

WASHINGTON
UNION STATION

STATION EXPANSION

Draft Environmental Impact Statement for Washington
Union Station Expansion Project

Appendix E1 – Agency Correspondence



U.S. Department of Transportation
Federal Railroad Administration

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Preserving America's Heritage

January 15, 2016

Mr. David Valenstein
Federal Railroad Administration
Division Chief
Office of Railroad Policy and Development
1200 New Jersey Avenue, SE
Washington, DC 20590

Ref: *Washington Union Station Expansion Project*
Washington, District of Columbia

Dear Mr. Valenstein:

The Advisory Council on Historic Preservation understands that the Federal Railroad Administration (FRA) is initiating the environmental review for the referenced undertaking. Since FRA will need to coordinate its compliance with the National Environmental Policy Act (NEPA) with its compliance under Section 106 of the National Historic Preservation Act, 54 U.S.C. § 306108, and its implementing regulations, *Protection of Historic Properties* (36 CFR part 800), for this undertaking, we are contacting FRA in the early stage of project planning. As you know, there is widespread public interest in the Union Station Expansion Project given the local and national importance of this historic property. In order to avoid the potential for delays that may occur without proper coordination of the environmental reviews for this undertaking and because the ACHP believes this undertaking has the potential for presenting procedural problems, in accordance with 36 CFR § 800.2(b)(1) and Appendix A to part 800, the ACHP has determined that our involvement in the Section 106 consultation is warranted. We will also be notifying the head of FRA of our intent to participate in the Section 106 consultation for this undertaking.

The Federal Register Notice issued on November 4, 2015, inviting the public to a scoping meeting regarding this undertaking explicitly stated that only the Union Station Expansion Project would be addressed in FRA's review process. Likewise, the NEPA scoping meeting held on December 7, 2015, clarified that the Union Station Expansion Project was a discrete undertaking, and not related to the proposed air rights development included in the Union Station Master Plan which we approved in 2012. Having attended the meeting, we noticed that the audience was obviously confused when FRA explained that the air rights development was not a part of the Expansion Project undertaking. To begin the Section 106 process, the agency first establishes the undertaking that will be subject to review. Without this crucial step, the subsequent steps in the Section 106 four-step process (identifying and evaluating historic properties, assessing effects, and resolving any adverse effects) cannot be completed. We are concerned that the FRA may be unreasonably restricting the scope of the undertaking subject to review at this juncture. Therefore, we are requesting that FRA respond to the following questions to attempt to clarify the Section 106 process.

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

1. **Definition of the Undertaking.** FRA has defined the Union Station Expansion Project as a discrete action proposed by AMTRAK that can be evaluated independent of any other activity. However, in reading the background information provided about this undertaking, it is evident that the Expansion Project will facilitate the adjacent development of the Burnham Place Project. How are these two projects related? Would the Expansion Project have separate, independent utility if constructed without the Burnham Place Project? Could the Burnham Place Project be constructed as proposed without the Expansion Project? Are there other background documents describing the Burnham Place Project that could be provided to further aid in our understanding of the possible interrelation of these two projects?
2. **Applicability of the Approved Union Station Master Plan.** The Union Station Master Plan discusses the expansion, redevelopment, and related development to create a new neighborhood. Have the terms of the 2012 Master Plan been revised? How will the Master Plan be used to guide both the Union Station Expansion and the Burnham Place Projects? Were the neighbors who participated in the Master Plan process advised of changes to this plan, and if so, when?
3. **NEPA-Section 106 Coordination.** FRA indicated in its letter of November 23, 2015, to the D.C. State Historic Preservation Office (SHPO) that it intends to prepare an Environmental Impact Statement for the Expansion Project to meet the requirements of NEPA. Does FRA intend to use the NEPA process for Section 106 purposes as provided in 36 CFR § 800.8(c)? If so, when does FRA intend to notify the ACHP of its intent to do so and clarify how the standards in 36 CFR § 800.(8)(c)(1) would be met? Has FRA applied the guidance in the ACHP's Handbook for Integrating NEPA and Section 106 to inform its decision regarding this process?
4. **Identification and Involvement of Consulting Parties.** Based upon our observation at the December 7, 2015 public meeting, there is widespread interest in the future of the Union Station historic property. Local and national preservationists, planners, and civic organizations have been intimately involved in the plans for this iconic structure that welcomes numerous visitors to Washington, DC. The National Trust for Historic Preservation shared with us their letter of January 4, 2016, to FRA explaining its concerns about the limited scope of this undertaking under review. We have heard from residents of the NoMA and Capitol Hill areas about the impact of the Union Station Expansion Project on their communities. We are certain that there are many other potential consulting parties who would want to be involved in the Section 106 review that are yet to be identified. Accordingly, we recommend that FRA consider inviting parties who have shared their interest in this historic property and/or the Section 106 review process during the recent scoping meeting, the Master Plan development, and other local administrative reviews to join the consultation. The sooner FRA identifies and invites appropriate consulting parties to join this process, the sooner FRA will be aware of the range of historic preservation issues it should consider in planning this project.
5. **Coordination of Section 106 and Local Administrative Reviews.** The Section 106 regulations require agencies to plan to involve the public in the review process. Likewise, the public is part of most local administrative reviews conducted by planning, zoning, and economic development agencies. It is our understanding that the Burnham Place Project has already been through a local review under the terms of a Section 106 air rights covenant negotiated in 2006. It is not clear to stakeholders what role the District of Columbia assumes in reviewing proposed air rights development. We believe that FRA should clarify what, if any, local reviews are required for the Union Station Expansion Project and the Burnham Place Project, and how these reviews will be coordinated with Section 106 during project planning to avoid a duplication of effort and possible project delays. Please describe the roles, if any, of the National Capital Planning Commission and the Commission of Fine Arts in these projects. Has either agency been involved in early planning discussions with FRA for the initiation of the Section 106 review?

We thank FRA in advance for responding to the issues raised above. We are eager to begin consultation with FRA, the DC SHPO, and other consulting parties on the Union Station Expansion Project. However, it is critical that we have a perspective and context for this undertaking to help guide the Section 106 review. Should you have any questions, please contact Christopher Wilson, Program Analyst, at (202) 517-0229, or via e-mail at cwilson@achp.gov.

Sincerely,

A handwritten signature in cursive script that reads "Charlene Dwin Vaughn".

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

Government of the District of Columbia

Department of Transportation



July 8, 2016

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

Subject: Washington Union Station Expansion Project EIS Cooperating Agency Roles and Responsibilities

Dear Ms. Murphy,

The District Department of Transportation (DDOT) appreciates the opportunity to participate in the Environmental Impact Statement (EIS) process as a Cooperating Agency for the Washington Union Station Expansion Project. With this letter, DDOT summarizes our understanding of our role and commensurate responsibilities.

We understand that we will provide information, comments and technical expertise for the benefit of the EIS concerning areas that DDOT has special expertise and/or jurisdiction by law. We will strive to attend every meeting that is convened for Cooperating Agencies and others that may require our collaboration and coordination.

To that end, we will have Mr. Stephen Plano, our Environmental program Manager, be the single point of contact for DDOT. He will attend Cooperating Agency Meetings and meetings with other agencies as necessary and identify issues of concern that might delay the process.

Mr. Plano will be further supported by Mr. Jamie Henson and Ms. Raka Choudhury, and others as needed. Inherent to this will be DDOT's assistance addressing comments on the EIS that relate directly to our area of expertise and jurisdictional roles.

Thank you again for the opportunity to partner with FRA as a Cooperating Agency and review and comment on the EIS, process and information presented for Washington Union Station Expansion. We look forward to participating as an integral member of the team and engage in regular project meetings with FRA and the project team to develop the best multimodal solution

for the District. Please contact Stephen Plano at 202.671.2227 or stephen.plano@dc.gov with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'SZ', is positioned above the typed name.

Sam Zimbabwe, Associate Director
Policy, Planning and Sustainability Administration
District Department of Transportation



U.S. Department
of Transportation

**Federal Railroad
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

OCT 05 2016

Mr. Sam Zimbabwe
Associate Director
Policy, Planning and Sustainability Administration
District Department of Transportation
55 M Street SE, Suite 500
Washington, DC 20003

Dear Mr. Zimbabwe:

Thank you for your July 8, 2016 correspondence regarding the participation of the District Department of Transportation (DDOT) as a Cooperating Agency for the Washington Union Station Expansion Project (Project) Environmental Impact Statement (EIS). The Federal Railroad Administration (FRA) is in agreement with your summary of DDOT's role and responsibilities as a Cooperating Agency. FRA would like to take this opportunity to inform you of our expectations regarding review of documents and dispute resolution. The terms outlined below are consistent with a Memorandum of Understanding for Cooperating Agencies that will be signed by the FRA, Federal Transit Administration, National Capital Planning Commission, and National Park Service for this Project.

Relating to Project environmental review, including technical reports and administrative drafts of the Draft and Final EISs, FRA will provide DDOT 15 calendar days to review and comment on documents. DDOT may request an extension of the comment period within seven calendar days of FRA's submission, by stating the number of additional days needed and the reason for an extension. FRA will consider DDOT's comment period extension requests in a timely manner, and will grant the request if FRA determines it is reasonable and will not significantly delay the project.

If a dispute arises during preparation of the EIS, FRA expects that DDOT will make all reasonable efforts to resolve the issue with FRA, first at the staff level. In turn, FRA will resolve potential disputes with DDOT in the same manner. If disputes concerning significant environmental objections are not resolved with FRA staff or management, interagency disagreements can be referred to the Council on Environmental Quality consistent with 40 CFR Part 1504.

FRA requests concurrence within 15 days from the date on this letter. If no response is received within 15 days, FRA will assume DDOT concurs with the terms above. Should you have any questions or concerns, please contact Ms. Amanda Murphy, FRA Environmental Protection Specialist at Amanda.Murphy2@dot.gov or 202-493-0624. We look forward to working with you on this important project.

Sincerely,

Michael Johnsen
Supervisory Environmental Protection Specialist

Cc: Stephen Plano, DDOT

From: amanda.murphy2@dot.gov
Sent: Thursday, November 03, 2016 10:31 AM
To: matthew.flis@ncpc.gov; daniel.koenig@dot.gov; melissa_mertz@nps.gov;
tammy_stidham@nps.gov; catherine_dewey@nps.gov; pmay@nps.gov;
joel_gorder@nps.gov; david.valenstein@dot.gov; Kathryn.Johnson@dot.gov
Cc: PMoyer@VHB.com; Decker, Bradley [USA]; Bennett, Carmen [USA]
Subject: [External] Final/Signed MOU: Union Station Coopreating Agencies
Attachments: How to UNZIP.html; SecureZIP Attachments.zip

Hello,

Attached for your records is the Final (signed) Federal Cooperating Agencies MOU for the Washington Union Station Expansion Project. Please note, DDOT is also a cooperating agency, but selected to concur with the terms outlined in this MOU through correspondence with FRA.

Amanda Murphy

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

*Please note email: Amanda.Murphy2@dot.gov

Government of the District of Columbia
Department of Transportation



November 9, 2016

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

**Subject: Washington Union Station Expansion Project EIS
Preliminary Concepts and Screening**

Dear Ms. Murphy,

The District Department of Transportation (DDOT) appreciates the opportunity to participate in the Environmental Impact Statement (EIS) process as a Cooperating Agency for the Washington Union Station Expansion Project. With this letter, DDOT summarizes our comments on the preliminary concepts and screening information presented to the public and agencies on October 19, 2016. Please note that we have high interest in the station design and that when those details are developed, we will provide additional comments.

As we noted in our January 4, 2016, Scoping Comments letter to Ms. Michelle W. Fishburne, the successful integration of parking, circulation and access are critical, especially the maximization of internal circulation, consideration of new access points for all modes and the management of on-site parking. The concepts and screening criteria used to assess them include these overarching principles and we look forward to continuing discussions as alternatives are developed for assessment in the Environmental Impact Statement (EIS) based on comments and input from various stakeholders. We understand that more detail will be provided as these concepts are refined and alternatives are formed and DDOT will provide more specific comments at that time.

In the interim, we provide the following comments:

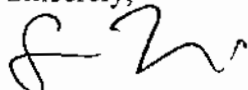
1. Current concepts provide a range of options for how major elements (bus, parking and train hall) of the project could reside on the site and how they might relate to each other, including internal circulation between the elements. We understand the EIS alternatives will provide additional detail concerning external circulation, impacts and mitigation and we will provide comments at that point.

2. The interaction of internal and external circulation is of great interest to DDOT and we look forward to working with you on their development. Specific parking access points, their location or locations on the site, and how those users make other modal connections or move through the site is one example of how we will assess the future alternatives.
3. The location of the major elements on site continues to be of interest to us. For example, the location of parking to the far north under some concepts, separated from the Union Station building, will need to be carefully weighed in terms of its efficiency in facilitating intermodal connections. It is possible that a cost-benefit study of one large parking facility versus several smaller ones and their comparative effects on traffic and transportation operations in the project vicinity would weigh more heavily in the next round of alternative development and assessment.
4. Similarly, the concepts shown to date do not indicate access points for multi-modal traffic. Singular points of access versus multiple points of access for one or more elements may drive the development of alternatives and the evaluation of impacts. Further, based on the study and information available at this point, below grade parking is our preference to facilitate greater flexibility in above ground uses.
5. We also believe an intercity bus facility should remain part of the project elements and that it should be located in close proximity to the station itself and Metro. If FRA would like to advance this concept, we think DDOT and FRA should work to evaluate potential impacts through the EIS process.

In future iterations, as details are developed, DDOT will provide comments on such elements as accommodation (or lack of preclusion) of a future Metrorail station east of the project site, high speed/high capacity vertical circulation solutions, placement of drop-off and staging areas for the rapidly evolving private carrier industry, internal building usage layout, frontage uses and activities along H Street, including orientation and proximity of the train hall. Additionally, as evaluation criteria evolve during alternative development, we will provide our thoughts on those.

Thank you again for the opportunity to partner with FRA as a Cooperating Agency and review and comment on the preliminary concepts and screening information presented for Washington Union Station Expansion. We look forward to participating as an integral member of the team and engage in regular project meetings with FRA and the project team to develop the best multimodal solution for the District. Please contact Stephen Plano at 202.671.2227 or stephen.plano@dc.gov with any questions.

Sincerely,



Sam Zimbabwe, Acting Chief Project Delivery Officer
District Department of Transportation

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

From: Flis, Matthew [<mailto:matthew.flis@ncpc.gov>]

Sent: Friday, December 23, 2016 10:13 AM

To: amanda.murphy2@dot.gov

Cc: Kathryn.Johnson@dot.gov; david.valenstein@dot.gov; Decker, Bradley [USA] <Decker_Bradley@bah.com>; Bernett, Carmen [USA] <bernett_carmen@bah.com>; PMoyer@VHB.com

Subject: [External] RE: WUS Purpose and Need

Good Morning Amanda,

Thank you for the additional follow-up. We have no additional comments regarding the purpose and need. Happy holidays to you all.

Best,
Matt

The Federal Planning Agency for America's Capital

Matthew J. Flis, AICP-CUD, LEED-AP

Senior Urban Designer | Urban Design & Plan Review Division

Main: 202.482.7200 | Direct: 202.482.7236

401 9th Street, NW | Washington, DC 20004 matthew.flis@ncpc.gov | https://urldefense.proofpoint.com/v2/url?u=http-3A__www.ncpc.gov&d=DwIGaQ&c=f4NRRID3zFYDyClb0wZXwA&r=PCTsVSt4p3oT2E-MuHeDjv8Y-GDnzJeWXYtLLVpm3g&m=N8PX8zDXX9FezIHTU6VyutgHvE1170cjslEyxx_LgVM&s=r4aiq2jpQwpftwMoOnFVYTYzoeaALHvNKIdKMBa7He4&e=

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

From: amanda.murphy2@dot.gov [<mailto:amanda.murphy2@dot.gov>]

Sent: Tuesday, December 13, 2016 3:41 PM

To: Flis, Matthew <matthew.flis@ncpc.gov>

Cc: Kathryn.Johnson@dot.gov; david.valenstein@dot.gov; Decker_Bradley@bah.com; bernett_carmen@bah.com; PMoyer@VHB.com

Subject: WUS Purpose and Need

Hello Matthew,

Please see the attached correspondence regarding the Washington Union Station EIS Purpose and Need Statement. Thank you!

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



Architect of the Capitol
U.S. Capitol, Room SB-16
Washington, DC 20515
202.228.1793
www.aoc.gov

March 8, 2017

Amanda Murphy
Environmental Protection Specialist
Office of Railroad Policy and Development
USDOT Federal Railroad Administration (MS-20 RPD-13)
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Ms. Murphy:

Thank you for reaching out to the Architect of the Capitol (AOC) regarding the Federal Railroad Administration's (FRA) Environmental Impact Statement (EIS) for the Washington Union Station Expansion Project.

During the 'Develop and Screen Preliminary Concepts' phase of the EIS process, the FRA presented nine preliminary concepts for stakeholder review. Stakeholders responded to FRA proposing an alternate concept: To move the parking element into underground garages beneath AOC land (Squares 680 and 723). As you may know, the AOC has previously explored this concept at the request of the Union Station Redevelopment Corporation. The study concluded that the concept is infeasible due to the proposed project's cost, site constraints, security, and legislative requirements.

Because the Washington Union Station Expansion Plan has the potential to significantly impact the U.S. Capitol campus, we look forward to our continued coordination throughout the Plan's development. Should you have any questions or require additional information, please contact our Director of Planning and Project Development, Nancy Skinkle, at 202.226.0644 or nskinkle@aoc.gov.

Sincerely,

Stephen T. Ayers, FAIA, LEED AP
Architect of the Capitol

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.

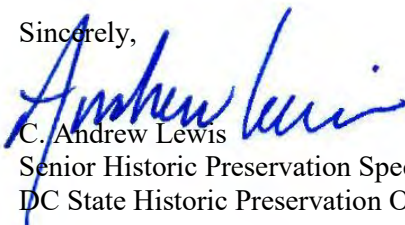
On a related note, all of the streets, avenues, parks and reservations that contribute to the National Register of Historic Places-Listed Plan of the City of Washington (L'Enfant Plan) should be designated on the Study Area Map and incorporated, collectively rather than individually, in the list of historic 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

Government of the District of Columbia

Department of Transportation



d. Office of the Director

April 12, 2017

David Valenstein
Senior Advisor – Project Development
Federal Railroad Administration
Office of Railroad Policy Development
1200 New Jersey Ave. SE
Washington, D.C. 20159

Re: Intercity and Charter Buses at Washington Union Station

Dear Mr. Valenstein:

The District Department of Transportation (DDOT) appreciates the opportunity for continued participation in the Washington Union Station Expansion Project Environmental Impact Statement (EIS) process as a Cooperating Agency. This letter articulates DDOT's position regarding intercity and charter buses.

Background and Summary

Union Station is a rail and bus hub serving the District's residents, workers, and visitors. It has the highest Metrorail ridership in the District, and it is Amtrak's second-busiest station nationwide.¹ Intercity bus attracts 2.6 million riders per year, or approximately 7,000 passengers per day.² Due to its central location and unique multimodal function, Union Station should continue to serve as the transportation center for travelers to and from the capital city, anticipating and adapting to future growth. Loss of this facility from this location would negatively affect multimodal operations for the city and the larger Washington region.

Several different concepts, sizes of bus facilities, and management strategies could potentially meet the long-term need for charter and intercity bus. The EIS process should quantify and assess the environmental consequences resulting from these concepts. In doing so, the EIS will

¹DC State Rail Plan. 2017. <http://www.dcrailplan.com/>.

² Washington Union Station 2nd Century Plan. 2012. <https://nec.amtrak.com/content/washington-union-stations-2nd-century>

demonstrate whether the concept or management strategy meets the bus needs, what impacts may occur, and what mitigations may be required.

The Federal Railroad Administration (FRA) is the lead agency for the EIS, which is proposing to affect the current intercity and charter bus operations as part of the larger Union Station Expansion. As such, DDOT believes FRA should take the following considerations into account when considering changes to the current functions of the station.

Accommodate bus demand

Several planning studies predict future growth in intercity and charter bus operations.³ This growth should be documented in the EIS to demonstrate that all proposed concepts for bus loading and/or management strategies for bus operations will meet the long-term need for charter and intercity bus travel. The proposed concepts for bus facilities at Union Station should take growth projections into account when developing facility size. Approaches that manage bus operations to minimize the number of bus slips needed within the station should also be considered. Further, DDOT will consider releasing Circulator slips to help reduce the overall bus demand at Union Station.

Consider splitting bus uses by function or type

In considering options for intercity and charter bus operations, the EIS may propose splitting bus uses by function, such as loading and layover, or type, such as sightseeing and intercity, into separate locations around or near Union Station. DDOT encourages FRA to consider multiple concepts that use the full Union Station site, including Columbus Circle, interior parking garages, and access from H Street.

Consider a full range of alternatives

DDOT also encourages FRA to propose concepts that differ from current operations and accommodate future projections of bus travel demand at Union Station. Active loading for buses should occur in an appropriate location on site or immediately adjacent to Union Station due to its proximity to Metrorail and intercity rail. DDOT would consider limited use of public streets for active loading, provided that a robust evaluation of options yields street operations that can be managed.

DDOT does not have funding for a new facility to serve intercity and charter buses. Therefore, coordination between DDOT and FRA, through the EIS process, related to the planned Union Station Expansion will be critical to the continued sustainable operations of intercity and

³ These studies include NEC Futures (<http://www.necfuture.com/>); MWCOG Regional Bus Staging, Layover, and Parking Location Study (<https://www.mwcog.org/about-us/newsroom/2015/03/31/regional-study-sets-stage-for-improved-commuter-and-tour-bus-parking-in-the-district-bus-parking/>); and Destination DC Visitor Research (<https://washington.org/press/DC-information/washington-dc-visitor-research>).

Mr. Valenstein, page 3

Re: Intercity and Charter Buses at Washington Union Station

charter bus travel in Washington, D.C. We encourage early and transparent coordination with DDOT and community stakeholders related to developing and evaluating alternatives.

We appreciate the opportunity to partner with FRA in progressing with the Union Station Expansion. We look forward to our continued participation as a Cooperating Agency. If you have any further questions, please contact Jamie Henson at 202-671-1324 or jamie.henson@dc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'SZ', with a small mark to the right.

Sam Zimbabwe,
Chief Project Delivery Officer

cc: Jamie Henson, Systems Planning Manager

Government of the District of Columbia

Department of Transportation



d. Office of the Director

May 24, 2017

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

Subject: Washington Union Station Expansion Project EIS Alternatives and EIS Methodologies

Dear Ms. Murphy,

The District Department of Transportation (DDOT) appreciates the opportunity to participate in the Environmental Impact Statement (EIS) process as a Cooperating Agency for the Washington Union Station Expansion Project. With this letter, DDOT summarizes our comments on the alternatives, technical analyses, and EIS methodology topic areas presented to the agencies on May 10, 2017. We look forward to continuing to work together throughout the EIS process, and would like to focus our comments at this stage on three areas: (1) refinement of alternatives, (2) technical analyses, and (3) EIS methodology topic areas.

1. Refinement of Alternatives

DDOT will continue to stress the importance of access for the many users of the transportation system in the District. To that end, we look forward to the continued refinement of the alternatives that will be assessed and analyzed to a greater level of detail in the EIS. Detailed graphic and written descriptions of these will be essential to their full understanding.

We would like to work with FRA and USRC on developing pedestrian circulation (horizontal and vertical) and travel demand parameters that can inform the refined alternatives and eliminate any fatal flaws at this early stage of refinement. Related to this, DDOT is interested in additional information that will show how the many pedestrians will ingress and egress the alternative designs for Union Station. These capacity and circulation aspects will be important to full understanding of the alternatives and commenting upon the refined alternatives by DDOT and the public as the EIS is prepared.

As the alternatives are refined, we encourage you to show details of pedestrian entrances and movements for all alternatives, bicycle infrastructure, details of "enhancements to pedestrian flow", and

relative consistency of vehicular circulation areas across alternatives (especially for taxis and shared rides). We will support you including the possibility of an eastern entrance for Capitol Hill residents.

DDOT also recommends showing vehicle access through the site from Columbus Circle to the back of the site (K Street). DDOT considers this vehicular access to be critical for project feasibility and to meet the purpose and need. Concerning buses and private vehicles, we provide the following understanding and questions concerning bus line circulation and private vehicle parking (ingress/egress) and seek your confirmation:

- 1A – bus and parking from 1st Street or H Street entrance?
- 1B – bus from 1st Street or H Street/parking from K Street
- 4A – bus from where?/parking from K Street or 1st Street?
- 4B – bus from three access points on H Street/parking from K Street
- 5 – bus from H Street/parking from K Street

Knowing that part of the purpose of the Washington Union Station Expansion Project is to facilitate intermodal travel and enhance integration with the adjacent neighborhoods and businesses, DDOT looks toward development of supportive EIS discussions of impacts and mitigation that address the importance of integration with adjacent neighborhoods from a pedestrian standpoint. Similarly, we believe it critical that discussion be included describing how multimodal connections will facilitate intercity travel, integrate with existing neighborhoods, enhance pedestrian access and move people into D.C.

DDOT also recommends an acknowledgement as part of the project purpose about using multimodal transportation and existing and future transit (Metrorail, buses, Streetcar) to integrate intermodal travel into existing District transportation networks without increasing congestion. We believe analysis may be needed to consider how much additional transit would be necessary to meet the growing need. Overall, DDOT is interested to see how the retained concepts will respond to the significant demand caused by station expansion.

DDOT also refers you to our April 12, 2017 letter on intercity bus policy regarding the location and use of a bus facility. We will continue to work with you on these and other details such as bus slip number and access, car rental facility sizing and accommodations. DDOT supports alternatives that make innovative use of the station capacity to serve as many people as possible, as efficiently as possible. As alternatives are refined and assessed for issues from bus slips to site parking, it will be informative to see additional details on how time-of-day utilization, for example, can maximize the benefits of this investment.

2. Technical Analyses

DDOT looks toward additional analysis of trip generation, vertical circulation, WMATA connections, surface and subsurface transit capacity, and other transportation aspects as the alternatives advance. We continue to have interest in the flow of users from the DC Streetcar stop on the H Street Bridge into and from the proposed improvements. DDOT would like to encourage early coordination on establishing analysis parameters, and we are committed to working to understand the various users and their movements, as well as projected train ridership volumes throughout the day. We think this analysis will help inform the refinement of the alternatives, too. DDOT supports the inclusion of internal pedestrian and vehicular flows in all alternatives at this early, conceptual stage. These movements are critical for project feasibility and to meet purpose and need.

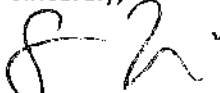
3. EIS Methodology Topic Areas

Thank you for providing the following listing of EIS topics areas at the May 10, 2017 meeting. We have provided additions as noted in **bold underline** with our reasoning in parentheses. Adding DDOT review of these topic areas will not affect our Cooperating Agency review timeline commitments. We look forward to your review and consideration and are happy to discuss any and all of these with you. We encourage early and continuous coordination with DDOT on analysis methodologies for these areas.

- Air quality – DDOT, NCPC
- Water Quality – NCPC
- Noise and Vibration – DDOT, FTA, NCPC
- Solid Waste Disposal – NCPC
- Hazardous Materials – NCPC
- Natural Ecological Systems – NCPC, NPS
- Greenhouse Gas Emissions and Climate Change – NCPC, **DDOT (relates directly to air quality above)**
- Energy Resources – NCPC, **DDOT (relates directly to air quality and greenhouse gas emissions and climate change above)**
- Aesthetics – NCPC, NPS
- Transportation – DDOT, FTA, NCPC
- Land Use and Property – NCPC, NPS, **DDOT (relates directly to public space and indirect and cumulative impacts below)**
- Social and Economic – NCPC
- Environmental Justice – NCPC
- Public Health and Safety – NCPC
- Recreation – NCPC, NPS
- Cultural Resources – NCPC, NPS
- Section 4(f) Properties – NCPC, NPS
- **Indirect and** Cumulative Impacts – DDOT, FTA, NCPC, NPS

Thank you again for the opportunity to partner with FRA as a Cooperating Agency and review and comment on the alternatives and EIS topic areas for Washington Union Station Expansion. We look forward to participating as an integral member of the team and engage in regular project meetings with FRA and the project team to develop the best multimodal solution for the District. Please contact Stephen Plano at 202.671.2227 or stephen.plano@dc.gov with any questions.

Sincerely,



Sam Zimbabwe

Chief Project Delivery Officer

Cc: Stephen Plano, DDOT

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.

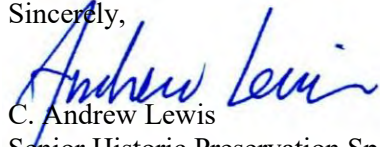
The Draft Report for the Area of Potential Effects and Identification of Historic Properties for the Washington Union Station Expansion Project provides a thorough analysis of historic properties in the initial study area and a comprehensive evaluation of the geographic limits and view sheds where potential 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.

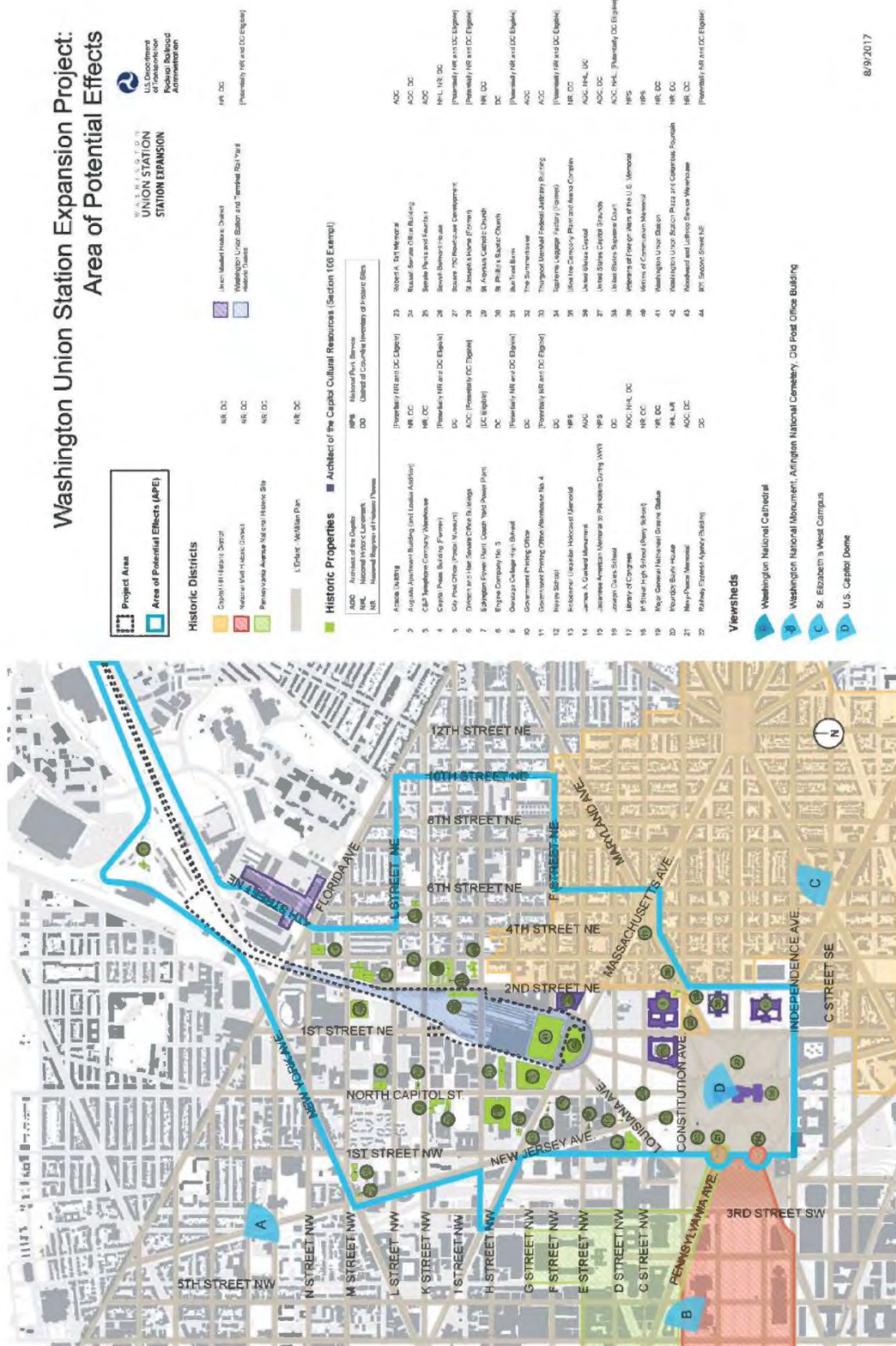
We very much appreciate FRA's consultation efforts to date and we look forward to consulting further in a manner that thoroughly vets all potential alternatives and ensures our common goal of establishing a new, world class rail facility that preserves and compliments the historic significance of Union 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



District of Columbia Office of Planning



Office of the Director

March 6, 2018

Ms. Amanda Murphy
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Zoning Information Concerning Washington Union Station Expansion Project EIS

Dear Ms. Murphy:

This letter is in response to your request for zoning information pertaining to the four Project Concept Alternatives currently under consideration as part of the Washington Union Station Expansion Project (WUSEP) Environmental Impact Statement (EIS). The requested information relates to Attachment 1 to this letter.

As you know, the District of Columbia Office of Planning (DCOP) develops long range land use and policy plans and conducts a variety of project review activities that help implement these plans. These endeavors collectively shape and guide current and future development in the District. DCOP's long-range planning tools include the Comprehensive Plan and Small Area Plans, which govern land uses throughout the city. Current planning tools include historic preservation review and evaluation and analysis of zone changes proposals, among several other types of review.

DCOP is using this letter to provide Federal Railroad Administration (FRA) information regarding existing zoning, as well as zone changes required to achieve project configurations contemplated in the current WUSEP Concept Alternatives. However, given the long-range nature of WUSEP (which has a build year of 2040), DCOP would like to alert FRA to the fact that, over the next 20 years, DCOP will conduct long-range planning initiatives that could result in land use and zoning changes within the WUSEP Project Area and environs. This letter therefore does not represent a tacit endorsement of, or commitment to, the status quo or to the zone changes outlined below. As the District evolves over the next 20 years, DCOP will continue to carry out its mission, developing proactive strategies that address challenges and leverage opportunities to meet the needs of and ensure an enhanced quality of life for District residents.

Additional provisos: first, FRA should direct any clarifications pertaining to existing zoning to the District's Zoning Administrator (ZA), who is charged with interpreting zoning regulations; the ZA is copied on this letter and can weigh in on the information furnished below as appropriate; second, the District of Columbia Zoning Commission (ZC) is the decision-making body for zone changes, and therefore the zone changes outlined below would be subject to ZC discretionary review and approval.



With the above as context, and at this highly conceptual stage of the WUSEP EIS, DCOP provides the following zoning information to FRA as a courtesy.

Existing Zoning

Zones within the WUSEP Project Area are PDR-3 and USN (see Attachments 2 and 3). The PDR-3 zone allows a maximum height of 90 feet with a datum believed by DCOP to be approximately 52 feet above sea level (roughly the level of the existing train tracks). Mixed uses (as shown in some of WUSEP EIS Concept Alternatives in Attachment 1), are currently prohibited, since housing is not a permitted use in the PDR-3 zone.

The USN zone allows a maximum height ranging from 90 feet to 130 feet, subject to stepdown and other requirements pursuant to [11 DCMR K § 305.1](#). The measurement of building height for the USN zone is taken from the elevation of the sidewalk on H Street at the middle of the front of the building, to the highest point of the roof or parapet, as stated in [11 DCMR K § 305.2](#).

Project Concept Alternatives in Attachment 1 show Union Station Parking Garage (USPG) bus station uses in the USN zone. An interpretation from the ZA is needed to confirm that this use is permitted in the USN zone.

Required Zone Changes for EIS Concept Alternatives

To build mixed uses on the site of the existing USPG, a new Air Rights Lot and zoning amendments would be necessary, with the zoning amendments subject to review and approval by the ZC:

1. The owner of the PDR-3 parcel would apply for creation of a new Air Rights Lot (on the site of the USPG) at an elevation equal to the existing abutting USN zoned air rights lot.
2. A zoning map amendment and zoning text amendment request would be made to the ZC to designate the new Air Rights Lot (created in (1), above) with the USN zone. Any new construction on the new air rights lot would then be considered part of the same “building” (pursuant to K § 304) as other structures in the USN zone south of H Street, and could then measure building height from the level of the H Street bridge (pursuant to [11 DCMR K § 305.2](#)). Any development on the new air rights lot would also be subject to the USN review processes.
 - a. Importantly, the PDR-3 zone would remain applicable to the area underneath the new Air Rights Lot created in (1), allowing for uses such as the train hall, concourse, retail and office uses, train platforms and tracks, and the Red Line Metro Station.
3. If the ZA determines that the USN zone currently does NOT permit bus station uses, then an additional text amendment would be necessary to permit them.
4. The amendments in (2) and (3) above could be submitted as a package to the ZC for review and discretionary approval.
5. Steps (1) through (4) would need to be completed before design review of detailed project components by the ZC can take place.
6. All the above would need to be completed prior to issuance of any building permit by the District.

The processes for (1), (2) and (3) above could proceed parallel with the current WUSEP EIS process – something FRA may wish to consider at this juncture in addition to seeking zoning interpretation from the ZA per the above.

DCOP looks forward to continued engagement in the WUSEP EIS process and ongoing historic review through the Section 106 process.

Should you have questions related to zoning processes, please contact Jennifer Steingasser, DCOP Deputy Director, Development Review and Historic Preservation, at jennifer.steingasser@dc.gov, or at 202-442-8808. Questions related to zoning interpretation should be directed to Matt LeGrant, Zoning Administrator, Department of Consumer and Regulatory Affairs (DCRA), matthew.legrant@dc.gov, or at 202-442-4576.

Sincerely,



Eric D. Shaw

Attachments:

Attachment 1: Slide No. 18 from FRA Draft Presentation titled *Washington Union Station Expansion Project Environmental Impact Statement*, DC Government Coordination Meeting, February 13, 2018

Attachment 2: Union Station Parking Garage Zoning Designation, screen capture from the DC Office of Zoning website, February 27, 2018

Attachment 3: Union Station Environs Zoning Designations, screen capture from the DC Office of Zoning website, February 27, 2018

Cc: Brian Kenner, Deputy Mayor for Planning and Economic Development
Jennifer Steingasser, District of Columbia Office of Planning
Beverly Swaim-Staley, Union Station Redevelopment Corporation
Matt LeGrant, Zoning Administrator, Department of Consumer and Regulatory Affairs
Rogelio Flores, District of Columbia Office of Planning
Andrew Lewis, District of Columbia State Historic Preservation Office
David Zaidain, Amtrak
Sam Zimbabwe, District of Columbia Department of Transportation

Current Zoning: PDR-3 vs USN

PROPERTY DATUM
(BASED ON AIR-RIGHTS SURVEY)



1. PARKING GARAGE LOT DATUM: 80'
2. USN SUB LOTS' MAX HEIGHT REQUIREMENT DOES NOT EXTEND TO PDR-3.
3. MAX HEIGHT MEASUREMENT:

A. USN MAX. HEIGHT IS MEASURED FROM THE ELEVATION OF H STREET.

B. PDR-3 MAX. HEIGHT IS MEASURED ABOVE "THE NATURAL GRADE."

MAX HEIGHT ASSUMPTION



18 DRAFT



Action Alternatives

- TRAIN HALL
- BUS TERMINAL
- PARKING

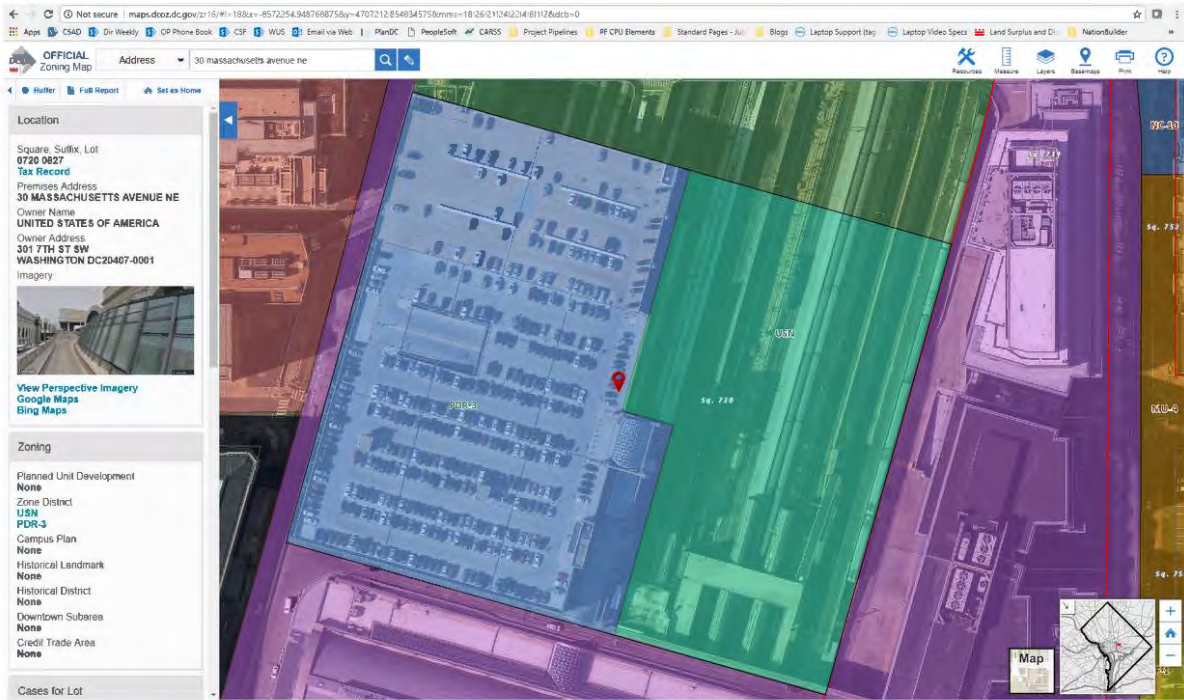


19 DRAFT

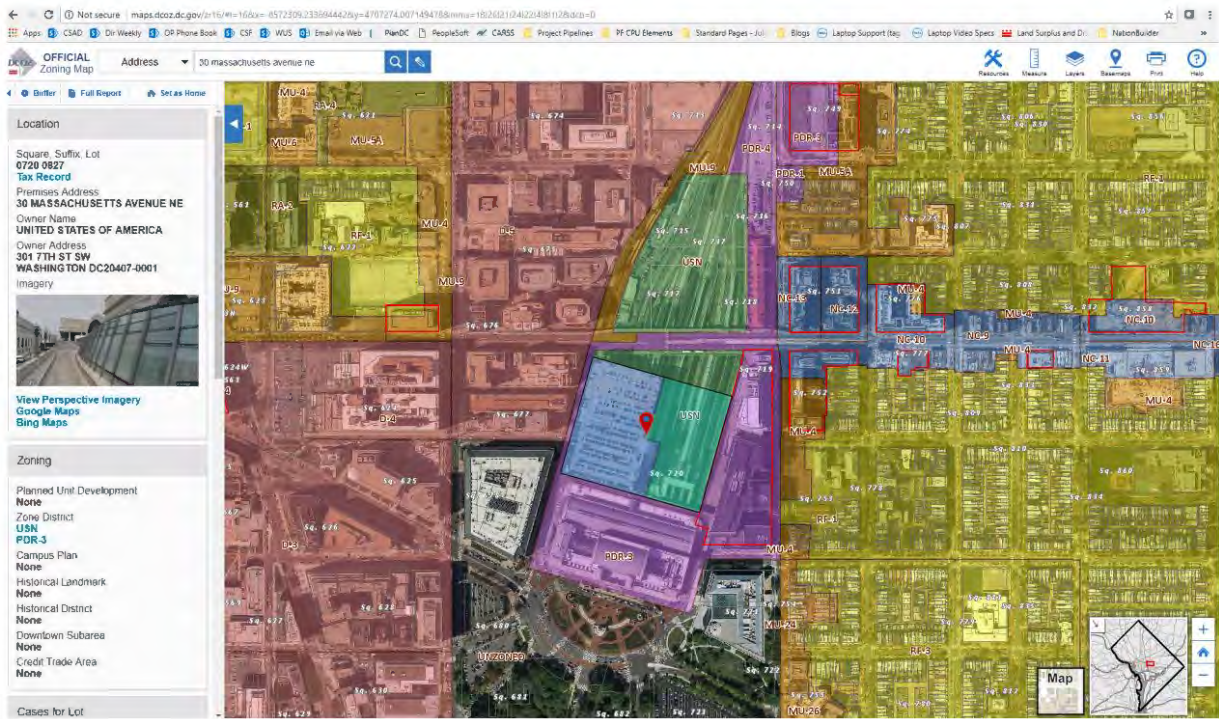
Diagrams for illustration purposes and not to scale



Attachment 2: Union Station Parking Garage Zoning Designation, screen capture from the DC Office of Zoning website, February 27, 2018



Attachment 3: Union Station Environs Zoning Designations, screen capture from the DC Office of Zoning website, February 27, 2018



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: Comments on Alternatives for the Washington Union Station Expansion Project DEIS

Dear Ms. Murphy:

This letter is to provide FRA with comments regarding the five remaining Project Concept Alternatives under consideration for analysis in the Draft Environmental Impact Statement (DEIS) of the Washington Union Station Expansion Project (WUSXP) National Environmental Policy Act (NEPA) process. These comments are provided in accordance with the March 30, 2018 submission deadline requested by FRA.

The District of Columbia Office of Planning (DCOP) furnishes these comments to fulfill requirements of NEPA at this inflection point in the overall process. However, DCOP will continue to engage and provide comments through regular meetings that DCOP understands will continue to occur between FRA and the District Department of Transportation (DDOT) throughout the DEIS process and beyond.

DCOP Principles for the Washington Union Station Expansion Project (WUSXP)

Based on internal deliberation and review of existing land use policies and plans, DCOP developed Principles that have guided development of our comments and will continue to inform our review of forthcoming analyses.

Principles

- 1. Ensure effective integration of WUSXP with immediate sites, adjacent neighborhoods, and citywide context:**
 - a. Immediate Sites:** Ensure particular care in the manner in which WUSXP transitions from the project site to existing surrounding urban program along the project perimeter; a primary focus should be the careful and intentional treatment of the project's built environment, program and infrastructure along east-west cross streets (H Street, K Street, L Street, M Street, and New York Avenue, NE); along First Street and Second Street from Massachusetts Avenue to K Street, NE; and especially for street-level project frontages beneath the H Street Bridge along First Street and Second Street;
 - b. Adjacent Neighborhoods:** Maximize the project's potential to knit together and appropriately modulate continuity across urban fabrics and land use programs of Downtown East, Capitol Hill, and NoMA neighborhoods surrounding the project; specific attention should be focused on ensuring appropriate transitions to fine-grain residential neighborhoods to the east of the project area along G Street, H Street, and I Street, NE;

- c. **Citywide Context:** Ensure project includes measures to provide expanded capacity of services and infrastructure systems to service the project demands, including but not limited to public safety, transportation, water, energy, and solid waste;
 - d. Ensure project contributes to maintenance and expanded capacity of local infrastructure systems as appropriate.
- 2. Prioritize intermodal systems effectiveness and efficiency:**
- a. Ensure that station users can move into and out of WUSXP through as many modes as possible in a safe, comfortable and non-congested manner;
 - b. Maximize ease of transfer between regional and local transportation modes – both within WUSXP and between WUSXP and transportation systems that surround WUSXP (e.g. Metro subway and buses, circulator buses, bikeways, etc.);
 - c. Provide enhanced connections to local District systems.
- 3. Ensure continued and enhanced quality of life for those who live, work, and visit WUSXP and environs:**
- a. Maximize the potential of WUSXP to integrate local neighborhoods by providing high quality design that is responsive both to the WUSXP program and to the urban program that surrounds the project;
 - b. Provide vertical circulation and connections from the grade / street level of 1st Street NE and 2nd Street NE to the WUSXP and to the H Street Bridge that are publicly accessible (without paywalls or other similar impediments);
 - c. Provide access points to WUSXP that are publicly accessible beneath H Street Bridge;
 - d. Minimize spillover effects of WUSXP on local neighborhoods, and ensure that unavoidable spillover impacts are appropriately mitigated.
 - e. Architecture:
 - i. Ensure that architecture clearly communicates civic identity rooted in transportation infrastructure. Grand public spaces should clearly communicate and frame civic gathering and infrastructure spaces as focal elements;
 - ii. Appropriately balance preservation of the historic characteristics of the station with contemporary architectural features that relate to the existing scale and purpose of the surrounding neighborhoods;
 - iii. Maximize architectural variety and articulation to avoid long blank walls, especially along the outer perimeter of the project area.
 - f. Provide for interesting, safe, and comfortable pedestrian routes along the edges of and through the station to connect to broader community. Effort should include improvements at the H Street bridge, at the railway tunnels at K, L, and M Streets NE, and across Columbus Circle towards the National Mall and Capitol.

While DCOP understands that assumptions need to be made to carry out NEPA and 106 analyses for this project, it is important to note that the District’s land use and transportation plans for the WUSXP and surrounding areas may change in advance of the 2040 build-out horizon year for the project. Such changes could affect policies and regulations pertaining to land use, zoning, and transportation, among other topic areas. As an example, DCOP is currently conducting a District of Columbia Comprehensive Plan Amendment process, which will include changes to the map that governs land uses in the District.

This letter therefore should not be interpreted as a tacit endorsement of, or commitment to, existing land uses and zoning as these will evolve over the long horizon for this project. Additionally, FRA should ensure continued consideration of the zoning information DCOP furnished to FRA in a letter dated March 6, 2018 (from DCOP Director Eric D. Shaw, with the subject line: “Zoning Information Concerning Washington Union Station Expansion Project EIS”).

Comments on WUSXP Concept Alternatives in Preparation for DEIS Analyses

The DCOP Principles outlined above guided development of the following EIS comments:

1. **Preferred Alternative:** DCOP strongly supports the full study of all remaining WUSXP Concept Alternatives (A – E) as part of the DEIS, so that tradeoffs between them can be weighed appropriately and only then (subsequently to the DEIS) a superior alternative (or alternatives) be identified. The range of alternatives present complex tradeoffs that should be fully elucidated so that evaluation of alternatives can be properly contextualized with the range of impacts and mitigations each will produce.
2. **“No Action” Alternative:** in alignment with the provisions of the USN Zone (11 DCMR K § 305.1), DCOP supports inclusion of an assumed Burnham Place program in the “No Action” DEIS analysis as background development. This will result in a comprehensive understanding of the collective impacts of each alternative.
3. **Consistency with Local Plans:** ensure relevant District plans are fully inventoried (including but not limited to the District of Columbia Comprehensive Plan, MoveDC, NoMA Vision Plan, and SustainableDC), and that impact analyses and mitigations are consistent with them. By way of example, DCOP attaches to this letter a few policies drawn from the Comprehensive Plan.
4. **Onsite Impacts:** DCOP is supportive of distributing access points across the WUSXP Project Area rather than concentrating them at one or few WUSXP locations with the intention of minimizing spillover effects on adjacent neighborhoods. Vehicular access from K Street will require careful feasibility analysis for vertical clearances and historic preservation.
5. **Offsite Impacts:** impacts to immediate sites, adjacent neighborhoods and on a citywide basis that arise from spillover effects of WUSXP must be thoroughly analyzed and integrated into overall transportation modelling for this effort; appropriate mitigations should be studied, including changes to project development assumptions that will minimize or eliminate impacts on local neighborhoods (such as, but not limited to, increasing the number of on-site bus stalls, on-site parking spaces, and so forth).
6. **Inter-city and charter buses:**
 - a. Continue to study the impacts of reducing bus slips from 60 to 20 – 25 as currently contemplated in the WUSXP Concept Alternatives; mitigations for offsite impacts should include an increase in the number of onsite bus slips;
 - b. Discuss “Active Bus Management” assumptions with DDOT and DCOP (including the 30-minute bus turn-around assumption); revise assumptions and incorporate them into overall transportation model;
 - c. Account for heavy vehicle circulation and movements on the local street network and incorporate them into overall transportation model (including, for example, the turning and dwelling behaviors of buses, which may be slower than those of smaller private vehicles);
 - d. Minimize spillover effects of onsite bus facilities and operations on local neighborhoods;
 - e. Off-site impacts should be fully studied and appropriately mitigated (including impacts such as increased bus use of local streets for bus movement, parking, and temporary layover activities).

7. Parking:

- a. Ensure that the proposed reduction in parking program is fully analyzed with respect to the economic viability of the Union Station Redevelopment Corporation (USRC), in alignment with federal requirements;
- b. Ensure that configuration of parking facilities minimizes impact to active uses at street level, such as pedestrian entrances, potential for retail, and views into and out of the station from existing and new entry points.

8. Pedestrian Mobility:

- a. Ensure that transportation models incorporate assumed changes in pedestrian travel behavior on local streets, including work-related foot trips from and to WUSXP, which could affect vehicle and pedestrian signal timings at various crosswalks and related transportation network impacts.

9. Metro Red Line:

- a. DCOP supports the study of a potential third portal entrance to Metro Red Line as a mitigation for the significant increase in anticipated pedestrian traffic within the station. A third portal would support DCOP Principles (1) and (2), above.

10. Bicycle Planning:

- a. DCOP supports the study of the Met Branch Trail and other local bicycle planning efforts and plans as deemed appropriate by DDOT.

Please note that while DDOT will submit separate comments, DCOP and DDOT have coordinated to ensure consistency. Separately, the State Historic Preservation Office (SHPO) will provide comments as appropriate and in relation to the historic review Section 106 process.

DCOP looks forward to continued engagement in the WUSXP EIS process. Please do not hesitate to contact me if you should have any questions.

Sincerely,



Rogelio A. Flores, AICP
Lead Planner, Infrastructure, Facilities and Capital Planning Unit
District of Columbia Office of Planning
(202) 741-0815
Rogelio.Flores@dc.gov

Attachment

Cc: Brian Kenner, Deputy Mayor for Planning and Economic Development
Eric D. Shaw, District of Columbia Office of Planning
Beverly Swaim-Staley, Union Station Redevelopment Corporation
Matt LeGrant, Zoning Administrator, Department of Consumer and Regulatory Affairs
David Maloney, District of Columbia State Historic Preservation Office
Gretchen Kostura, Amtrak
Sam Zimbabwe, District of Columbia Department of Transportation

ATTACHMENT: EXAMPLE POLICIES FROM THE DISTRICT OF COLUMBIA COMPREHENSIVE PLAN RELATING TO WASHINGTON UNION STATION

Land Use Element of the District of Columbia Comprehensive Plan:

Policy LU-1.1.5: Urban Mixed-Use Neighborhoods Encourage new central city mixed use neighborhoods combining high-density residential, office, retail, cultural, and open space uses within the Union Station air rights.

Capitol Hill Area Element of the District of Columbia Comprehensive Plan:

Policy CH-1.1.5 NoMA/Capitol Hill Transition Areas Improve buffering and urban design transitions between the emerging office and high-density residential corridor north of Union Station (“NoMA”) and the adjacent row house neighborhoods of Capitol Hill. Use zoning, design guidelines, historic preservation review, and other measures to avoid sharp contrasts in scale and character where high density and moderate density areas abut one another.

Policy CH-1.1.15 Transit Service Maintain and improve mass transit service in the Near Northeast section of the neighborhood, particularly along the corridor extending from Union Station along H Street to Hechinger Mall and continuing on Benning Road to the Minnesota Avenue Metro station.

Policy CH-2.1.7 H Street Overpass Ensure that any future development in the air rights adjacent to the H Street overpass recognizes the limitations of the streets beneath the bridge to serve high volume commercial traffic, and includes provisions for parking and delivery ingress and egress from the bridge itself. Development must give special attention to the preservation and enhancement of and views to Union Station and its historic surroundings by ensuring the provision of exemplary architecture and encouraging upper story setbacks and minimized penthouses.

Policy CH-2.3.3 Surface Transportation Improvements (US Capitol Perimeter) Improve surface transportation in and around the Capitol Complex in a manner that reduces impacts on Capitol Hill neighborhoods and facilitates access within the area. This could include the use of shuttles between key destinations such as Union Station, the new Capitol Visitors Center, and the Capitol South Metro station.

Policy CH-2.5.4 Enhancing the Identity of “Downtown East” Strengthen Downtown East as a geographically distinct mixed-use area of hotel, commercial, retail, and residential development, taking advantage of its strategic location between Capitol Hill, Downtown, and Union Station. Undertake streetscape improvements, well-designed infill development, and branding and marketing strategies to give the area a stronger identity and sense of place.

Government of the District of Columbia

Department of Transportation



d. Office of the Director

March 30, 2018

Amanda Murphy
Environmental Protection Specialist
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 EIS—Alternatives Retained for the EIS

Dear Ms. Murphy,

The District Department of Transportation (DDOT) appreciates the opportunity to participate in the Environmental Impact Statement (EIS) process as a Cooperating Agency for the Washington Union Station Expansion Project (WUSX). With this letter, DDOT summarizes our comments on the alternatives retained for further study and analysis in the EIS, as presented to agencies on March 12, 2018.

As a guiding principle, multiple multimodal connections between WUSX and the surrounding network are critical to accommodating site trips throughout the transportation network. As the alternatives are refined and multimodal transportation analysis is performed, the details of pedestrian entrances and movements, bicycle access and effects on existing bicycle facilities, vehicle distribution, and overall balancing of modal movements into and out of the proposed facility will be important to us and will serve as the basis for our evaluation of each of the alternatives.

The alternatives offer different options for vehicular access ranging from heavy reliance on H Street NE via the Hopscotch Bridge to more distributed vehicle access from K Street NE. DDOT supports the exploration of a K Street NE driveway but requires additional information regarding the constructability and operational feasibility of this access point, specifically regarding the potential movements in and out of the station and traffic controls given the

proximity to signalized intersections at First Street NE and 2nd Street NE. FRA would be responsible for all funding and construction needed to implement this access point, and the design would be subject to DDOT review and relevant District standards.

Differing pedestrian circulation patterns are represented in the alternatives. DDOT's interest is ensuring the alternatives allow for efficient vertical circulation between WUS platforms and H Street NE and ease of general pedestrian access through the proposed project in all directions for non-Union Station patrons and along the project's perimeter.

To assist with DDOT's ongoing evaluation of alternatives, FRA is expected to proceed with a multimodal transportation analysis of the alternatives per the ongoing Comprehensive Transportation Review (CTR) scoping process. The outcome of the analysis may necessitate changes to the proposed alternatives.

The treatment of H Street NE is important to DDOT given our ongoing efforts to rehabilitate the Hopscotch Bridge and to extend the DC Streetcar system westward from the current terminus west of 3rd Street NE. Because of the needs of having a streetcar station on the bridge, DDOT has concerns with a full-movement intersection from new access driveways in the middle of the bridge. In addition, DDOT has concerns about two closely spaced access points at the southeast side of the bridge. This would require an additional phase in the existing traffic signal at this location in addition to the potential for a signal phase related to the streetcar operations. If an access point is required for station circulation, the loading dock access should be modified to tie into the station circulation roadway. DDOT has initiated preliminary engineering for the rehabilitation of the Hopscotch Bridge, to address current conditions of the structure and—contingent on the ongoing NEPA studies—to accommodate the related independent projects. Specific DDOT plans involving the Hopscotch Bridge have not been finalized, and as a result FRA is expected to continue to coordinate with DDOT as the EIS progresses to ensure consistency with these ongoing DDOT efforts.

FRA proposes to reduce the number of bus slips for the intercity bus facility and manage the smaller facility through an active management approach. As this concept advances, additional commitments from FRA or other parties to the EIS, such as staffing to manage the facility, financial incentives or penalties for bus operators, and on-site layover spaces are required to ensure an active management approach is successful. Additional bus circulation trips to and from WUS generated by this approach must be accounted for in the traffic analysis in the CTR.

FRA proposes to accommodate some coach bus pick-up/drop-off on First Street NE, which would be accompanied by changes to vehicular circulation and the relocation of the First Street cycle track from the east to the west side of the street. DDOT is concerned that this change could degrade the safety and operations of the cycle track by introducing additional driveway intersections that create bicyclist/motorist conflicts. Additional focus is needed on accommodating coach bus pick-up/drop-off activities on-site and, if public street options are

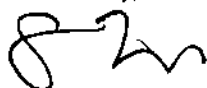
deemed necessary, the unit block of G Street NE is likely to be a more appropriate location that would not require changes to First Street NE vehicle circulation or the cycle track. In the event that FRA is interested in retaining a reconfiguration of First Street NE in the EIS, an analysis of bicycle safety and operations, as well as traffic analysis, will be required for the full length of the bicycle facility, from Massachusetts Avenue NE to M Street NE.

DDOT also offers the following additional comments:

- Several of the alternatives include potential air rights development for the area currently occupied by the above-grade parking structure. DDOT expects this air rights development to be accounted for as an Indirect Effect with a defined plan to mitigate the transportation impacts generated by the development.
- FRA should include only the rehabilitation of the H Street Bridge Project in the No Action alternative.
- DDOT has no objection to the inclusion of the Burnham Place development in the No-Action alternative.
- As the alternatives progress, additional focus is needed on freight and delivery for the site. Access is expected to be consistent with DDOT standards with on-site loading needs accommodated on-site without reverse movements within public space.

Thank you again for the opportunity to partner with FRA as a Cooperating Agency and review and comment on the alternatives retained for the Washington Union Station Expansion EIS. We look forward to continuing to work together to address the multi-modal needs in the District and understand that further detail will be provided on these alternatives as they are refined and assessed in the EIS. Please contact Stephen Plano at 202.671.2227 or stephen.plano@dc.gov with any questions.

Sincerely,



Sam Zimbabwe

Chief Project Delivery Officer

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.

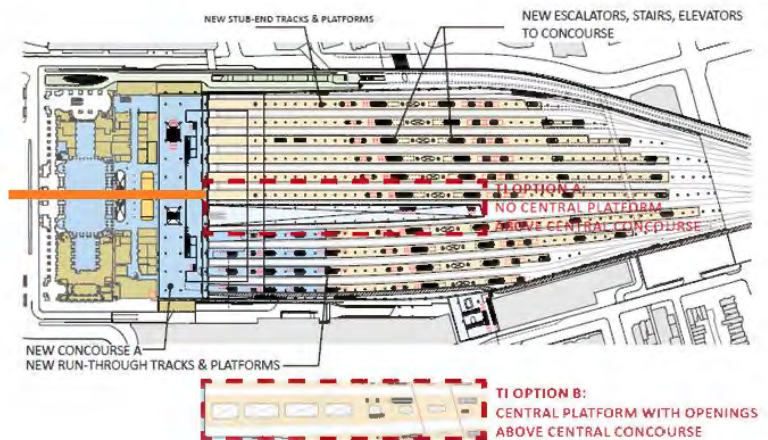
- Allow for greater architectural flexibility and expression in the new train hall by unencumbering it from most of the bus-related functions proposed in Alternatives D and E. Locating bus parking north of H Street should improve views to the new train hall, views out of the new facility, and allow the 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.

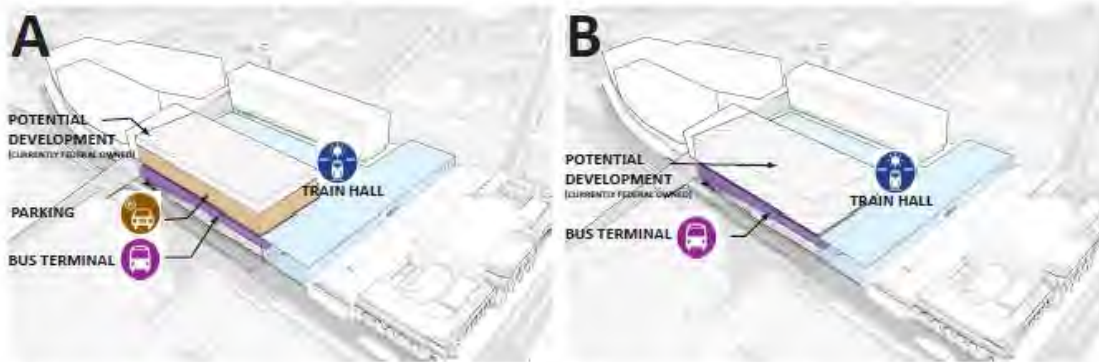
If you should have any questions or comments regarding any of these matters, please contact me at andrew.lewis@dc.gov or 202-442-8841. Otherwise, thank you for providing this additional opportunity to review and comment. We look forward to working further with FRA and all consulting parties to continue 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
- ADDITIONAL PARKING BELOWGROUND
- 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
- ADDITIONAL PARKING BELOWGROUND
- 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

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



August 29, 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 Comments

Dear Ms. Murphy:

Thank you for meeting with the DC SHPO on August 21, 2018 to discuss the on-going development of concepts for the WUS Expansion Project. As explained during the meeting, the DC SHPO's goal is to ensure compatibility of new development with the historic character and exceptional importance of Union Station by applying urban design approaches that visually and physically integrate the new and historic train facilities in a manner consistent with that goal.

We appreciate the introduction of the concept for a multi-function open zone ("Station & Visual Access Zone") that relates spatially and symmetrically to the main vault of Union Station along its central axis. Even at this conceptual level of development, the inclusion of this zone in each alternative reflects an important design principle that should continue to guide any further development of alternatives, including such items as: achieving consistency with Union Station's civic nature and monumentality through appropriate materials, details, scale and overall character; incorporating a prominent entry plaza inspired by the grandeur of Columbus Plaza; centering upon and framing important views to the historic station to provide visual cues and orient patrons; and establishing direct physical links to Union Station's historic circulation patterns.

Addressing these issues during continuing Section 106 consultation will be necessary to ensure that the new development avoids "adverse effects" by being consistent with the Secretary of the Interior's Standards, especially Standard No. 9 which requires new additions and related new construction to be compatible with historic properties to protect their integrity and environment. This requirement is applicable to new development in both the Federal and Private Air Rights Development Areas.

We appreciate that renderings showing views of the new development from a variety of locations were presented. These views show that development will be visible in the frontal approach to station and from other areas, and will thus need to be considered further as development concepts proceed. Additional views from multiple vantage points will also be needed for evaluation of more developed concepts since no single view will completely capture the visual effects of the new development in its entirety. 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. We look forward to working further with FRA and all consulting parties to continue the Section 106 review of this important project.

Sincerely,

A handwritten signature in blue ink that reads "Andrew Lewis".

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

16-0114

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

Government of the District of Columbia
Department of Transportation



October 24, 2019

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

**Subject: REVISED COMMENTS on Washington Union Station Expansion Project EIS
Traffic Impacts**

Dear Mr. Valenstein,

This letter serves to update a previous correspondence dated May 10, 2019, from the District Department of Transportation (DDOT) to the Federal Railroad Administration (FRA) for the Washington Union Station Expansion Project (SEP). With this letter, DDOT will revise its comments on the Environmental Consequences Technical Report – Transportation of the Draft Environmental Impact Statement (DEIS), based on additional meetings between DDOT and FRA and updated traffic analysis.

1. Revised Trip Generation Assumptions

Based on our conversations from the last few months, DDOT and FRA have jointly refined the assumptions related to trip generation and site circulation in the DEIS. These updated assumptions are based on newly available data and the advancement of design of the H Street Bridge, leading to better understanding of future capacity constraints. The updated assumptions also address the request in the May 10 letter for “Multiple demand scenarios to achieve an acceptable LOS.”

FRA and DDOT discussed that several assumptions in the original trip generation calculations were overly conservative. DDOT and FRA agreed to these conservative estimates in 2017 based on best available data and to instill greater confidence that the resulting model would show “worst case” results. DDOT now agrees that updating the trip generation assumptions would result in more realistic models and a more accurate reflection of travel behavior. DDOT concurs with the following new assumptions that FRA presented on June 14, 2019:

1. For-hire vehicle internal capture rate of 46 percent based on literature review and DDOT transportation network company data (changed from zero percent internal capture);
2. Revised WMATA growth estimates (one percent annual station and eastbound growth), which reduces Washington Union Station (WUS) boardings and alightings by seven to fifteen percent;
3. 430 trips shifted to MARC-VRE from WMATA due to through-running trains; and

4. Assumed shifts of some vehicle trips to WMATA based on anticipated congestion along North Capitol that would make the Red Line more attractive.

The above assumptions are expected to result in an approximate 23 percent reduction in vehicular volumes. DDOT notes that these are all planning level assumptions but feels that this analysis is appropriate for the DEIS. Therefore, DDOT concurs with the trip generation assumptions and resulting reduction.

Even with a 23 percent reduction, DDOT believes that resulting traffic (for all Build alternatives) is still higher than what the traffic network can sustain. The traffic volumes are high enough that traditional mitigations may not be sufficient to allow for sustainable traffic conditions. DDOT recommended changes to the internal site circulation to promote better traffic flow (see section 2 below).

DDOT looks forward to seeing the results of the updated traffic model. Based upon these results and after FRA has selected a preferred alternative, DDOT may recommend a workshop on the development of mitigation to seek an overall reduction in traffic volumes by an additional 20 percent (as noted in our original correspondence on May 10). The workshop should include DDOT, FRA, Union Station Redevelopment Corporation (USRC), and WMATA to discuss strategies when developing mitigation for the preferred alternative.

2. Revised Site Circulation Assumptions

Due to the high volume of vehicle trips anticipated from future conditions, the SEP, the private air rights development, and the future constraints on bridge capacity, DDOT recommended a series of internal site circulation assumptions pertinent to the air rights development and the SEP. DDOT recommended that FRA make the following assumptions in the EIS traffic analysis for all alternatives including No Action:

1. The private air rights development will need to institute a circulation pattern that relies primarily on one-way movements;
2. Left turns into and out of the SEP & private air rights development will be restricted but include the following:
 - o At least one EB and WB left turn from H Street Bridge;
 - o Restrict NB and SB left turns from the eastern intersection (due to the complexity of the five-way intersection);
 - o At least one NB and SB left turn from the private air rights development from the western or central intersections; and
 - o Any additional left turn movements and pockets are included as needed to accommodate anticipated traffic volumes.
3. The proposed circulation plan (after mitigation) should maintain a LOS of D and above or not degrade traffic LOS from the future No Action per the requirement from DDOT's Design and Engineering Manual.

DDOT reviewed the assumptions to the updated internal circulation patterns, presented by FRA in June and July 2019. Again, DDOT looks forward to reviewing the results of the updated traffic model and anticipates that the internal circulation changes will better accommodate site trips.

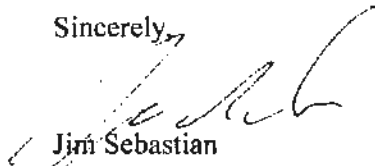
4. Feasibility of Alternatives

In the May 10, 2019 letter, DDOT noted that four of the six Build alternatives would not be compatible with the design of H Street Bridge and therefore were not feasible. However, upon further discussion between the H Street Bridge design team and the SEP technical staff, DDOT revises this previous statement. DDOT now finds that all six Build alternatives are feasible but may require some design modifications to fit within limitations of the H Street Bridge design.

1. Alternatives A and B show central intersections that are offset. FRA clarified that these intersections would be designed as right-in, right-out only, and therefore would be compatible with the future streetcar platform. While DDOT does not recommend offset intersections from a traffic operations and safety perspective, the design of the alternatives is feasible with FRA's clarifications.
2. FRA provided revised conceptual drawings of Alternatives C East and C West and confirmed that the central intersection would align with the design of the H Street Bridge (and not conflict with the streetcar station platform or tracks).
3. FRA is proposing to consider keeping the existing west ramp location which would be offset from the private air rights development road north of the western intersection of the H Street Bridge. DDOT does not recommend offset intersections; however DDOT will consider maintaining this condition.

Thank you again for the opportunity to partner with FRA as a Cooperating Agency and review and comment on DEIS. We look forward to continuing to work together to address the multi-modal needs in the District. Please contact Haley Peckett at 202.671.2365 or haley.peckett@dc.gov with any questions.

Sincerely,



Jim Sebastian

Chief, Planning and Sustainability Division

DDOT

U.S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

401 F STREET NW SUITE 312 WASHINGTON DC 20001-2728 202-504-2200 FAX 202-504-2195 WWW.CFA.GOV

27 November 2019

Dear Mr. Valenstein:

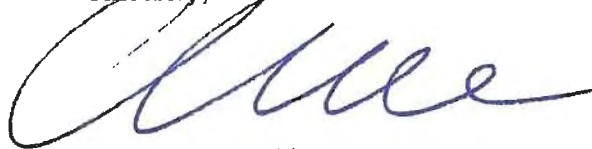
In its meeting of 21 November, the Commission of Fine Arts was pleased to hear an information presentation on plans for the renovation and expansion of Washington's Union Station, the historic building and complex that accommodates commuter and intercity rail service, Metrorail, retail, parking, and the city's central bus station. The Commission expressed support for Alternative A-C, the project team's preferred approach, and provided the following comments.

The Commission members noted the ambitious scope of the project, which will provide extensive modernizations for a wide-ranging program, to be implemented while the station remains in operation. They expressed support for the general approach, sectional disposition, and plan layout of the programmatic elements in the preferred alternative; they added that the inclusion of the bus terminal at Union Station is an important, equitable convenience for travelers. For the development of the plan, they commented that the design of the expansion in relation to the H Street viaduct needs careful consideration with the goal of avoiding the perception of the viaduct as an impediment to people's use of the area. They also commented that the conceptualization of the train hall should be carefully developed so that its design can appropriately express its intended civic role.

Regarding the parking program, the Commission members expressed concern that the planning for this long-term project seems to be based on a model of past decades that may not be a useful predictor of future needs. They observed that Union Station is not primarily a retail destination, but the parking program appears sized to accommodate large numbers of retail customers; the resulting built form, in conjunction with a large two-level bus terminal, generates an ungainly above-ground volume that presents aesthetic and programmatic problems in designing the area above the train platforms. They suggested reconsideration of this component of the project, in conjunction with further study of retailing trends, in order to develop a more appropriately sized and sympathetically configured massing.

The Commission looks forward to review of the project when it is submitted at the concept level. As always, the staff is available to assist you.

Sincerely,



Thomas E. Luebke, FAIA
Secretary

David Valenstein, Senior Advisor
Federal Railroad Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

cc: Beverley Swaim-Staley, Union Station Redevelopment Corporation
Hany Hassan, Beyer Blinder Belle



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*

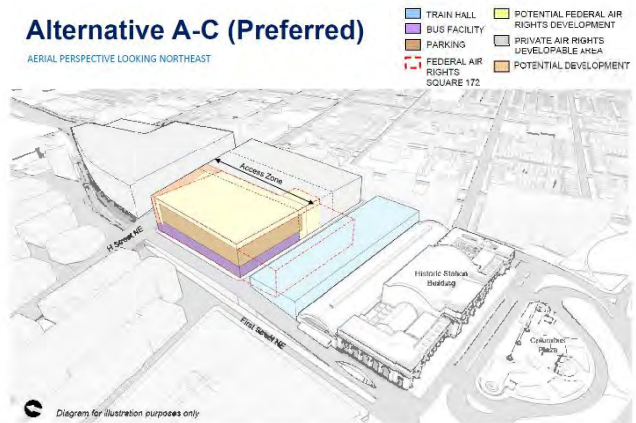
Dear Ms. Zeringue:

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.

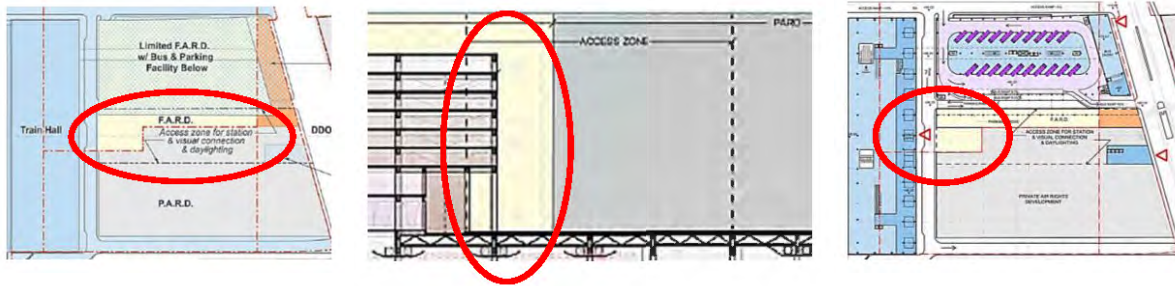
Now that we have had an opportunity to evaluate the Preferred Alternative in more detail, we offer the following recommendations for how FRA's progress can continue and how adverse effects on historic properties can be better avoided and/or minimized. Our comments focus on three primary themes: 1.) civic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



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

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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