of Burnham Place.

3) Incorporation of surface transportation components will require changes to the concepts

The significant surface transportation components required to serve the station and Burnham Place have not yet been considered in the concepts sufficiently to demonstrate feasibility. Private vehicle and taxi pick-up and drop-off, streetcar and Metrobus access, station and Burnham Place parking access and loading, and other surface transportation modes are not yet represented, located or sized. As a result, it is possible that significant additional impacts on, and use of, Burnham Place property could be required to serve these functions. Following adequate analysis, the "Development Zones" shown could shrink considerably. In addition, the surrounding road network outside of the SEP and Burnham Place may not be able to accommodate some of the concepts as proposed.

Future vehicular uses at grade within Columbus Circle have not been indicated, yet many concepts indicate duplication or replacement of current Columbus Circle functions within Burnham Place. An over-sized vehicular zone with buses, taxis, and private vehicles at the scale of what currently exists south of the station will not allow for the kind of high-quality and complementary place-making that will be required for Burnham Place and the SEP.

We recommend that as part of concept screening, FRA analyze surface transportation components sufficiently to identify distinctions among concepts and demonstrate feasibility.

4) Outside of FRA and Amtrak property, Burnham Place is the only property indicated for station functions in the concepts

Every SEP concept indicates the use of a substantial portion of Burnham Place property for station functions. This includes those concepts with a bus terminal on the southwest which have a train hall partially over a central concourse below BP property. It is highly unlikely that there are no additional properties in close proximity to Union Station which could also effectively accommodate SEP functions. Is it reasonable that only Akridge's property be considered for station functions outside of the SEP footprint? We recommend that other properties be considered for such uses, particularly vehicular and back-of-house functions, so that the impacts of these options can be compared to those of the current options. Please see our April 9, 2016 letter for further elaboration.

5) The North-South Train Hall as shown prevents sufficient opportunity for place-making

Akridge believes that both an east-west or north-south train hall can be compatible with Burnham Place, and allow for the high-quality place-making which is demanded

of both projects. However, the shape, location, and character of the north-south train hall shown in the concepts is detrimental to the SEP and Burnham Place. To provide sufficient open space, east-west pedestrian and vehicular circulation and development potential, a north-south train hall must have greater permeability, rather than serve as a visual and physical barrier. Previous studies by the SEP team explored north-south train halls with the following features: retail-programmed edges, substantial natural lighting, folded, elevated ground planes with clerestory day-lighting to below, and areas for pedestrians and vehicles to traverse across.

While the specific nature and character of a train hall will be determined later during the concept and alternative refinement process, initial concept images will determine public perception of the proposed character of a train hall. We recommend rather than show a repetitive, extremely long, unbroken, all-glass structure, more flexible imagery or icons be incorporated which could allow for the combination of uses described above.

II. Recommended Adjustments to Programmatic Concept Diagrams

Nine different concept configurations were presented within the “Final Range of Programmatic Concepts.” Attached are images with suggested adjustments to seven of those diagrams (options with buses in the southeast are omitted). These suggestions are intended to more accurately reflect the nature of the SEP or adjacent development, and to preserve future flexibility within each concept framework. Suggested changes are noted on each diagram, and the majority of suggestions repeat on subsequent diagrams.

Below we include explanations for each of these suggestions

A. Re-label “Development Zones” as “Development/Road Network Zones”

As the SEP consultant team described during the May 24th meeting, the zones indicated on the diagrams were inclusive of buildings, road networks and open spaces. Changing the label will more accurately reflect the elements to be contained inside the zones, and that future concept refinement will define these items.

B. Extend Development/Road Network Zones to the edges of the SEP and Burnham Place properties

As depicted, these zones fall far short of the property boundaries leaving acres of space which are unaccounted for. Along with the recommended change in Item A above, this adjustment will more accurately show how podium level space could be used within a given concept.

C. Extend Development/Road Network Zones to the west in Bus on Southwest concepts

Similar to Item B, this change will show that roads and open spaces can be located north and south of the train hall.

D. Add Development/Road Network Zone between Concourse A and bus drop-off area

As drawn in several concepts, the bus drop-off zone is directly adjacent to Concourse A with development constrained to north of the drop-off area. We believe this configuration to be detrimental to high-quality place-making for both Burnham Place and the SEP. By providing opportunities for open space and building development adjacent to Concourse A, the two projects will be much more complementary, and vehicular uses less likely to overwhelm both. Depicting the zones in this way will leave open greater opportunities for flexibility in design refinements later.

E. For “Bus on North” concepts with parking above, clarify that this above-podium garage could also be integrated with development

As shown, two concepts indicate a massive bus and parking garage with no development screening it. Labeling this garage to include integrated development can show the potential for buildings wrapped around or open spaces atop the garage—two critical features which greatly increase the feasibility of this concept from an architectural and place-making perspective.

F. General notes applicable to all diagrams

- i. As noted previously, a range of bus facility sizes should be incorporated and noted within the concepts
- ii. A linear park along the west side of the project is shown in all concepts. It is the only green area shown and is not labeled. For clarity, it seems appropriate to label this area as “Greenway” or “Linear Park” if such a feature is proposed as part of all concepts
- iii. All east-west train hall concepts could be construed as having no train hall, but rather just a very large concourse. Perhaps all train halls could be labeled in the concepts, including those running east-west with notes such as “Train Hall including Concourse A and Bus Terminal.” Otherwise, the east-west train hall concepts appear inferior as they are ‘missing’ a component shown in the north-south train hall concepts.

The May 24th presentation included a substantial amount of additional material beyond the nine Programmatic Concepts including floor plans and building sections, which were much more precise in their depiction of various project elements. It is our understanding that these detailed drawings are for study purposes only, do not represent specific proposals at this time, and will not be presented to the public in their current format. Since we assume these drawings will change during the upcoming concept refinements, we do not comment on them specifically here. If our assumptions are inaccurate, we would appreciate your advising us accordingly.

III. Coordination Between the SEP and Burnham Place Moving Forward

Based on our meeting with you on the 24th, we understand that the concept refinement phase beginning this fall will allow time to undertake design studies and modifications of the preliminary concepts presented, and that the FRA will coordinate with the Burnham Place team during this process. We would like to re-state the importance of such coordination in order to prove out the feasibility of both of our projects. Without further coordination

regarding the intersections between our two projects, the SEP cannot be understood or evaluated by affected parties, including Akridge.

Principal among these coordination areas is surface transportation access and circulation to both projects. To demonstrate how this upcoming coordination process can lead to effective deliverables, we are attaching a second set of diagrams which our team produced late last year as part of a workshop with the SEP team. We include two diagrams (Sheets B-1 and B-2): one with a north-south train hall, and one with an east-west train hall. These diagrams show buses located on the north and south respectively.¹ These site plans use the format of the SEP concept diagrams to show examples of how Development/Road Network Zones can be developed and integrated with the key station project components at the podium level. We look forward to working with FRA and the SEP team to develop these project components which are essential to each of our projects.

Even before this refinement stage occurs, we believe there are several essential areas of technical coordination between the teams which should continue, as they have over the previous months. These areas concern topics which are universally applicable to all potential SEP concepts (except for a No Action alternative). Further, these subjects all directly impact the concepts under consideration and their feasibility. We propose that the MDP, TI and BP design and engineering teams meet at FRA's offices to further develop concepts and solutions related to the following areas (with input welcomed from all other teams regarding subject matter):

1. Structural Engineering

- a. Column grid and structural system options for various use configurations. Includes grid and structural system at concourse level, track level, BP parking, BP podium level and above. Conditions include east side and west side tracks as well as H Street concourse and frontage area. Coordination is necessary to determine feasibility for where development zones can occur in relation to below-track programming. Coordination will also determine where and how many parking spaces for private development are feasible for use in impact analyses.
- b. Each configuration includes discussion of clearance requirements and elevations at each level of the two projects.
- c. Rail yard level specific considerations: structure around elevators and escalators; allowance for elevator over-rides and pits (incl. coordination for mechanical ducts); and column landing zones in special condition areas. Resolving these issues will allow further advancement of the track layout with lower chances of re-visiting and re-designing important infrastructure elements in the future.

2. Mechanical, Electrical and Plumbing Engineering (MEP)

- a. South of H Street fan plant and vertical shaft locations. Further discussion is required regarding strategies for accommodation of requirements through BP property. Has impact on feasible building and roadway locations.

¹ See Appendix under separate attachment for the full presentation from which these diagrams are excerpted.

- b. SEP team north of K Street concept for station MEP facilities. Further understanding of this strategy and any alternatives are necessary to prove out feasibility (secondary issue – can wait until later refinement).
- c. Strategies for noise and vibration mitigation related to MEP equipment throughout the SEP (secondary issue – can wait until later refinement).

3. Stormwater Management

- a. Develop and document baseline strategies and assumptions for compliance including associated space requirements. Engage DC DOEE to share strategies. Has impact on below-track program and chase requirements through the rail yard.

4. Vertical Circulation Elements (VCEs)

- a. Refine potential vertical connection locations, where they pass through rail platform level (including at Concourse A, H Street, NoMa, Greenway/First Street Concourse, etc.) for impacts and coordination with track layout.

5. Rail Yard Edge Conditions

- a. Continue discussions regarding structural, MEP and VCE conditions at the edges or other special areas of the projects as noted on May 24th.
- b. Develop working assumption for construction offset distances from WMATA right-of way. Has material impact on width of rail yard and edge of air rights construction.

Thank you for the continued opportunity to work with your team and facilitate opportunities to solicit our feedback regarding the SEP. We remain dedicated to coordinating with the SEP team to allow each project to be as mutually beneficial as possible. We look forward to hearing from you regarding these our next opportunity for stakeholder coordination per the requests above, and remain available to clarify any comments in this letter.

Sincerely,



David Tuchmann
Vice President, Development

CC: Ms. Beverley Swaim-Staley, Union Station Redevelopment Corporation (via E-mail)
Ms. Lezlie Rupert, Union Station Redevelopment Corporation (via E-mail)
Ms. Janet Campbell-Lorenc, Amtrak (via E-mail)
Ms. Gretchen Kostura, Amtrak (via E-mail)
Mr. David Zaidain, Amtrak (via E-mail)

Attachments: Proposed Diagrammatic Adjustments and Clarifications
Compatibility of Burnham Place with Proposed Station Expansion Concepts
Appendix: BP Team Workshop Presentation – November 5, 2015

B U R N H A M P L A C E

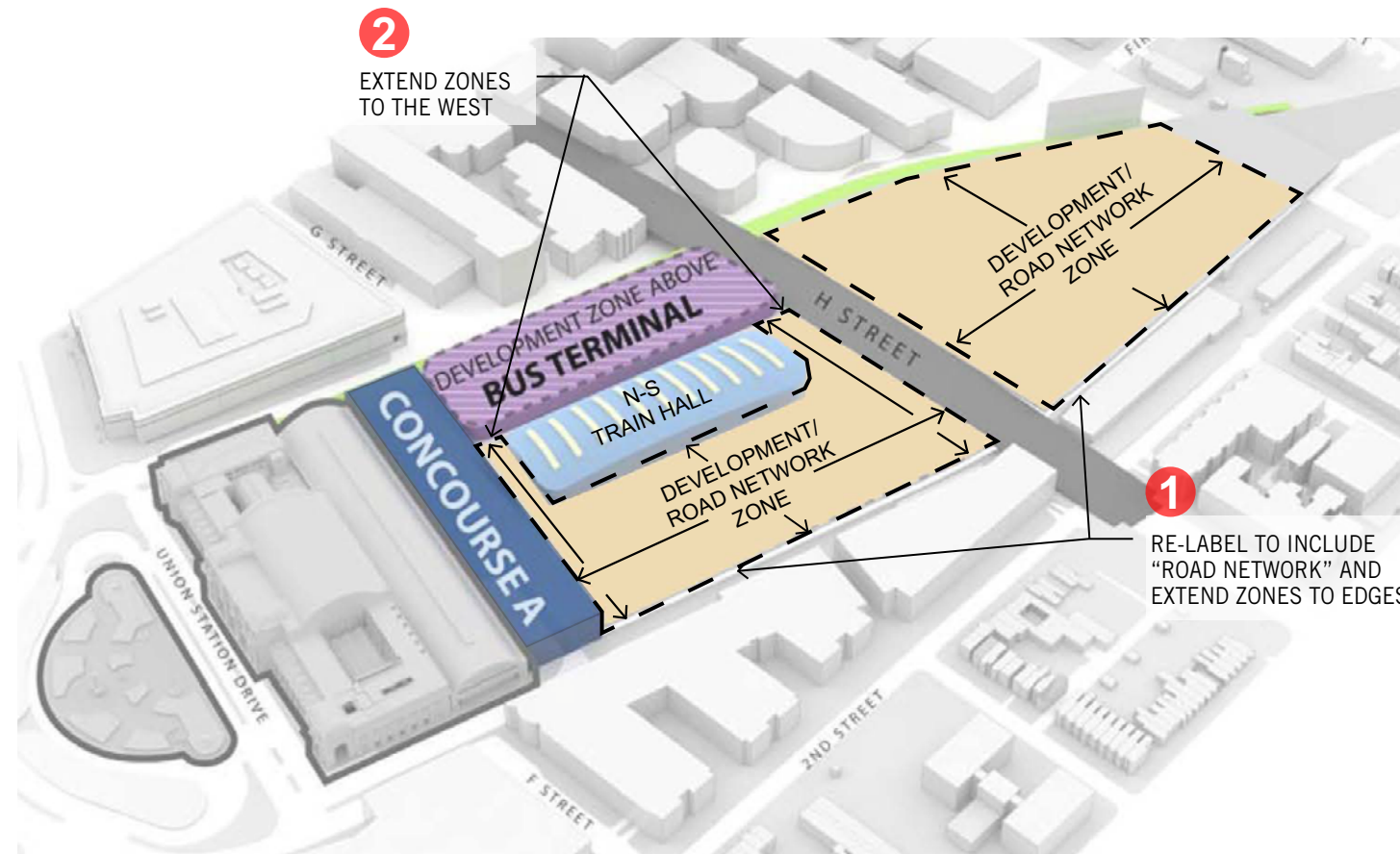
**Comments to Station Expansion Project
Final Range of Programmatic Concepts**

**Proposed Diagrammatic Adjustments
and Clarifications**

June 01, 2016



PARKING BELOW, BUS ON SOUTH-WEST NEW STRUCTURE, N-S TRAIN HALL BY SEP TEAM FROM "STAKEHOLDER COORDINATION MEETING" - 05/24/2016



PROPOSED DIAGRAMMATIC ADJUSTMENTS AND CLARIFICATIONS

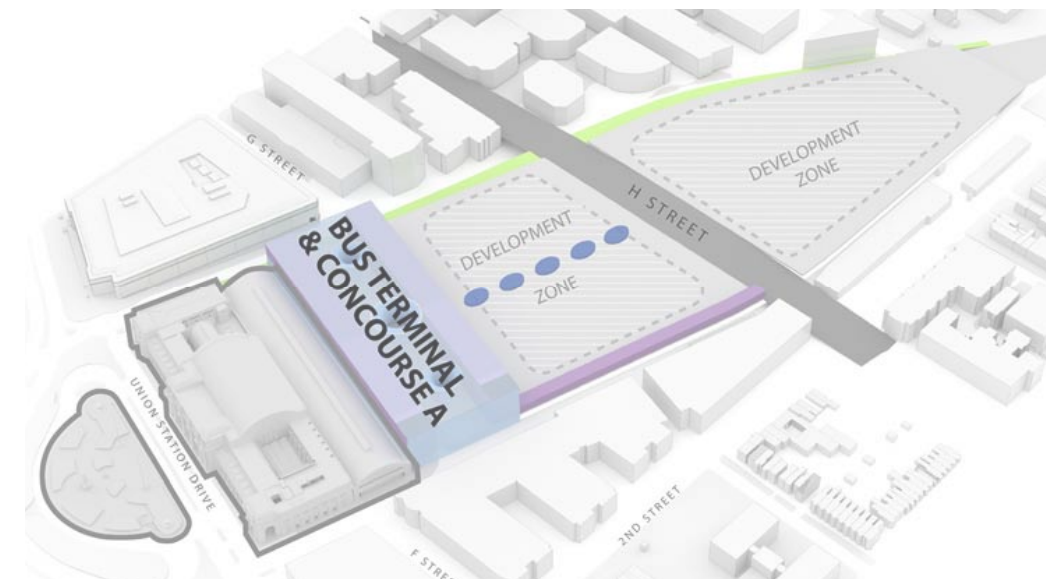
BURNHAM PLACE

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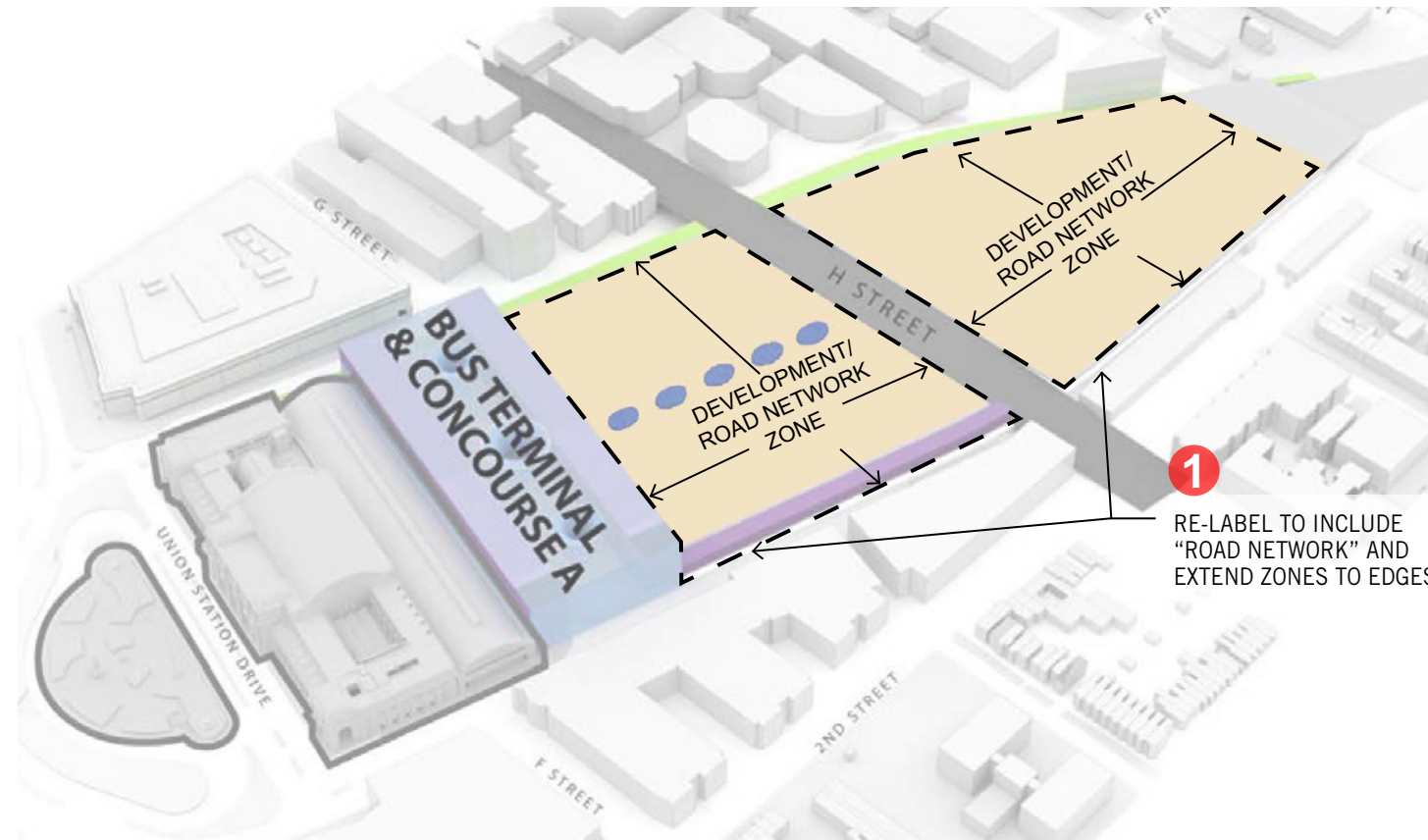


BUS ON SOUTH-WEST NEW STRUCTURE

A-2



PARKING BELOW, BUS ON SOUTH, E-W TRAIN HALL
 BY SEP TEAM FROM "STAKEHOLDER COORDINATION MEETING" - 05/24/2016



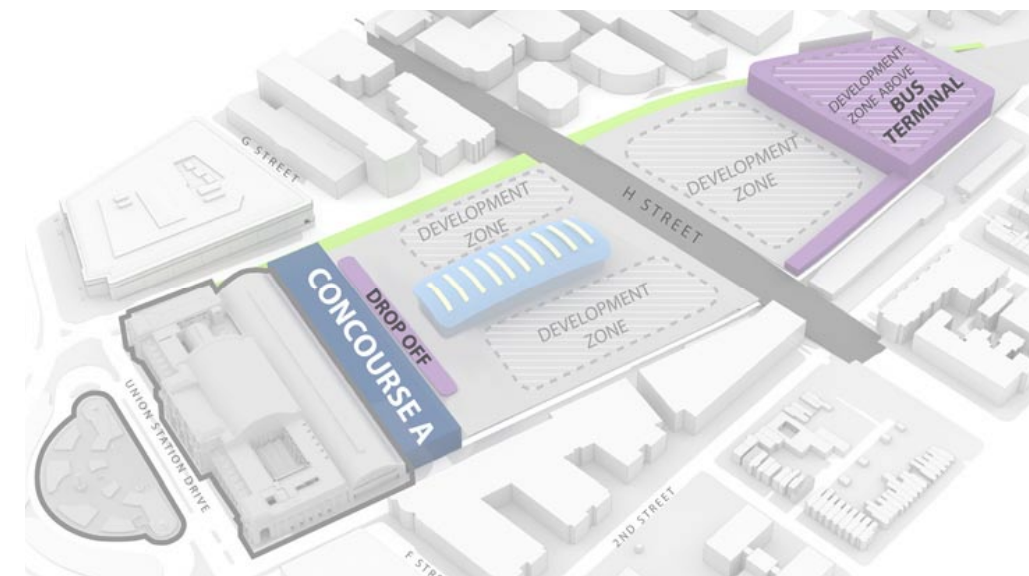
RE-LABEL TO INCLUDE
 "ROAD NETWORK" AND
 EXTEND ZONES TO EDGES

PROPOSED DIAGRAMMATIC ADJUSTMENTS AND CLARIFICATIONS

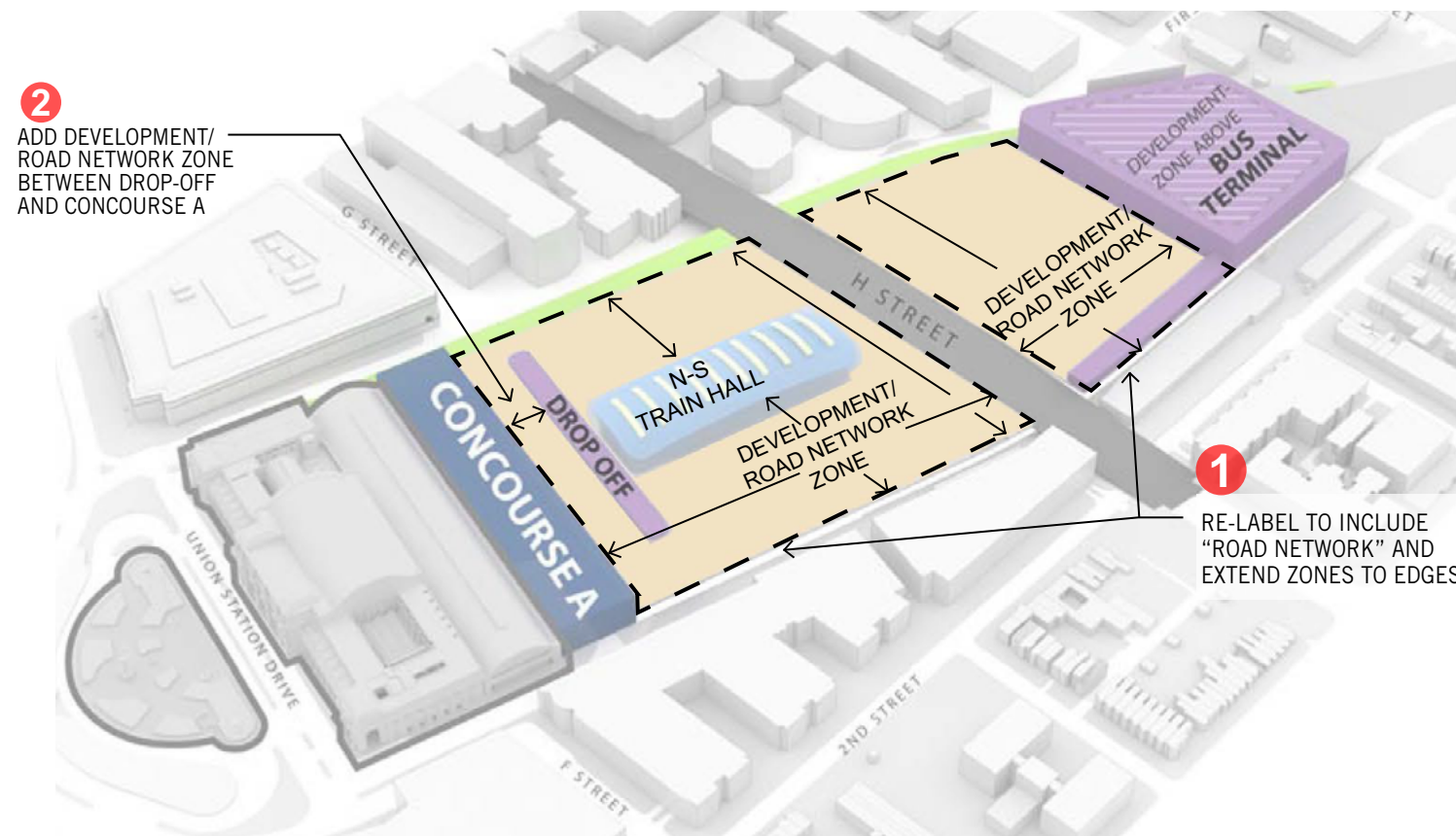
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 BY SEP TEAM FROM "STAKEHOLDER COORDINATION MEETING" - 05/24/2016

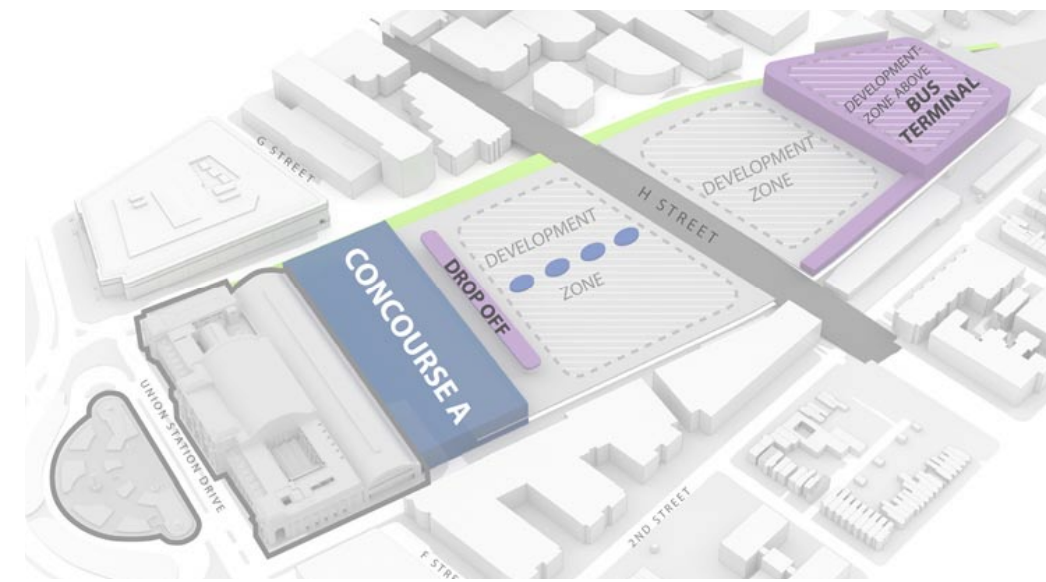


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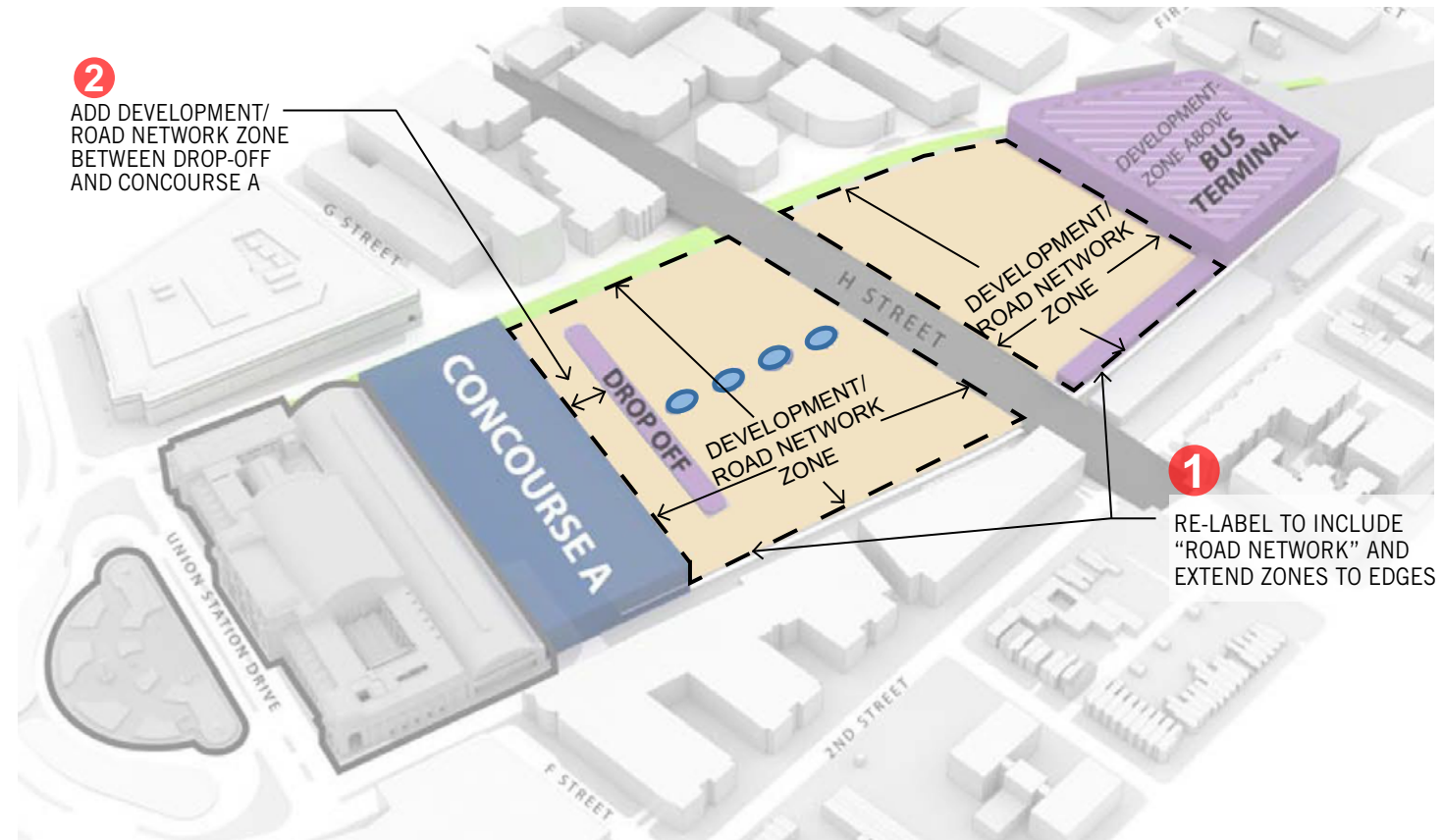
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 BY SEP TEAM FROM "STAKEHOLDER COORDINATION MEETING" - 05/24/2016



PROPOSED DIAGRAMMATIC ADJUSTMENTS AND CLARIFICATIONS

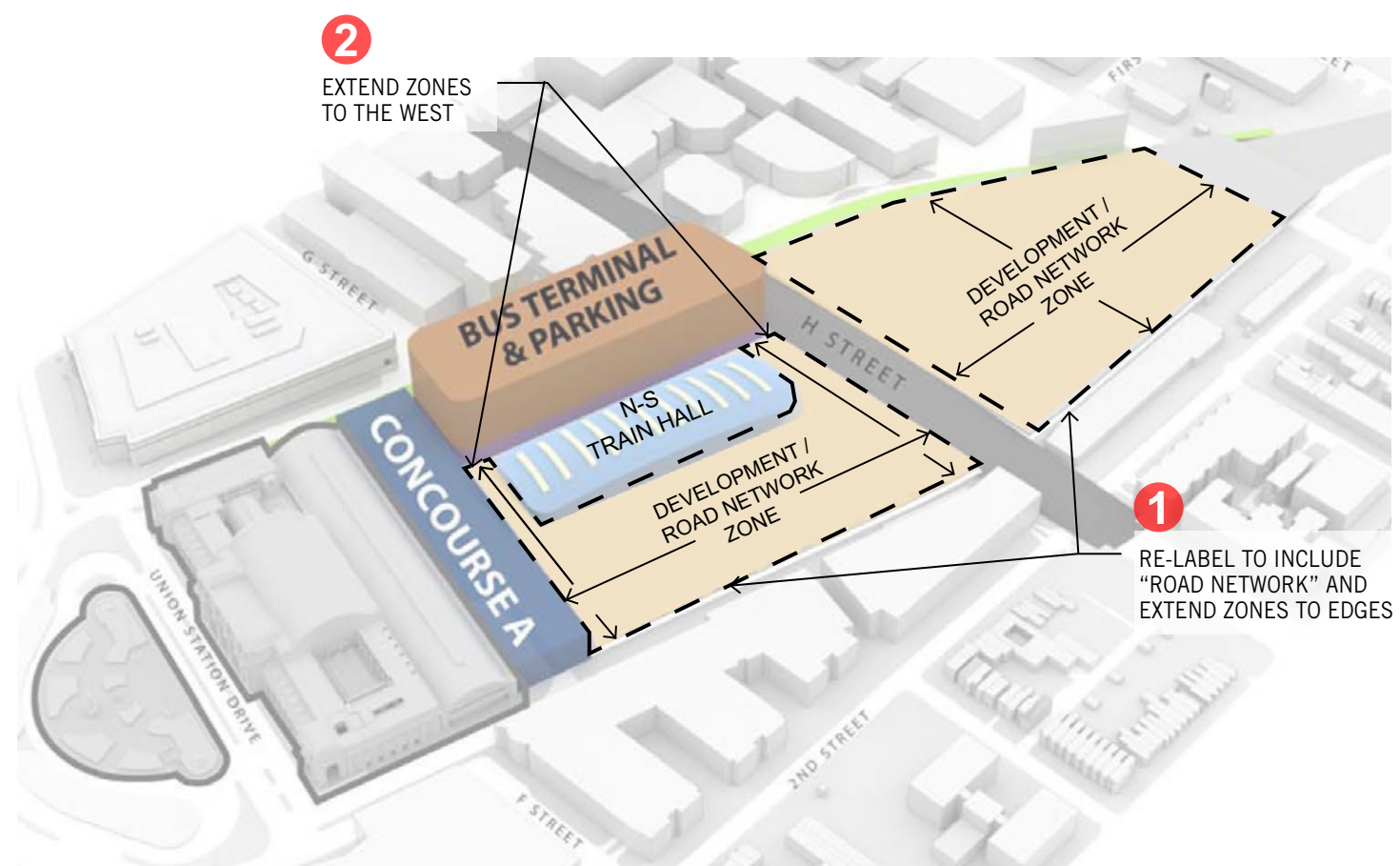
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PARKING ABOVE, BUS ON SOUTH-WEST NEW STRUCTURE, N-S TRAIN HALL BY SEP TEAM FROM "STAKEHOLDER COORDINATION MEETING" - 05/24/2016



PROPOSED DIAGRAMMATIC ADJUSTMENTS AND CLARIFICATIONS

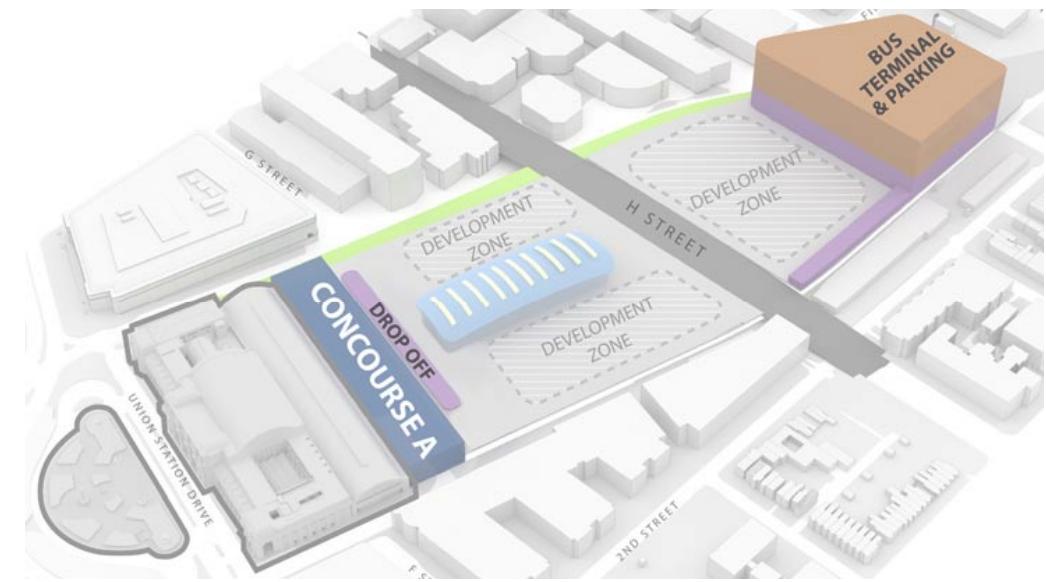
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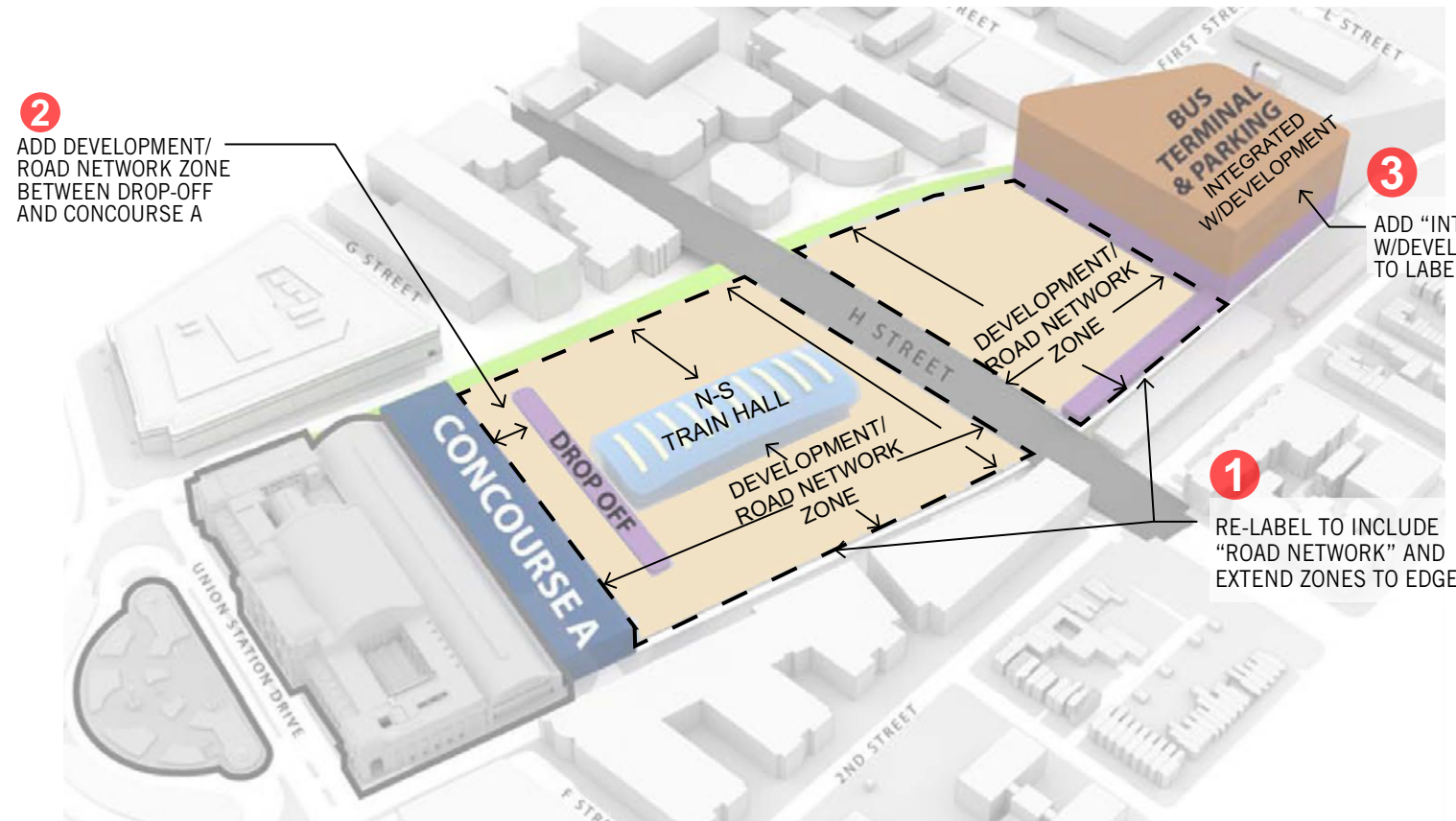


BUS ON SOUTH-WEST NEW STRUCTURE

A-6



PARKING ABOVE, BUS ON NORTH, N-S TRAIN HALL
 BY SEP TEAM FROM "STAKEHOLDER COORDINATION MEETING" - 05/24/2016



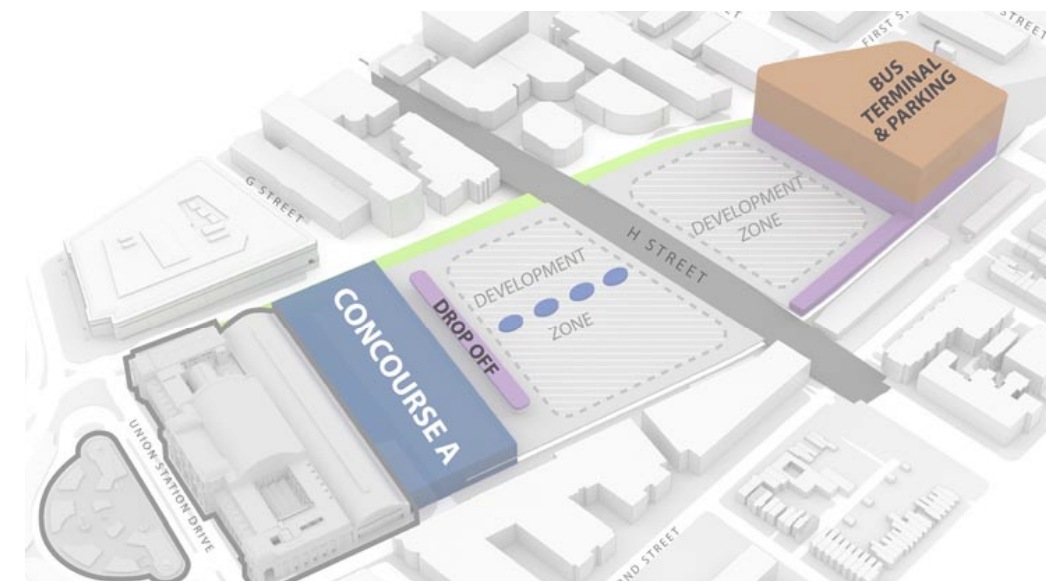
PROPOSED DIAGRAMMATIC ADJUSTMENTS AND CLARIFICATIONS

BURNHAM PLACE

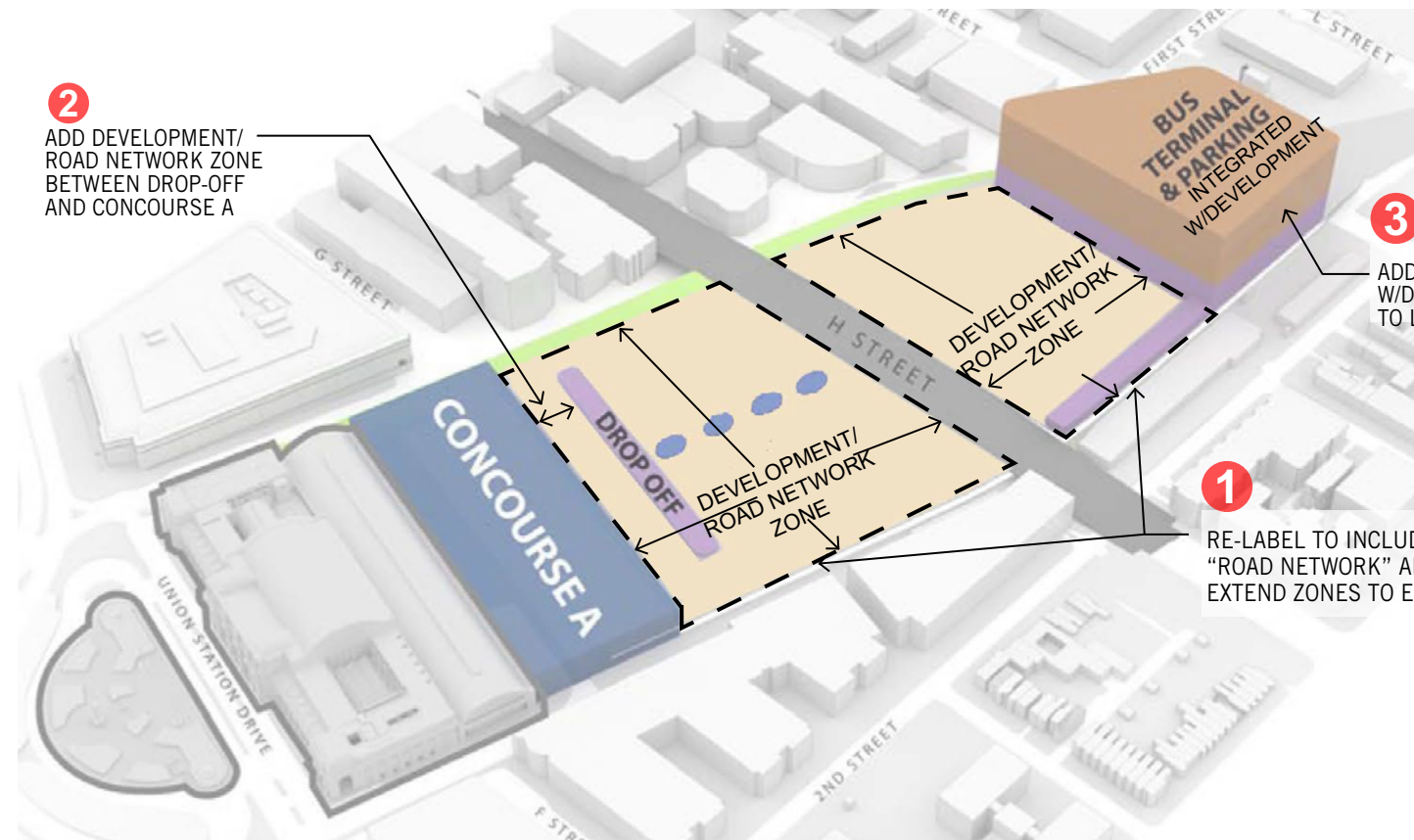
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BUS ON NORTH



PARKING ABOVE, BUS ON NORTH, E-W TRAIN HALL
 BY SEP TEAM FROM "STAKEHOLDER COORDINATION MEETING" - 05/24/2016



PROPOSED DIAGRAMMATIC ADJUSTMENTS AND CLARIFICATIONS

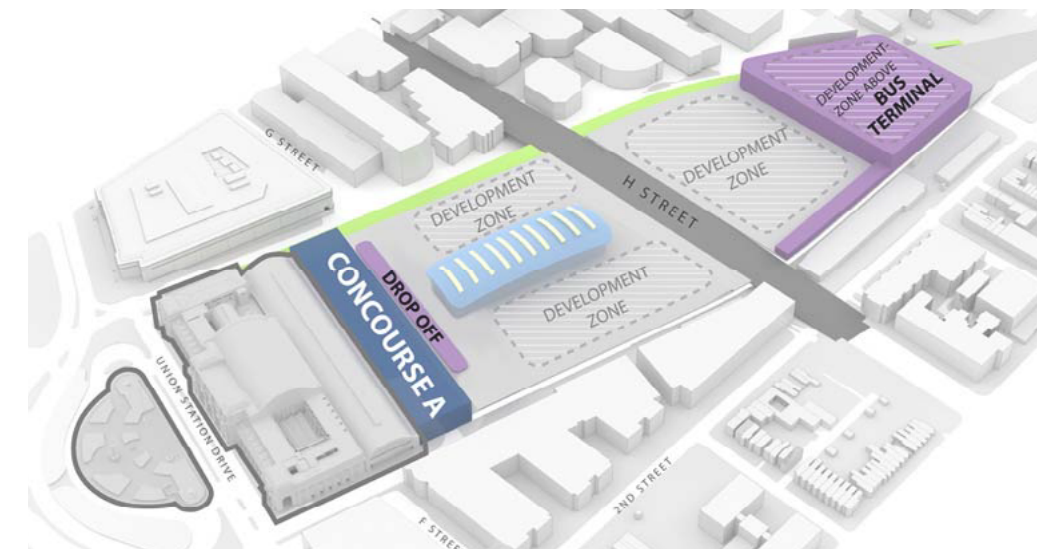
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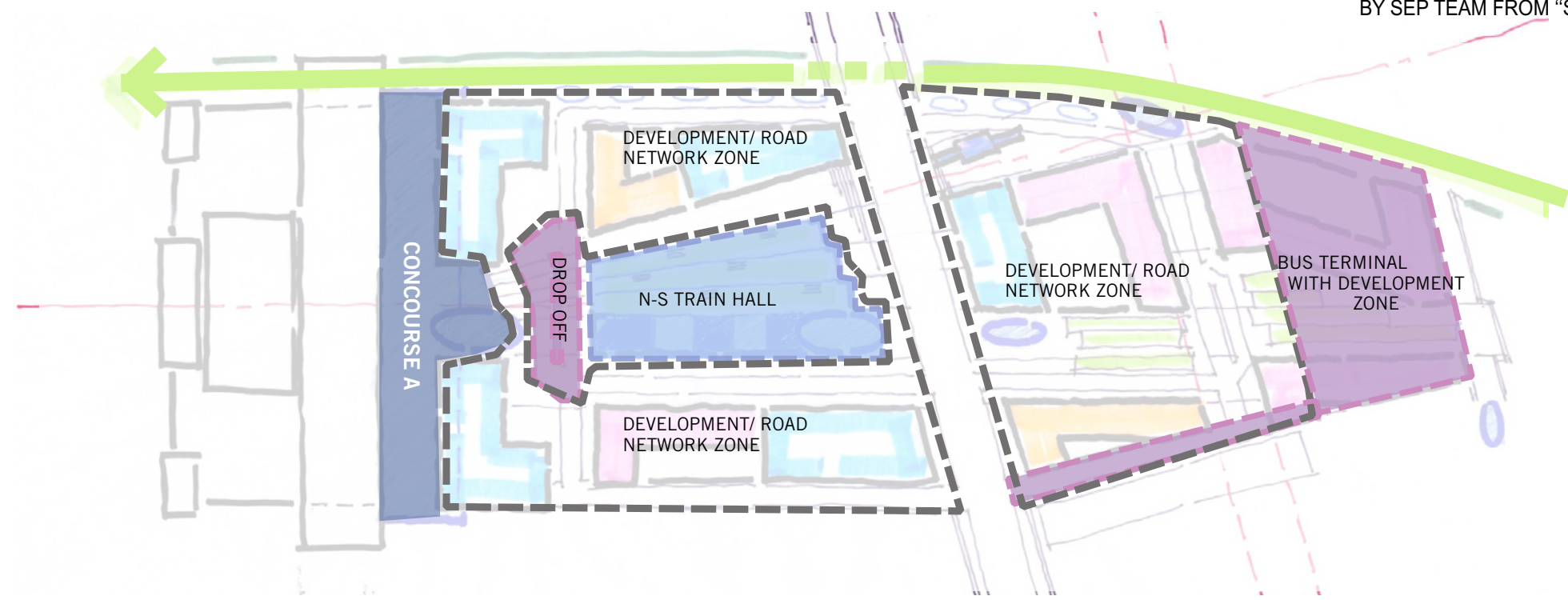


BUS ON NORTH

A-8



PARKING BELOW, BUS ON NORTH, N-S TRAIN HALL
 BY SEP TEAM FROM "STAKEHOLDER COORDINATION MEETING" - 05/24/2016



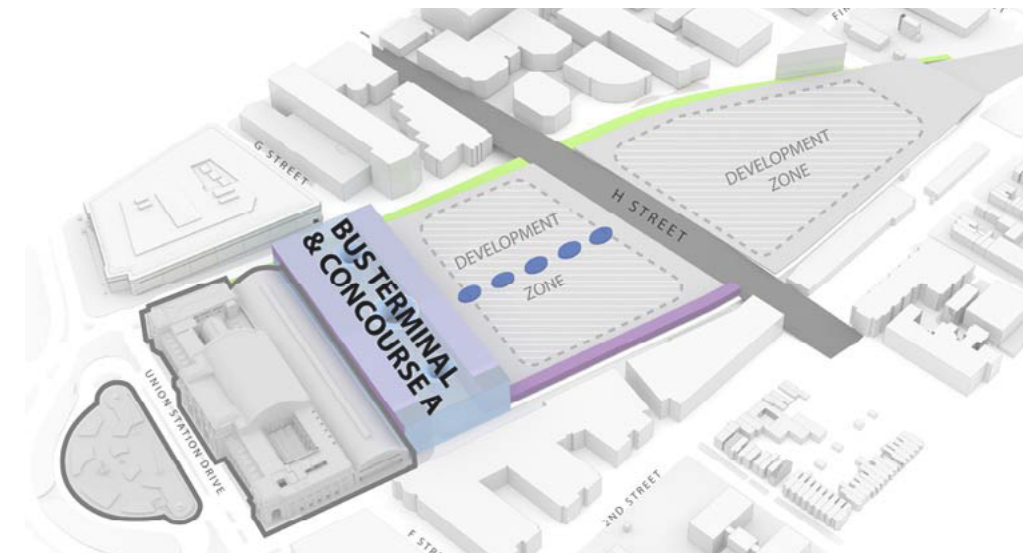
BP TEAM N-S TRAIN HALL INTEGRATION CONCEPT (PRESENTED 11/05/2015)

BURNHAM PLACE

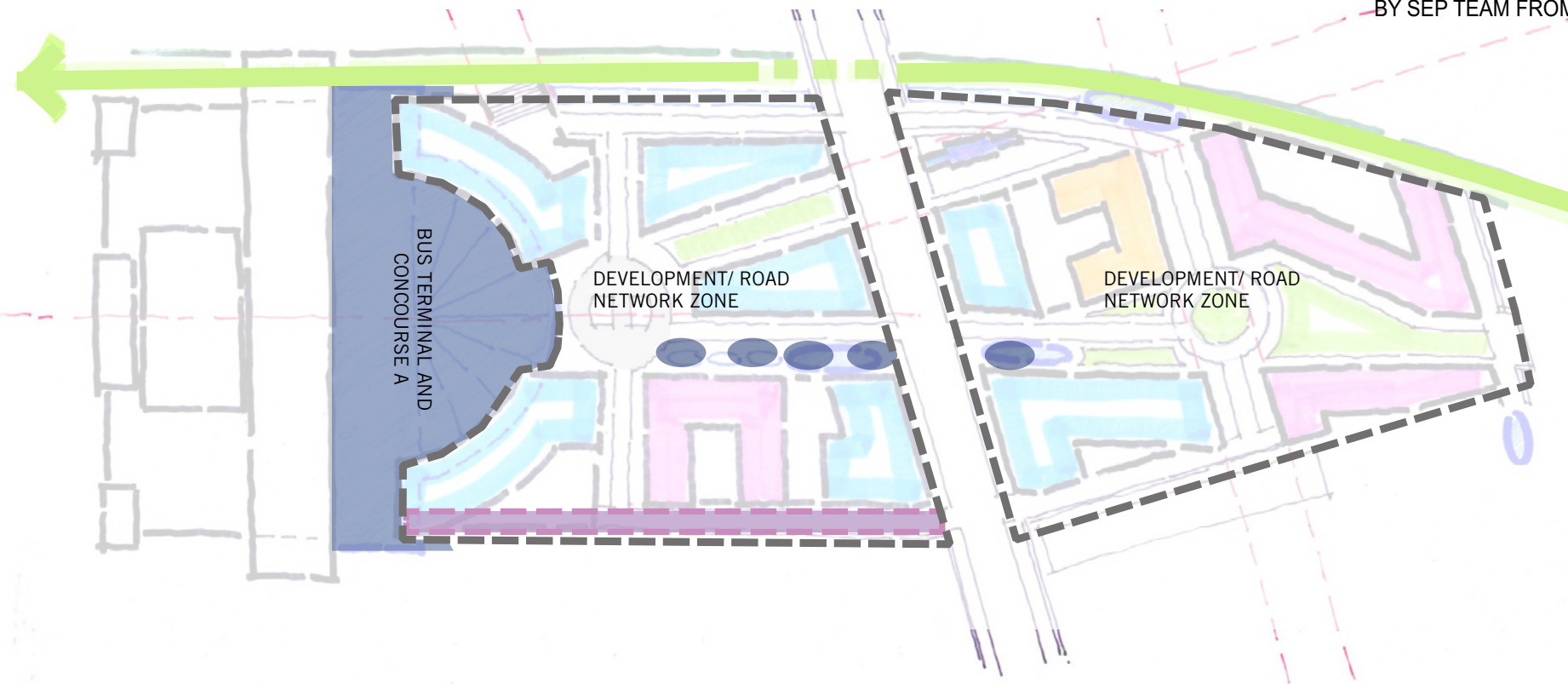
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COMPATIBILITY OF BURNHAM PLACE WITH PROPOSED STATION EXPANSION CONCEPTS





PARKING BELOW, BUS ON SOUTH, E-W TRAIN HALL
 BY SEP TEAM FROM "STAKEHOLDER COORDINATION MEETING" - 05/24/2016



BP TEAM E-W TRAIN HALL INTEGRATION CONCEPT (PRESENTED ON 11/05/2015)

BURNHAM PLACE

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COMPATIBILITY OF BURNHAM PLACE WITH PROPOSED STATION EXPANSION CONCEPTS





MEMORANDUM

TO: Mr. David Valenstein,
Senior Advisor, Major Project Development
Office of Program Delivery
USDOT Federal Railroad Administration

FROM: Ms. Beverley K. Swaim-Staley
President & CEO
Union Station Redevelopment Corporation

DATE: June 28, 2016

SUBJECT: Washington Union Station Expansion Project – Preferred Concepts

The purpose of this memorandum is to document the Union Station Redevelopment Corporation's preferred concepts, as described in the Draft Concept Development and Evaluation Report dated June 14, 2016. USRC evaluated each of the concepts with the Union Station Redevelopment Act of 1981 as our frame of reference; specifically how each of the concepts aligned with the mission to preserve and restore the Station's historic and architectural significance, preserve the function as a multi-use transportation center, and enhance Station amenities, including retail.

At this preliminary stage of concept development, USRC's evaluation of the concepts is largely focused on how the concepts preserve the Station's function as a multi-use transportation center. USRC awaits further refinement to identify the concepts which best align with the two remaining components of our mission.

Consistent with both the enabling legislation and our mission, USRC maintains that it is imperative to retain all existing transportation modes in the Station Expansion Project. While each concept retains all existing modes, the concepts vary in the degree of multi-modal integration. As described in greater detail below, USRC's preferred concept is the *Bus on the South above the East-West Train Hall Integrated with Concourse A*, but we acknowledge that each of the concepts preserve Washington Union Station as the region's multi-modal transportation center.

USRC can support both below-grade and above-grade parking, or a combination thereof as required to meet the demands of parking, taxi and ride share vehicles, service, loading and support functions necessary for the Station Expansion Project. USRC awaits additional information during the refinement process to fully evaluate garage access locations and the effect upon circulation patterns within and adjacent to the Station.

The following paragraphs document USRC's comments on each of the concepts.

Bus on the South above the East-West Train Hall Integrated with Concourse A

The *Bus on the South above the East-West Train Hall Integrated with Concourse A* concept embodies USRC’s mission as it provides a true intermodal center, with multiple transportation functions in a consolidated location. In addition to the ease of transfer among rail, Metrorail and bus, the concept provides sufficient capacity for the tour, charter and intercity buses within an efficient, single-story terminal immediately adjacent to the historic Station.

The *East-West Train Hall Integrated with Concourse A* also replicates the east-west orientation of the historic head house, original passenger concourse and the contemporary Claytor Concourse. This east-west orientation maintains the historic arrival and departure patterns present throughout the Station’s history and allows the head house to remain the primary entrance to the Station. As stated in Appendix B of the Draft Concept Development and Evaluation Report, “...a new train hall structure must respond to the existing historic progression of spaces from the south to the north – a progression where one passes laterally through grand spaces vaulted in the east-west direction: a contrast of north-south pedestrian flows and east-west architectural directionality.”

In summary, the *Bus on the South above the East-West Train Hall Integrated with Concourse A* concept complements the Station’s historic and architectural significance, strengthens the multi-modal functionality, allows a small bus loop during early stages of project implementation and provides the most efficient design for Station stakeholders and customers.

Bus on the South-East with North-South Train Hall South of H Street

While not as ideal as the previously described concept, USRC can also support the *Bus on South-East with North-South Train Hall South of H Street* concept as it maintains connectivity to the historic Station for tour, charter and inter-city bus passengers and does not require a temporary relocation of the bus function during construction.

Bus on the North with East-West Train Hall Integrated with Concourse A / Bus on the North with North-South Train Hall South of H Street

The *Bus on the North with East-West Train Hall Integrated with Concourse A* and the *Bus on the North with North-South Train Hall South of H Street* are also acceptable concepts to USRC if the relevant stakeholders concur that the separate, but connected bus terminal fulfills the function of a multi-modal transportation center. USRC notes that our support for this concept is contingent upon the following:

- Passenger connectivity between the historic Station and the bus terminal at the lower concourse level and/or deck level; and
- A dedicated drop-off and pick-up area for tour and charter buses adjacent to Concourse A.

Bus on South-West with North-South Train Hall South of H Street

The *Bus on South-West with North-South Train Hall South of H Street* concept has inherent challenges, which USRC believes render this concept the least desirable. These challenges include:

- The complete relocation of the bus function to an off-site location during construction;
- An inefficient bus circulation pattern due to required clearances below the deck level; and
- An inability to accommodate the minimum bus capacity.

While these challenges result in a less than desirable concept, USRC acknowledges that the concept merits further evaluation, as the bus terminal is generally located as it exists today – on property owned by the United States Department of Transportation and in close proximity to the historic Station.

Caroline VanAcker

From: Zaidain, David A <David.Zaidain@amtrak.com>
Sent: Wednesday, June 29, 2016 1:52 PM
To: Jessica McVary
Cc: Beverley Swaim-Staley; Kostura, Gretchen M; Sporik, Daniel J; david.valenstein@dot.gov
Subject: Amtrak Draft Concept Comments
Attachments: DRAFT_ConceptReport_CommentsDue_2016_0628_AMTRAK.xlsx

Jessica-

Thanks for the opportunity to provide comments on the Draft Concept Development and Evaluation Report. Our comments on specific text in the document are summarized in the attached form as USRC provided.

We also wanted to clarify the Amtrak IID team's position on the initial, draft concepts as proposed in the report. These comments are based on the premise that additional further information will be gathered to inform these concepts, particularly as it pertains as to constructability and bus programming options. We understand this is the starting point of what will be continued refinement of ideas going forward into the EIS process.

To clarify Amtrak's position on the current, draft concepts, we offer the following points:

- *We support the bus terminal on the southwest and the north side of the project, however we do have some constructability concerns with the bus program on the north side. We hope that this will be clarified as we develop more feasibility information through the Terminal Infrastructure program.*
- *We do not prefer the buses on the east side as we believe this will be a construction feasibility concern due to the complexities of tracks on the east side as well as the potential phasing of any development.*
- *We do not prefer the bus integration with an expanded Concourse A and Train Hall as we feel it will not support the development of a signature train concourse and continues to orient the station expansion to the south, not throughout the entire site.*
- *We prefer the north-south orientation of the train hall. In our view, this provides for a more prominent expansion of the station as having a landmark civic element expanding from the current station towards H Street. This will also provide, in our view, better daylighting and visual experiences from the tracks below to the train hall above.*
- *While we understand the need to have access and connectivity for intercity buses, we still encourage the exploration of a bus layover off site at another location off site from the Union Station complex. We hope this can be explored through further development of concepts and alternatives during the EIS process.*
- *We appreciate the continued coordination of the Terminal Infrastructure work and the information provided for the current Options 14 and 16. Please note these too are a work in progress and are subject to further refinement as the TI scope advances.*

In addition to these positions, we still have concern with the reflection of the ABGT in the report and how that will be discussed publicly. As it stands today, we have concerns with the ABGT being provided as concepts in the report, but we would like to discuss the issue more with FRA, USRC and the MDP team before the report is finalized. Let us know how best to have that conversation and we can resolve that issue.

Please let me know if you have any questions. Again, thanks for your patience on this.

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