



U.S. Department
of Transportation
**Federal Railroad
Administration**

Draft Section 106 Assessment of Effects to Historic Properties Report Appendices - DEIS Appendix D1a

FOR THE WASHINGTON UNION STATION
EXPANSION PROJECT

JUNE 2020

Appendix 1: List of Consulting Parties

1.1 Section 106 Consulting Parties for the Washington Union Station Expansion Project:

1. Advisory Council on Historic Preservation (ACHP)
2. Akridge
3. Amtrak
4. ANC 6C
5. Architect of the Capitol
6. Capitol Hill Restoration Society (CHRS)
7. Commission of Fine Arts
8. Committee of 100 on the Federal City (Committee of 100)
9. DC Historic Preservation Office (DC SHPO)
10. DC Preservation League
11. Department of Transportation including FRA, FTA, FHA
12. District Department of Transportation
13. General Services Administration
14. Government Printing Office
15. Greyhound
16. MARC/MTA
17. Megabus
18. Metropolitan Council of Governments
19. National Capital Planning Commission
20. National Park Service, National Mall and Memorial Parks
21. National Railway Historical Society, DC Chapter
22. National Trust for Historic Preservation
23. Union Station Redevelopment Corporation (USRC)
24. VRE
25. WMATA

**Appendix 2: Formal Communication and Comments from Consulting Parties in
order received**

From: Murphy, Amanda (FRA) <amanda.murphy2@dot.gov>
Sent: Wednesday, March 15, 2017 3:01 PM
To: Katherine Hummelt; Gretchen Pfahler
Cc: Bernett, Carmen [USA]
Subject: FW: Washington Union Station: Historic Property Identification Concurrence

From: Koenig, Daniel (FTA)
Sent: Thursday, February 16, 2017 11:28 AM
To: Murphy, Amanda (FRA) <amanda.murphy2@dot.gov>
Subject: RE: Washington Union Station: Historic Property Identification Concurrence

Hi Amanda – Thanks for providing. Not surprised that there are a lot of resources. My thinking though, is that the APE could be drawn to be a bit much narrower. The improvements to the station would have far less potential, if any, to affect resources to the south. Take for example, resource 51 (Botanical Garden), what is the likelihood that that property could experience any proximity effects from construction and operation of an enhanced station? This large APE will be also be very burdensome under 4f as each of the resources identified in this map would have to be evaluated under 4f and I would again argue that many of the properties have zero potential to be impacted, either directly or indirectly. Let me know if you'd like to discuss more, but our overall comment is that this could be narrowed substantially.

Thanks,
Dan

From: Murphy, Amanda (FRA)
Sent: Friday, February 10, 2017 4:04 PM
To: Murphy, Amanda (FRA)
Cc:

Subject: Washington Union Station: Historic Property Identification Concurrence

On behalf of the Federal Railroad Administration (FRA), I want to thank you for your participation in the National Historic Preservation Act Section 106 process for the Washington Union Station Expansion Project. This past October, FRA hosted the third Consulting Party meeting in which we presented the preliminary project concepts, discussed the proposed Section 106 study area, and identified the historic properties and sites within the proposed study area. The following is a link to those materials on the project website for your reference: <https://www.fra.dot.gov/Page/P0944>

As presented at the second and third Consulting Party meetings, the attached document is a map detailing the proposed study area and historic properties identified from the Consulting Parties, the National Register of Historic Places, the DC Inventory of Historic Sites, the Architect of the Capitol's List of Heritage Assets, the National Mall and Memorial Parks Sites, and the Washington Union Station Historic Preservation Plan (completed 2012).

Union Station is located in an area that has been thoroughly studied by many public and private historic preservation entities. As such, it is believed that all historic properties (built before the past 50 years) have been identified, and no further research to identify historic properties would be conducted as a part of the Washington Union Station Expansion Project Section 106 process.

With this correspondence we are confirming your concurrence on two specific topics as noted during the third meeting and with the attached revised map:

1. The Proposed Study Area, the geographic area surrounding the proposed project area, is appropriate with the scope of the federal undertaking.
2. The historic properties and features within and bordering the Proposed Study Area have been appropriately identified and that the appropriate view sheds are identified.

The Proposed Study Area takes a conservative approach towards the areas that may be affected by the proposed project and includes a wide area surrounding Union Station and the rail yard, as well as view sheds along adjacent historic streets, buildings, parkland, green space, memorials, and neighborhoods. The Proposed Study Area will be refined to an Area of Potential Effect once a preferred alternative is selected as part of the Environmental Impact Statement (EIS), occurring in tandem with the Section 106 Process.

If you have comments regarding the Proposed Study Area and the identified historic properties, I ask that you submit them to me **within 30 days** at Amanda.murphy2@dot.gov. Thank you for your continued cooperation on this important project!

Amanda Murphy

Environmental Protection Specialist
Office of Railroad Policy and Development
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590
202-493-0624 (Office)

Katherine Hummelt

From: Gretchen Pfaehler
Sent: Friday, March 10, 2017 3:13 PM
To: Katherine Hummelt; Jill Cavanaugh
Subject: FW: Washington Union Station: Historic Property Identification Concurrence

FYI and for the files.

Gretchen Pfaehler AIA

BEYER BLINDER BELLE
ARCHITECTS & PLANNERS LLP
3307 M Street, NW, Suite 301
Washington, DC 20007

-----Original Message-----

From: Murphy, Amanda (FRA) [mailto:amanda.murphy2@dot.gov]
Sent: Friday, March 10, 2017 3:12 PM
To: Gretchen Pfaehler
Cc: Bernett, Carmen [USA]
Subject: FW: Washington Union Station: Historic Property Identification Concurrence

NCPC response

-----Original Message-----

From: Flis, Matthew [mailto:matthew.flis@ncpc.gov]
Sent: Friday, March 10, 2017 3:11 PM
To: Murphy, Amanda (FRA) <amanda.murphy2@dot.gov>
Subject: Re: Washington Union Station: Historic Property Identification Concurrence

Good Afternoon Amanda,

Thank you for the opportunity to review the study area materials. We appreciate the conservative approach which captures a broad area of resources and viewsheds. We look forward to an update on the process and discussing when it may be appropriate to brief our Commission.

Best,
Matt

Matthew J. Flis, AICP-CUD
Senior Urban Designer
National Capital Planning Commission

From: Murphy, Amanda (FRA) <amanda.murphy2@dot.gov>
Sent: Friday, February 10, 2017 4:04:13 PM
To: Murphy, Amanda (FRA)
Cc: c

Subject: Washington Union Station: Historic Property Identification Concurrence

On behalf of the Federal Railroad Administration (FRA), I want to thank you for your participation in the National Historic Preservation Act Section 106 process for the Washington Union Station Expansion Project. This past October, FRA hosted the third Consulting Party meeting in which we presented the preliminary project concepts, discussed the proposed Section 106 study area, and identified the historic properties and sites within the proposed study area. The following is a link to those materials on the project website for your reference: <https://www.fra.dot.gov/Page/P0944>

As presented at the second and third Consulting Party meetings, the attached document is a map detailing the proposed study area and historic properties identified from the Consulting Parties, the National Register of Historic Places, the DC Inventory of Historic Sites, the Architect of the Capitol's List of Heritage Assets, the National Mall and Memorial Parks Sites, and the Washington Union Station Historic Preservation Plan (completed 2012).

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If you have comments regarding the Proposed Study Area and the identified historic properties, I ask that you submit them to me within 30 days at Amanda.murphy2@dot.gov<<mailto:Amanda.murphy2@dot.gov>>. Thank you for your continued cooperation on this important project!

Amanda Murphy
Environmental Protection Specialist
Office of Railroad Policy and Development Federal Railroad Administration

1200 New Jersey Avenue, SE

Washington, DC 20590

202-493-0624 (Office)

*Please note email: Amanda.Murphy2@dot.gov<mailto:Amanda.Murphy2@dot.gov>



Government of the District of Columbia
**Advisory Neighborhood
Commission 6C**

March 13, 2017

Amanda Murphy
Environmental Protection Specialist
Office of Railroad Policy and Development
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Section 106 Process for Union Station Expansion Project & Proposed Study Area

Dear Ms. Murphy:

On March 8, 2017, at a duly noticed regularly scheduled monthly meeting of ANC 6C, with a quorum of six out of six commissioners and the public present, the current matter came before ANC 6C. The commissioners voted 6-0 to adopt the position set forth below.

Thank you for your email of February 10, 2017 in which you requested ANC 6C's concurrence on two points:

1. *The Proposed Study Area, the geographic area surrounding the proposed project area, is appropriate with the scope of the federal undertaking.*
2. *The historic properties and features within and bordering the Proposed Study Area have been appropriately identified and that the appropriate view sheds are identified.*

This project is of great significant to ANC 6C, and in fact the majority of the Proposed Study Area (PSA) lies within this ANC. The low-scale residential neighborhoods immediately east of the rail corridor will almost certainly be among those most impacted by not only the rail yard construction and expansion, but also by very closely related projects such as the reconstruction of the H Street Bridge, and the Burnham Place air-rights project. We are very concerned by the narrow scope of the current EIS project. Members of our community have previously expressed reservations about the failure to include any information about those projects within the limited scope of this EIS/Section 106 effort. We believe this results in a fundamentally flawed process that will fail to capture the complexity of this project and ultimately diminish the overall plan.

Despite our reservations regarding the scope of this project, we will endeavor to respond to your current request on the above two points.

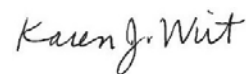
Item 1: We find the Proposed Study Area inadequate to address both the short and long term Area of Potential Effects (APE). In a meeting with USRC on March 2, you stated that the APE would be even more restricted than the PSA. We note that the PSA fails to include areas that undoubtedly would have significant traffic and other impacts under all of the concept development scenarios. As one example, it is impossible to travel from Union Station to New York Avenue without leaving the PSA. All of the development scenarios involve inter-city bus facilities and the impact of that activity must be addressed. As a second example, many of the proposed development alternatives envision a large parking structure below the rail corridor with access from the 100 block of K Street, NE. However, Third Street, NE—the closest north-south street immediately east of the H Street Bridge—is not fully included in the study area.

Item 2: This is a two-part question. For the first part, we believe you have adequately identified historic properties within the PSA. (One of those properties, No. 84 – 911 Second St., NE/former milk depot, is no longer extant.) For the second part, we believe the proposed view sheds also may be inadequate. The alternative development scenarios described potential parking structures, bus, and taxi facilities at various locations both above and below the rail corridor; and on property owned by FRA’s private sector partner. Because FRA has not more clearly defined the location and height of the project elements, we cannot determine whether the view sheds are or are not adequate. Therefore, we conclude that the appropriate view sheds have not been identified.

Finally, ANC 6C wishes once again to express in the strongest possible terms our concern for the overall project planning of the Union Station Expansion. This is a very complex project with Federal, District, and multiple private sector interests, as well as varied public/neighborhood interests. Assessment of the impacts of Union Station expansion must take account of the entirety of the project in order for the planning and design to achieve the goals we all anticipate for this very important project.

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

Sincerely,



Karen Wirt
Chair, ANC 6C



Capitol Hill Restoration Society, P.O. Box 15264, Washington, DC 20003-0264

March 14, 2017

Amanda Murphy
Environmental Protection Specialist
Office of Railroad Policy and Development
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590
amanda.murphy2@dot.gov

Re: National Historic Preservation Act Section 106 process for the Washington Union Station Expansion Project: Historic Properties and Proposed Study Area

Dear Ms. Murphy,

Thank you for your email of February 10, 2017. We write in response to your request for concurrence on these two points:

- 1. The Proposed Study Area, the geographic area surrounding the proposed project area, is appropriate with the scope of the federal undertaking.*
- 2. The historic properties and features within and bordering the Proposed Study Area have been appropriately identified and that the appropriate view sheds are identified.*

Regarding Item 1: Even restricting our comments to only the “Federal Undertaking” portion of this project we write in strong opposition to FRA's too narrowly identified "Proposed Study Area." FRA's massive, although entirely un-quantified, proposed increase in rail, bus, car, bike and pedestrian traffic will adversely affect the quality of life for residents and businesses on North/South as well as East/West streets far beyond the proposed boundaries, and especially for blocks immediately east of 3rd Street, NE. The same is true during the years of construction.

Regarding Item 2: we believe you have adequately documented the numerous historic properties in the surrounding area. However, what is far less clear is whether the view sheds are appropriate. It appears the view sheds are limited to the Proposed Study Area. Depending on the design and location of the “Project Elements”, portions of even just the Federal Undertaking may be visible from more distant locations.

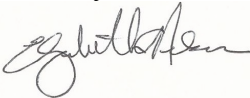
As one example of why we feel the Proposed Study Area is inadequate, several of the preliminary concept proposals indicate an underground garage with access from K Street, NE. This will inarguably add a large volume of traffic onto the nearby residential streets. Note also that Third St., NE - the closest north/south access east of the H Street Bridge – is not entirely included in the Study Area. The Proposed Study Area must include additional streets east of the Proposed Study Area

More broadly, our concern and objections to the Proposed Study Area extend beyond the inappropriately narrow “Federal Undertaking”. We cannot determine the extent of the Federal Undertaking versus District and Private undertakings; and therefore, we cannot endorse the Proposed Study Area without a clear understanding of the extent of the Federal Undertaking. We again state our objection to the failure to include the impacts of the air-rights project and reconstruction of the H Street Bridge in this analysis. Those projects are an integral part of the Union Station Redevelopment effort. Nonetheless, to date FRA has made no effort to anticipate or to coordinate the impacts of three million square feet of additional development by its closely-related partner, Akridge Development.

Further, FRA also has provided no information to CHRS or to the broader public regarding the scope and nature of effects to Metro’s already troubled capacity as well as related concerns to the area’s water, sewer, electricity and other infrastructure that could well affect residents, businesses and taxpayers outside the current, arbitrarily drawn borders of its Proposed Study Area.

For these reasons, CHRS finds the Proposed Study Area to be both deficient, and entirely lacking supporting evidence. Therefore, we find the Proposed Study Area to be unacceptable.

Sincerely,



Elizabeth Nelson, President
Capitol Hill Restoration Society

CC:

Councilmember Charles Allen, Ward 6, callen@dccouncil.us

Karen Wirt, Chair, ANC6C, kwirt@crs.loc.gov

Mark Eckenwiler, ANC6C04, 6C04@anc.dc.gov

C. Andrew Lewis, DC State Historic Preservation Office, andrew.lewis@dc.gov

Rob Nieweg, National Trust for Historic Preservation, RNieweg@savingplaces.org

Eric Hein, Exec. Director, NCSPPO, hein@ncshpo.org

Beverly Swaim-Staley, USRC, bswaimstaley@usrcdc.com

John Sandor, President, D.C. Preservation League, John_Sandor@nps.gov

Rebecca Miller, Executive Director, D.C. Preservation League, rebecca@dcpreservation.org

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



March 16, 2017

Ms. Amanda Murphy
Environmental Protection Specialist
Office of Railroad Policy and Development
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Washington Union Station Expansion Project Study Area

Dear Ms. Murphy:

Thank you for providing the District of Columbia State Historic Preservation Office (SHPO) with an opportunity to review the Washington Union Station Expansion Project Study Area, which we understand the Federal Railroad Administration (FRA) will use as a basis for developing the undertaking's Area of Potential Effect (APE) in accordance with 36 CFR 800.4. We appreciate the conscientious efforts that FRA has made to identify historic properties thus far and we offer the following comments for consideration as the Section 106 review process continues.

To address the immediate project area first (No. 3 on the Study Area Map), most of this area is referred to as the Terminal Rail Yard (see historic image below) and is generally considered eligible for listing in the National Register of Historic Places. However, a formal Determination of Eligibility (DOE) form has yet to document the basis for eligibility, the boundaries of the area, and the contributing and non-contributing elements. The Study Area map appears to suggest that only [parts of] two retaining walls, the K Street Tower and the REA Building are historically significant, while the list of historic properties on the reverse side of the map identifies train platforms, umbrella sheds and other resources as contributing. The completion of a DOE Form to clarify these matters should be made a priority. The recently completed Union Station Historic Preservation Plan provides a great deal of relevant information in this regard. The Eckington Power Plant DOE Form that Amtrak prepared in 2010 should be also considered in determining the boundaries of the Terminal Rail Yard.



With regard to the larger Study Area, we share some of the concerns recently expressed by consulting parties about the boundaries being too limited to adequately consider all of the Expansion Project's likely indirect effects – particularly the visual and traffic-related effects of new construction. For example, it seems possible that the newly proposed train concourse and/or parking garage may be visible from areas outside of the Study Area. It also seems reasonable to anticipate that increased traffic may result in backups that extend beyond the blocks immediately surrounding Union Station. Although it is too early in the consultation process to determine the full extent of such indirect effects, it is important that the APE include all areas where *potential* effects may occur. To that end, we recommend that the APE be drawn as generously as possible rather than being a subset of the Study Area as was recently suggested.

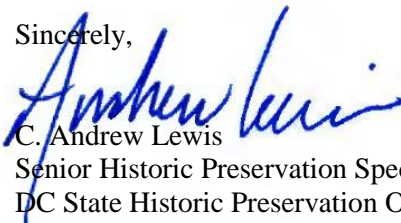
On a related note, all of the streets, avenues, parks and reservations that contribute to the National Register of Historic Places-Listed Plan of the City of Washington (L'Enfant Plan) should be designated on the Study Area Map and incorporated, collectively rather than individually, in the list of historic properties since these resources are among the most likely to be subject to indirect effects.

Finally, we offer the following list of specific edits to the Study Area Map itself:

1. Although Capitol Square and its landscape are technically exempt from Section 106, the entirety of the area (i.e. bounded by 1st Streets SE and SW, Constitution Avenue, and Independence Avenue) is a DC Landmark and unquestionably makes up a significant resource upon which the effects of the project should be evaluated.
2. Similarly, the landscaped area known as Senate Park (i.e. bounded by Constitution, Delaware and New Jersey Avenues) is included among the Architect of the Capitol's Heritage Assets and should be identified as an important resource to consider.
3. Numbers 42, 45, 48 and 51 should also be identified as DC Landmarks.
4. Numbers 43, 44, 46, 47, 49, 50 and 81 should also be identified as potential DC Landmarks.
5. Number 32 should be revised to clarify that the St. Aloysius Catholic Church is a landmark/listed, but the adjacent school and related buildings are not. However, these buildings are potential DC landmarks and potentially eligible for listing in the National Register.
6. The Acacia Building at 311 1st Street NW should be identified as a potential DDC Landmark potentially eligible for listing in the National Register.
7. The historic building currently used as a Sun Trust Bank at 2 Massachusetts Avenue, NW should be identified as a potential DDC Landmark and potentially eligible for listing in the National Register.
8. The former National Capital Press Building at 301 N Street, NE should be identified as a potential DDC Landmark potentially eligible for listing in the National Register.
9. The Union Market Historic District/Union Market Terminal Buildings along Morse, 4th, 5th, and 6th Streets NE should be identified as a DC and National Register-Listed Historic District.

We look forward to continuing consultation with all parties and to assisting FRA in determining and documenting the APE. If you should have any questions or comments regarding this matter, please contact me at andrew.lewis@dc.gov or 202-442-8841. Otherwise, thank you for providing this additional opportunity to review and comment.

Sincerely,



C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office

16-0114



Preserving America's Heritage

September 29, 2017

Ms. Amanda Murphy
Environmental Protection Specialist
Office of Railroad Policy and Development
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Ref: *Washington Union Station Expansion Project
Area of Potential Effect and Identification of Historic Properties Report and Concept Screening Report
Washington, D.C.*

Dear Ms. Murphy:

The Advisory Council on Historic Preservation (ACHP) has reviewed the draft *Area of Potential Effects and Identification of Historic Properties Report* and the *Concept Screening Report* regarding the referenced undertaking. We are providing the Federal Railroad Administration (FRA) with the ACHP's comments on these two reports, which take into account remarks shared by the D.C. State Historic Preservation Office (DC SHPO) and other consulting parties regarding the Section 106 review for this undertaking.

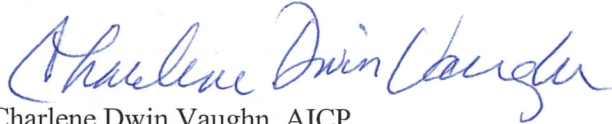
On August 7, 2017, ACHP received the draft *Area of Potential Effects and Identification of Historic Properties Report* and participated in the follow up consultation meeting on September 7th. The ACHP understands FRA expanded the Area of Potential Effect (APE) in response to comments from the consulting parties in order to consider indirect and cumulative effects from the undertaking. FRA indicated that it will finalize the identification of the historic properties based on this revised APE and the comments from the DC SHPO. As such, the ACHP has nothing further to add to FRA's APE determination.

On July 31, 2017, FRA issued the *Concept Screening Report* and also followed up with discussions at the September 7th consultation meeting. ACHP believes that the analysis required in our regulations for evaluating alternatives (36 CFR 800.6(a)) has not been fully met in this report. Therefore, the ACHP recommends that FRA share additional, more in-depth information with consulting parties that explains how FRA evaluated these concepts, and the basis for determining which concepts should be eliminated. The analysis of the advanced concepts should take into account potential effects on historic properties surrounding Union Station. Further, FRA should include consulting parties in the analysis of measures that will avoid, minimize, or mitigate potential adverse effects to historic properties as FRA continues to refine the proposed alternatives.

We commend FRA's commitment to coordinating the Section 106 review with consulting parties. Please consider the ACHP's comments along with those submitted by other consulting parties as FRA continues

with the planning of the Washington Union Station Expansion Project. If you have any questions, please contact Sarah Stokely at (202) 517-0224 or via email at sstokely@achp.gov.

Sincerely,

A handwritten signature in blue ink that reads "Charlene Dwin Vaughn". The signature is written in a cursive style with a large initial "C".

Charlene Dwin Vaughn, AICP
Assistant Director
Office of Federal Agency Programs
Federal Permitting, Licensing and Assistance Section

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



September 29, 2017

Ms. Amanda Murphy
Environmental Protection Specialist
Office of Railroad Policy and Development
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Washington Union Station Expansion Project Area of Potential Effect and Concept Screening Report

Dear Ms. Murphy:

Thank you for continuing to consult with the District of Columbia State Historic Preservation Office (SHPO) regarding the Washington Union Station Expansion Project (Expansion Project). We are writing to provide additional comments regarding effects on historic properties pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

The *Draft Report for the Area of Potential Effects and Identification of Historic Properties for the Washington Union Station Expansion Project* provides a thorough analysis of historic properties in the initial study area and a comprehensive evaluation of the geographic limits and view sheds where potential direct and indirect effects of the project may occur. We appreciate that FRA circulated this report for comment and provided additional opportunities to discuss the Area of Potential Effect (APE) during the September 7, 2017 Consulting Parties' meeting. We were especially pleased to learn that the Determination of Eligibility (DOE) form for the Terminal Rail Yard is nearly complete and will be submitted for review in the near future. Since it appears that all APE-related concerns have been addressed, we agree that FRA's proposed APE (see attached) provides an appropriate basis upon which to continue Section 106 consultation.

Although the primary purpose of the Consulting Parties' meeting was to discuss and finalize the APE, much of the presentation and discussion focused on the *Washington Union Station Expansion Project Concept Screening Report* dated July 31, 2017. This report provides FRA's analysis of the nine initial project concepts as well as "...some ideas and issues raised by the public, agencies, and Project Proponents...." The Consulting Parties provided general comments on the initial concepts approximately a year ago, but it came as a surprise that four concepts had been eliminated without opportunities for more detailed discussion or analysis. It was even more surprising to learn that many ideas, including one which our office has been formally advocating since 2008 – "Reinstating the Ends of the Historic Passenger Concourse" – had also been dismissed without any further consultation with our office or the Consulting Parties.

We understand that FRA must continue to make decisions as part of project planning, but the Section 106 regulations require Federal agencies to consult in a manner that 36 CFR 800.2(a)(4) describes as "...appropriate to the scale of the undertaking and the scope of the Federal involvement..." Fulfilling this responsibility is particularly important before concepts and potential alternatives are eliminated from further consideration. In fact, 36 CFR 800.1(c) states that Federal agencies may conduct project planning provided it does not "...restrict the subsequent consideration of alternatives to avoid, minimize or mitigate the undertaking's adverse effects on historic properties." In our opinion, some of the dismissed ideas, and possibly the dismissed concepts, have potential as avoidance, minimization and mitigation measures. They may also have potential to address broader urban design and transportation-related issues as well as the effects of private development in the project area but, at the very least, we believe many of them warrant further analysis and discussion before being entirely dismissed.

We very much appreciate FRA's consultation efforts to date and we look forward to consulting further in a manner that thoroughly vets all potential alternatives and ensures our common goal of establishing a new, world class rail facility that preserves and compliments the historic significance of Union Station. If you should have any questions or comments regarding this matter, please contact me at andrew.lewis@dc.gov or 202-442-8841. Otherwise, thank for providing this additional opportunity to review and comment.

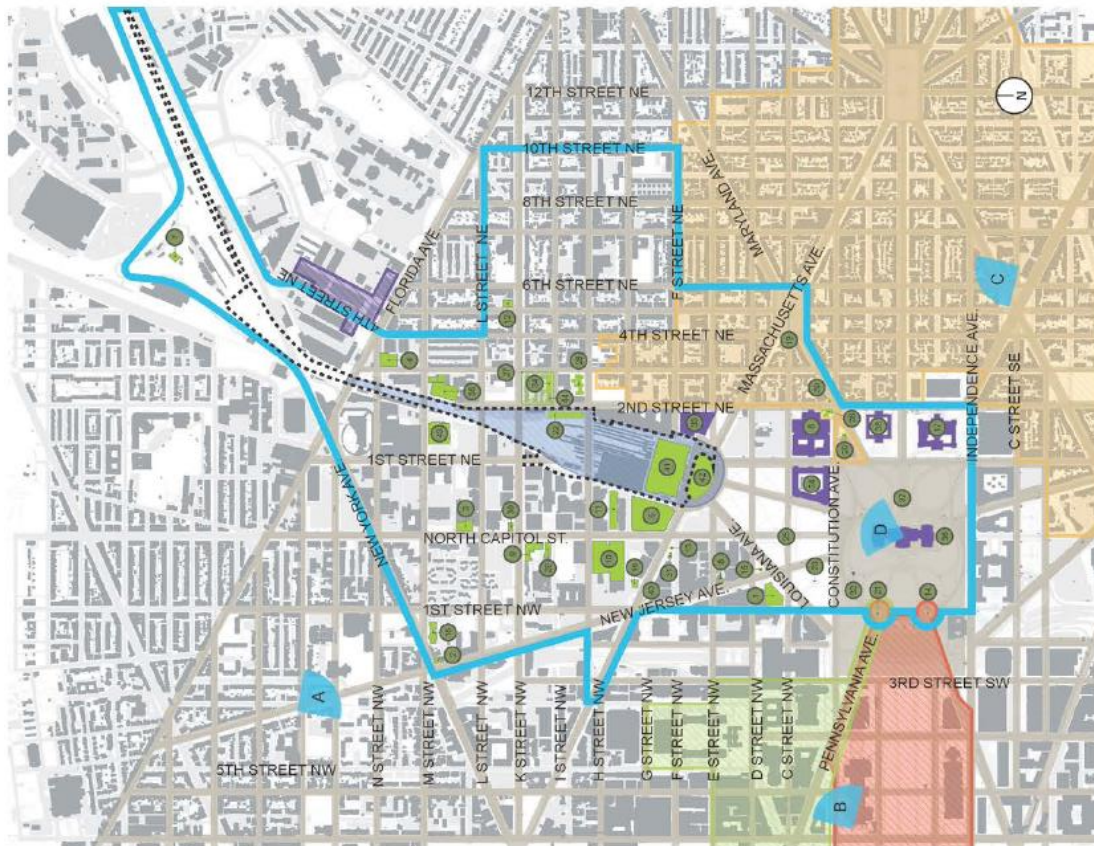
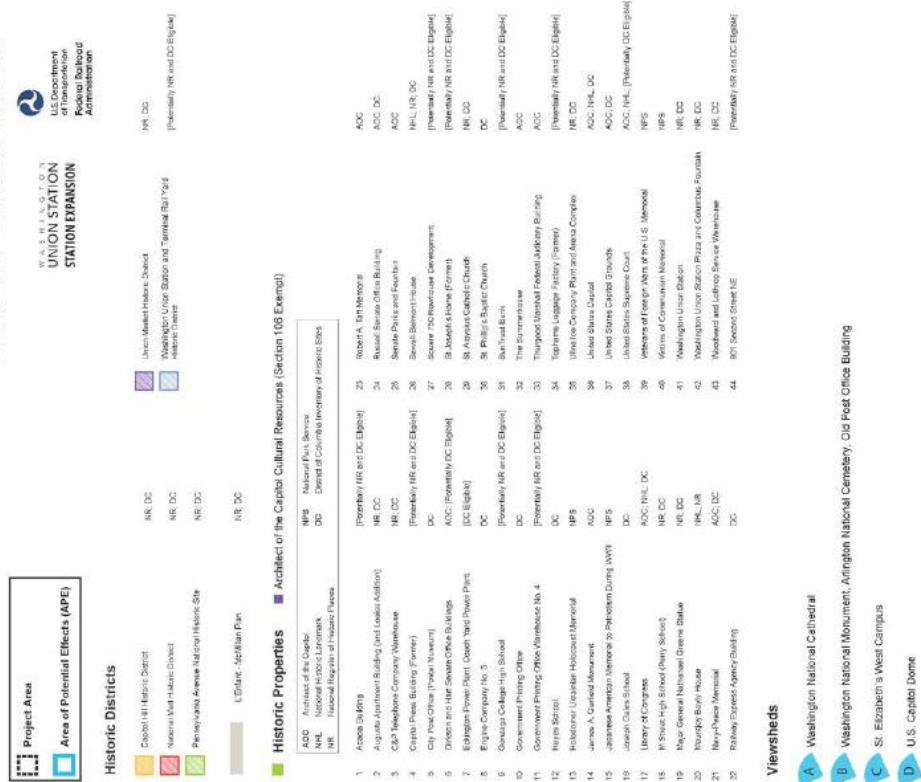
Sincerely,



C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office

16-0114

Washington Union Station Expansion Project: Area of Potential Effects



GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



March 30, 2018

Ms. Amanda Murphy
Environmental Protection Specialist
Office of Railroad Policy and Development
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Washington Union Station Expansion Project Action Alternative Comments

Dear Ms. Murphy:

Thank you for continuing to consult with the District of Columbia State Historic Preservation Office (SHPO) regarding the Washington Union Station Expansion Project (Expansion Project). We are writing to provide additional comments in accordance Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

Based upon discussions held during the March 12, 2018 Cooperating Agency Meeting and other recent communications, we understand that FRA intends to carry five “action alternatives” forward for further consideration. These alternatives, currently identified as “A, B, C, D & E”, are illustrated in the attachment to this letter for reference.

Given the complexities and scope of the Expansion Project, we recognize that further study of all the alternatives will be necessary to fully identify the range of effects on historic properties and the rest of the affected environment, but we are offering the following general comments to help guide decisions from a historic preservation standpoint as consultation continues.

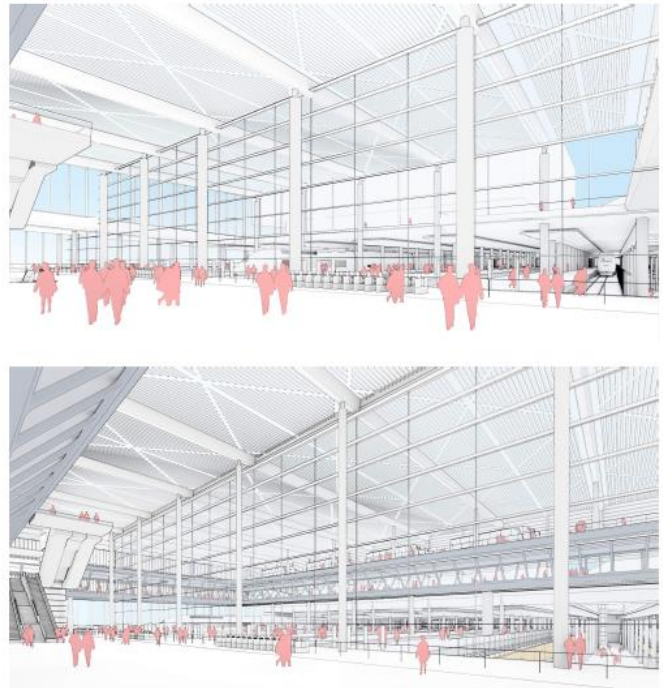
Since Alternatives A and B represent relatively little change from existing conditions they may fall short of achieving the goals of the Expansion Project. However, we note that the larger, north-south oriented portion of the train hall proposed in these alternatives has potential to create a grander presence on H Street and result in a more fitting entrance into the new facility.

Alternatives D and E propose significant changes that appear to further many of FRA’s goals. For example, concentrating all bus-related facilities near the historic station may offer advantages in terms of proximity. On the other hand, we are concerned that this concentration may compromise the architectural quality of the new train hall and intensify already constricted traffic patterns by requiring all buses to circulate south of H Street regardless of whether they are picking up/dropping off passengers or simply parking for extended periods of time.

By contrast, Alternative C proposes many improvements that further project goals while also offering a number of advantages including the potential to:

- Provide the most substantial buffers between the historic station and the proposed new development. These buffers would be achieved not only through the north-south set back between the existing building and new construction, but also through the east-west setback of the new train hall. Such buffers should help to minimize the visual effects of the new development on Union Station.

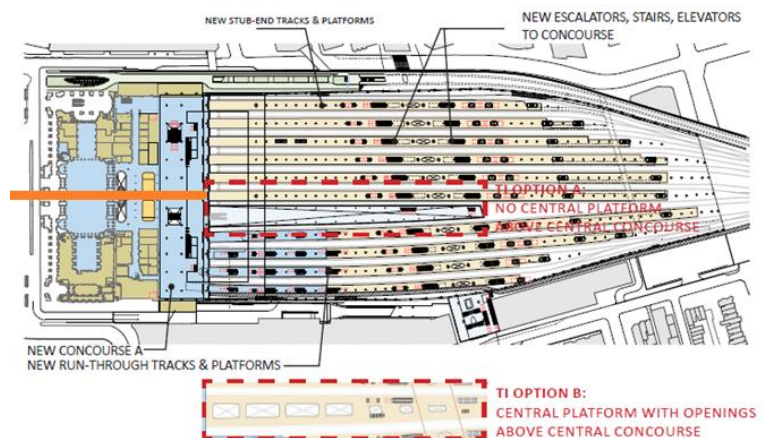
- Allow for greater architectural flexibility and expression in the new train hall by unencumbering it from most of the bus-related functions proposed in Alternatives D and E. Locating bus parking north of H Street should improve views to the new train hall, views out of the new facility, and allow the structure to be designed as a signature piece of architecture that would complement the historic station and establish a visual connection with it. The renderings to the right illustrate potential differences between the two approaches. Note how Alternative C (above) could provide uninterrupted views to the sky as compared to Alternatives D & E (below).
- Potentially improve traffic circulation by limiting bus traffic to those vehicles that are picking up/dropping off passengers.



Alternative C has two sub-options – one with parking on the east and the other with parking on the west. It is not possible to comment extensively on the advantages/disadvantages of these two sub options without more fully developed plans, but we note that the east parking option will require careful consideration of the historic REA Building since it is located in the same general area as the proposed parking facility.

Regardless of the alternative that is ultimately selected, one of the most important historic preservation considerations is that all new construction should respect the prominent symmetry of Union Station’s design. This will be important near the station and also from long views where asymmetrical buildings would have even more potential to result in adverse visual effects. At present, none of the action alternatives adequately address this concern because they all propose buildings of radically different sizes on either side of a off-centered axis. We raised this issue during the March 12, 2018 meeting and are reiterating the concern in this letter to underscore its importance as a likely “adverse effect” for which avoidance and minimization alternatives must be evaluated.

Specifically, the concern stems from the proposal to locate the new “central” concourse platform off center (i.e. to the east) of the true central axis of the historic station (represented by the orange line in the plan to the right). We understand the proposed location relates to the existing change in grade between the upper tracks and the lower tracks and recognize that shifting the location may not be a simple matter, but we are also very concerned about this one decision because it manifests itself not only within the station, but also throughout the entire project area by dictating the shape and location of all new above grade development.



To address this concern, we are requesting FRA to analyze the possibility of shifting the new concourse platform further to west so that it will align with Union Station’s central axis. We do not have an east-west section of Alternative C, but in the Alternative B section below, this could potentially be achieved by “swaping” the locations of the Train Hall with the easternmost, upper level train track and platform (i.e. shifting the “Train Hall” to the left, and by shifting the easternmost train and platform to the right). We appreciate that FRA has verbally indicated their willingness to conduct further study on this topic.




In addition to resulting in symmetrical above-grade development, a centered concourse platform would help establish a logical circulation spine that could extend throughout the new and historical portions of Union Station and visually tie them together. This could reinforce the importance of the grand new entrance on H Street and assist station users in orienting themselves.

Although work within the historic station is not part of the current project, a central spine could also encourage, or at least not preclude, future improvements within the historic station that could provide functional and aesthetic benefits. For example, future relocation of the existing Amtrack ticketing desk and removal of all or portions of the 1980s mezzanine in the historic train concourse could facilitate direct passenger circulation through the historic Main Hall to the new train hall and improve views between the two grand spaces. Such improvements would go beyond merely preserving the historic station by fully integrating it into the new facility instead.

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. Otherwise, thank you for providing this additional opportunity to review and comment. We look forward to working further with FRA and all consulting parties to continue the Section 106 review of this important project.

Sincerely,


C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office

16-0114

UNION STATION EXPANSION PROJECT ACTION ALTERNATIVES



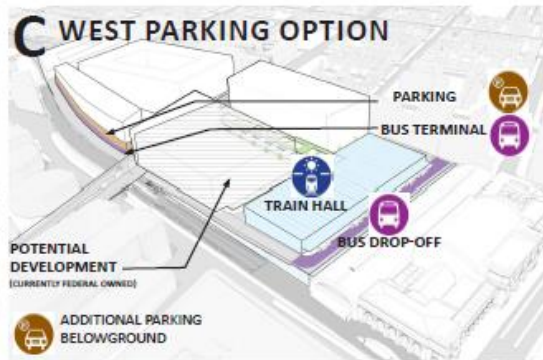
- NORTH-SOUTH TRAIN HALL
- SOUTHEAST BUS TERMINAL
- PARKING ABOVE: 1578 CARS (6 LEVELS)



- NORTH-SOUTH TRAIN HALL
- SOUTHEAST BUS TERMINAL
- PARKING BELOW: 1756 CARS (2 LEVELS)



- EAST-WEST TRAIN HALL
- SOUTH BUS DROP OFF AND NORTH BUS TERMINAL
- PARKING ABOVE AND BELOW
 - TOTAL 1668 CARS
 - PARKING ABOVE: 1056 CARS (4 LVLS)
 - PARKING BELOW: 612 CARS



- EAST-WEST TRAIN HALL
- SOUTH BUS DROP OFF AND NORTH BUS TERMINAL
- PARKING ABOVE AND BELOW
 - TOTAL 1668 CARS
 - PARKING ABOVE: 1056 CARS (4 LVLS)
 - PARKING BELOW: 612 CARS



- EAST-WEST TRAIN HALL
- SOUTH BUS TERMINAL
- PARKING:
 - TOTAL 1620 CARS
 - PARKING ABOVE: 1008 CARS (4 LEVELS)
 - PARKING BELOW: 612 CARS



- EAST-WEST TRAIN HALL
- SOUTH BUS TERMINAL
- PARKING:
 - PARKING BELOW: 1756 CARS

The Committee of 100 on the Federal City



www.committeeof100.net

May 7, 2018

Amanda Murphy
Federal Railroad Administration
USDOT
MS-20 RPD-13
1200 New Jersey Avenue SE
Washington, DC 20590

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Dear Amanda:

Thank you for opportunity to comment on the methodology of assessing the effects of proposed alternatives for the expansion of Union Station, and on the alternatives themselves.

Overall, the methodology outlined in the presentation offered at the April 24th, 2018 Consulting Parties meeting does seem appropriate. We commend the Federal Railway Administration on their intention to evaluate visual effects on historic properties as well as those caused by noise and vibration.

We should note, however, that at this stage we are being asked to consider effects only on generalized placement of various station functions – a new concourse, bus staging area, and parking. This approach allows us only to look at various volumetric representations. These representations are very vague, provided in a small graphic format, and make it extremely difficult to actually assess effects. Without the information that will be gleaned as a part of the methodology of assessing effects, we do not have the visual representations from all necessary angles to determine the impact on the historic Union Station or the surrounding area. There is also, at this point, no indication of architectural approach, materials, or clear passenger circulation patterns.

That said, there are a few of the proposed options that we think are particularly problematic. Specifically, Options D and E would seem to add a significant height and volume immediately adjacent to the historic station. Even with only the sample visual effect provided in the presentation, this would have a dramatic impact (and adverse effect) on the view of the station from E Street NW and the surrounding area. Given the proposed function for the upper parts of these options would include bus loading and staging areas, it is hard for us to imagine how any design approach could mitigate the impact to the symmetrical Beaux-Arts architecture of Union Station.

Options A and B, on the other hand, replicate somewhat the existing alignment, while pushing the height back from the station and allowing the new concourse to be aligned alongside the historic one. This approach could have merit – however, its success will rest very heavily on the design of the new concourse and how it would be integrated. It is impossible to tell from a purely volumetric study devoid of illustrations depicting visual effects.

Option C could also have merit. It does respect more the symmetry of Union Station, but it appears that the new concourse would be elevated as would be bus circulation – leaving it unclear how the new construction would be integrated with the station.

Overall, while we appreciate the careful and deliberate manner the FRA has proceeded with consultation, we still feel as if the consultation process is more explanatory than consultative. Meaningful consultation on the potential impacts of expansion to Union Station will require adequate design studies, visual representations and circulation patterns. We hope that the information you glean from the application of the Methodology you have outlined will be presented to consulting parties so that we can provide meaningful input on the proposed options at that time, helping to inform a final selection.

Sincerely,



Erik M. Hein
Secretary, Committee of 100 on the Federal City
Co-Chair, Historic Preservation Subcommittee

cc: Sarah Stokely, Advisory Council on Historic Preservation



420 10th Street, SE Washington, DC 20003
info@chrs.org, 202.543.0425

May 8, 2018

USDOT Federal Railroad Administration
Attn: Amanda Murphy
Environmental Protection Specialist
Office of Railroad Policy and Development
1200 New Jersey Ave., SE MS-20
Washington, DC 20590

Re: Washington Union Station Expansion Project (WUS SEP)

Dear Sir or Madam,

The Federal Railroad Administration (FRA) has requested comments following the 5th Consulting Parties meeting on April 24, 2018. The Capitol Hill Restoration Society (CHRS) welcomes the opportunity to contribute to this very important project.

The Agenda for the April 24 meeting states that its purpose was to “describe the methods for assessing effects to the identified historic properties within the APE” (Area of Potential Effects). This meeting also included a brief overview of the project concept alternatives that were presented to the public on March 22, 2018. FRA has requested our comments on the proposed “methods for conducting the assessment of effects” on historic properties within the APE that will result from the concept alternatives.

CHRS finds that it is not feasible to evaluate the adequacy of the proposed methodology. The Environmental Impact Statement (EIS) and related Section 106 Review do not include the entirety of the Union Station Expansion. The on-going EIS presages the design not only of the Union Station Rail Terminal expansion, but also of the closely related Burnham Place air rights project and the H Street Bridge reconstruction. FRA has largely ignored the cumulative impact of these three integrally related projects. Alone, each of these projects represents a very significant investment in which the public and the surrounding community have a vital interest.

Taken together, these projects represent a transformation beyond even regional significance.

CHRS is very cognizant of the tremendous complexity of each of these three projects (Union Station Terminal Expansion, Burnham Place, H Street Bridge replacement). Each project taken alone poses complex issues not only in design but also in construction. We understand FRA's desire to simplify the scope of the EIS in order to make it more manageable. However, that simplification also renders the on-going EIS as an expensive, time consuming, but ultimately ineffective exercise. Even worse, the completed EIS is highly likely to hamstring later design opportunities by locking-in sub-optimal design and operational alternatives based on the narrow focus underpinning the EIS process.

We believe that limiting the scope of the EIS and Sections 106 processes will result in missed opportunities that will limit later design options and compromise Union Station's fundamental operational purpose: to accommodate both present and future rail service. We note the following examples of where the on-going process fails to provide useful information as the entire project moves into the design phase:

1. Coordination between the proposed and existing terminals is very weak due to the failure to include the former train shed in the concept alternatives for the expansion. Because the historic train shed is excluded from the project alternatives, the EIS and Section 106 reviews will not include in-depth analysis of that area. This will lead to designs that avoid integration of the existing and expanded train terminal.
2. Analysis of access to the expanded Union Station complex is inadequate. A facility, ostensibly designed as an intermodal hub, must take into consideration the network of roads and transportation options. However, current and projected ridership and trip generation numbers for the various modes of transportation have not been presented. Even more basic is the need for the EIS to take into account the ridership projections of Amtrak, VRE, MARC and High-Speed rail to the south and demonstrate how the proposed design accommodates those projections. At the April 24th meeting we were told a "transportation study" would be available in winter 2019. That is after our 6th meeting this summer or fall when comments on the draft Memorandum of Agreement (MOA or PA) are due, and perhaps even after or coincident with the final, 7th Consulting Parties meeting in spring 2019 when we apparently have a last chance to "consult."
3. Burnham Place with its anticipated 3 million square feet of building area will sit atop the terminal expansion. That Burnham Place is a private investment does not excuse excluding its impacts from this process. These projects are very closely related and need to be fully integrated with each other to be successful. In fact, every proposed development alternative for FRA's proposed expansion envisions some form of air-rights swap, sale, or expropriation between these two interconnected projects.
4. The H Street Bridge doesn't even get a mention in FRA's analysis. The H Street bridge and tunnel have been absent from the public presentations or consulting party

meetings. This overlooks the opportunity to explore reopening the H Street tunnel to vehicular traffic, or perhaps even doing away with the H Street Bridge and returning the street to grade level.

The Washington Metropolitan Area and Washington, DC, in particular, have undergone enormous change in the last few decades with significant new development throughout the District and the region. We are experiencing unprecedented congestion highlighting the urgent need for improved and widely distributed access to public transit. This greatly elevates the significance of this project as the region's single designated multimodal transport hub – a decision that looks back to the conditions that prevailed in the 1980s. Instead the EIS and Section 106 review need to look forward and envision the totality of the transformation proposed for Union Station within the context of a greatly expanded region. It would be ironic if the Washington region's premier intermodal transportation hub were itself to become practically inaccessible.

We thank you for considering our comments.

Sincerely,



Elizabeth Nelson, President

Amanda Murphy Amanda.murphy2@dot.gov

Cc
Charles Allen, Ward 6 Council Member, callen@dccouncil.us

Brian Kenner, Deputy Mayor for Economic Development, dmped.eom@dc.gov

Jennifer Steingasser, DC Office of Planning, Deputy Director for Development Review and Historic Preservation, Jennifer.steingasser@dc.gov

Jeff Marrotian, Director of DC DDOT, ddot@dc.gov

Karen Wirt, Chair, ANC 6C, 6C02@anc.dc.gov

Robin-Eve Jasper, President of NoMa BID, rjasper@nomabid.org

DC Committee of 100, jasmailes@gmail.com

Rob Nieweg, National Trust for Historic Preservation, rnieweg@savingplaces.org

David Tuchman, Akridge Development, dtuchmann@akridge.com



Government of the District of Columbia
**Advisory Neighborhood
Commission 6C**

May 9, 2019

Ms. Katherine Zeringue
Federal Railroad Administration
US Dept. of Transportation
MS-20 RPD-13
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Washington Union Station Expansion Project
Draft Assessment of Effects to Historic Properties

Dear Ms. Zeringue,

Advisory Neighborhood Commission 6C (ANC 6C) welcomes this opportunity to comment on the March 2019 Draft Assessment of Effects to Historic Properties. Union Station is a crown jewel of our ANC and is an integral part of our neighborhood.

Although ANC 6C is accustomed to reviewing the many PUD projects in NOMA and the Union Market area, the Washington Union Station Expansion together with Burnham Place is undoubtedly the largest project we are likely to ever address. Critical among our review criteria for all large projects in ANC 6C has been an assessment of the traffic impacts on the adjacent neighborhoods, especially within the Capitol Hill Historic District (which includes roughly half of our constituents).

We object to the draft report's determination of "no adverse effect" on the Capitol Hill Historic District, which you concede was made without the benefit of a traffic analysis. *See p. 25 n. 29.* We are at a loss to understand how, as a process matter, the draft report can reach any determination of the impacts without such a traffic analysis. Substantively, we believe there will be significant adverse traffic effects on the Capitol Hill Historic District and the neighborhoods north of H Street NE directly attributable to the expansion of Union Station. Even under present conditions, these neighborhoods suffer from a sub-optimal traffic pattern that displaces traffic onto the residential streets east of Union Station.

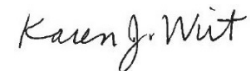
Some of the Action Alternatives envision utilizing K Street NE as a primary vehicular entrance to underground parking areas. As we stated in our previous written comments, we strongly object to burdening the residential areas of Near Northeast with additional traffic volumes. The Action Alternatives uniformly fail to address vehicular circulation issues, and it is

sadly ironic that a project involving a multi-modal transit facility would omit meaningful analysis of the existing roadway usage.

In conclusion, ANC 6C disagrees with and objects to the determination of “no adverse effect” to the Capitol Hill Historic District. We strongly urge you to revisit the assumptions made in the draft report and to incorporate more rigorous transportation-impacts analysis.

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

Sincerely,



Karen Wirt
Chair, ANC 6C

cc: Councilmember Charles Allen, Ward 6
Jeff Marootian, Director, DC DDOT
C. Andrew Lewis, DC Historic Preservation Office
Rob Nieweg, National Trust for Historic Preservation
Ms. Beverly Swaim-Staley, USRC



IN REPLY REFER TO:
NCPC FILE No. 7746

May 9, 2019

Ms. Katherine Zeringue
Federal Preservation Officer
Office of Railroad Policy and Development
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Washington Union Station Expansion Project Comments on Draft Assessment of Effects Report, Section 106 Consultation

Dear Ms. Zeringue:

Thank you for the opportunity to provide scoping comments on the draft Assessment of Effects Report (dated March 2019) for the proposed Washington Union Station Expansion Project. The Project includes reconstructing and relocating tracks, developing new concourse facilities, maintaining multimodal transportation services, and improving and expanding infrastructure and other facilities. The National Capital Planning Commission (NCPC) authority includes approval of site development and building plans on federal lands (40 U.S.C. Section 8722(b)(1) and (d)), and approvals of certain sales or transfers of jurisdiction within the District of Columbia. NCPC also reviews certain zoning districts and developments, including the Union Station North (USN) Zone and the future Burnham Place project. NCPC will rely on the Environmental Impacts Statement (EIS) prepared by the Federal Railroad Administration (FRA) to fulfill its responsibility under the National Environmental Policy Act (NEPA) for any necessary approvals. NCPC also has an independent obligation to comply with Section 106 of the National Historic Preservation Act (NHPA), and therefore requests to be a signatory on the Programmatic Agreement (PA) prepared during the consultation process.

NCPC staff supports efforts to enhance multimodal transportation service and access for the nation's Capital. The *Comprehensive Plan for the National Capital* states the importance of developing and maintaining a multi-modal regional transportation system that meets the travel needs of residents, workers, and visitors. At the same time, the important historic and cultural resources of the capital should be protected and enhanced.

As such, NCPC staff remain particularly interested in the potential effects of the proposed undertaking on the Union Station building, the Union Station Historic Site, and how additional development may alter the perception of the building and the critical viewsheds of the Plan for the City of Washington. We appreciate the general thoroughness of the draft assessment and the

Ms. Katherine Zeringue
Page two

significant number of historic properties that were evaluated. Staff also concurs that the alternatives, as currently described, are likely to result in adverse effects on those properties specified in the report. However, the assessment should also include additional narrative and analysis that compare the various alternatives, particularly regarding visual effects. This analysis will provide a basis by which the consulting parties can discuss ways to further avoid, minimize or mitigate impacts for each alternative, and may help inform selection of the preferred alternative. We also request the report include a more robust description and analysis of cumulative effects.

Regarding the process moving forward, we request that the Commission have an opportunity to formally provide comments and recommendations on the alternatives prior to selection of the preferred alternative. Please coordinate with NCPC staff to discuss submission for a concept review that will allow this to occur. We appreciate the continued coordination on this important and complex project, and we look forward to continued consultation. If you have any questions regarding our comments, please contact Matthew Flis at 202.482.7236 or matthew.flis@npsc.gov or Lee Webb at 202.482.7240 or lee.webb@npsc.gov.

Sincerely,



Diane Sullivan, Director
Urban Design and Plan Review Division

cc: Andrew Lewis, District of Columbia State Historic Preservation Office
Jamie Loichinger, Advisory Council on Historic Preservation
Frederick Lindstrom, US Commission of Fine Arts



420 10th Street, SE Washington, DC 20003
info@chrs.org, 202-543-0425

May 10, 2019

Ms. Katherine Zeringue
Federal Railroad Administration
US Dept. of Transportation
MS-20 RPD-13
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Washington Union Station Expansion Project:
Draft Assessment of Effects to Historic Properties

Dear Ms. Zeringue,

The Capitol Hill Restoration Society (CHRS) appreciates this opportunity to comment on the Draft Assessment of Effects to Historic Properties (DA) report dated March, 2019. CHRS's representatives have attended the Consulting Party meetings that began in early 2016. The most recent meeting on April 30, 2019 provided additional information on the DA. With the exception of Union Station itself and the REA Baggage Express Building the DA identified no other properties with an adverse effect.

CHRS's primary concern is the effect of the WUS Expansion on the Capitol Hill Historic District. We disagree with the DA determination of "No Adverse Effect" on the Capitol Hill Historic District, in particular, footnote 29, which states:

Traffic Impact Analysis, conducted as part of the EIS, will fully evaluate the impacts (not just to historic properties) of future traffic, including WUS-generated traffic, on the operation of the street network near WUS for the No-Action Alternative and the Action Alternatives.

The DA's conclusion of "No Adverse Effect" cannot be made without due consideration of the effect that increased traffic will have on the Capitol Hill Historic District and object

to this presumption in the absence of a full traffic analysis. Some information contained in the DA with regard to traffic can be gleaned from Section 4.3 “Noise and Vibration Effects”. We disagree that only noise and vibration pose a potential adverse effect; traffic itself can greatly diminish the quality of the historic district.

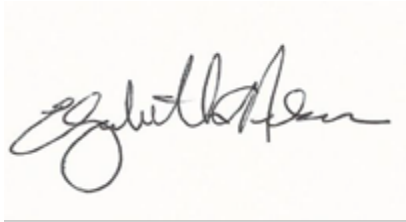
Table 2 “Existing and Projected Passenger Volumes at Union Station” envisions total daily passengers on Amtrak, MARC, VRE and Intercity bus to more than double with any of the Action Alternatives. Even at current levels, vehicular traffic associated with pick-up and drop-back up onto nearby streets at both the front and rear of Union Station, at peak periods. Taxis that drop off passengers near Union Station often return to the queue on the H Street Bridge using either Third Street or North Capitol to circle between the front and rear of Union Station. This pattern of vehicular circulation and the DA report’s estimate that this traffic pattern will more than double directly impacts the Capitol Hill Historic District. This is an adverse effect on the Capitol Hill Historic District

Table 3 “Projected Increases in Traffic Volumes over Existing Volumes (2040) employs misleading information in order to reach a conclusion of no adverse effect. The analysis is based on an unspecified, projected traffic volume in 2040. The “No-Action Alternative” includes an unspecified traffic volume from the Burnham Place air rights project - and presumably other as-yet-unbuilt projects - to reach its conclusions regarding Noise and Vibration. Setting aside the accuracy or usefulness of Table 3, this table indicates that WUS Expansion will result in significant increased traffic within the Capitol Hill Historic District. The Action Alternatives predict a 71% increase in traffic volume on the H Street Bridge (relative to existing plus Burnham Place). However, east of Fourth Street, NE the increase in traffic is only 42%. Even if we were to believe the traffic volumes in Table 3, it predicts that 29% of the traffic on H Street, NE (a major arterial) will either come from or be diverted onto residential Third and Fourth St, NE. This is a significant adverse effect on the Capitol Hill Historic District.

More generally, CHRS has been very critical of fundamental assumptions embedded within the EIS and Section 106 Review for the Union Station Expansion. The transformation of Union Station - inclusive of Burnham Place and the H Street Bridge - must be examined in its entirety. CHRS has repeatedly urged that the project alternatives should envision use of the H Street tunnel as a critically important link between 1st and 2nd Streets, NE for WUS traffic. Whether the H Street Bridge should be rebuilt or demolished (in whole or in part) and whether other road network changes are needed should also be part of the public discussion for a project of this significance.

On the narrow question of the Draft Assessment’s determination of No Adverse Effect on the Capitol Hill Historic District, CHRS disputes that determination. We are very disappointed that the EIS and Section 106 Review have not been used, as they should have been, to provide a meaningful review process focused on achieving the best possible outcome for the project, in its entirety. We are very concerned that any Programmatic Agreement resulting from this process will result in diminished opportunities for problem solving and limit design options for Burnham Place.

Sincerely,

A handwritten signature in black ink on a light-colored background. The signature is cursive and appears to read "Elizabeth Nelson".

Elizabeth Nelson, President
Capitol Hill Restoration Society

Cc:

Councilmember Charles Allen, Ward 6: callen@dccouncil.us
Beverly Swaim-Staley, Union Station Redevelopment Corporation: bswaimstaley@usrcdc.com
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David Tuchman, Akridge: dtuchmann@akridge.com
James Smailes, Chair, Transportation Sub-committee, Committee of 100 on the Federal City:
jasmailes@gmail.com
Rob Nieweg, National Trust for Historic Preservation: rnieweg@savingplaces.org
Eric Hein, Exec. Director, National Conference of State Historic Preservation Officers:
hein@ncshpo.org

The Committee of 100

on the Federal City



Ms. Katie Hummelt
Associate, Architectural Historian
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May 13, 2019

Dear Katie:

The Committee of 100 on the Federal City appreciates the opportunity to comment on the Draft Assessment of Effects Report for the Washington Union Station Expansion Project. Overall we find the document to be very well written and organized, and we concur with most of the findings of effect. That said, we do have comments and concerns we would like to address.

We believe that the finding of no adverse effect resulting from an increase in noise and traffic on the Capitol Hill Historic District is premature.

The conclusion that an increase in traffic and noise would have no adverse effect upon the Capitol Hill Historic District, in our view, is based upon both an incomplete and too narrow of an analysis. First, it was acknowledged that traffic impacts are being considered as a part of the Environmental Impact Statement (EIS) – a draft of which will not be ready until fall. We believe this information is necessary to properly evaluate the impact upon the historic district. The rationale provided for your determination of no adverse effect in the absence of this information seems to rest upon a narrow interpretation that increases in noise and traffic would simply not impact the significance of the historic district. While this may be true, it does not take into account other effects which could adversely affect the district. A substantial increase in traffic and noise, for example, could render a historic district no longer accessible or desirable – directly impacting the ongoing use and preservation of historic properties. The Advisory Council on Historic Preservation regulations (36 CFR 800.5(a)(1)) state that effects that are “reasonable and foreseeable” that may occur in the future must be considered. Further, the “introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features,” is provided as a specific example in 36 CFR 800.5(a)(2)(v). While the Capital Hill Historic District is an urban one, and traffic

and noise would be expected, we do not believe that that amount to necessarily be infinite. Therefore, those effects should be more closely evaluated once the traffic study is completed.

An analysis comparing the effects of various alternatives would be helpful.

While the effects on each of the historic properties in the Area of Potential Effect were individually evaluated, and some discussion of the adverse effects presented by each of the alternatives, there is not much in the way of analysis of advantages or disadvantages. While we appreciate the determination of adverse effects, it is hard to determine how the alternatives compare to each other in any quantifiable way.

The impact of various alternatives on subsequent air rights development(s) remains a concern.

We continue to have serious concerns about the impacts of the various alternatives upon the anticipated private and/or federal air rights development opportunities. While we appreciate the attempt at visually representing the potential impacts of the private and federal development opportunities, it is unclear to us how and whether these impacts will be assessed. Each of the alternatives will have a substantial effect upon these development projects – particularly in how new buildings will be aligned and will relate to the symmetrical nature of the station. While we certainly are not reviewing the development projects themselves, there is no reason why we can't consider how the various station expansion alternatives will influence the location, size and availability of the air-rights development. Since the development is both reasonable and foreseeable, we believe there needs to be some clear consideration and evaluation of how each alternative will impact development potential.

Sincerely,

A handwritten signature in blue ink that reads "S. A. Hansen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Stephen Hansen
Chair, Committee of 100 on the Federal City

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



May 17, 2019

Ms. Katherine Zeringue, Federal Preservation Officer
U.S. Department of Transportation
Federal Railroad Administration
Office of Railroad Policy and Development
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: *Draft Section 106 Assessment of Effects to Historic Properties; Washington Union Station Expansion Project; March 2019*

Dear Ms. Zeringue:

Thank you for providing the DC State Historic Preservation Officer (DC SHPO) with a copy of the *Draft Section 106 Assessment of Effects to Historic Properties; Washington Union Station Expansion Project; March 2019* (AOE), and for hosting a consulting parties' meeting to discuss the proposed findings on April 30, 2019. We are writing in accordance with Section 106 of the National Historic Preservation Act to provide additional comments regarding effects on historic properties. These comments are based upon our review of the AOE and our participation in the consulting parties' meeting.

The AOE was well-written and organized and we appreciate the effort that obviously went into developing the document. Since we generally agree with the majority of the AOE's findings of "no adverse effect," our comments will focus primarily on the three properties that were identified as being adversely affected by the Washington Union Station Expansion Project, specifically the historic train station, the Railway Express Agency (REA) Building, and the Union Station Historic Site (i.e. the station, the railyard and the 1st Street Tunnel which were recently determined eligible in a Determination of Eligibility Form).

It is critically important that the full range of potential adverse effects be thoroughly identified and described in the AOE since the report will serve as the basis for the forthcoming Programmatic Agreement (PA) and the avoidance, minimization and mitigation measures that it will include. Although the AOE addresses adverse effects related to physical, visual, and noise and vibration-related causes, it does so only in general terms. More specificity about the range/array/types of potential adverse effects will be required to make meaningful suggestions for the types of actions that may be taken to resolve the adverse effects. The following comments address the types of adverse effects which we believe the AOE should evaluate in more detail.

The AOE should provide more specifics about the adverse effects that will result from failing to preserve distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize the property (i.e. *Secretary of the Interior's Standard No. 5*). Incorporating a detailed list or table that outlines all of the historic fabric that will be destroyed by each alternative would be helpful in this regard.

We are particularly concerned about the types of adverse effects that may result from the massing, scale and other design-related aspects of the proposed new construction, specifically as they relate to the *Secretary of the Interior's Standards No. 2 and No. 9* in terms of “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.”

For example, the AOE describes adverse visual effects “from various vantage points of the L’Enfant Plan” but does not appear to evaluate them from the H Street Bridge where important views of the historic train station will be either be appropriately preserved, framed and celebrated, or inappropriately compromised or blocked. The AOE should include photo simulations looking south from the H Street Bridge to properly evaluate the potential that each alternative has for adverse effects of this type at this important location.

On a related note, the potential for adverse effects that could result from improperly designed “Access Zones” in Alternatives C (East/West), D and E is not sufficiently evaluated. The illustrations suggest these zones might be solids rather than voids and the footnote on page 50 describes them as follows:

³⁹ The designated “Access Area” delineates an area within which visual connections, vehicular access, pedestrian access points to the station, and daylighting features to the central concourse could be established. These objectives should be achieved through a design that reflects the civic importance and identity of the station and enhances integration with and connectivity to the adjacent neighborhoods. The physical points of access and connections are intended to occupy only a portion of this area.

We are concerned that these zones are described as areas where critically important visual connections and access could be established, and that a design reflecting the civic importance and identity of the station merely should be achieved. Failure to provide critically important visual and physical access to the historic station and/or to develop a design commensurate with the civic importance and identity of Union Station would significantly increase the number and intensity of adverse effects. The AOE should provide more information about the potential adverse effects of this sort.

Similarly, the AOE should provide a detailed analysis of how the visual effects of each alternative compare to each other. For example, the Summary of Effects Matrix Table uses the exact same language for each alternative even though Alternatives A, B, D and E locate taller new construction closer to the historic station than Alternative C which proposes a lower volume adjacent to the station and also incorporates a buffer to minimize the visual effects. In other words, the AOE should summarize what the illustrations suggest. This may be best achieved through an additional narrative summary.

Page 173 of the AOE describes the potential beneficial effect that would result from the removal of the Amtrak ticket office inside the historic passenger concourse. We fully agree with this statement but note that adverse effects may not be limited to the exterior. The AOE should also identify potential adverse effects that may result on the interior of Union Station. Examples may include attached new construction and/or related interior renovations that disrupt historic circulation patterns, impede important interior site lines, or directly alter historic fabric.

Comments to this point have focused primarily on the three adversely affected properties but the following comments relate not only to station, REA Building and historic site, but also to other properties which were identified as not being adversely affected, including the Capitol Hill Historic District.

With regard to noise and vibration, we acknowledge that train-related sounds and vibrations are associated with Union Station but we cannot agree that the intensive levels of noise and vibration caused by what is likely to be decades of significant new construction have no potential to adversely affect Union Station's integrity of "feeling" and "association." Jackhammers, pile drivers, and related heavy construction equipment are not associated with train operations but they do have potential to affect these aspects of Union Station's integrity. On the other hand, we also recognize that noise and vibration will be necessary to construct the project so we are not suggesting these likely adverse effects must be completely avoided, but we are strongly recommending that they be minimized as much as possible through reasonable approaches such as building monitors; using trains to remove debris instead of trucks; establishing noise level thresholds during working hours; installing temporary sound dampening walls; drilling rather than pile driving (when possible); and other industry standards.

Similar statements can be made for potential adverse effects associated with traffic. We understand that future study will provide more definitive data, not only on the noise and vibration associated with possible traffic increases, but also the potential increases in the volume (i.e. amount) of traffic. We believe that this data may support a finding of adverse effect since traffic jams also have the potential to affect the integrity "feeling" and "association" of historic neighborhoods. The AOE should be revised to incorporate and analyze the data if it is possible to do so within project timelines. If not, the AOE should be revised to document that further analysis will be conducted as soon as the data becomes available, and to recommend reasonable approaches that could be used to minimize any traffic-related adverse effects, if the data support it. The PA should also be drafted accordingly.

Notwithstanding the comments about more specificity above, we recognize that the AOE can only go "so far" in identifying the range of potential adverse effects at this point so we stress that the PA must be drafted in a manner that provides opportunities for the reevaluation of known adverse effects, and the identification of new and/or intensified adverse effects once more thoroughly developed plans and related project information are available for review.

Finally, the AOE should better address the cumulative effects of the project and related development. This includes the potential adverse effects referenced above and, to the extent possible, those associated with the eventual construction of Burnham Place. We understand that Burnham Place is not part of FRA's undertaking but there is nothing in the Section 106 regulations that prohibits FRA from working collaboratively with Akridge to plan for the best possible outcome and, as several consulting parties expressed during the meeting, it is impossible to fully evaluate the effects of the Expansion Project on Union Station and the surrounding historic properties without simultaneously considering Burnham Place.

Ms. Katherine Zeringue

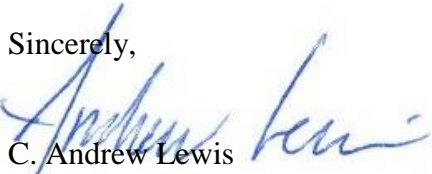
Draft Section 106 Assessment of Effects to Historic Properties; Washington Union Station Expansion Project; March 2019

May 17, 2019

Page 4

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. Otherwise we look forward to reviewing a revised version of the AOE when it becomes available and to working further with FRA and all consulting parties to continue the Section 106 review of this important project.

Sincerely,



C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office

16-0114



**National Trust for
Historic Preservation**
Save the past. Enrich the future.

May 21, 2019

VIA EMAIL [khummelt@bbbarch.com]

Ms. Katherine Zeringue
Federal Railroad Administration USDOT
MS-20 RPD-13
1200 New Jersey Avenue SE
Washington DC 20590

Re: WUS Expansion Project / Draft Assessment of Effects

Dear Ms. Zeringue:

Thank you for the opportunity to comment on the “Draft Section 106 Assessment of Effects to Historic Properties” (DAOE) for the Washington Union Station Expansion Project, and for granting our request to extend the comment deadline for one additional week. We appreciate the valuable Section 106 consultation meeting that was convened on April 30 to discuss the issues raised by the DAOE report. The National Trust for Historic Preservation has been intensively involved in this matter since 2012, when the Second Century Master Plan was released to the public. The National Trust believes that, taken together, the Union Station expansion project and the Burnham Place private air-rights development project can be a golden opportunity to re-invest in historic Union Station, an iconic National Treasure. Indeed, in 2012, the Union Station Preservation Coalition advocated that: “Union Station must become a splendid neighborhood anchor. The expansion of Union Station is an unprecedented opportunity for the surrounding neighborhoods. The project should support community revitalization and create new connections that benefit travelers and neighbors.”

Throughout the year, the National Trust meets regularly with the Union Station Redevelopment Corporation and other agencies and stakeholders to confer about protection of Union Station pursuant to the indispensable Historic Preservation Plan. We commend USRC for its inspired work to restore Union Station.

Amtrak Expansion and Burnham Place

From the outset, the National Trust has advocated that the expansion/modernization of Union Station and the construction of Burnham Place should be reviewed simultaneously to ensure the best outcome. We continue to concur with USRC’s 2016 statement that: “The Burnham Place development is fully integrated with Amtrak’s proposed track and concourse improvements and will essentially create a new neighborhood center at Union Station that will better connect it to the surrounding communities of NoMa, H Street, and

Capitol Hill.” This will be one fully integrated and tremendously important project that will transform the District of Columbia and, certainly, the Capitol Hill Historic District.

The Draft Assessment of Effects begins to assess the impacts of Burnham Place as one aspect of the Non-Action Alternative. However, it is not sufficiently clear to us how the impacts of the Burnham Place development are evaluated. At the April 30 consultation meeting, the Advisory Council on Historic Preservation asked the Federal Railroad Administration to revise the draft to more clearly explain how the DAOE analyzes the impacts of Burnham Place.

The National Trust concurs with the assessments regarding adverse effects on the Washington Union Station Building, the Washington Union Station Historic Site, and the Railway Express Agency Building. However, we do not concur with the assessment regarding the Capitol Hill Historic District. In addition, we share the concerns articulated by the State Historic Preservation Office about the potential for adverse effects to the interior of Union Station building from construction or interior renovations that could disrupt historic circulation patterns or interior sight lines, or destroy historic fabric.

Capitol Hill Historic District

The DAOE report concludes there will be no adverse effect to the Capitol Hill Historic District from any of the alternatives. The National Trust disagrees with this finding, pursuant to 36 C.F.R. § 800.5(c)(2)(i).

This no-adverse effect finding in the DAOE report is based on the fundamental presumption, also articulated at the April 30 consultation meeting, that traffic by its nature does not inherently have the potential to adversely affect a historic district or historic property, unless it causes specific noise or vibration levels that rise above certain levels. We strongly disagree.

As the SHPO comments emphasized, “traffic jams ... [do] ... have the potential to affect the integrity ‘feeling’ and ‘association’ of historic neighborhoods.” We also agree with the SHPO that a thorough traffic study is needed in order to adequately assess the potential impacts of traffic on the Capitol Hill Historic District, especially the potential cumulative traffic impacts of the fully integrated Union Station and Burnham Place development.

But even the preliminary traffic information summarized in the DAOE shows that the cumulative impacts of the development at Union Station will foreseeably result in dramatic increases in traffic within the Capitol Hill Historic District. For example, as summarized in the comments of the Capitol Hill Restoration Society, the Action Alternatives predict a 71% increase in traffic volume on the H Street Bridge just from the Union Station expansion. East of Fourth Street NE the increase in traffic will be 42%. (DAOE, Table 3.) We believe these numbers understate the true cumulative impact of the traffic increases.

The exclusive focus on noise and vibration levels from increased traffic overlooks the many ways in which these extreme traffic impacts will adversely affect residents and business owners within the Historic District, by interfering with parking and access to

homes and businesses, safe mobility for pedestrians and bicycles, and general quality of life within the Historic District. We agree with the SHPO that these constitute potential adverse effects to the integrity, feeling, and association of the Capitol Hill Historic District.

The Capitol Hill Restoration Society, a dedicated and award-winning civic association, exists to preserve the neighborhood's historic character and to enhance the neighborhood's livability through attention to planning, zoning, preservation, and public safety. Indeed, CHRS has a longstanding special concern about existing and potential future "incursions into the neighborhood by increased cross-town traffic." The National Trust shares the concerns of the Capitol Hill Restoration Society, and the SHPO, that the increased volume of vehicular traffic through the historic neighborhood from the Union Station expansion project and Burnham Place development has the potential to adversely impact the Capitol Hill Historic District.

Conclusion

In sum, the "Draft Assessment of Effects" needs to be revised to acknowledge that all Action Alternatives -- and the No-Action alternative -- would have an adverse effect on the Capitol Hill Historic District. In addition, a full traffic impacts analysis needs to be conducted considering the integrated Union Station expansion and Burnham Place development.

In addition, the document needs to be revised to clearly explain how the potential impacts of the Union Station expansion and Burnham Place development are being considered pursuant to Section 106, consistent with the April 30 comments from the Advisory Council on Historic Preservation.

Thank you for considering the comments of the National Trust. We look forward to further consultation as the Section 106 review proceeds.

Sincerely,



Elizabeth S. Merritt
Deputy General Counsel
National Trust for Historic Preservation



Rob Nieweg
Senior Field Director & Attorney
National Trust for Historic Preservation

cc: Sarah Stokely, Jaime Loichinger, and Reid Nelson, Advisory Council on Historic Preservation
David Maloney and Andrew Lewis, D.C. Historic Preservation Office
Elizabeth Nelson, Capitol Hill Restoration Society
Stephen Hansen, Committee of 100 on the Federal City



Preserving America's Heritage

May 22, 2019

Katherine Zeringue
Federal Preservation Officer
U.S. Department of Transportation
Federal Railroad Administration
Office of Railroad Policy and Development
1200 New Jersey Avenue, SE
Washington, DC 20590

Ref: Proposed Washington Union Station Expansion Project
Washington, District of Columbia
ACHP Connect Case #009904

Dear Ms. Zeringue:

On March 29, 2019, the Federal Railroad Association (FRA) provided the Advisory Council on Historic Preservation (ACHP) with its draft Section 106 Assessment of Effects to Historic Properties Report (Effects Report) for the referenced undertaking. The Effects Report is submitted as part of the FRA's compliance with the Section 106 (54 U.S.C. § 306108) of the National Historic Preservation Act (NHPA) (54 U.S.C. § 300101 et seq.) and its implementing regulations, "Protection of Historic Properties" (36 C.F.R. Part 800). As the ACHP is participating in consultation, we are providing our comments regarding FRA's preliminary assessment of effects. Our comments are also informed by the April 30th, 2019, consultation meeting regarding this Effects Report.

The Effects Report provides a good overview of the consultation conducted thus far, and appropriately describes the historic properties within the Area of Potential Effect (APE). In the Effects Report, FRA analyzed the potential effects to 49 historic properties and 6 culturally significant viewsheds under 5 "Project Action" alternatives (Section 7 Assessment of Effects). However, the ACHP is concerned certain potential effects have not been adequately addressed in this Effects Report. We suggest that additional information and further revisions will be required to address the following:

- *Reasonably foreseeable effects from the proposed private air rights development.* During the recent consultation meeting, FRA stated that it will analyze these effects in the Draft Environmental Impact Statement (DEIS). While these effects should be assessed pursuant to the National Environmental Policy Act (NEPA), they are also reasonably foreseeable effects that should also be considered pursuant to 36 C.F.R. § 800.5(a)(1). Accordingly, in revising the Effects Report, FRA should provide a discussion of these effects, the methodology for assessing them, and a summary of these effects for each alternative. Additionally, during the last Section 106 consultation meeting and discussed in the Effects Report, some of the alternatives include the creation of developable air-rights available on current federal property and if one of these alternatives is selected as the preferred alternative, a property transfer, lease or disposal may occur (Section 1.5 Agency Official for the WUS Expansion Project; page 10). FRA should provide additional information in the Effects Report explaining how these air rights could be developed for certain

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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alternatives, their relation to the proposed private air rights development, and the potential effects of their development for each alternative. This analysis is needed to ensure FRA is considering all the potential effects related to the air rights development and ways to avoid, minimize or mitigate these potential adverse effects earlier in consultation.

- *The effects of increased traffic to the historic residential neighborhoods.* FRA explained in the last consultation meeting that the DEIS will provide more information related to the traffic studies, and the DEIS will be available for review and comment in the early fall of 2019. However, there is concern that the potential for increased traffic could adversely affect the integrity of historic properties, including the Capitol Hill Historic District. The traffic studies completed to date do not include certain roads, which results in insufficient data to consider the range of effects on historic properties. The ACHP requests that FRA consider expanding the scope of the traffic studies if certain roads were not included, so that consulting parties can better understand the percentage of traffic increase within certain historic properties during and after construction.
- *The undertaking's visual effects, cumulative effects, and effects to the interior of the Washington Union Station (WUS).* The Effects Report would benefit from a more robust discussion of how each alternative would affect the integrity of location, design, setting, materials, workmanship, feeling, and association for the identified adversely effected historic properties (Section 7.2 Summary of Effects). This includes providing additional information and graphics related to potential visual impacts, and additional information related to the potential effects to the interior of the WUS. Additionally, the ACHP requests FRA include a thorough analysis of cumulative effects in the Assessment of Effects Section.
- *Noise and vibration effects.* Because the undertaking could have noise and vibration effects, FRA should consider developing a Monitoring Plan to be included with the proposed Programmatic Agreement (PA). While some of the historic properties within the APE may not be adversely affected by the noise and vibration from construction and operation, it may be appropriate to monitor these properties and have baseline information in order to confirm that they remain unaffected.

Although FRA is proposing a Programmatic Agreement (PA) that will allow for further Section 106 consultation once a preferred alternative is selected and its design is developed and refined, additional analysis of the effects is needed at this point to understand which alternative(s) has the least and the most potential to affect historic properties. A more thorough effects assessment would facilitate the selection of a preferred alternative. Additionally, while FRA has stated that it cannot make a finding of effect for the No Action Alternative, the ACHP recommends FRA make a finding of effect for it (Section 4 Methodology, page 20). The analysis and comparison of all alternatives will allow the federal agency to meet the consultation requirements of the Section 106 regulations and to seek ways to avoid, minimize or mitigate any adverse effects on historic properties (36 C.F.R. § 800.1(a)).

We look forward to receiving a revised Effects Report. Our comments should be considered along with other relevant comments and edits submitted by other consulting parties who are participating in the Section 106 consultation process. If you have questions or concerns, please contact Sarah Stokely at (202) 517-0224, or via e-mail at sstokely@achp.gov.

Sincerely,



Jaime Loichinger
Assistant Director

Federal Permitting, Licensing, and Assistance Section
Office of Federal Agency Programs

From: [Kostura, Gretchen M](#)
To: [Katherine Hummelt](#); katherine.zeringue@dot.gov
Cc: [Davies, Johnette](#); [Jill Cavanaugh](#); [Kevin Forma](#); "[David Valenstein](#)"; [Decker, Bradley \[USA\]](#)
Subject: WUS Expansion Project_2019_0326_Draft AOE Report_Amtrak Comments
Date: Monday, June 10, 2019 4:35:26 PM
Attachments: [image.png](#)

FRA/Contractor team:

As you consider comments from Section 106 consulting parties, Amtrak would like to offer a few suggestions for the preparation of the revised Section 106 effects report.

1. Table 5: It is not clear what "DC HPO approval" means in this table (is it for local review approvals only?). Consider whether it is important to note which projects have already completed the 106 process (e.g. Satellite commissary, raising track 15/16, Track 22 rehab, etc.). Consider whether a separate column is warranted for this information.
2. Because the GSA (now private) air rights development is part of the No Action alternative, where discussed at the end of 6.1, Amtrak suggests including a massing diagram (aerial oblique view similar to illustrations for other alternatives) showing the location and extent of the developable GSA air rights in the No Action Alternative to illustrate the potential baseline context within which the effect of the project alternatives are assessed prior to introducing the EIS alternatives in 6.2. Of the numerous projects within the No Action alternative, the private developer element may be the only No Action scope item in the yard that survives the station expansion project in a visible way, and therefore provides a useful mechanism to assess the cumulative visual effect of the project on historic properties. An explicit statement to that effect (if correct) may be helpful.
3. Including the private air rights development in the visualizations of each action alternative could provide a helpful basis for assessing cumulative visual effects.
4. Regarding noise/vibration impacts discussion on page 205 or elsewhere, remember that there are several known federally-funded projects within the No-Action Alternative (see Table 5) – the "No Action" is not limited to the private development. Is it useful to note somewhere in this document that separate projects that have independent utility would undergo separate review processes for Section 106, if applicable? Or perhaps that the known federal projects for which consultation has been completed have resulted in no adverse effect findings?
5. If, as noted on page 205, the DEIS projects similar though lesser impacts than the action alternatives, does the DEIS provide any reasonable extrapolation or assumptions to inform its analysis of impacts under NEPA? If so, could the cumulative effect analysis be also informed by those adopted parameters?
6. Amtrak encourages the use of clear statements in the methodology regarding analysis assumptions for cumulative effects or other issues. Repeating those in other areas of the report may be helpful to readers of this long, informative document.

Thank you,

Gretchen

Gretchen Kostura, AICP, PMP

Senior Program Manager – Major Stations
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December 18, 2019

Ms. Katherine Zeringue, Federal Preservation Officer
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; Comments on the Preferred Alternative A-C*

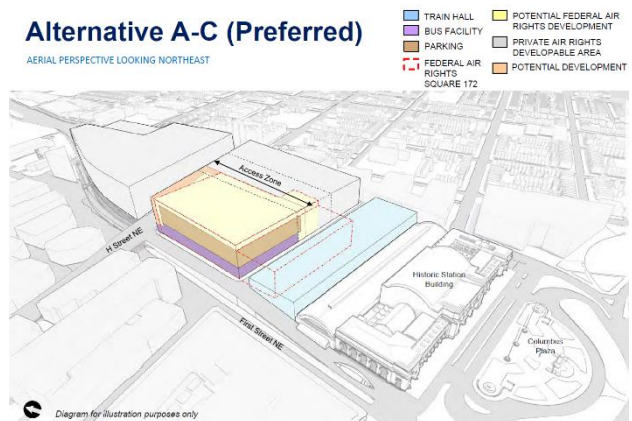
Dear Ms. Zeringue:

Thank you for continuing to consult with the DC State Historic Preservation Officer (DC SHPO) regarding the above-referenced undertaking and for hosting a Consulting Parties' meeting on November 19, 2019 to introduce the new Preferred Alternative A-C (see image below). This letter provides additional comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act.

We appreciate that the Preferred Alternative responds to many of the comments the Federal Railroad Administration (FRA) has received thus far and we are encouraged by the progress that many aspects of the revised concept represent.

For example, we applaud FRA for selecting an east-west orientation for the new concourse/train hall; for eliminating the proposal to surround the upper level of the train hall with a bus facility; for pulling development back from 1st Street; and for connecting the new concourse directly to the historic train station. These decisions should facilitate greater architectural expression, improve views to and from the concourse, provide for better internal circulation between the old and new sections of the station, and ensure that the taller, mixed-use buildings will be located far enough to the north to minimize their visibility from Columbus Plaza and points south.

We also appreciate that Alt A-C incorporates a vehicular circulation route to H Street that does not significantly impede upon the "access zone". This design appears to offer efficient vehicular access/egress while separating cars and pedestrians as much as reasonably possible. Reducing vehicular parking to approximately 2/3 of the current capacity is also a notable improvement.



Constructing the bus facility on the deck level is logical from a transportation standpoint since adjacencies among the various modes increase efficiency and convenience. Downsizing the bus facility from the current sixty (60) to between twenty (20) to forty (40) slips provides the added benefit of reducing the amount of space devoted to bus-related functions. We are pleased that FRA is open to limiting the bus facilities to one level rather than two, if possible.

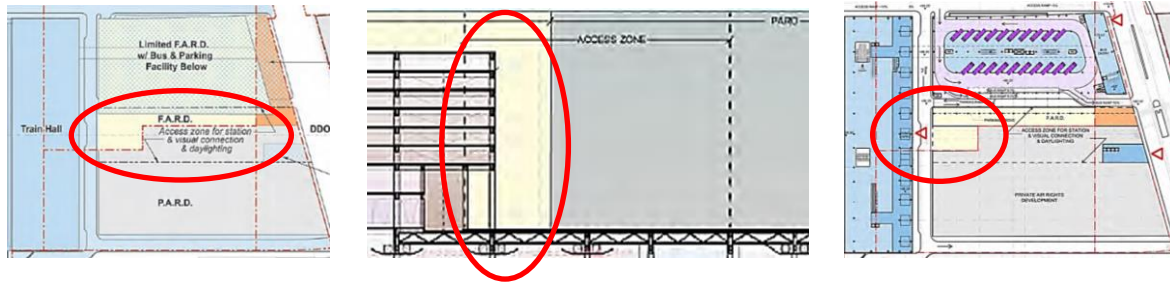
Now that we have had an opportunity to evaluate the Preferred Alternative in more detail, we offer the following recommendations for how FRA's progress can continue and how adverse effects on historic properties can be better avoided and/or minimized. Our comments focus on three primary themes: 1.) civic character, 2.) parking refinements and 3.) public/private coordination.

Civic Character:

Union Station is unquestionably among the most important buildings in the District of Columbia. Part of what sets important buildings apart is their designed context. Columbus Plaza provides the grand, civic setting for Union Station. So important was this notion to Union Station's Architect Daniel Burnham that he developed a series of elaborate designs for the plaza, some of which were far grander than what exists today. The image below illustrates Burnham's concept for a semicircular peristyle that would have enclosed the plaza.



The importance of creating a civic context for the Expansion Project cannot be overemphasized. Failure to do so will result in an "adverse effect" on historic properties. In order to provide civic character, the space must be open, ceremonial in scale, feature the highest caliber architecture and provide uninterrupted views to and from the historic station. We have raised this concern repeatedly in meetings and letters, and we were under the impression that the Access Zone had been introduced specifically to provide the civic character that is so fundamental. As currently proposed, however, the Preferred Alternative's Access Zone fails to achieve this critically important goal because it proposes development that will obscure views to/from the station, projects the upper level parking deck and support columns into the open space, and potentially hides the primary public entrance behind some new construction. These issues are illustrated in the images on the next page which were borrowed from FRA's November 19, 2019 meeting materials (red ovals added for emphasis).



The fact that the Access Zone will be located “behind” Union Station only increases the urgency to provide an appropriate civic space. For some patrons, this will serve as the primary, and possibly the only entrance they will ever experience. Therefore, the Access Zone must exhibit the highest standards of urban design to signal arrival at an important civic space and to visually tie the historic station and its counterpart to the north together. The image below illustrates the care which Burnham devoted to his design for the rear of Union Station despite the fact that it would rarely be seen from this perspective. How much more does the Expansion Project warrant equal or greater consideration given that it will serve as Union Station’s “new entrance”? For additional comments about the importance of civic character and an explanation of why and how failure to provide it will meet the criteria of adverse effect specified at 36 CFR Part 800.5(a)(1), please refer to our letters of March 30, 2018, August 29, 2018, and May 17, 2018.



Parking:

Another way the Preferred Alternative should be improved is by reducing the amount of parking, especially above-grade parking. Up to 6 levels are currently proposed above the bus facility. This would essentially replicate the existing garage and place empty automobiles in spaces that should be designed for people. This is a historic preservation concern because proximity to the grand historic station calls for higher, more active and compatible uses. Parking garages simply do not contribute to great civic spaces. The fact that parking currently exists in this location neither justifies replacement nor avoids or minimizes adverse effects. The Expansion Project is a new project charged with improving current conditions and avoiding development that would result in adverse effects, even if some conditions that would result in adverse effects already exist.

The preferred design locates a considerable amount of Amtrak's "back of house" functions in the lower level concourse. We assume some of these areas will be housed by employees who would be better served above ground. The remainder of the lower level concourse is slated for pedestrian circulation and retail. Improved circulation is an important goal, but we question if some circulation might also be accommodated above-grade. The same is true for retail. Considering current on-line shopping trends, we question the potential for success of some commercial ventures in what would effectively be an underground shopping mall. We are pleased that in the most recent Consulting Parties' meeting FRA indicated a willingness to devote further study to determining how much retail and how many "back of house" functions could be moved to the upper levels, and how much parking could be moved below.

Public/Private Coordination:

Another continual theme that has echoed throughout this consultation process is the need to coordinate FRA's project with the adjacent private Burnham Place development by Akridge. We understand successful coordination among the various parties occurred to determine how/where structural supports for new decking and related infrastructure would be located so we question why such coordination cannot occur for other key areas. The benefits of greater coordination could be significant. For example, parking that could not be accommodated underground might be divided between the federal and private development areas, located on fewer levels and screened behind mixed-use functions. A coordinate approach such as this might be an ideal way to diminish the visual effects of parking.

Improved coordination could also help to improve the quality of the civic space by allowing a coherent, coordinated design to be developed for both halves of the area north of the historic station and south of H Street. Such a coordinated design could help signal arrival at Union Station much better than two, unrelated buildings on either side of the Access Zone.

As you are aware, the Expansion Project and related federal air rights areas are subject to our review in accordance with 36 CFR Part 800 and we have approval authority over the private air rights development. For these reasons, we must consider the cumulative effects of both developments as carefully as possible. The potential for additional benefits is substantial. We encourage FRA and Akridge to work together to identify mutually beneficial solutions that avoid and minimize adverse effects and further the common goal of creating the high-quality context that Union Station deserves.

We look forward to consulting with FRA and all consulting parties to continue the Section 106 review of this important undertaking. 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. Otherwise, thank you for providing this additional opportunity to review and comment.

Sincerely,



C. Andrew Lewis

Senior Historic Preservation Specialist
DC State Historic Preservation Office

16-0114

The Committee of 100

on the Federal City



December 19, 2019

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Ms. Katherine Zeringue
Federal Preservation Officer
US Department of Transportation, Federal Railroad Administration
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RE: Proposed Alternative A-C, Union Station Expansion Project

Dear Ms. Zeringue:

Thank you for the opportunity to comment on the additional alternative for the expansion of Union Station, identified as "A-C," which was presented to us at the November consulting parties meeting. Although we take issue with the manner in which the alternative was presented, with no accompanying materials provided to the consulting parties until December 6th for a December 20th comment deadline, and by the hostility exhibited by some members of the Federal Railroad Administration (FRA) staff at the meeting, we are somewhat encouraged by the direction in which this "preferred alternative" seems to be going.

We are pleased with the orientation of the proposed new train hall, mirroring the orientation of the existing concourse, and leveraged as a needed separation between the historic station and the taller massing proposed to the north. This approach will help minimize adverse effects to the historic station, and serve the public in terms of consistent circulation and orientation.

Consolidating the bus and parking functions into a single structure behind the new train hall, with bus access at the deck level makes sense - serving efficient multi-modal transportation goals while at the same time maintaining a separation from the historic train station.

Some refinement, however, is needed to the program and massing of the federal air rights development relative primarily to the designated Access Zone. The historic station, which embodies the classical, symmetrical and ceremonial characteristics that are the hallmarks of Beaux-Arts design, requires a simplified, ordered and ceremonial program for the Access Zone that will be a new public approach to the

historic station. As proposed, the garage seems to project over the Access Zone and minimize the visual approach to the station. This should be revisited and, in our opinion, coordinated in some manner with the Private Air Rights Development located parallel on the other side of the Access Zone. Symmetry between these two disparate developments is essential to achieve a successful approach to the station. Perhaps a public-private partnership opportunity exists here – to achieve a commitment to some cohesiveness to this complex project.

Respectfully,

A handwritten signature in blue ink, appearing to read "S. A. Hansen", written in a cursive style.

Stephen Hansen
Chair



Preserving America's Heritage

December 20, 2019

Ms. Katherine Zeringue
Federal Preservation Officer
Federal Railroad Administration
1200 New Jersey Ave SE
Washington DC 20590

Ref: *Washington Union Station Expansion Project*
Washington, D.C.
ACHP Connect Log Number: 009904

Dear Ms. Zeringue:

On November 19, 2019, the Advisory Council on Historic Preservation (ACHP) participated in a consultation meeting for the referenced undertaking. We offer the following comments and recommendations to the Federal Railroad Administration (FRA) to assist in complying with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 300101 et seq.) and its implementing regulations, "Protection of Historic Properties" (36 C.F.R. Part 800).

The Union Station Redevelopment Corporation (USRC), in coordination with Amtrak, proposes to expand and modernize Washington Union Station, which is owned by FRA. Additionally, FRA will be required to approve the undertaking. The FRA or the U.S. Department of Transportation (USDOT) may provide funds for the undertaking as well. FRA initiated consultation in 2015, and has multiple opportunities for consulting parties to review and comment on FRA's determinations and findings as required by the Section 106 implementing regulations. Recently, however, consulting parties have raised concerns that there has been insufficient information provided prior to the consultation meetings regarding the undertaking and its effects on historic properties, and that there is difficulty in reviewing and commenting on Section 106 related documents within 30 days. The ACHP recommends FRA address these concerns by providing an updated consultation schedule to the consulting parties, ensuring that reasonable accommodations are made to provide advance notice to the consulting parties for scheduled consultation meetings, and sharing updates to the consulting parties when the schedule is delayed or changed. Additionally, FRA should take the necessary steps to provide the relevant meeting materials prior to the meeting so that consulting parties have the opportunity to review them and effectively participate in the consultation meeting.

The ACHP is concerned that FRA considered the November consultation meeting an "informational meeting" and shared a modified alternative that had not previously been reviewed by the consulting parties. By identifying a preferred alternative prior to a consultation meeting, FRA may have given the impression that the federal agency made this selection before meaningfully considering comments from the consulting parties. To address these concerns, the ACHP suggests that FRA conduct a consultation meeting to provide an opportunity for consulting parties to comment on the modified alternative, and to discuss potential modifications to alternative A-C that could avoid and minimize potential effects to historic properties.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

401 F Street NW, Suite 308 • Washington, DC 20001-2637
Phone: 202-517-0200 • Fax: 202-517-6381 • achp@achp.gov • www.achp.gov

FRA presented new graphics and information at this recent meeting on potential federal air rights development. The ACHP understands FRA plans to conduct a separate Section 106 review for the development of these FRA air rights; however, the ACHP is concerned that providing the information at this time gives the impression that the current undertaking includes the development of these air rights. Accordingly, the ACHP requests that FRA clarify how the development of these air rights is not part of this undertaking, and provide information, to the extent it is available, regarding the timeline for initiating the Section 106 process on the development of the federal air rights.

Finally, the ACHP recommends FRA address the comments and requests from the consulting parties articulated during the recent consultation meeting. In particular, the ACHP supports the consulting parties' request for a summary of the consulting parties' comments on the first draft *Section 106 Assessment of Effects to Historic Properties* and FRA's responses to them in the next revised assessment of effects report.

We look forward to continuing consultation on this undertaking. If you have any questions regarding our comments, please contact Sarah Stokely at (202) 517-0224, or via e-mail at sstokely@achp.gov.

Sincerely,



Jaime Loichinger
Assistant Director
Federal Permitting, Licensing, and Assistance Section
Office of Federal Agency Programs

December 20, 2019

Ms. Katherine Zeringue
Federal Railroad Administration
US Department of Transportation
MS-20 RPD-13
1200 New Jersey Avenue SE
Washington, D.C. 20590

Dear Ms. Zeringue:

I am writing to submit comments about Preferred Alternative A-C for the Washington Union Station expansion project as part of the Section 106 Process. I have serious concerns that this alternative will do harm to the urban setting and significantly contribute to traffic problems in our neighborhood.

The proposed construction of a massive above ground parking structure runs directly counter to the District of Columbia's ongoing efforts to reduce automobile travel and to encourage the use of other modes of transportation. Just as importantly, a structure of this size would do real harm to the fabric of our community, precluding the development of public spaces or buildings that would both enliven our street life and bring meaningful benefits to our neighborhood.

The preferred alternative would also create a ring of traffic around Union Station that will inevitably spill out onto surrounding streets, contributing to congestion on nearby streets. Alternative A-C misses a major opportunity to focus our energy on supporting transportation alternatives like Metro and the Circulator which provide cleaner and more equitable options for our residents.

The expansion of Union Station provides a unique chance for our neighborhood, the District and our region to build infrastructure that reflects the needs of our community in the twenty-first century. Unfortunately, Preferred Alternative A-C will move us further away from that goal.

Thank you for your attention and assistance.

Sincerely,



Drew Courtney

Commissioner ANC6C06

CHRISTINE HEALEY, COMMISSIONER ANC 6C01

December 20, 2019

Ms. Katherine Zeringue
Federal Railroad Administration
US Department of Transportation
MS-20 RPD-13
1200 New Jersey Avenue SE
Washington, D.C. 20590

Re: Washington Union Station Expansion Project -- Section 106 process

Dear Ms. Zeringue:

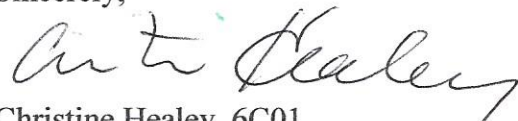
Thank you for the opportunity to submit comments about the Preferred Alternative A-C. I remain concerned that this alternative does not sufficiently enhance the urban setting, nor does it sufficiently minimize operational traffic or property impacts or show a close connection to local intermodal transit uses.

I believe the construction of a massive, above-ground parking garage at this location would be detrimental to the fabric of the area and the historic properties within it. An above-ground parking garage is out of keeping with the effort of the District of Columbia to reduce automobile travel and encourage other transportation modes. The garage's construction would preclude the development of buildings and public spaces that would better enliven the urban fabric at this location.

In addition, the Preferred Alternative suggests that there will be both a ring of traffic around the historic Union Station and a spill-over of traffic into the historic Capitol Hill neighborhood. This is a significant and continuing concern for nearby residents. At the same time, the Preferred Alternative does not seem to incorporate local intermodal transit uses into the plan, such as the Metro and Circulator buses, which are the connections that would seem to be the most important at Union Station.

I am writing to you as an individual advisory neighborhood commissioner but I refer you to the letters written by Advisory Neighborhood Commission 6C about this project during its development. I look forward to continued participation in this important project.

Sincerely,


Christine Healey, 6C01
Advisory Neighborhood Commissioner



Government of the District of Columbia

Advisory Neighborhood Commission 6C02

December 20, 2019

Katherine Zeringue, Esq.
Federal Railroad Administration
US DOT
MS-20 RPD-13
1200 New Jersey Ave SE
Washington DC 20590

Re: Comments on presentation materials from the seventh Section 106 Consulting Parties meeting on November 19, 2019

Dear Ms. Zeringue:

I am writing today as Single Member District ANC 6C02 commissioner. Please consider this a preliminary response for comments on the materials relating to the proposed Union Station Expansion Project from the seventh Section 106 Consulting Parties Meeting held on November 19, 2019. These preliminary comments have not been voted on by all commissioners of ANC6C; therefore, they are preliminary in nature.

As you know, USRCDC invited ANC6C to meet with it on January 7, 2020. Hopefully, at that time, the ANC 6C commissioners will provide further detailed comments.

ANC6C previously provided comments on the Union Station Expansion Project. See letter dated November 16, 2019, to Hon. Mayor Bowser and Hon. D.C. counsel. To the extent necessary, I incorporate the comments contained therein by reference.

At this point, the main concerns focus on two issues: massing the necessity of the proposed parking and traffic flow.

1. The project likely will not benefit from the number of proposed parking spaces given the public access to the project and the current diminution of private vehicular use. To extent parking is necessary, numerous private parking is available in the immediate neighborhood. In addition, the six proposed levels of parking creates a visual disruption of the Washington, DC sightline and detracts from the historical nature of the city.
2. A second concern is the proposed internal and external traffic flow. The internal flow is confusing and appears to promote congestion. The external traffic flow potentially interrupts the immediate neighborhood, is not workable given the current traffic flow

around Union Station, and places too much emphasis on secondary streets in and around Union Station.

Some of the preliminary concerns articulated above are ambitious. The ANC 6C commissioners and I hope to continue the dialogue at our meeting on January 7, 2020. Thank you for considering the above concerns.

On behalf of ANC6C02,



Karen Wirt
ANC 6C02

December 20, 2019

Ms. Katherine Zeringue
Federal Railroad Administration
US Dept. of Transportation
MS-20 RPD-13
1200 New Jersey Ave., SE
Washington, DC, 20590

Re: Comments on Alternative A-C
Presented November 19, 2019

Dear Ms. Zeringue,

Thank you for this opportunity to comment on FRA's draft preferred alternative A-C.


This proposal suffers from the same deficiencies that have been noted on several occasions both within the Consulting Party Meetings and in written responses. There is little to recommend Alternative A-C over any of the previous alternatives.

I am enclosing for your review the November 27, 2019 letter from Councilmember Charles Allen, and the May 10, 2019 letter from the Capitol Hill Restoration Society. Both letters describe the significant deficiencies in FRA's plans for the expansion of Union Station. FRA has given scant attention to the urban design implications of Alternative A-C and has consistently ignored traffic issues implicit in the station expansion. Rather than respond to CHRS's concerns about traffic within the Capitol Hill Historic District, FRA plans to divert traffic into the neighborhood via F St., NE. (See Page 10 of the November 19, 2019 presentation materials).

The time frame allowed to digest and respond to a project of this significance and complexity is inadequate. Katherine Hummelt's email of October 28, 2019 promised that presentation materials would be available prior to the November 19 meeting. That did not occur. The presentation materials were provided December 6, 2019, allowing only two weeks to review the materials and respond. If FRA were sincerely interested in what the Consulting Parties can contribute to this process, materials would be available ahead of meetings and adequate time allowed for review and response.

FRA has ignored the effects of the station expansion beyond the federally controlled property. In terms of urban design and traffic circulation FRA has failed to employ the EIS as a process to resolve complex issues. Thank you for considering these comments.

Sincerely,


Drury Tallant

Cc:

Councilmember Charles Allen, Ward 6: callen@dccouncil.us

John Falcicchio, Interim Deputy Mayor for Planning and Econ Devel: john.falcicchio@dc.gov

Andrew Trueblood, Director, DC Office of Planning: andrew.trueblood@dc.gov

Beverly Swaim-Staley, Union Station Redevelopment Corporation: bswaimstaley@usrcdc.com

Brian Kenner, Deputy Mayor for Economic Development: dmped.eom@dc.gov

Jeff Marrotian, Director, District Department of Transportation: jeffrey.marootian@dc.gov

Jennifer Steingasser, DC Office of Planning, Deputy Director: Jennifer.steingasser@dc.gov

C. Andrew Lewis: DC State Historic Preservation Office: andrew.lewis@dc.gov

Karen Wirt, Chair, ANC 6C: 6C02@anc.dc.gov

Mark Eckenwiler, ANC 6C04: 6c04@anc.dc.gov

David Valenstein: david.valenstein@dot.gov

Robin-Eve Jasper: President, NoMa BID: rjasper@nomabid.org

Katie Hummelt, Beyer, Blinder, Belle: khummelt@bbbarch.com

David Tuchman, Akridge: dtuchmann@akridge.com

James Smailes, Chair, Transportation Sub-committee, Committee of 100: jasmailes@gmail.com

Rob Nieweg, National Trust for Historic Preservation: rnieweg@savingplaces.org

Eric Hein, Exec. Director, Natl. Conf. of State Historic Preservation Officers: hein@ncshpo.org

Beth Purcell, President, Capitol Hill Restoration Society: beth@eapdc.com



**COUNCIL OF THE DISTRICT OF COLUMBIA
THE JOHN A. WILSON BUILDING
1350 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20004**

Charles Allen
Councilmember, Ward 6
Chairperson
Committee on the Judiciary and Public Safety

Committee Member
Business and Economic Development
Education
Transportation and the Environment

November 27, 2019

The Honorable Muriel Bowser
Executive Office of the Mayor
1350 Pennsylvania Avenue, NW
Washington, DC 20004

The Honorable Phil Mendelson
Chairman, Council of the District of Columbia
1350 Pennsylvania Avenue, NW
Washington, DC 20004

Dear Mayor Bowser and Chairman Mendelson:

The Federal Railroad Administration (FRA) recently released its preferred plan for the Union Station Expansion Project. After reviewing the concept and meeting with key stakeholders, including representatives from ANC 6C, I believe this federally-produced plan would create significant adverse effects for the District of Columbia, as well as the surrounding Capitol Hill, Near Northeast, and NoMa neighborhoods in Ward 6. The expansion of Union Station represents a once-in-a-century opportunity for one of the busiest transit hubs in the region, and the largest within the District, that will shape movement in and out of our city for generations to come. The plans released fall well short of capturing the extraordinary potential associated with this important project.

Union Station's expansion represents the single greatest economic development and transportation opportunity for the District of Columbia. By more than doubling the station's daily capacity for Amtrak and commuter rail passengers, the job growth, fiscal benefits, and mobility improvements are immeasurable. Unfortunately, the FRA's proposed plan disregards and subordinates the interests of District residents and stakeholders to objectionable or ill-advised priorities. The misguided direction of the current plan would be a costly investment in infrastructure that undermines rather than enhances the District of Columbia's efforts to increase economic vitality, livability, and urban experience.

Union Station is and should be a national gateway to the District of Columbia. The Station Expansion and related projects are an opportunity to produce a vital and nationally significant transportation center with great public spaces on par with those in any world class city. The FRA-preferred plan shrinks from

the opportunity before us, damages the District's long-term interests in Union Station's potential, and will create substantial harm that cannot be easily reversed in the future. I urge greater priority and engagement among District stakeholders in this project as we are at a serious inflection point, now entering the fifth and final year of a federal environmental review process.

I ask that we work collectively to strengthen the District's role and guide the needed course correction to shape this historic and monumental investment to ensure that the Union Station Expansion Project seizes on the opportunity before us to create a world-class transit hub that is integrated into the surrounding communities and protects the District's long-term needs.

Sincerely,



Councilmember Charles Allen, Ward 6
Chair, Committee on the Judiciary and Public Safety

cc: John Falcicchio, Interim Deputy Mayor for Planning and Economic Development
Andrew Trueblood, Director – Office of Planning
Jeff Marootian, Director – Department of Transportation
Karen Wirt, Chair – Advisory Neighborhood Commission 6C



**National Trust for
Historic Preservation**
Save the past. Enrich the future.

December 20, 2019

VIA EMAIL [katherine.zeringue@dot.gov]

Ms. Katherine Zeringue
Federal Railroad Administration / US DOT
MS-20 RPD-13
1200 New Jersey Ave SE
Washington DC 20590

Re: Washington Union Station Expansion Project / FRA's Preferred Alternative A-C

Dear Ms. Zeringue:

Union Station is a publicly owned and nationally significant historic property that serves as a major gateway to the Nation's Capital. The proposed transformation of Union Station will be a momentous public-works project of great interest to millions of residents, travelers, commuters, and tourists.

I am writing to share the National Trust for Historic Preservation's preliminary comments regarding new information provided by the Federal Railroad Administration (FRA) about "Alternative A-C," which the agency has identified as its Preferred Alternative for the Washington Union Station Expansion Project. Given the public's interest in Union Station as a historic landmark and as a transportation center, the National Trust believes the FRA has an obligation to lead a consultation process about the future of Union Station that matches the great care with which the Union Station Redevelopment Corporation is meticulously restoring Union Station's historic fabric.

However, the National Trust is seriously concerned about FRA's handling of the federal review process to date. To introduce the agency's new Preferred Alternative, FRA screened a slideshow depicting Alternative A-C for Consulting Parties on November 19, 2019. Some agencies had been briefed in advance, but other Consulting Parties had not previously seen Alternative A-C, including the National Trust, Union Station Preservation Coalition, and, we believe, the representatives of Advisory Neighborhood Commission 6C. FRA had promised but failed to share information about Alternative A-C before the November 19 meeting and, consequently, the non-governmental Consulting Parties' only opportunity to consult in-person with FRA and other experts and interested parties about Alternative A-C was unnecessarily constrained by a lack of relevant advance information – as the National Trust commented during the meeting. Seventeen days later, on December 6, FRA finally emailed to Consulting Parties the same slides the agency screened on

November 19, but only after FRA had missed the opportunity on November 19 for a meaningful exchange of information and views about Alternative A-C.

Since the 2012 release of the “Union Station 2nd Century Plan,” the interested public has known that Union Station will be dramatically transformed by the planned expansion and modernization of the multi-modal transportation center at Union Station, and by the planned construction of Burnham Place, the private air-rights development over Union Station’s railyard. Together, the expansion project and the air-rights development constitute an integrated and highly complex public-private development project that has the potential to create grand urban space while preserving the unique and iconic architectural qualities of the historic railroad station. Since 2012, the National Trust and other public-interest groups have participated actively and have contributed to the public dialogue about the transformation of Union Station. Unfortunately, however, the FRA has undermined the review process by choosing to bifurcate the federal review of this integrated development, notwithstanding the timely objections of the National Trust, DC SHPO, and many others. The National Trust continues to believe that the expansion project and the air-rights development must be reviewed holistically, to ensure the best outcome, and to achieve a meaningful review of the cumulative impacts of the development as a whole, as required by 36 CFR § 800.5(a)(1). Nevertheless, FRA is reviewing the expansion project in isolation and, apparently, already has chosen the new Alternative A-C as its Preferred Alternative.

Our assessment of FRA’s Alternative A-C concept, as we learn more about it, will draw upon certain guiding principles identified by the National Trust and its allies in the Union Station Preservation Coalition in 2012, including the following:

- **Restoration of Union Station must go hand-in-hand with its expansion.** As hundreds of millions of dollars are spent to expand the function of Union Station as a transportation center, the historic station should be restored to its original grandeur and protected against harmful future changes.
- **Transportation must remain Union Station’s primary function.** The station should serve travelers, commuters, and visitors in an efficient and positive way.
- **Future work must restore Union Station’s original pedestrian circulation patterns.** Modern-day impediments to convenient circulation should be removed, and any new concourses and facilities should be seamlessly integrated with the historic circulation patterns.
- **Development adjoining Union Station must embody exemplary and compatible architectural design.** The placement, massing, and design of new buildings near Union Station should be compatible with and enhance the historic station. They should strive to become respectful landmarks of our own time.

- **Union Station must become a splendid neighborhood anchor.** The expansion of Union Station is an unprecedented opportunity for the surrounding neighborhoods. The project should support community revitalization and create new connections that benefit both travelers and neighbors.

Restoration of Union Station is underway thanks to the Union Station Redevelopment Corporation's excellent stewardship, pursuant to the 2015 Preservation Plan. To be successful, FRA's Alternative A-C would need to incorporate measures to restore, protect, and ensure that historic Union Station is fully utilized as the heart of the modernized, multi-modal transportation center. In concept, Alternative A-C's proposed train hall is aligned with the historic passenger concourse and oriented in a way that could create efficient pedestrian circulation and could help assure that transportation remains the historic station building's primary function. Further consultation is needed to explore ways that Alternative A-C's new train hall can be aesthetically subordinate to the historic passenger concourse and can act as a buffer to reduce the visual impacts of the taller structures to the north associated with the private air-rights development, federal air-rights development, parking structure, and bus facility.

To be successful, expansion of the railroad station and redevelopment of the rail yard must result in exemplary new architecture, contributing new landmarks that respect the historic station and enhance DC's cityscape. The Alternative A-C diagrams indicate that more than half of the area between the new train hall and H Street would be occupied by a bus facility, parking structure, and potential federal air-rights development. According to the Alternative A-C diagrams, the remaining portion of this area from the train hall to H Street would be occupied by the private air-rights development. It is not clear to the National Trust whether or not Alternative A-C is compatible with Akridge's current plan for Burnham Place. The "Union Station 2nd Century Plan" depended upon private-public cooperation; we do not know whether Alternative A-C enables or precludes Burnham Place. Additional consultation about Alternative A-C, as the Advisory Council on Historic Preservation has recommended, can help to illuminate the answer to this question.

Finally, the Capitol Hill Historic District, Union Station's immediate neighbor, is one of the most important historic areas in Washington DC. Fortunately, the historic district is home to a community of residents and property owners who care deeply and are actively involved in DC's civic life to ensure that their neighborhood remains a thriving and livable place. The Capitol Hill Restoration Society, which participates actively as a Consulting Party, has repeatedly expressed concern about potential adverse impacts to the historic district that may result from the expanded transportation center and re-developed rail yard – especially potential adverse impacts from traffic. Indeed, DC City Councilmember Charles Allen has reviewed FRA's Preferred Alternative and wrote that it "would create significant adverse effects" and undermine "efforts to increase economic vitality, livability, an urban experience" in the neighborhoods surrounding Union Station. [Councilmember Allen

to Mayor Bowser, Nov. 27, 2019.] The Capitol Hill Restoration Society, National Trust, and other public-interest groups have requested an opportunity to review traffic impact studies for this project. Unfortunately, the FRA has not yet provided the requested studies.

Because of the way the FRA has conducted the consultation process, the National Trust does not fully understand Alternative A-C or its implications for historic Union Station or the Capitol Hill Historic District. We believe other Consulting Parties are in the same boat. The National Trust agrees with the Advisory Council on Historic Preservation that FRA should provide additional information and convene another Consulting Parties meeting, in order to remedy this problem and comply with Section 106. The Advisory Council wrote that, to address the concerns of the Consulting Parties, "ACHP suggests that FRA conduct a consultation meeting to provide an opportunity for consulting parties to comment on the modified alternative, and to discuss potential modifications to alternative A-C that could avoid and minimize potential effects to historic properties." [ACHP to FRA, Dec. 20, 2019.]

Thank you in advance for considering the National Trust's request for additional information about FRA's Preferred Alternative and for an additional Consulting Parties meeting to discuss Alternative A-C.

Sincerely,

A handwritten signature in black ink that reads "Rob Nieweg". The signature is written in a cursive, flowing style with a long horizontal stroke at the end of the name.

Rob Nieweg
Senior Field Director & Attorney
National Trust for Historic Preservation



January 2, 2020

Ms. Katherine Zeringue
Federal Preservation Officer
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington DC 20590

Dear Ms. Zeringue:

On behalf of the DC Preservation League (DCPL), I am writing to express our profound frustration with the Section 106 process on Washington's Union Station to date. At the November Consultation meeting, the Federal Railroad Administration (FRA) presented a hybrid of previous alternatives now presented as the preferred alternative. Information promised to precede the meeting was not available until December. The lack of information provided in advance of the November meeting limited the ability of the consulting parties to participate in meaningful discussion about the substance of the newly presented proposal. Notably absent from the material made available are traffic impact studies previously requested and critical for assessing impact on the Historic District.

While much can depend on the quality on sensitivity of the design of the proposed additions and alterations to the overall property, design alone cannot compensate for a rigid framework assigning space and location to functions, some of which are inadequately evaluated for spatial needs or even their appropriateness for being located within the historic property. No part of the mix should remain unquestioned. The approach of moving boxes around the site is inherently limiting, making difficult a really effective solution for accommodating the needs of increasing rail traffic without leaving the existing historic station to be little more than a shopping-mall vestibule to newly built station facilities.

We also remain skeptical of the separation of the Expansion Project from the Air-Rights Development. Decisions made concerning one will inevitably affect the outcome of the other.

The number of parties currently involved in the property and the legal structures parsing out the turf understandably present a complex context for this project, but a landmark of the architectural and historical importance of Union Station deserves more of an effort to cross the boundaries previously established and strive for a more creative and integrated approach that best serves the building, its setting and its users.

Sincerely,

A handwritten signature in blue ink that reads "Rebecca Miller".

Rebecca Miller
Executive Director

1221 Connecticut Avenue NW, Suite 5A | Washington, DC 20036 | T: 202.783.5144 | F: 202.783.5596 | dcpreservation.org

Scott P. DeMartino, Esq., *President* | Fay Armstrong, *Vice President* | Howard S. Berger, *Treasurer* | Melissa Cohen, AIA, LEED AP, *Secretary*
Amy Ballard | M. Jesse Carlson, Esq. | John DeFerrari | Greta Fuller | Hany Hassan, FAIA | Gerard Heiber, LEED AP
Rob McLennan, AIA | D. Peter Sefton | Joseph E. Taylor, AIA | Benjamin L. Williams, Esq., LEED AP | Jason T. Young | Juliet Zucker



Government of the District of Columbia

Advisory Neighborhood Commission 6C

P.O. Box 77876 Washington, D.C. 20013 | (202) 547-7168

March 20, 2020

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

Ms. Beverley Swain-Staley
Union Station Redevelopment Corporation
750 First Street, NE, Suite 1010
Washington, D.C. 20002

Re: Union Station Expansion Project

Dear Mr. Valenstein and Ms. Swain-Staley:

We are writing to thank you for appearing at the March 5 meeting of ANC 6C's Transportation and Public Space Committee meeting to discuss the Union Station Expansion Project. As a result of our discussion, we must reiterate that we remain strongly opposed to any expansion proposal that includes a large above-ground parking and bus garage. Furthermore, we remain concerned that we have not yet seen in the plans to date a solution to the circulation problems that currently plague access to Union Station under current conditions.¹

ANC 6C supports the goals of the expansion project. Improvements in the rail passenger experience are sorely needed. While we support in general the treatment of the platforms and concourse in Preferred Alternative A-C, we strongly oppose Preferred Alternative A-C's proposed above ground parking and bus garage.

In our view, each and every parking space created in this expansion project must be justified, on its own terms, starting from zero, and the preferred alternative envisions extraordinarily more parking spaces than necessary. In terms of justifying the appropriate amount of parking, we note the National Capital Planning Commission in January requested that FRA "evaluate and *confirm* the appropriate amount of parking given the mix of uses, traffic and urban design impacts, and transit-oriented nature of the project" (emphasis added).²

¹ On March 11, 2020 at a regularly scheduled, duly noticed monthly meeting of ANC 6C, with a quorum of 5 out of 6 commissioners and the public present, the above-mentioned item came before us. The commissioners voted unanimously, 5:0:0, to send this letter to express our continued concerns regarding the Union Station Expansion Project.

² National Capital Planning Commission, Executive Director's Recommendation, NCPC File No. 7746, page 5.

ANC 6C believes there are *no* parking space requirements that can be justified for Amtrak passengers, intercity bus travelers, or retail customers. Amtrak does not request parking spaces for its passengers at Washington Union Station and parking is not being provided in the renovation of other urban train stations. We believe intercity bus travelers are seeking a low-cost travel option and they will avoid expensive urban parking. Most retail customers are shopping as they travel through the station, not driving to the station to shop; those who are visiting Union Station as a shopping destination should understand that it is best accessed by one of many non-car transit options available.

ANC 6C understands that there may be the need for a small number of parking spaces at Union Station for rental car companies, tenants of station offices, and some other purposes. Because of this, we believe the parking program within the expansion project in total could be limited to a substantially smaller number of spaces (e.g., around 200) far below the 1575 currently envisioned in the FRA/USRC presentation.

Likewise, ANC 6C believes the number of intercity bus slips should be kept to a minimum so that intercity buses do not overwhelm the nearby neighborhoods of NoMa and Near Northeast. Although a bus station was historically located near Union Station before the residential growth in the area, intercity bus service does not require a close intermodal connection to intercity passenger rail service. Intercity bus companies compete with Amtrak; the intercity bus passengers need intermodal connections to mass transit, not a connection to Amtrak service.

Should an intercity bus station near Union Station remain in the project, the number of bus slips provided should be used as efficiently as possible, in order to keep the footprint of the bus garage as small as possible. Ensuring the numbers of parking spaces and bus slips are justified and right-sized is important in and of itself, but doing so will also provide flexibility in where those spaces can be located on the site, allowing more opportunity for the development of vibrant public spaces.

Finally, as ANC 6C has long advocated, the action alternatives must include specific plans to minimize the snarl of vehicle traffic at the station. The project must consider the routes and access points of pedestrians, bicyclists and mass transit users going to and around the station, as well as efficient and effective management of for-hire vehicles. We will continue to evaluate how the alternatives handle the ring of traffic around the historic Union Station and the spill-over of vehicle traffic into the historic nearby neighborhoods. These are a significant and continuing concern for nearby residents.

Union Station is and should be a national gateway to the District of Columbia. We see this project as an opportunity to create both a great public space that people will want to visit as well as a world class transportation center that can be a model for the country and the world. We look forward to continuing to work with you to realize these goals.

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

On behalf of ANC 6C,



Karen Wirt
ANC 6C Chair

Cc: The Honorable Eleanor Holmes Norton
Mayor Muriel Bowser
Chairman Phil Mendelson
Council Member Charles Allen
Andrew Trueblood, OP
Jeff Marootian, DDOT
Johnette Davies, Amtrak
Marcel Acosta, NCPC



May 19, 2020

Ms. Katherine Zeringue, Federal Preservation Officer
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; Comments Regarding On-Going Consultation*

Dear Ms. Zeringue:

During the November 19, 2019 consulting parties meeting, the Federal Railroad Administration (FRA) announced that it planned to host two more meetings for Section 106 purposes. One meeting would focus on the revised Assessment of Effects Report (AOE) and the other on the proposed Programmatic Agreement (PA). Through recent emails, we understand that the subject of one meeting may be revised to focus on traffic impacts but, regardless of the subject matter, one or both meetings may have to be conducted “virtually” due to the current health crisis.

As explained during the last consulting parties meeting, the DC State Historic Preservation Office (DC SHPO) is very concerned that meaningful opportunities for consulting parties to contribute to a discussion about potential alternatives that may avoid or minimize adverse effects have not yet been provided. The last meeting consisted almost entirely of FRA explaining the rationale for its preferred alternative. A dialogue about potential modifications to the proposed concept could not and did not occur because the consulting parties had not yet had an opportunity to consider the updated proposal and identify potential revisions.

The regulations that implement Section 106 define consultation as “...the process of seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters arising in the Section 106 process.” (36 CFR 800.16). They also direct Federal agencies to “...plan consultations appropriate to the scale of the undertaking and the scope of Federal involvement...” (36 CFR 800.2(a)(4)).

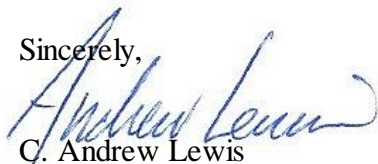
The scale and scope of the Washington Union Station Expansion Project clearly warrant extraordinary consultation efforts. While FRA did invite written comments on its preferred alternative, the important two-way dialogue that can often be useful in identifying ways to resolve adverse effects and improve projects in other ways has still not occurred. The predominantly negative consulting party comments provided thus far also suggest that FRA’s efforts to seek agreement have not been successful either.

To provide the level of consultation that this project warrants, we believe that FRA should host at least one or two additional consulting parties meetings, provide opportunities for meaningful, two-way dialogue, and give serious consideration to the suggestions that are made. We do not believe that FRA can appropriately revise the AOE without first providing such opportunities for comment.

For example, one topic that requires further consultation is the amount of parking. Our letter of December 18, 2019 identified this as one of the primary causes of adverse effects which stem from the inability of parking structures to contribute to the quality of civic space that Union Station deserves. More recently, the DC Office of Planning (OP) and the District Department of Transportation (DDOT) conducted a study that the National Capital Planning Commission (NCPC) requested to determine the appropriate number of parking spaces that should be provided for the project (see attached letter). The very substantial difference between FRA's proposed 1,575 spaces and the OP/DDOT recommendation of 295 spaces (with a maximum of 375) demonstrates just how much potential may yet exist for avoiding and/or minimizing adverse through the reduction of parking alone.

The realities of COVID 19 and "virtual" meetings may limit the potential for meaningful dialogue, but this only reinforces the need to provide additional opportunities for discussion and comment. We urge FRA to expand its Section 106 consultation schedule in advance of issuing the revised AOE and the Draft Environmental Impact Statement (DEIS). We will be pleased to assist FRA in any way possible. Please contact me at andrew.lewis@dc.gov or 202-442-8841 if you should have any questions or comments regarding this matter.

Sincerely,



C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office

Enclosure
cc: Consulting Parties
16-0114

Appendix 3: Area of Potential Effects and Identification of Historic Properties for the Washington Union Station Expansion Project – Final Report

FINAL REPORT

Area of Potential Effects and Identification of Historic Properties

For the Washington Union Station
Expansion Project

11-6-2017

1. Introduction

The Union Station Redevelopment Corporation (USRC), in coordination with the National Railroad Passenger Corporation (Amtrak) (the Project Proponents), have proposed the Washington Union Station (WUS) Expansion Project (the Project) for the expansion and modernization of WUS to meet current and future needs. The Federal government, acting through the Federal Railroad Administration (FRA), owns WUS. The Project requires FRA approval, which is an undertaking with the potential to adversely affect historic properties under Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA) (54 USC § 306108). FRA is the lead Federal agency responsible for complying with Section 106 in accordance with the process set forth in 36 CFR Part 800 (the Protection of Historic Properties). FRA is coordinating the Section 106 process with the preparation of an Environmental Impact Statement (EIS) in accordance with the National Environmental Policy Act of 1969 (NEPA) (40 CFR Part 1500-1508), FRA's Procedures for Considering Environmental Impacts (64 Federal Register [FR] 28545 [May 26, 1999]), and FRA's Update to NEPA Implementing Procedures (78 FR 2713 [January 14, 2013]).

The Project Area, as identified through the NEPA process, includes WUS, the Terminal Rail Yard, and the rail tracks to the north, which extend from WUS to the Eckington Rail Yard and the Ivy City Rail Yard located immediately north of New York Avenue (**Figure 1**). Section 106 regulations (36 CFR Part 800) require the lead Federal agency to seek information from Consulting Parties and others with knowledge of the project area to identify issues relating to the undertaking's potential effects to historic properties. In March 2016, FRA identified individuals and entities with a demonstrated interest in the Project and invited them to be consulting parties, along with the State Historic Preservation Officer and the Project Proponents. FRA continues to consult with the Consulting Parties as the Project advances.

The purpose of this report is to explain the methodology used in determining the Area of Potential Effects (APE) for the Project, and identify historic properties within the APE.

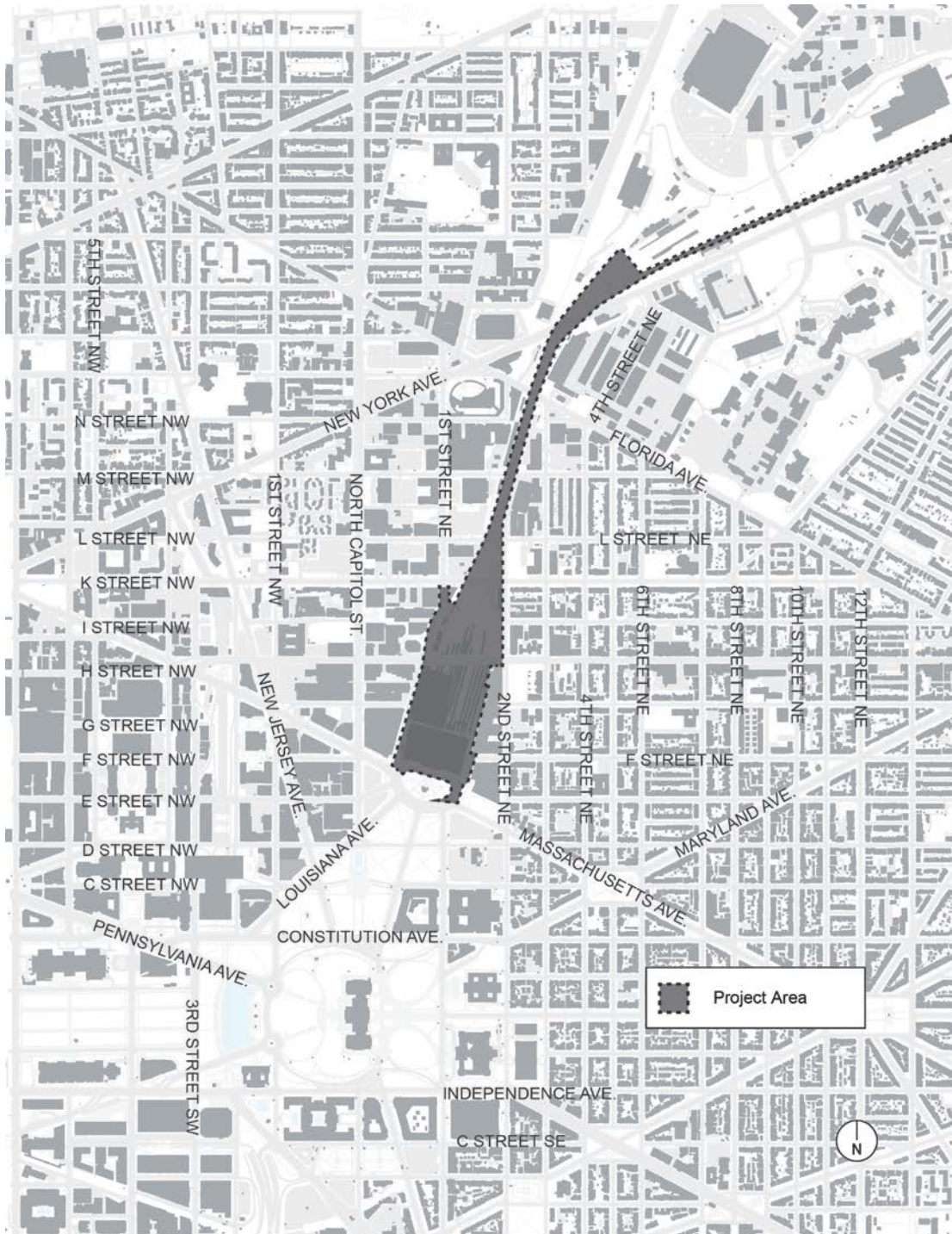
2. Procedures for Establishing the Area of Potential Effects

Section 106 regulations require the lead Federal agency to determine an APE boundary that considers multiple types of effects to historic properties. The regulations also require the Federal agency to seek information from Consulting Parties and others to identify potential effects to historic properties. Types of effects to historic properties may include direct, indirect, temporary, future, and cumulative. The Project's APE includes all locations where alterations in the character or use of historic properties may occur including:

- All locations where ground disturbance may result;
- All locations where the Project may be visible or audible; and
- All locations where the Project may result in changes in traffic patterns, land use, and public access.

The types of direct and indirect effects that would likely occur as a result of the WUS Expansion Project, and how they informed FRA's delineation of the APE are described in Section 3.

Figure 1. Project Area as identified for the NEPA EIS



In order to inform the identification of the APE, FRA identified a *Proposed Study Area* at the second Consulting Parties meeting on May 9, 2016. The Proposed Study Area was intended to be a starting point for ongoing APE consultation while the Project's preliminary concepts were being developed, screened, and refined into Preliminary Alternatives (**Figure 2**). FRA presented the preliminary concepts to the Consulting Parties at the third Consulting Parties meeting on October 6, 2016. At this meeting, FRA again presented the same Proposed Study Area along with the known historic properties within and surrounding the Proposed Study Area. The Project Area at this time, was smaller than currently shown in Figure 1. Since October, the Project Area was extended to include the rail work associated with the re-alignment of the tracks to support the overall track improvements.

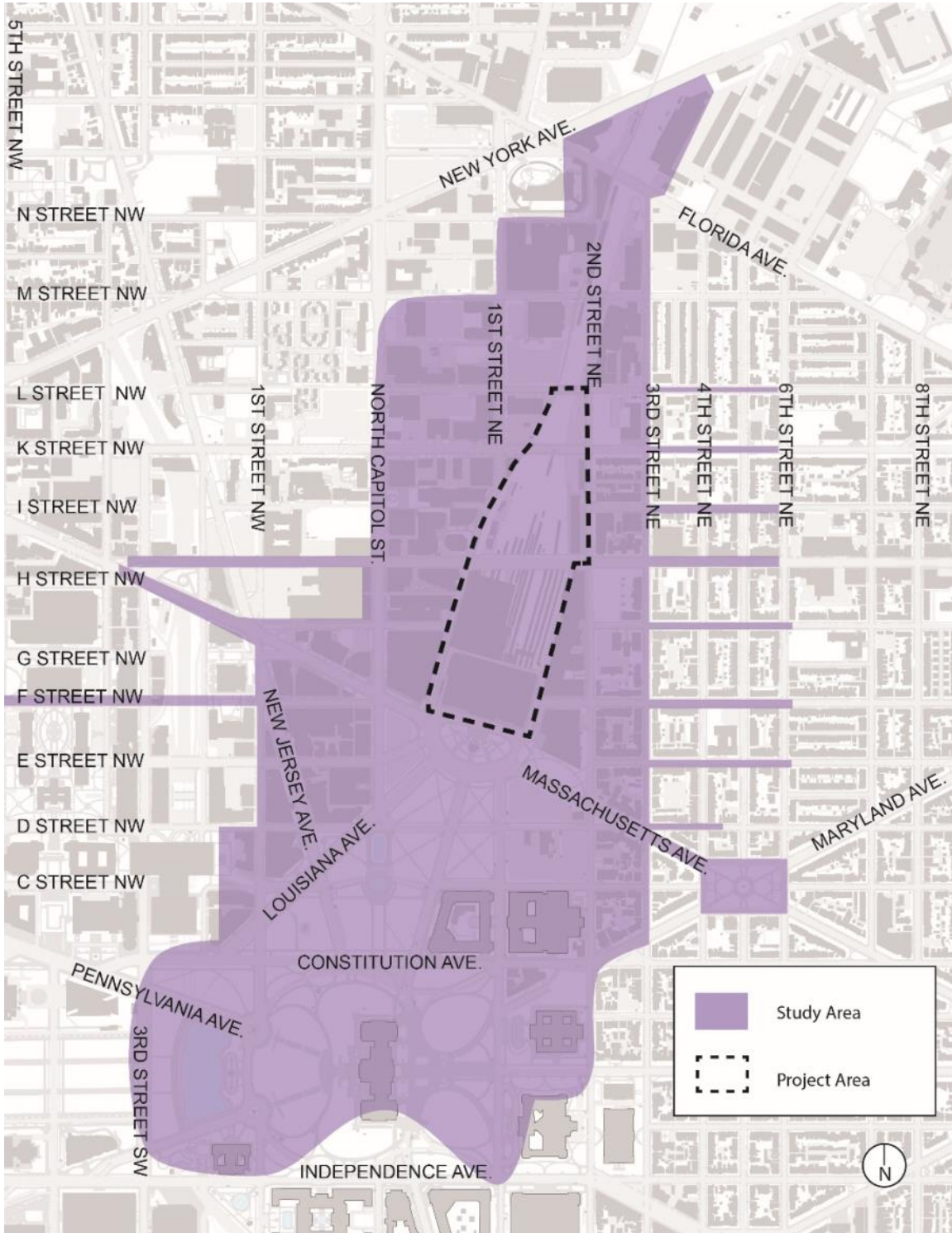
FRA requested comments on the Proposed Study Area and historic properties, and offered Consulting Parties an opportunity to provide comments following the meeting. Having received no comments from Consulting Parties after the October meeting, FRA sent an email to Consulting Parties on February 10, 2017 requesting confirmation of their concurrence with the Proposed Study Area and identification of historic properties, and/or provide any final comments within 30 days.

In February and March 2017, five consulting parties, including the DC Historic Preservation Office (DC HPO), provided comments regarding the Proposed Study Area and the identified historic properties (see [Appendix A](#)). Notably, several Consulting Parties were concerned that the Proposed Study Area did not extend far enough to adequately address potential indirect effects from the Project's proposed new facilities or potential increases in traffic attributed to the Project.¹ Additional comments from the DC HPO addressed the identification of historic properties and noted properties that were potentially eligible for the *DC Inventory of Historic Sites* and *National Register of Historic Places (NRHP)*. FRA considered all comments in developing the APE once the Preliminary Alternatives were identified.² The Preliminary Alternatives are described below.

¹ Letters of response from the Consulting Parties are provided in Appendix A at the end of this report.

² Section 4 discusses the development of the APE in greater depth, as well as how comments from Consulting Parties were taken into consideration.

Figure 2. Section 106 Proposed Study Area and Project Area from October 6, 2016 - predating the determination of the APE

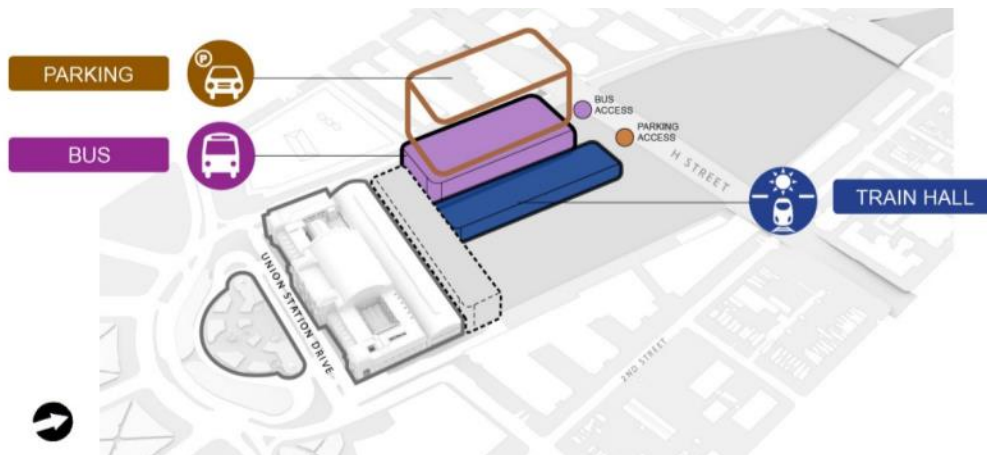


3. Preliminary Alternatives

Four Preliminary Alternatives³ have been selected by FRA for refinement and are depicted below.⁴ In each alternative the height of the train hall element will be lower than the historic WUS headhouse. FRA considered all Preliminary Alternatives in developing the APE.

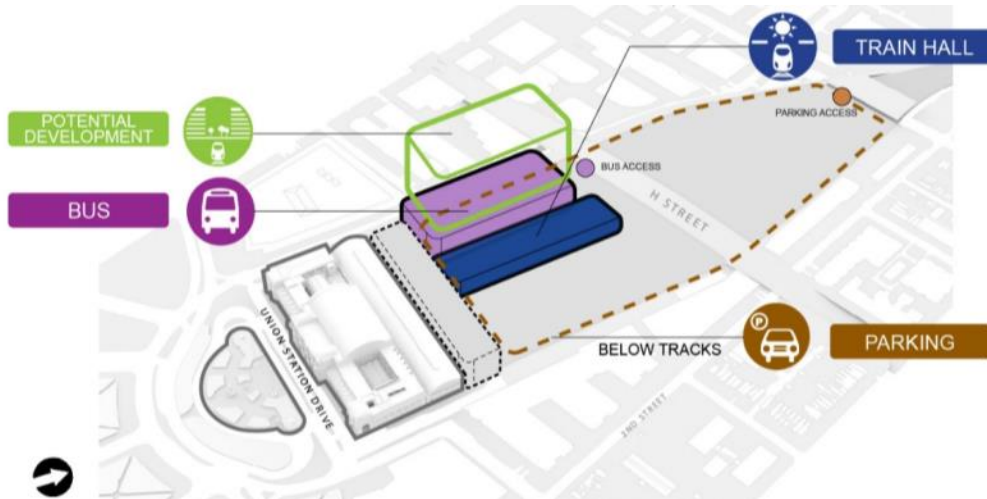
- Preliminary Alternative 1A features a north-south oriented train hall, one-level bus terminal on the southwest portion of the Project Area, and parking above the bus terminal. **(Figure 3)**

Figure 3. Preliminary Alternative 1A



- Preliminary Alternative 1B features a north-south oriented train hall, one-level bus terminal on the southwest portion of the Project Area, parking below the tracks, and the potential for development in current Federal space above the bus terminal. **(Figure 4)**

Figure 4. Preliminary Alternative 1B

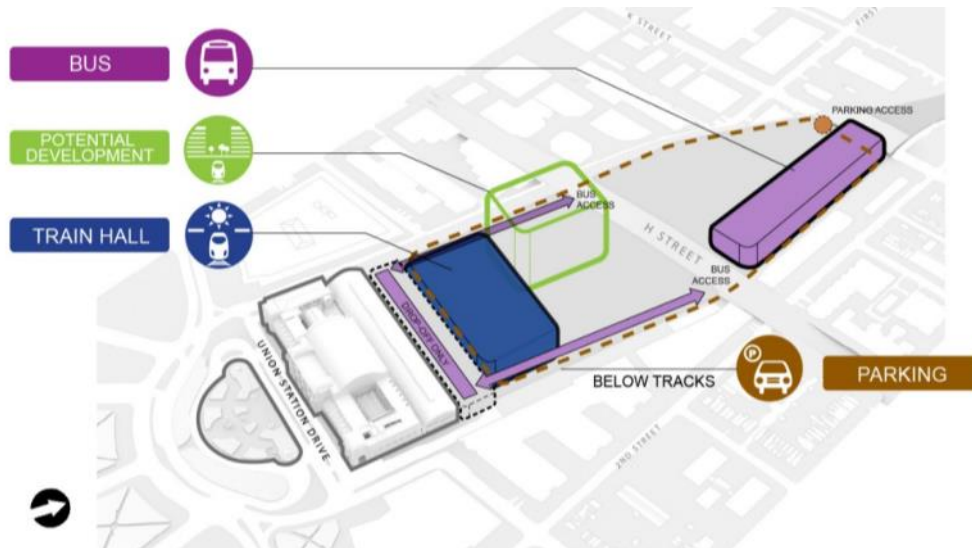


³ For more information on how concepts advanced to Preliminary Alternatives, please see the Concept Screening Report on the WUS Expansion project website.

⁴ All Preliminary Alternative illustrations are not to scale and merely reflect the overall placement of the various Project components including parking, bus, and train hall.

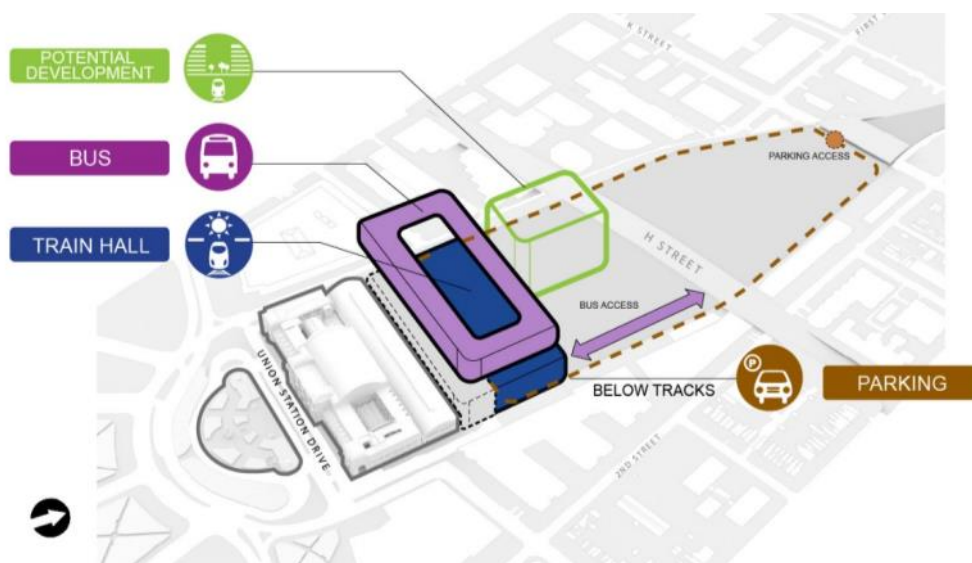
- Preliminary Alternative 4B features an east-west oriented train hall, a north-south oriented one-level bus terminal (located on the east side of the Project Area between H and K streets) with bus drop off on the south side of the train hall, parking below the tracks, and potential for development in current Federal space north of the train hall on the west side of the Project Area. (Figure 5)

Figure 5. Preliminary Alternative 4B



- Preliminary Alternative 5 features an integrated east-west oriented train hall and one-level bus terminal, parking below the tracks, and potential for development in current Federal space on the west side of the Project Area north of the train hall. (Figure 6)

Figure 6. Preliminary Alternative 5

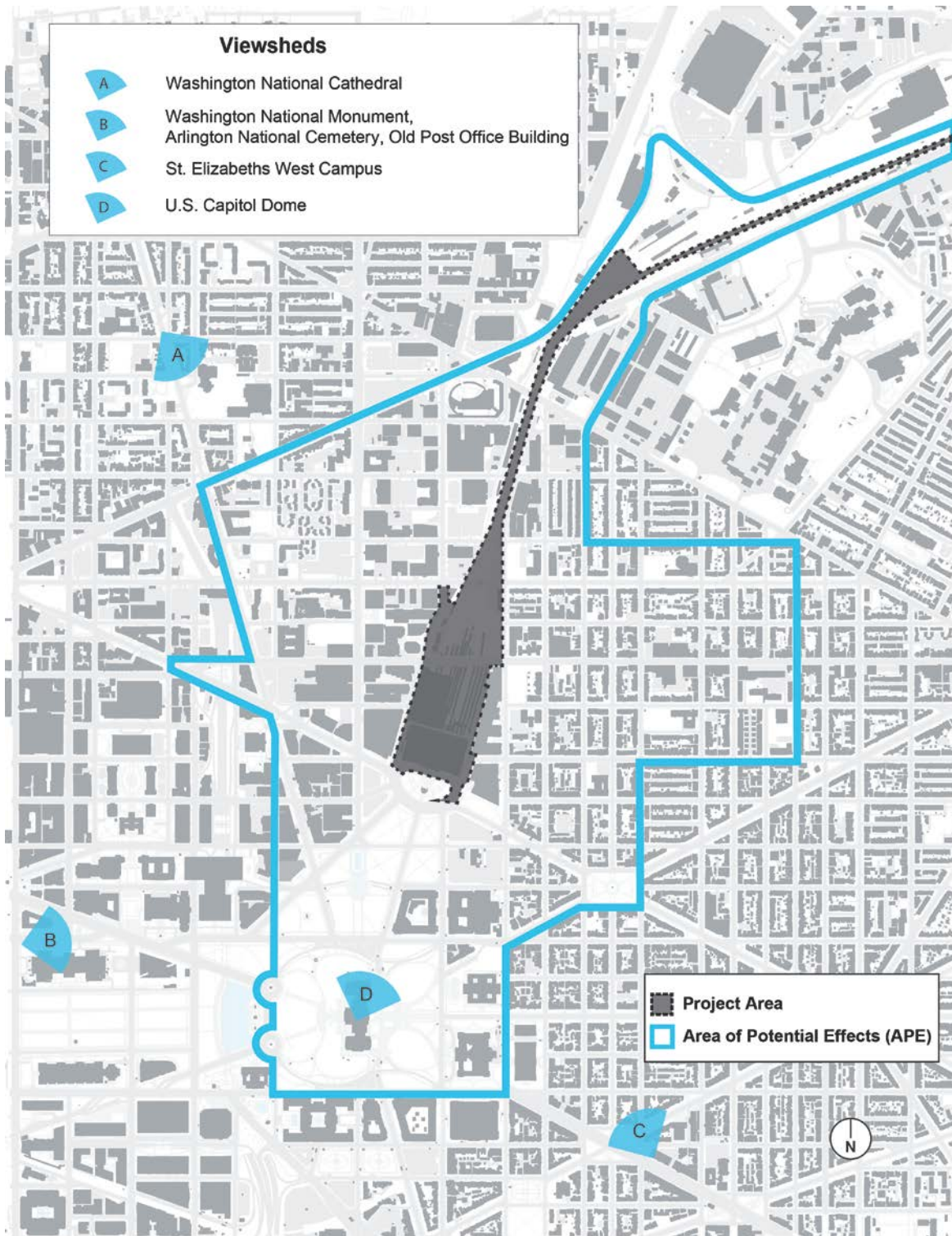


4. Area of Potential Effects (APE)

The WUS Expansion Project APE (**Figure 7**) is bound by Independence Avenue SW and SE to the south; First Street SW and NW, and New Jersey Avenue NW to the west; and New York Avenue NW and NE, the Eckington Rail Yard, and Ivy City Rail Yard tracks to the north. The APE boundary to the east is more irregular due to the varying degree to which the Project may result in visible and traffic related effects along the east-west running streets. The east boundary follows New York Avenue NE southwest to Fourth Street NE, and continues to L Street NE. The APE then runs along L Street NE to Tenth Street NE, before running south to F Street NE, and turning south again on Sixth Street NE to the southern edge of Stanton Park at C Street NE. The boundary follows Maryland Avenue NE to Second Street NE until Independence Avenue SE.

The APE includes all areas that may be directly or indirectly affected by the Project undertaking. The following sections describe how the potential effects influenced the development of the APE.

Figure 7. WUS Expansion Project APE



Direct Effects

Direct effects are physical effects that include alteration, removal, or damage. Direct effects are those caused by the proposed action, and occur at the same time and place. Potential direct effects of the WUS Expansion Project include ground disturbance, grading, demolition, removal, physical damage, alteration, preservation, restoration, rehabilitation, and reconstruction. Direct effects may also include vibration if it causes structural damage to a historic property. Direct effects would mostly occur in the Project Area (See **Figure 7**).

Indirect Effects

Indirect effects are typically atmospheric related effects and include those that are reasonably foreseeable, may occur at a later time, be farther removed in distance, or be cumulative (36 CFR 800.5). For the WUS Expansion Project, indirect effects could include visual, noise, vibration effects. The APE boundary for the Project was largely determined by the potential for indirect effects described in detail below.

FRA assessed the potential for visual effects that could result from the proposed locations of the structures that would be constructed as part of the Project by completing a visual survey photo map (see [Appendix B](#)) with an understanding of:

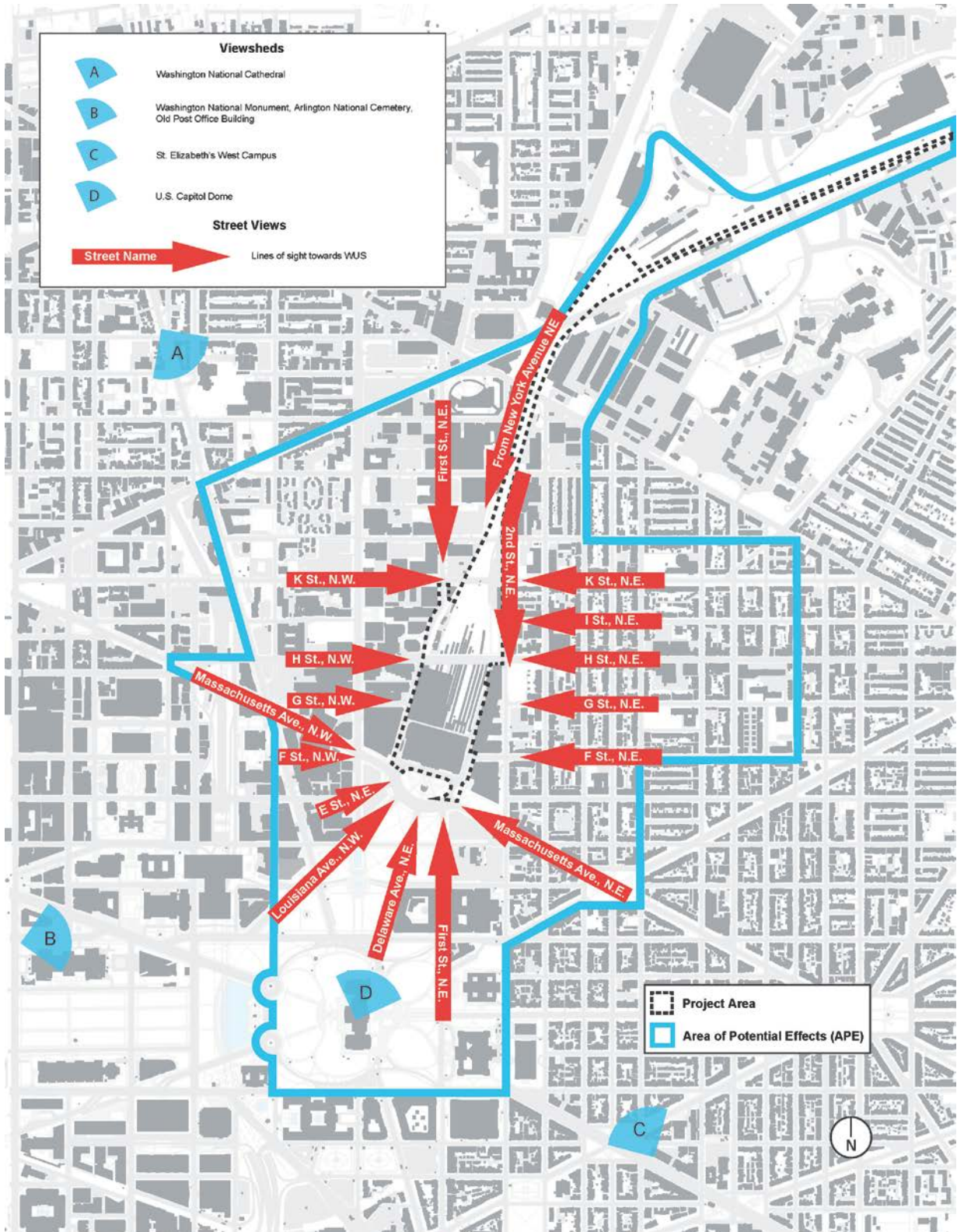
- Important views to, and from, the Project Area (**Figure 8**)
- Axial views along streets of the L'Enfant and McMillan Plans, and
- Views to and from buildings and public spaces.

The visual survey was conducted April 1, 2016, with additional photos taken April 27, 2017. The survey consisted of a photographic exercise traversing the neighborhoods surrounding WUS and was conducted to provide documentation of existing conditions and assess the potential visibility of the Project from various locations, generally within a quarter to a half mile radius (as measured from the center of the Project Area at the H Street Bridge). Spring was the chosen time frame for the survey because it allowed for good walking weather and provided views with early leaf growth; allowing one to interpret views with no leaf growth (as in winter) and full leaf growth (as in late spring, summer, and early fall). Photos taken April 27, 2017 feature full leaf growth. Approximately fifteen hundred photos were taken as part of this survey. (See [Appendix B](#).)

The [visual survey photo map](#) informed an understanding of the areas with potential visual effects. Areas within the APE with potential visual effects include all viewsheds towards WUS from Senate Park and the radial streets including Louisiana Avenue NW, Delaware Avenue NE, and First Street NE. Views along Massachusetts Avenue NW and NE, E Street NW and NE, F Street NW and NE, G Street NW and NE, H Street NW and NE, K Street NW and NE, New York Avenue NE, and Second Street NE may also be affected (**Figure 8**).

In addition, a topographic map was used to identify high points in the city and surrounding area. Based on this information, and knowledge of high standing structures, FRA identified six culturally significant viewsheds: Arlington National Cemetery, St. Elizabeth's West Campus, the U.S. Capitol Dome, the Washington Monument, the Old Post Office Building, and the Washington National Cathedral (**Figure 8**). Due to their cultural and historic significance, FRA will also assess potential effects on the viewsheds from these sites towards the Station as a part of the Section 106 process.

Figure 8. Street views towards Project Area and significant viewsheds



In determining the APE, FRA also considered the potential for indirect effects (e.g. visual, noise, and vibration) resulting from potential increases in traffic attributed to the Project's construction period and long-term operation. These effects may impact the integrity of a historic property through changes in the property's setting. As noted above, several Consulting Parties requested that the Proposed Study Area be extended to account for the potential indirect effects from Project-related traffic, specifically within the Capitol Hill Historic District, which is located to the east of the Project Area. FRA considered these comments and the APE was subsequently expanded to New Jersey Avenue NW on the west and 10th Street NE on the east. This area considers the potential indirect effects from construction-related traffic, as well as the potential for increased traffic as a result of the completed Project.

Based on traffic patterns from nearby construction projects to the west of WUS, and the design for the Preliminary Alternatives, FRA anticipates that traffic related to Project construction will primarily be directed north to New York Avenue NW and NE along the north-south running streets, and will likely not extend beyond New Jersey Avenue NW to the west. Areas to the east of WUS may also be impacted by traffic. FRA defined the APE to include the neighborhoods extending east to Fourth Street NE north of L Street NE; extending east to Tenth Street NE between L Street and F Street NE; and extending to Sixth Street NE from F Street NE south to Stanton Park. The APE extends to Tenth Street NE between L and F Streets NE to accommodate the potential impact of traffic from the below ground station parking garage entrance on K Street NE and Second Street NE as designed in the Preliminary Alternatives.

As the Section 106 process continues, FRA will continue to coordinate with the NEPA EIS process to measure noise and vibration conditions. Existing noise and vibration measurements will be taken in and surrounding the Project Area, including at historic properties, to further the understanding of potential noise and vibration effects.

Rationale for the APE:

The rationale for delineating the APE (**Figure 7**) at the various street intersections relates to the potential for indirect effects. It is based on the design of the Preliminary Alternatives and professional judgment and is described in further detail below:

- *First Street SW and NW, between Independence Avenue SW and Constitution Avenue NW:* Due to the sloping topography, existing buildings, streetscape, and lines of sight towards WUS, effects are unlikely beyond this point.
- *First Street NW, from Louisiana Avenue NW to Massachusetts Avenue NW:* Views along Louisiana Avenue NW from its intersection with First Street NW to WUS ([Image B](#) in Appendix B) are historically significant and may be affected by the Project. However, due to the existing buildings, streetscape, and lines of sight towards WUS, effects west of First Street NW between Louisiana NW and Massachusetts Ave NW are unlikely.
- *Massachusetts Ave NW, between First Street NW and Fourth St NW; and H Street NW between Fourth Street NW and New Jersey Avenue NW:* Massachusetts Avenue NW provides views towards Columbus Plaza, which is unlikely to be impacted by the Preliminary Alternatives. Views towards WUS along H Street NW may be affected. However, due to the interruption of H Street NW by Massachusetts Avenue NW at Fourth Street NW, it is unlikely that there will be effects beyond this point.

- *New Jersey Avenue NW between H Street NW and New York Avenue NW:* While visual impacts related to the proposed location of the Project's facilities are not expected to extend to New Jersey Avenue NW between H Street NW and New York Avenue NW, there is potential for construction activities and other related traffic to affect this area as New Jersey Avenue NW and the north-south running streets to the east are main routes to New York Avenue NW where the majority of construction traffic would be directed.
- *New York Avenue NW and NE:* Due to the topography, existing buildings, streetscape, and lines of sight towards WUS, effects are unlikely north of New York Avenue NW and NE.
- *"Wye" portion of the Ivy City Rail Yard:* A small portion of the rail yard is part of the Project Area that will undergo track upgrades. It is unlikely that work in this area will have the potential to affect areas beyond the western portion of the Ivy City Rail Yard.
- *New York Avenue NE to Fourth Street NE:* This portion of the Project Area will undergo track upgrades and it is unlikely that work will affect areas south of New York Ave NE to Fourth Street NE.
- *Fourth Street NE, south to L Street NE:* Due to the topography, existing buildings, streetscape, and lines of sight towards WUS, effects are unlikely east of Fourth Street NE between New York Avenue and L Street NE.
- *10th Street NE, between L and F Streets NE:* Between L and F Streets NE there are potential effects due to the potential for increased traffic to and from the below ground parking garage entrance on K Street NE and Second Street NE as planned in some of the Preliminary Alternatives. Due to existing buildings, lines of sight toward WUS, topography and streetscape, visual effects from the proposed location of the Project's facilities between L and F Streets NE are unlikely to occur beyond Third Street NE. Along F Street, only the WUS headhouse is visible, making it unlikely that the Project's proposed facilities will be visible from F Street. ([Image D](#) and [Image F](#) in Appendix B).
- *Sixth Street NE, between F and C Streets NE:* Between F and C Streets NE there are potential effects due to the potential for increased traffic that could result from the Project. However, due to the topography, existing buildings, streetscape, and lines of sight toward WUS, visual related effects from the proposed location of the Project's facilities south of F Street NE are unlikely east of Third Street NE.
- *Maryland Avenue NE, between Fourth and Second Streets NE:* Due to the topography, existing buildings, streetscape, and lines of sight towards WUS, effects are unlikely south of Maryland Avenue NE.
- *Second Street NE and SE, between Constitution NE and Independence Avenue SE:* Due to the topography, existing buildings, streetscape, and lines of sight towards WUS, effects are unlikely east of Second Street NE.
- *Independence Avenue SE and SW:* Due to the topography, existing buildings, streetscape, and lines of sight towards WUS, effects are unlikely south of Independence Avenue SE and SW. The only direct view towards the Project Area from Independence Avenue is at First Street SE ([Image A](#) in Appendix B).

5. Identification of Historic Properties

In accordance with the Section 106 regulations, the lead Federal agency is responsible for identifying historic properties within the APE. Historic properties are defined as “any prehistoric or historic district, site, building, structure or object included in, or eligible for inclusion in, the National Register of Historic Places.”⁵ The existing information regarding historic properties in the WUS Expansion Project APE is extensive because the area has been thoroughly studied by many public and private entities, and the existing historic properties are well known and documented. Many properties within the APE are already recognized historic properties listed on the NRHP. Five properties are National Historic Landmarks, three of which are Architect of the Capitol (AOC) properties, including the U.S. Capitol, the U.S. Supreme Court, and the Library of Congress. Other historic properties were identified from the AOC *List of Heritage Assets*⁶ and by the National Park Service’s (NPS) National Mall and Memorial Parks. Four memorials that are a part of National Mall and Memorial Parks are located within the APE. Because they are NPS sites, they are also listed on the NRHP. (Figure 9)

Many properties are listed on the *District of Columbia Inventory of Historic Sites*. All such properties are also submitted to and typically listed on the NRHP. Cases in which properties are listed on the DC Inventory but not the NRHP are limited and typically occur when the agency or owner does not want them listed. In such cases, the properties remain eligible for the NRHP. In addition, ten properties potentially eligible for listing on the DC Inventory and NRHP were identified in the 2015 Union Station Historic Preservation Plan (WUS HPP)⁷ and in a [letter](#) from the DC HPO dated March 16, 2017 (See [Appendix A](#)).

Historic properties were first identified at the third Consulting Parties meeting on October 9, 2016, when FRA presented the Proposed Study Area in anticipation of the development of Preliminary Alternatives and the development of the APE. No comments regarding the Proposed Study Area or historic properties were received following the October meeting. On February 10, 2017, FRA again shared the identified historic properties with the consulting parties, and asked the Consulting Parties to provide comments within 30 days.⁸ In response, the DC HPO provided information on buildings that are potentially eligible for listing on the DC Inventory of Historic Sites and the NRHP.⁹ In the response from ANC 6C, it was noted that one of the identified historic properties (the former milk depot located at 911 Second Street NE) had been demolished.¹⁰

In addition to identifying potentially eligible properties, the letter from the DC HPO asked that FRA prepare a Determination of Eligibility (DOE) to determine the NRHP eligibility of resources within the WUS rail yard. FRA is currently producing a DOE for the WUS and Terminal Rail Historic District which includes WUS, Union Station Plaza, and the Terminal Rail Yard, which extends from the station north to Florida Avenue. The DOE will further inform the identification of historic properties for the WUS Expansion Project.

⁵ 36 C.F.R. § 800.16(l).

⁶ Per the NHPA (54 USC § 307104) the United States Capitol and its related buildings and grounds are exempt from the NHPA and the Section 106 process. Therefore, all AOC heritage assets will be exempt from the Section 106 process, but will be considered as cultural resources under the National Environmental Policy Act (NEPA). Impacts to all cultural resources will be assessed and addressed within the EIS.

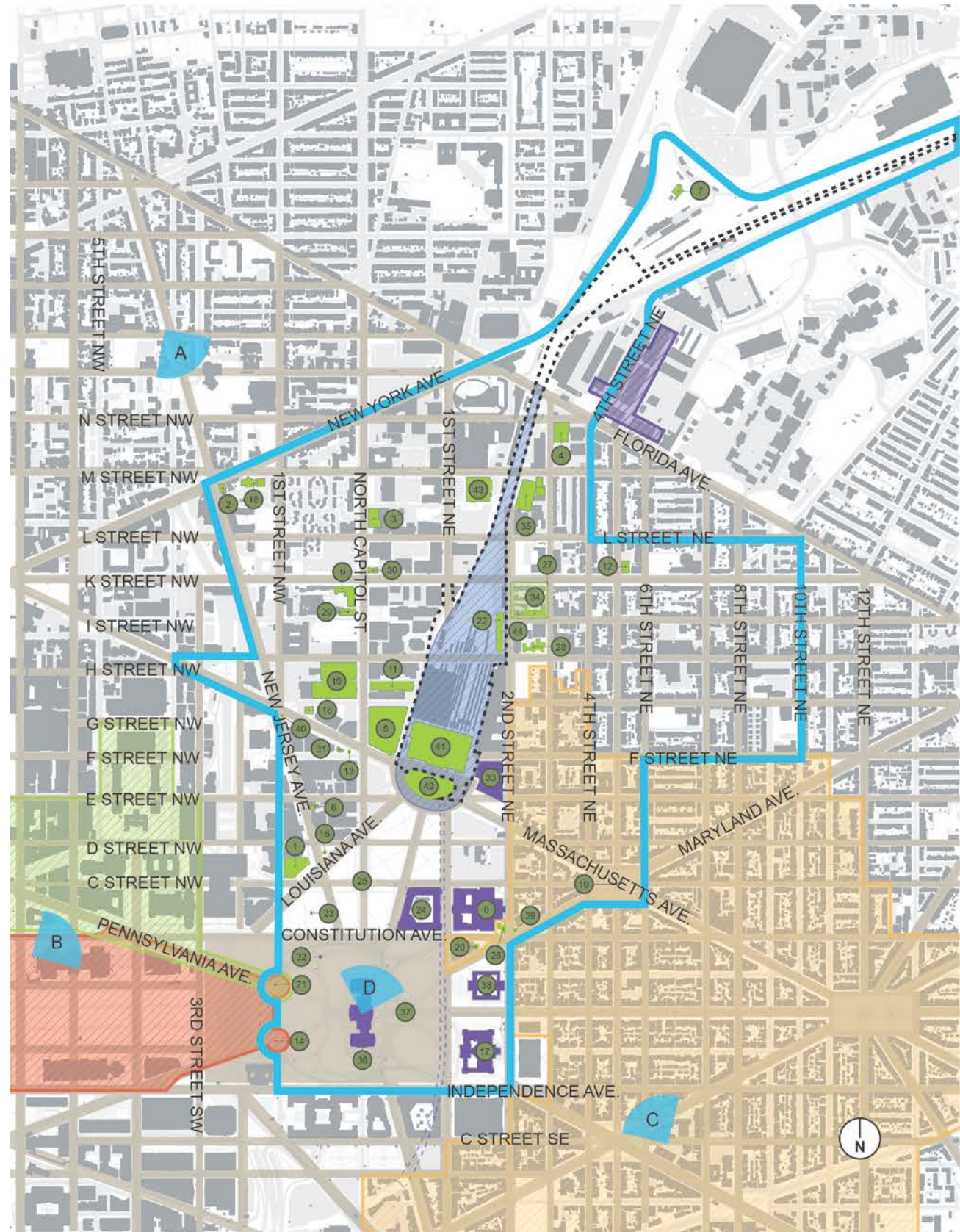
⁷ Building Conservation Associates, Inc. *Washington Union Station Historic Preservation Plan*. 3 vols (Philadelphia, 2015).

⁸ Responses are included in Appendix A.

⁹ See A-1 in Appendix A.

¹⁰ See A-5 in Appendix A.

Figure 9. APE and Identified Historic Properties



Washington Union Station Expansion Project: Area of Potential Effects

Project Area

Area of Potential Effects (APE)

WASHINGTON
UNION STATION
STATION EXPANSION

Historic Districts

Capitol Hill Historic District	NR; DC	Union Market Historic District	NR; DC
National Mail Historic District	NR; DC	Washington Union Station and Terminal Rail Yard Historic District	[Potentially NR and DC Eligible]
Pennsylvania Avenue National Historic Site	NR; DC	First Street Tunnel (Below-grade)	
L'Enfant - McMillan Plan	NR; DC		

Historic Properties Architect of the Capitol Cultural Resources (Section 106 Exempt)

AOC	Architect of the Capitol	NPS	National Park Service	DC	District of Columbia Inventory of Historic Sites
NHL	National Historic Landmark				
NR	National Register of Historic Places				
1	Acacia Building	NR; DC	23	Robert A. Taft Memorial	AOC
2	Augusta Apartment Building (and Louisa Addition)	NR; DC	24	Russell Senate Office Building	AOC; DC
3	C&P Telephone Company Warehouse (Former)	NR; DC	25	Senate Parks and Fountain	AOC
4	Capital Press Building (Former)	[Potentially NR and DC Eligible]	26	Sewall-Belmont House	NHL; NR; DC
5	City Post Office (Postal Museum)	DC	27	Square 750 Rowhouse Development	[Potentially NR and DC Eligible]
6	Dirkson and Hart Senate Office Buildings	AOC; [Potentially DC Eligible]	28	St Joseph's Home (Former)	[Potentially NR and DC Eligible]
7	Eckington Power Plant, Coach Yard Power Plant	[DC Eligible]	29	St. Aloysius Catholic Church	NR; DC
8	Engine Company No. 3	DC	30	St. Philip's Baptist Church	DC
9	Gonzaga College High School	[Potentially NR and DC Eligible]	31	SunTrust Bank	[Potentially NR and DC Eligible]
10	Government Printing Office	DC	32	The Summerhouse	AOC
11	Government Printing Office Warehouse No. 4	[Potentially NR and DC Eligible]	33	Thurgood Marshall Federal Judiciary Building	AOC
12	Hayes School	DC	34	Tophams Luggage Factory (Former)	[Potentially NR and DC Eligible]
13	Holodomor Ukrainian Holocaust Memorial	NPS	35	Uline Ice Company Plant and Arena Complex (Former)	NR; DC
14	James A. Garfield Monument	AOC	36	United States Capitol	AOC; NHL; DC
15	Japanese American Memorial to Patriotism During WWII	NPS	37	United States Capitol Grounds	AOC; DC
16	Joseph Gales School (Former)	DC	38	United States Supreme Court	AOC; NHL; [Potentially DC Eligible]
17	Library of Congress	AOC; NHL; DC	39	Veterans of Foreign Wars of the U.S. Memorial	NPS
18	M Street High School (Perry School) (Former)	NR; DC	40	Victims of Communism Memorial	NPS
19	Major General Nathanael Greene Statue	NR; DC	41	Washington Union Station	NR; DC
20	Mountjoy Bayly House	NHL; NR	42	Washington Union Station Plaza and Columbus Fountain	NR; DC
21	Navy-Peace Memorial	AOC; DC	43	Woodward and Lothrop Service Warehouse (Former)	NR; DC
22	Railway Express Agency Building (Former)	DC	44	901 Second Street NE	[Potentially NR and DC Eligible]

Viewsheds

- Washington National Cathedral
- Washington National Monument, Arlington National Cemetery, Old Post Office Building
- St. Elizabeths West Campus
- U.S. Capitol Dome

11/6/2017

6. Potential Archaeological Resources

Historic Properties also include archaeological resources. The WUS Expansion Project has the potential to affect archaeological resources within the Project Area, where all ground disturbing activities would occur. An Archaeological Assessment was completed in 2015 as a part of the WUS HPP.¹¹ All the areas noted in the Archaeological Assessment are located within the APE. The Archaeological Assessment concluded that the Project Area is likely to contain a range of prehistoric and historic archaeological materials from isolated artifacts to significant cultural features. However, certain areas are more likely to contain significant archaeological remains than others. **Figure 10** illustrates areas of low and medium to high potential for archaeological resources. Areas unlikely to contain archaeological resources have low potential and are shaded in green, while areas of moderate to high potential are shaded in red.

The area with the greatest potential for archaeological resources is in the rail yard south of L Street, NE and beneath Columbus Plaza (area “B” in **Figure 10**). Fill deposited on top of these areas to raise the grade has buried pre-1903 cultural resources, suggesting an increased likelihood of preservation. The ground below the WUS headhouse, passenger concourse, and garage (area “A” in **Figure 10**) is unlikely to contain significant archaeological remains since such features would have been removed in the subsurface excavations for the buildings’ foundations. An exception to this understanding was the discovery of a brick masonry sewer catch basin and two terracotta pipes during a 2015 project to stabilize the WUS subbasement.¹² Section 106 efforts for the near term WUS subbasement repairs project will result in forthcoming information on the extent of existing archaeological resources in area “A.”

Areas that have been regraded and leveled, such as the rail yard between L Street NE and New York Avenue NE, are unlikely to contain significant archaeological remains. Areas “C” and “E” in **Figure 10**, between L Street NE and New York Avenue NE, have low archaeological potential. Area “D” also has low archaeological potential except for the remains of the 18th century Casanovia farm house. Artifacts, likely associated with the Casanovia farm house, were discovered during the NoMa-Gallaudet Metrorail Station’s construction. All areas north of New York Avenue NE were not surveyed for archaeological potential.

Overall, the 2012 Archaeological Assessment found there is low to moderate potential that significant prehistoric material is present, and moderate to high potential that significant historic material (mostly dating from the nineteenth and early twentieth centuries) is present. Historic archaeological resources likely to be present relate to the Swampoodle neighborhood,¹³ and include building foundations, wells, privies, street

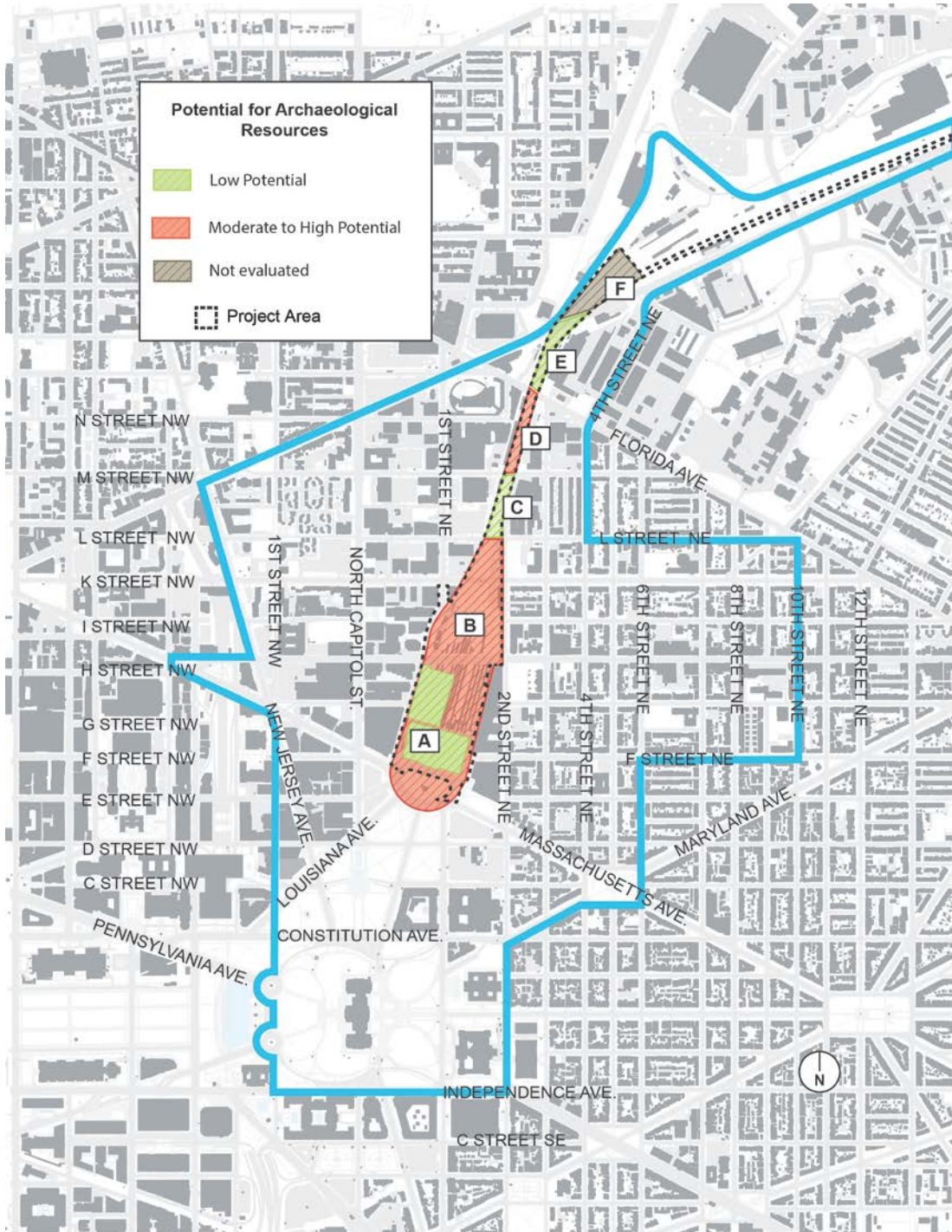
¹¹ Karell Archaeological Services, “Archaeological Assessment for the Washington Union Station” (2015) in Washington Union Station Historic Preservation Plan, Archaeological Assessment of Washington Union Station, E-125.

¹² Karell Archaeological Services, “Union Station Archaeological Feature 1,” *DC Preservation Office Determination of Eligibility Form* (2015).

¹³ The “Swampoodle” neighborhood was generally bounded by 1st Street NW to the west, 2nd Street NE to the east, K Street in the north and G Street to the south. The working-class neighborhood was home to laborers and immigrants. Over 300 buildings in Swampoodle were demolished during the construction of Union Station between 1903 and 1907. For further information please refer to “Capitol Hill Historic District (Boundary Increase 2015)” *National Register of Historic Places Registration Form*.

infrastructure, trash pits, as well as railroad infrastructure dating to the late nineteenth century and earlier. Such resources were demolished and covered over during the construction of WUS.

Figure 10: *Low and moderate to high areas of potential for archaeological resources*



7. Conclusion:

The APE considers potential effects to historic properties that could result from the WUS Expansion Project. FRA considered comments provided by the Consulting Parties regarding the Study Area in the development of the APE. Should the potential for effects change as project activities progress, FRA may reevaluate and adapt the APE to accommodate these changes.

FRA identified the historic properties within the APE by reviewing existing documentation and seeking input from consulting parties. Historic properties and cultural resources within the APE include historic districts, sites, buildings, structures, and objects recognized by the National Historic Landmarks Program, NRHP, District of Columbia Inventory of Historic Sites, AOC List of Heritage Assets, and National Mall and Memorial Parks. Additional properties were determined to be potentially eligible for listing in the NRHP and will be included in the Section 106 Process.

FRA provided a draft copy of this report to all Consulting Parties on August 8, 2017 for review and comment. On September 7, 2017 FRA held a Consulting Parties meeting, in which it presented the Draft APE and identified historic properties (**Figure 9**). FRA requested final comments by September 27, 2017. No revisions to the APE or additional identification of historic properties were proposed by the Consulting Parties during the September 7th meeting or during the comment period. The DC Historic Preservation Office concurred with FRA's APE and identification of historic properties in a letter dated September 29, 2017.

Over the next several months, FRA will assess adverse effects for all identified historic and potentially eligible properties in accordance with the Section 106 implementing regulations (36 CFR § 800.5). Once an assessment of effect has been made and documented, FRA will continue to seek consulting party input on ways to avoid, minimize, and mitigate any adverse effects.

APPENDIX A:
Consulting Party Responses to FRA
February – March 2017

APPENDIX A: Consulting Party Responses to FRA, February – March 2017

A-1. DC State Historic Preservation Officer response (DC HPO), March 16, 2017.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



March 16, 2017

Ms. Amanda Murphy
Environmental Protection Specialist
Office of Railroad Policy and Development
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Washington Union Station Expansion Project Study Area

Dear Ms. Murphy:

Thank you for providing the District of Columbia State Historic Preservation Office (SHPO) with an opportunity to review the Washington Union Station Expansion Project Study Area, which we understand the Federal Railroad Administration (FRA) will use as a basis for developing the undertaking's Area of Potential Effect (APE) in accordance with 36 CFR 800.4. We appreciate the conscientious efforts that FRA has made to identify historic properties thus far and we offer the following comments for consideration as the Section 106 review process continues.

To address the immediate project area first (No. 3 on the Study Area Map), most of this area is referred to as the Terminal Rail Yard (see historic image below) and is generally considered eligible for listing in the National Register of Historic Places. However, a formal Determination of Eligibility (DOE) form has yet to document the basis for eligibility, the boundaries of the area, and the contributing and non-contributing elements. The Study Area map appears to suggest that only [parts of] two retaining walls, the K Street Tower and the REA Building are historically significant, while the list of historic properties on the reverse side of the map identifies train platforms, umbrella sheds and other resources as contributing. The completion of a DOE Form to clarify these matters should be made a priority. The recently completed Union Station Historic Preservation Plan provides a great deal of relevant information in this regard. The Eckington Power Plant DOE Form that Amtrak prepared in 2010 should be also considered in determining the boundaries of the Terminal Rail Yard.



With regard to the larger Study Area, we share some of the concerns recently expressed by consulting parties about the boundaries being too limited to adequately consider all of the Expansion Project's likely indirect effects – particularly the visual and traffic-related effects of new construction. For example, it seems possible that the newly proposed train concourse and/or parking garage may be visible from areas outside of the Study Area. It also seems reasonable to anticipate that increased traffic may result in backups that extend beyond the blocks immediately surrounding Union Station. Although it is too early in the consultation process to determine the full extent of such indirect effects, it is important that the APE include all areas where *potential* effects may occur. To that end, we recommend that the APE be drawn as generously as possible rather than being a subset of the Study Area as was recently suggested.

APPENDIX A: Consulting Party Responses to FRA, February – March 2017

Ms. Amanda Murphy
Washington Union Station Expansion Project Study Area
March 16, 2017
Page 2


On a related note, all of the streets, avenues, parks and reservations that contribute to the National Register of Historic Places-Listed Plan of the City of Washington (L'Enfant Plan) should be designated on the Study Area Map and incorporated, collectively rather than individually, in the list of historic properties since these resources are among the most likely to be subject to indirect effects.

Finally, we offer the following list of specific edits to the Study Area Map itself:

1. Although Capitol Square and its landscape are technically exempt from Section 106, the entirety of the area (i.e. bounded by 1st Streets SE and SW, Constitution Avenue, and Independence Avenue) is a DC Landmark and unquestionably makes up a significant resource upon which the effects of the project should be evaluated.
2. Similarly, the landscaped area known as Senate Park (i.e. bounded by Constitution, Delaware and New Jersey Avenues) is included among the Architect of the Capitol's Heritage Assets and should be identified as an important resource to consider.
3. Numbers 42, 45, 48 and 51 should also be identified as DC Landmarks.
4. Numbers 43, 44, 46, 47, 49, 50 and 81 should also be identified as potential DC Landmarks.
5. Number 32 should be revised to clarify that the St. Aloysius Catholic Church is a landmark/listed, but the adjacent school and related buildings are not. However, these buildings are potential DC landmarks and potentially eligible for listing in the National Register.
6. The Acacia Building at 311 1st Street NW should be identified as a potential DDC Landmark potentially eligible for listing in the National Register.
7. The historic building currently used as a Sun Trust Bank at 2 Massachusetts Avenue, NW should be identified as a potential DDC Landmark and potentially eligible for listing in the National Register.
8. The former National Capital Press Building at 301 N Street, NE should be identified as a potential DDC Landmark potentially eligible for listing in the National Register.
9. The Union Market Historic District/Union Market Terminal Buildings along Morse, 4th, 5th, and 6th Streets NE should be identified as a DC and National Register-Listed Historic District.

We look forward to continuing consultation with all parties and to assisting FRA in determining and documenting the APE. If you should have any questions or comments regarding this matter, please contact me at andrew.lewis@dc.gov or 202-442-8841. Otherwise, thank you for providing this additional opportunity to review and comment.

Sincerely,


C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office

16-0114

2000 14th Street, N.W., 4th Fl., Washington, D.C. 20009 202-442-7600, fax 202-442-7637

APPENDIX A: Consulting Party Responses to FRA, February – March 2017

A-2. National Capital Planning Commission (NCPCC) response, March 10, 2017.

From: Flis, Matthew [mailto:matthew.flis@ncpc.gov]
Sent: Friday, March 10, 2017 3:11 PM
To: Murphy, Amanda (FRA) <amanda.murphy2@dot.gov>
Subject: Re: Washington Union Station: Historic Property Identification Concurrence

Good Afternoon Amanda,

Thank you for the opportunity to review the study area materials. We appreciate the conservative approach which captures a broad area of resources and viewsheds. We look forward to an update on the process and discussing when it may be appropriate to brief our Commission.

Best,
Matt

Matthew J. Flis, AICP-CUD
Senior Urban Designer
National Capital Planning Commission

A-3. Federal Transit Administration response (FTA), February 16, 2017.

From: Koenig, Daniel (FTA)
Sent: Thursday, February 16, 2017 11:28 AM
To: Murphy, Amanda (FRA) <amanda.murphy2@dot.gov>
Subject: RE: Washington Union Station: Historic Property Identification Concurrence

Hi Amanda – Thanks for providing. Not surprised that there are a lot of resources. My thinking though, is that the APE could be drawn to be a bit much narrower. The improvements to the station would have far less potential, if any, to affect resources to the south. Take for example, resource 51 (Botanical Garden), what is the likelihood that that property could experience any proximity effects from construction and operation of an enhanced station? This large APE will be also be very burdensome under 4f as each of the resources identified in this map would have to be evaluated under 4f and I would again argue that many of the properties have zero potential to be impacted, either directly or indirectly. Let me know if you'd like to discuss more, but our overall comment is that this could be narrowed substantially.

Thanks,
Dan

A-4. Capitol Hill Restoration Society (CHRS) response, March 14, 2017.



Capitol Hill Restoration Society, P.O. Box 15264, Washington, DC 20003-0264

March 14, 2017

Amanda Murphy
Environmental Protection Specialist
Office of Railroad Policy and Development
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590
amanda.murphy2@dot.gov

Re: National Historic Preservation Act Section 106 process for the Washington Union Station Expansion Project: Historic Properties and Proposed Study Area

Dear Ms. Murphy,

Thank you for your email of February 10, 2017. We write in response to your request for concurrence on these two points:

- 1. The Proposed Study Area, the geographic area surrounding the proposed project area, is appropriate with the scope of the federal undertaking.*
- 2. The historic properties and features within and bordering the Proposed Study Area have been appropriately identified and that the appropriate view sheds are identified.*

Regarding Item 1: Even restricting our comments to only the “Federal Undertaking” portion of this project we write in strong opposition to FRA's too narrowly identified "Proposed Study Area." FRA's massive, although entirely un-quantified, proposed increase in rail, bus, car, bike and pedestrian traffic will adversely affect the quality of life for residents and businesses on North/South as well as East/West streets far beyond the proposed boundaries, and especially for blocks immediately east of 3rd Street, NE. The same is true during the years of construction.

Regarding Item 2: we believe you have adequately documented the numerous historic properties in the surrounding area. However, what is far less clear is whether the view sheds are appropriate. It appears the view sheds are limited to the Proposed Study Area. Depending on the design and location of the “Project Elements”, portions of even just the Federal Undertaking may be visible from more distant locations.

APPENDIX A: Consulting Party Responses to FRA, February – March 2017


As one example of why we feel the Proposed Study Area is inadequate, several of the preliminary concept proposals indicate an underground garage with access from K Street, NE. This will inarguably add a large volume of traffic onto the nearby residential streets. Note also that Third St., NE - the closest north/south access east of the H Street Bridge – is not entirely included in the Study Area. The Proposed Study Area must include additional streets east of the Proposed Study Area

More broadly, our concern and objections to the Proposed Study Area extend beyond the inappropriately narrow “Federal Undertaking”. We cannot determine the extent of the Federal Undertaking versus District and Private undertakings; and therefore, we cannot endorse the Proposed Study Area without a clear understanding of the extent of the Federal Undertaking. We again state our objection to the failure to include the impacts of the air-rights project and reconstruction of the H Street Bridge in this analysis. Those projects are an integral part of the Union Station Redevelopment effort. Nonetheless, to date FRA has made no effort to anticipate or to coordinate the impacts of three million square feet of additional development by its closely-related partner, Akridge Development.

Further, FRA also has provided no information to CHRS or to the broader public regarding the scope and nature of effects to Metro’s already troubled capacity as well as related concerns to the area’s water, sewer, electricity and other infrastructure that could well affect residents, businesses and taxpayers outside the current, arbitrarily drawn borders of its Proposed Study Area.

For these reasons, CHRS finds the Proposed Study Area to be both deficient, and entirely lacking supporting evidence. Therefore, we find the Proposed Study Area to be unacceptable.

Sincerely,



Elizabeth Nelson, President
Capitol Hill Restoration Society

CC:

Councilmember Charles Allen, Ward 6, callen@dccouncil.us

Karen Wirt, Chair, ANC6C, kwirt@crs.loc.gov

Mark Eckenwiler, ANC6C04, 6C04@anc.dc.gov

C. Andrew Lewis, DC State Historic Preservation Office, andrew.lewis@dc.gov

Rob Nieweg, National Trust for Historic Preservation, RNieweg@savingplaces.org

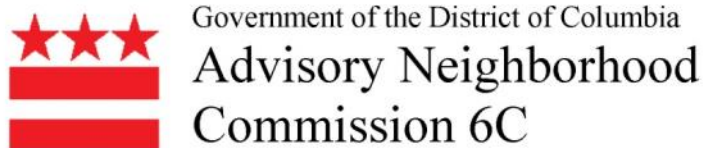
Eric Hein, Exec. Director, NCSPO, hein@ncshpo.org

Beverly Swaim-Staley, USRC, bswaimstaley@usrcdc.com

John Sandor, President, D.C. Preservation League, John_Sandor@nps.gov

Rebecca Miller, Executive Director, D.C. Preservation League, rebecca@dcpreservation.org

A-5. Advisory Neighborhood Commission 6C response (ANC 6C), March 13, 2017.



March 13, 2017

Amanda Murphy
Environmental Protection Specialist
Office of Railroad Policy and Development
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Section 106 Process for Union Station Expansion Project & Proposed Study Area

Dear Ms. Murphy:

On March 8, 2017, at a duly noticed regularly scheduled monthly meeting of ANC 6C, with a quorum of six out of six commissioners and the public present, the current matter came before ANC 6C. The commissioners voted 6-0 to adopt the position set forth below.

Thank you for your email of February 10, 2017 in which you requested ANC 6C's concurrence on two points:

1. *The Proposed Study Area, the geographic area surrounding the proposed project area, is appropriate with the scope of the federal undertaking.*
2. *The historic properties and features within and bordering the Proposed Study Area have been appropriately identified and that the appropriate view sheds are identified.*

This project is of great significant to ANC 6C, and in fact the majority of the Proposed Study Area (PSA) lies within this ANC. The low-scale residential neighborhoods immediately east of the rail corridor will almost certainly be among those most impacted by not only the rail yard construction and expansion, but also by very closely related projects such as the reconstruction of the H Street Bridge, and the Burnham Place air-rights project. We are very concerned by the narrow scope of the current EIS project. Members of our community have previously expressed reservations about the failure to include any information about those projects within the limited scope of this EIS/Section 106 effort. We believe this results in a fundamentally flawed process that will fail to capture the complexity of this project and ultimately diminish the overall plan.

Despite our reservations regarding the scope of this project, we will endeavor to respond to your current request on the above two points.

ANC 6C, page 2

Item 1: We find the Proposed Study Area inadequate to address both the short and long term Area of Potential Effects (APE). In a meeting with USRC on March 2, you stated that the APE would be even more restricted than the PSA. We note that the PSA fails to include areas that undoubtedly would have significant traffic and other impacts under all of the concept development scenarios. As one example, it is impossible to travel from Union Station to New York Avenue without leaving the PSA. All of the development scenarios involve inter-city bus facilities and the impact of that activity must be addressed. As a second example, many of the proposed development alternatives envision a large parking structure below the rail corridor with access from the 100 block of K Street, NE. However, Third Street, NE—the closest north-south street immediately east of the H Street Bridge—is not fully included in the study area.

Item 2: This is a two-part question. For the first part, we believe you have adequately identified historic properties within the PSA. (One of those properties, No. 84 – 911 Second St., NE/former milk depot, is no longer extant.) For the second part, we believe the proposed view sheds also may be inadequate. The alternative development scenarios described potential parking structures, bus, and taxi facilities at various locations both above and below the rail corridor, and on property owned by FRA's private sector partner. Because FRA has not more clearly defined the location and height of the project elements, we cannot determine whether the view sheds are or are not adequate. Therefore, we conclude that the appropriate view sheds have not been identified.

Finally, ANC 6C wishes once again to express in the strongest possible terms our concern for the overall project planning of the Union Station Expansion. This is a very complex project with Federal, District, and multiple private sector interests, as well as varied public/neighborhood interests. Assessment of the impacts of Union Station expansion must take account of the entirety of the project in order for the planning and design to achieve the goals we all anticipate for this very important project.

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

Sincerely,



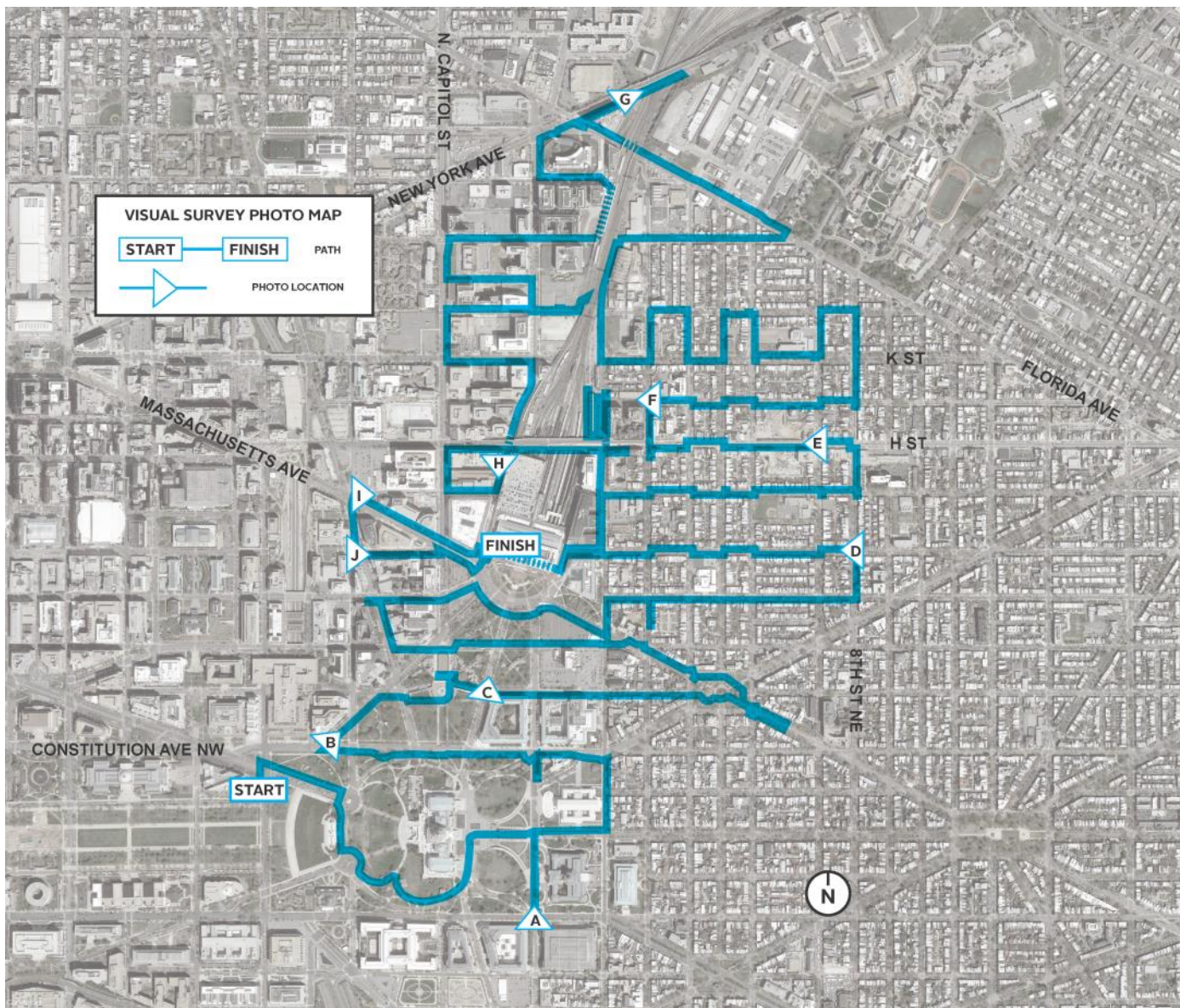
Karen Wirt
Chair, ANC 6C

APPENDIX B:

Photographic Survey Map and Corresponding Images

APPENDIX B: Photographic Survey Map and Corresponding Images

Visual Survey Photo Map showing route taken during the survey. Labeled photo locations "A" through "J" correspond to images in Appendix B.



APPENDIX B: Photographic Survey Map and Corresponding Images

Image A: View looking north towards the Union Station headhouse from First Street SE and Independence Avenue SE.



APPENDIX B: Photographic Survey Map and Corresponding Images

Image B. *View looking northeast towards Union Station headhouse from Louisiana Ave and First Street NW.*



APPENDIX B: Photographic Survey Map and Corresponding Images

Image C. View looking north towards Union Station from C Street NE and Delaware Avenue NE.



APPENDIX B: Photographic Survey Map and Corresponding Images

Image D. View looking west from F Street and 8th Street NE. Only the WUS headhouse is visible from F Street.



APPENDIX B: Photographic Survey Map and Corresponding Images

Image E. View looking west towards Washington Union Station Terminal Rail Yard (Project Area) over H Street Bridge from H Street NE and 7th St NE.



APPENDIX B: Photographic Survey Map and Corresponding Images

Image F. View looking west from I Street NE and 3rd Street NE. REA Building visible at center.



APPENDIX B: Photographic Survey Map and Corresponding Images

Image G. *View looking south to Union Station rail yard and headhouse from New York Avenue.*



APPENDIX B: Photographic Survey Map and Corresponding Images

Image H. *View looking south towards Union Station garage from between G and H Streets NW and First Street NE with the Burnham Wall in the foreground.*



APPENDIX B: Photographic Survey Map and Corresponding Images

Image I. View looking east towards Union Station garage from G Street NW and Massachusetts Avenue NW with the Gales School (DC Inventory of Historic Sites) in foreground.



APPENDIX B: Photographic Survey Map and Corresponding Images

Image J. View looking northeast towards Union Station headhouse from the intersection of New Jersey Avenue NW, First Street NW and F Street NW.

