

Topic	Date	Name	Organization	Comment	Responses
ADA	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	The Selection of Preferred Design Study in the Assessment of Effects asserts that the existing elevator will be made more visible and accessible, with more effective signage. We recommend that this commitment be included in the MOA.	The Union Station Redevelopment Corporation (USRC) is now improving the visibility and accessibility of the existing elevator (including more effective signage) which will be completed in advance of the execution of any Memorandum of Agreement (MOA) with the District of Columbia State Historic Preservation Officer (DCSHPO) for the Main Hall Project.
ADA	11/15/2012	Stephen J. Gardner	Amtrak	Accessibility: does the proposal adequately address ADA and universal access issues?	The proposal by itself does not adequately address Americans With Disabilities Act (ADA) and universal access issues at the Station. However, it would improve access to the lower level, particularly to a currently unused portion of the Station. As noted above, USRC is now improving the visibility and accessibility of the existing elevator (including more effective signage) which will be completed in advance of any action on the Main Hall Project.
Alternatives	11/15/2012	Rebecca Miller	DC Preservation League	Maximizing the income from the subleases in the station is an understandable goal for Ashkenazy as the retail developer, but should not be the goal of FRA or the Union Station Redevelopment Corporation (USRC). The proposed floor penetrations of the Great Hall, to say nothing of the sign obelisks, are an adverse effect. Access alternatives need to be thoroughly investigated in terms of compensating for the loss of the café income, not in terms of maximizing overall retail profit. DCPL cannot, at this point with the information made available to us, support the cuts in the floor of the Great Hall and the obelisk signs rising from them.	<p>In enacting the Union Station Redevelopment Act of 1981 (Pub. L. No. 97-125, Dec. 29, 1981), Congress established four goals by providing: The Secretary of Transportation shall provide for the rehabilitation and redevelopment of the Union Station complex primarily as a multiple-use transportation terminal serving the Nation's Capital, and secondarily as a commercial complex, in accordance with the following goals:</p> <p>"(a) Preservation of the exterior facade and other historically and architecturally significant features of the Union Station Building;</p> <p>"(b) Restoration and operation of a portion of the historic Union Station building as a rail passenger station, together with holding facilities for charter, transit, and intercity busses in the Union Station complex;</p> <p>(c) Commercial development of the Union Station complex that will, to the extent possible, financially support the continued operation and maintenance of such complex; and</p> <p>(d) Withdrawal by the Federal Government from any active role in the operation and management of the Union Station complex as soon as practical and at the least possible Federal expense consistent with the goals set forth in subsections (a) through (c) of this section."</p> <p>Today, the Station does not receive financial support from the Federal government, but instead is supported by the income of the property. The commercial development supports the continued operation and maintenance of the building as was contemplated in the Redevelopment Act. The Assessment of Effect Report reflects that a wide variety of alternatives were considered through the section 106 process. Maximization of income is certainly not the primary consideration of USRC and the Federal Railroad Administration (FRA) but replacing the income generated by the existing cafe is an important consideration in any decision to remove the cafe (as is the need to develop a productive use for the currently unused former theater space on the lower level). We believe it is important to achieve a proper balance between a reasonable return on the investment for the commercial development and the long-term maintenance and preservation of the historic station. We want to work with Union Station Investco (USI) to see that a portion of the increased revenues that would be generated through the implementation of the Main Hall Project are devoted to maintenance and long term preservation of the facility. Adjustment in USI's contributions to the Capital Maintenance Reserve Fund might be one way of accomplishing that objective.</p>
Amtrak Master Plan	11/15/2012	Stephen J. Gardner	Amtrak	Ability to connect public spaces on the lower level to future parking and transit: will circulation corridors be preserved where needed on the lower level?	USRC will work with all Union Station stakeholders, including USI, Amtrak and Akridge, to develop a Facilities Master Plan for the Union Station complex that addresses the need for improved connectivity and accessibility.
Back-of-House Spaces	11/15/2012	Stephen J. Gardner	Amtrak	Provision of "back-of-house" spaces: as change is implemented in the retail and transportation functions of the station, demand for increased restroom areas, as well as mechanical and electrical rooms, storage areas, egress corridors and stairs, and loading and other support spaces will increase. What is the demand being created by the new space and is adequate support space being considered?	USI would provide all "back-of-house" spaces and services necessary for the improved space as currently proposed for the Lower Level. As the Master Plan is implemented, USRC will require that the Plan include support for the increased retail and transportation functions of the Station through the increase in restroom areas, mechanical and electrical rooms, storage areas, egress corridors and stairs, and loading and other support requirements.
Barnes & Noble	10/24/2012	Mary Yarnall	Individual	I work on Capitol Hill and use the Union Station Barnes & Noble book store regularly. What is to be gained by evicting them from the Union Station complex? They are always busy and a useful retail establishment. Will B&N ever come back?	Thank you for your comment and your interest in Union Station. While your comment does not apply to the Project currently under consideration, we appreciate your interest in the Station.

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Center Café	10/24/2012	Thoreau Bartmann	Individual	Please don't eliminate center cafe! It is a wonderful gathering spot for lunch or after dinner drinks and a real asset to the station. I work near the station and go there at least once a week.	The Preferred Alternative calls for the removal of the Center Café and the planters in favor of reinstating Burnham's original spatial volume and open sightlines. The removal of these features would assist in the pedestrian flow through the Main Hall by allowing for up to an additional 1,440 sf of floor space. The seating provided by the planters would be replaced with movable benches which will provide additional flexibility over the fixed planters currently in place. The food service currently provided by the Center Café would be moved to the areas where Godiva Chocolate and Little MissMatched are presently housed.
Center Café	10/26/2012	Mitchell Polman	Individual	I think the loss of the cafe is terrible. It adds character to the place and is an excellent place to relax and watch the world go by.	Comment noted. The Preferred Alternative calls for the removal of the Center Café, in favor of reinstating Burnham's original spatial volume and open sightlines. The food service currently provided by the Center Café would be moved to the areas where Godiva Chocolate and Little MissMatched are presently housed.
Center Café	10/30/2012	Jeffrey Struski	Individual	I live in Capitol Hill and have been a resident of Washington, DC for most of my adult life. I disagree with any plan that doesn't include some kind of restaurant/bar/lounge area in the center space where the Center Cafe sits today. It has always been a people friendly gathering place where locals sit alongside travelers from all over the world. It is the Capitol City's living room that blends a sense of community with a space to sit and view the historic architecture of the hall. This is the kind of space that other mass transit and community spaces strive for, and it should not be removed. Without such a cafe, the space turns into a cold, uninviting, sterile place that can no longer be enjoyed by the public, which is the opposite of everything a public space should be. It should not be treated as a walkthrough, it should be viewed as a national treasure. I hope you find a way to keep or incorporate a new center cafe into your plans. It's always been my favorite space in the District.	Comment noted. The Preferred Alternative calls for the removal of the Center Café, in favor of reinstating Burnham's original spatial volume and open sightlines. The removal of these features would assist in the pedestrian flow through the Main Hall by allowing for up to an additional 1,440 sf of floor space. The seating provided by the planters would be replaced with movable benches which would provide additional flexibility over the fixed planters currently in place. The food service currently provided by the Center Café would be moved to the areas where Godiva Chocolate and Little MissMatched are presently housed and the other food service options would continue in the Main Hall providing alternative options for viewing and experiencing this space.
Center Café	11/1/2012	Graham W. Jenkins	Individual	The closer any design brings us to Burnham's original vision of Union Station, the better. Eliminating the Center Cafe - which currently interrupts sightlines and features a private trolley operator instead of any kind of useful information booth - is an excellent start.	Agreed, the Preferred Alternative calls for the removal of the Center Café, in favor of reinstating Burnham's original spatial volume and open sightlines. An Information Booth, to be used solely for the distribution of information to travelers, commuters, tourists, and visitors to the Station, would be placed at the center of the Main Hall.
Center Café	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	We believe the best way to achieve these goals would be to remove the Center Café, as well as existing planters and retail kiosks, and not install escalators so that pedestrians can move freely and unimpeded through the Main Hall in all directions and easily see where they're going. We also advocate removing retail from the Main Hall and designing and placing such needed items as the information kiosk and seating in such a way that they create minimal impediments to pedestrian circulation and allow visitors to fully experience more of the original intention of the stunning and dramatic Hall.	The Preferred Alternative calls for the removal of the Center Café and planters, in favor of reinstating Burnham's original spatial volume and open sightlines. This would improve circulation in the Main Hall and enhance visitors appreciation of it. However, removing the Center cafe, as well as the existing planters and retail kiosks and not installing the escalators is not a viable option at this time. USI would not move forward with project on that basis.
Center Café	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	Along with others, CHRS too is glad the idea of a raised central café has been eliminated, along with the earlier proposed elevators and the luxury modular units.	Comment noted. The current proposal does not include either the earlier proposed elevators or the luxury modular units.
Center Café	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	Removal of the Center Café is crucial to restoring the full spatial volume of the Main Hall, and along with removal of the planters will greatly expedite pedestrian flow.	Agreed.
Center Café	11/15/2012	George R. Clark	Committee of 100	<p>The Committee of 100 fully supports the decision to remove the current Center Café. That structure disrupts what should be glorious architectural features of the headhouse, the main axes flowing both north/south and east/west and a marvelous, voluminous space. It also impedes visitors as they move between the front doors and the retail areas and obscures the way to train ticketing and waiting areas.</p> <p>Removing the Café will bring the Main Hall much closer to the monumental, inspiring room that Daniel Burnham and his chief designer Peirce Anderson created at the start of the 20th century. Its elimination will also support what the station's 2010 master plan recognized as its primary purpose: transportation. It will be much easier for travelers to find and reach the trains, as well as Metro and, in the coming years, the proposed addition of buses and streetcars.</p>	Agreed.
Center Café	11/15/2012	Robert Nieweg	National Trust for Historic Preservation	The National Trust supports the proposed removal of the Center Café, the central planters, and the retail kiosks from the design. These proposed changes would dramatically improve circulation in the Main Hall and help return the Hall to its original function as a transit and orientation area.	Agreed.

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Center Café	11/15/2012	Rebecca Miller	DC Preservation League	The DC Preservation League supports the proposed removal of the Center Café and the central planters. These proposed changes would dramatically improve circulation in the Great Hall and help the space return to its original function as a transit and orientation area. We also acknowledge that the removal of the café, taken independently, will cause a reduction in lease income that deserves to be addressed.	Comment noted.
Commercial Viability	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	The Assessment of Effect asserts that “The commercial viability of the station is inextricably linked to its success as an inter-modal transportation hub. Only if Union Station is commercially sustainable can it continue to operate as a transportation terminal.” This is tied to the need for the Main Hall escalators because the lower level’s “function as commercial and retail space necessitates more points of entry and a stronger visual connection to the first floor.” In other words, no escalators = insufficient commercial success to keep the station operating. However no sufficiently persuasive evidence has been produced to convince us that without the escalators, the retail would not succeed. Although USRC’s October 31, 2012, letter to the DC Preservation League (DCPL) broadly asserts that the proposed changes would benefit “Union Station itself through an increase in funding available to USI to handle the day-to-day operations, maintenance, insurance, and repairs of the Station”, no specific evidence has demonstrated exactly how improved commercial success would equate to additional revenue dedicated to maintenance, repair, and restoration, and to what degree. While the letter says USRC and Ashkenazy jointly contribute to the Capital Maintenance Reserve Fund for repair and restoration of historic fabric and other structural Station needs, it does not affirmatively state that increased profits resulting from the expanded escalator access would increase the level of Ashkenazy’s contributions.	As discussed in response to the Alternatives topic on page 1 raised by Rebecca Miller of the DC Preservation League, Congress in enacting the Union Station Redevelopment Act of 1981 sought to create a structure whereby the commercial development of the Station supported the long-term maintenance and preservation of the facility. USRC remains committed to that vision. That said, it is important for there to be a reasonable balance between income generated from the commercial uses and the investment in the long term preservation of the Station. The balance cannot tip too far in either direction or it will not continue to work. We believe it would be appropriate for a portion of the income generated from the Main Hall Project be devoted to maintenance and preservation of the Station. One possible way this could be addressed would be through increased contributions by USI to the Station's Capital Maintenance Reserve Fund. USRC also supports the full use of the facility and would like to see the former theater space productively used. We also can certainly see a connection between the decision to install the escalators in the Main Hall and the nature of the use occurring in the former theater space. A retail presence that adds significant value to the Station, the City, and the neighborhood, and that supports the long-term preservation of the facility, would provide a stronger justification for the new escalators than simply providing a retail operation that provides none of these benefits.
Commercial Viability	11/15/2012	Rebecca Miller	DC Preservation League	The FRA letter further asserts that the penetrations to the floor are necessary to “support a solid revenue stream that will ensure the future viability and continued preservation for the next generation.” While there may be little doubt that increased access to areas beneath the Great Hall would increase the income generating potential of the space, there does not seem to be any connection between that increased income and the revenue stream available for the maintenance and improvement of the station. The space may be more valuable with increased access, but no case has been made that it has no value without the access proposed. In fact, with a large part of the lower level space currently vacant the retail operation continues to be profitable according to a statement made by Barry Lustig of the Ashkenazy Acquisition Corporation (Ashkenazy) at the September 2012 Section 106 Consulting Party Meeting.	Please see the response to the previous comment.
Commercial Viability	11/15/2012	Rebecca Miller	DC Preservation League	However, no information has been presented to indicate the extent to which the proposed changes to the retail configuration of the Great Hall, and the proposed penetrations there, will increase lease income and how that increase compares to the loss of the current café. While it might be reasonable to consider changes to Union Station that would allow Ashkenazy to replace the income lost by the removal of the café, it should not be necessary to financially reward them for making this change.	Please see the response to the first comment on commercial viability.
Commercial Viability	11/15/2012	George R. Clark	Committee of 100	A troubling aspect of the entire Section 106 process has been the ongoing failure to provide crucial information. The Draft Assessment of Effect, released in August, argues that there is a "need" for these alterations to keep the station "economically viable" or even for the station to "survive." Nowhere, however, does that document provide any supporting analysis on the economic condition of the station (considered by most to be thriving), even though consulting parties made a request for those numbers more than a year ago. Nor does the proposal indicate exactly how this action would specifically benefit the preservation and ongoing stewardship of the station. Without such detail, one can only conclude that the financial benefit will accrue only to the developers, not to the station or its users.	Please see the response to the first comment on commercial viability.

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Design Criteria	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	The 1985 MOA also requires in Stipulation 3.a. that design criteria be developed and applied for interior redevelopment installations, including signs and kiosks. While this MOA no doubt did not anticipate future floor penetrations for escalators in the Main Hall with tall lighted pylons, neither should its provisions be ignored. Assuming that such design criteria were developed, we wonder whether the current proposal – which is intended for interior redevelopment purposes – meets those criteria. If no such criteria exist, or if existing criteria need updating for current needs, we recommend that the MOA require them, or their update, and that they be applied to this project.	USI is developing new tenant design criteria in cooperation with USRC which will then be submitted to DCSHPO for their review and approval. . Criteria for any signage in the station will be incorporated into the Design Criteria documents. DCSHPO has expressed the desire to engage the Consulting Parties in the review process.
Egress	11/15/2012	Stephen J. Gardner	Amtrak	Fire and life safety: what are the proposed population numbers on the lower level and what egress capacities and routes are being planned? Where will egress stairs be located and where will they connect with their required exits?	USI will ensure that all new spaces meet code. As Station owner, FRA will also be expanding its role with respect to code compliance at the Station as a whole. FRA fulfills the role of the Agency Having Jurisdiction at the Station (similar to a local code official in a non-federally owned building). This effort has been developing out of repairs being made to the Station following the earthquake.
Lower Level/ Pedestrian Circulation	11/15/2012	Stephen J. Gardner	Amtrak	Proposed lower level floor level: what floor levels are proposed for the new spaces below the main hall and will these levels align with the circulation framework in the master plan? Will the new floor levels be compatible with the integrated north-south circulation shown in the master plan?	USI and USRC will continue working closely with Amtrak to coordinate the development and implementation of the Master Plan with this Project.
Main Hall Character	10/5/2012	Lillian (or Sadie?)	Individual	the thing I love about union station, is that when you look down that long corridor (I'm thinking where you took the shot actually) you can see the dip marks where the benches used to be, where years and years peoples' feet would swing. it's like looking back to the past, ghost world almost. And the ceiling? spectacular.	Noted.
Mitigation	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	We suggest that the MOA provide for SHPO to work with USRC to develop and prioritize a list of restoration-related capital improvements.	We support the preparation of a Preservation Plan for the Station that will include the identification and prioritization of restoration-related capital improvements. The Historic Preservation Plan is scheduled to begin later this year. It will be a guide for future preservation, rehabilitation, restoration, and reconstruction efforts and will include a list of treatment options that could result in future capital improvements
Mitigation	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	CHRS fully supports preparation and submission of a National Historic Landmark nomination for Union Station; preparation of a brochure on the historic of the Station; and preparation of an interpretive exhibition program.	These are all items that could potentially be considered as stipulations in the MOA for the Project. USRC and FRA will consult with the DCSHPO and others in the development of a MOA and in identifying appropriate mitigation measures that would be appropriate for inclusion. Additional research is also needed on the specific benefits and any limitations associated with a National Landmark nomination. USRC applied for and was awarded a grant through the National Trust for Historic Preservation. The grant will help to fund self-guided tours of Union Station via a downloadable Smart Phone application. The tour will showcase the significance of the historic landmark highlighting its original construction, redevelopment in the 1980s, and future as a first class multimodal transportation hub. USRC is currently developing the scope and outline of content for the tour. The estimated timeframe for completion for launch of the tour is early 2014.
Mitigation	11/15/2012	George R. Clark	Committee of 100	Additionally, despite the negative impact of this proposal as submitted, the applicant has failed to provide for mitigation measures that adequately balance the harm to the building with the ongoing stewardship of nationally significant landmark.	USRC will work with USI, DCSHPO, the Advisory Council on Historic Preservation (ACHP), and FRA, as well as the Consulting Parties, to determine appropriate mitigation measures for inclusion in a Project MOA. While the Preferred Alternative would have an adverse effect, it would not cause the loss of any significant historic features of Union Station, could be reversed at a later date, and has positive attributes for visitors' use and enjoyment of the Main Hall as well. The removal of the Center Cafe and the planters would reinstate Burnham's original spatial volume and open sightlines, and improve the east-west and north-south axes of the pedestrian circulation through the Main Hall. The planters would be replaced with benches that would provide greater flexibility while maintaining seating in the Main Hall.

Mitigation	11/15/2012	George R. Clark	Committee of 100	<p>The Severe Shortcomings of the Proposed Mitigation</p> <p>Given all the factors already discussed, it seems premature to discuss mitigation measures extensively, but it is clear that the steps presented this September are insufficient. In general, they are not mitigation—that is, creative compensations for significant features that would be lost if the current proposal is enacted. Instead, they are projects that serve the station’s existing operating needs, promises that would carry no force of law, or efforts that should have been undertaken long ago.</p> <p>Providing a way-finding program and removing planters are simply logical actions that would make the Main Hall function better under any plan. While it would be laudable to nominate Union Station as a National Historic Landmark, this is a purely honorific designation, carrying with it no legal protections. Most disingenuous is the proposal to make a preservation plan as a mitigation measure when, in fact, the DC SHPO requested such a plan more than two years ago.</p>	<p>Comment noted. USRC will continue to work with DCSHPO, ACHP, USI, and FRA, as well as the Consulting Parties, to determine appropriate mitigation measures related to the adverse effects associated with the Project. While the Preferred Alternative would have an adverse effect, it would not cause the loss of any significant historic features of Union Station, could be reversed at a later date, and has positive attributes for visitors' use and enjoyment of the Main Hall as well. The removal of the Center Cafe and the planters would reinstate Burnham's original spatial volume and open sightlines, as well as return the east-west and north-south axes of the pedestrian circulation through the Main Hall. The planters would be replaced with benches that would provide greater flexibility while maintaining seating in the Main Hall.</p>
Mitigation	11/15/2012	George R. Clark	Committee of 100	<p>Based on the information currently provided, the Committee of 100 cannot support the preferred design alternative. Cutting new holes in the Main Hall floor would not only be a drastic change to the historic arrangement of that room, but it would do irreparable harm. For such an action, we must weigh this high price with any potential benefits to the building. Unfortunately, despite repeated requests, the plan fails to provide adequate information about crucial elements: how the new arrangements will financially benefit and support the ongoing preservation of the station, how the much-needed way-finding system will improve circulation; and how this project will fit into the long-overdue master plan for the station and its surroundings.</p>	<p>Comment noted. We do not agree that the proposed Project will cause irreparable harm to the Station. In accordance with the Secretary of the Interior's Standards, the new access from the Main Hall to the Lower Level would be designed to be reversible. Additionally, removal of the Center Café and planters would allow for 1,440 more square feet of space in the Main Hall and reinstate Burnham's original spatial volume and open sightlines. USRC will continue to work with all of the Union Station stakeholders, including USI, Amtrak and Akridge, to implement the Amtrak Master Plan as well as develop a Facilities Master Plan for the entire Union Station complex. In addition, the Historic Preservation Plan is intended to be a valuable reference tool and guide for future preservation, rehabilitation, restoration and reconstruction efforts. The Plan will also be a useful resource as development concepts are further advanced and more detailed analysis and studies completed by showing how new buildings can be complementary of an historic setting, highlighting examples of places from across the country and around the world where such a balance has successfully been achieved. USRC has also been working with USI and their management staff to finalize designs to update and/or expand the existing signage of the complex. Final draft renderings are currently being completed based on the comments from USRC and Amtrak. The final renderings are anticipated to be complete by the end of August. USRC will submit an Undertaking Review Request (URR) with the signage package to DCSHPO for review and comment. Once all comments are received, a RFP will be issued for fabrication and installation.</p>
Parking	11/15/2012	Stephen J. Gardner	Amtrak	<p>Parking: what demand for additional parking spaces will be created in developing the lower level? Is there adequate parking for both retail and transportation functions?</p>	<p>The existing parking structure will be sufficient to support an increase of visitors associated with the Lower Level. First, movie theaters occupied the space in the Lower Level until only a few years ago, and this was supported by the existing parking structure and second, in many cases visitors to the new uses on the Lower Level will be visitors who are using the Station's other services. The Station is of course also well connected by mass transit.</p>
Pedestrian Circulation	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	<p>However, it is inescapable that removing substantial pieces of the Main Hall floor to insert two sets of escalators still introduces significant obstacles to pedestrian circulation and changes the historic nature and experience of the Hall. With the expected large increases in visitors to the Station, it seems counterproductive and short-sighted to remove three obstacles (Center Café and planters) and then add two more. As the State Historic Preservation Office (SHPO) and others have noted, re-establishment of the north-south and east-west pedestrian axes is crucial to recapturing both more efficient pedestrian movement and unobstructed sight lines.</p>	<p>The Preferred Alternative provides an increased area for pedestrian circulation: the existing Center Cafe and planters together occupy approximately 2,400 sf, while the proposed penetrations would occupy only approximately 960 sf (there would be additional benches included for seating but these would be flexible and movable which the planters are not). The Preferred Alternative is also consistent with the desire to return north-south and east-west pedestrian axes and provides for additional access to and from the Lower Level.</p>
Penetration Design	10/22/2012	Marie Birnbaum	Individual	<p>Union Station is busy, beautiful, and important. Escalators in the Main Hall should be as unobtrusive as possible.</p>	<p>Thank you for your comment. The Preferred Alternative calls for the escalators to be of as simple and as non-obtrusive design as possible and located where they will minimize obstruction of pedestrian circulation.</p>



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Penetration Design	10/24/2012	Mark Eckenwiler	Individual	The new proposal is deficient in two respects: 2) The information desk seems too understated and inconspicuous. Even if modular construction is planned (in order to facilitate removal for private Main Hall functions), the desk should be more prominent. Ideally, this would include a lateral frame (at a height of 7.5-8 feet) allowing for a more readable horizontal "INFORMATION" sign in preference to the hard-to-read vertical signs depicted in the current design. With proper dimensions, such a frame would not unduly obstruct the general sight line from the central entrance portal to the Amtrak sign on the north wall. (Minor obstruction would not seem to be a valid concern, given that the Amtrak signage would not in any event be readable at that distance.)	The design for the new Information desk and its associated signage was developed for optimum visibility while also considering the strong desire to minimize obstructions of the spatial volume and sightlines in the Main Hall.
Penetration Design	10/24/2012	Dan Malouff	Beyond DC/ Greater Greater Washington	First, let me commend you for rethinking the original 2010 design proposal. This one is much better. Union Station's Main Hall is one of the most beautiful and best civic spaces in Washington, so we must be very careful not to overwhelm its wonderful Beaux Arts finishes with clashing modern designs. I was very worried about punching holes in the floor for escalators, but I think your solution will work. Good going!	Thank you for your comment and your interest in Union Station.
Penetration Design	10/24/2012	Derek Torrey	Individual	I also wonder if the glass railing around the escalator cuts might be better if they were built with more traditional materials. I don't doubt the need for the escalator cuts, and support their inclusion, but I think more attention should be paid to selecting a design that harmonizes with the original architecture of the space.	Thank you for your comment. The final design details for the elevator railing, surround, and signage will be developed in consultation with DCSHPO and other interested parties.
Penetration Design	10/24/2012	Mark Eckenwiler	Individual	This design is a significant improvement over previous proposals. In general, the new design better respects the grandeur of the Main Hall and avoids much of the fussiness (and jarring excess) of the options put forward in 2011.	Thank you for your comment and your interest in Union Station.
Penetration Design	10/25/2012	Gary Malasky	Individual	I think there needs to be a taller element in the middle and it should not be of a commercial nature. The observation deck with the two stairs is very graceful. If the sign in the middle were removed and transparent materials were used, that might work if the two floor penetrations were moved further to the sides, and similar transparent materials were used.	Thank you for your comment. Under the current plan, the new Information desk and its associated signage is designed for optimum visibility while also considering the strong desire to minimize obstructions of the spatial volume and sightlines in the Main Hall. The final design details for the elevator railing, surround, and signage would be developed in consultation with DCSHPO and other interested parties.
Penetration Design	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	As noted by a number of persons at the September 10 consulting parties meeting, the current proposal with two sets of escalators wrapped by short glass safety enclosures is a great improvement over both the intrusive and inappropriate initial proposal and the mid-2011 proposal.	Agreed.
Penetration Design	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	Should USRC and FRA choose to move forward with installing the escalators, every effort should be made to minimize their size, scale, and profile.	Under the current design, the size and scale of the escalators have been reduced as much as possible within code compliance. The final design details for the elevator railing, surround, and signage would be developed in consultation with DCSHPO and other interested parties.
Penetrations	10/22/2012	Marie Birnbaum	Individual	The overall experience with holes in the ground or floor in the Capitol Hill area has been difficult. The 1976 "Visitors' Center" hole in Union Station's floor had to be filled in fairly soon after it was dug out. The more recent change to the landscaping and plaza of the East Front of the Capitol has left two hideous gashes in the ground and an ugly plaza in place of what was a lovely, intimate landscape enjoyed by people from the neighborhood and the world.	Under the current design, the size and scale of the escalators have been reduced as much as possible within code compliance. Any new access from the Main Hall to the Lower Level of the historic building will be designed to be reversible. USRC will work with the FRA, DCSHPO, ACHP, and USI to determine an appropriate timeframe for removal and/or specific actions or circumstances that would trigger removal. We believe the commitment to reversibility, the timeframe, and the triggers would be appropriate for inclusion in the MOA to be developed with the DCSHPO.
Penetrations	10/25/2012	Paul Reber	American University	Why is it that we continue to allow banal economic considerations effect decisions about this building, and many of our other great rail stations? I can't help but look at the historical photographs in your presentation with a sense of melancholy. We should put the benches back in the hall the way they were in 1920 and find some place else to put those awful escalators.	As required by the Union Station Redevelopment Act, the Union Station complex was to be rehabilitated and developed as a multi-use transportation terminal and commercial center with the goal of eliminating Federal financial support. Today, the Station does not receive federal funding, but instead is supported by the income of the property. Accordingly, commercial considerations are relevant to decisions about improvements at the Station but they should be balanced with a number of other relevant considerations as well, including maintenance and long term preservation considerations.  Numerous locations for the escalators were studied; however, owing to limitations created by the building's foundation, the need to avoid harming or removing historic materials (interior and exterior), and the desire for improved pedestrian circulation, the location selected for the escalators in the Preferred Alternative was determined to minimize the adverse effect as much as possible.

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Penetrations	11/1/2012	Graham W. Jenkins	Individual	<p>I think most, however, would prefer that access to the lower levels be removed from the walking path of the main hall. As presented, these escalators significantly disrupt normal pedestrian flow throughout the hall, as does the cafe seating towards the ticket hall (and this is before even mentioning the retail like Godiva that has been a nightmare in obscuring passenger flow towards the trains - which, after all, is the raison d'etre of Union Station).</p> <p>It is my sincere hope that the USRC will reconsider at least this portion of the proposal, if not the entire premise of cutting yet more holes in the floor (again, the "mall" beyond has just been a tremendous waste of space and made the actual experience of rail travel far more miserable and cramped than it should be).</p>	Numerous locations for the escalators were studied; however, owing to limitations of the building's foundation, the need to avoid harming or removing historic materials (exterior and interior), and the desire for improved pedestrian circulation, the location selected for the Preferred Alternative was determined to have the least adverse effect.
Penetrations	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	We agree with the Federal Railroad Administration that penetrating the floor of the Main Hall with two openings for pairs of escalators to and from the downstairs retail constitutes an adverse effect on the majestic Main Hall. CHRS has maintained for over two years that any proposed alterations should restore the original unobstructed views of the Main Hall and eliminate, or at the very least substantially reduce, impediments to the flow of pedestrians through the space.	Comment noted. The removal of the Center Café without the introduction of a reasonably accessible entrance to the Lower Level is not under consideration at this time. USI would not advance the project on that basis and the central element and planters would remain as they are.
Penetrations	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	CHRS remains opposed to penetrating the Main Hall floor for escalator access to the lower level.	Noted.
Penetrations	11/15/2012	George R. Clark	Committee of 100	Despite these benefits, the preferred alternative's overall effect seriously damages the station's historic architecture. This wound results primarily from the two cuts in the northern section of the Main Hall floor that would allow escalators to carry visitors down to basement-level retail. The preferred alternative claims the escalators are vital for bringing shoppers downstairs—even though that area can be reached easily by stairs and escalators only a few feet away.	We disagree that the preferred alternative's overall effect seriously damages the Station's historic architecture. As noted above, the Project has benefits for the Main Hall as well.
Penetrations	11/15/2012	Robert Nieweg	National Trust for Historic Preservation	The National Trust continues to oppose the penetration of the Main Hall to allow escalator access to the lower level. We agree with the FRA's assessment that the Main Hall floor penetrations, the installation of escalators, the partial obstruction of the spatial volume of the Main Hall, and the obstruction of historic views constitute an Adverse Effect on Union Station. Although we oppose damaging the Main Hall floor, we appreciate the attempts of the Union Station Redevelopment Corporation to minimize the size of the openings, to avoid disrupting historic material, and to locate the escalators away from the central axes of the Main Hall.	Noted. USRC and the project proponents have worked very diligently to consider comments provided on the various options and to develop adjustments that address many of the identified concerns.
Planning	11/15/2012	George R. Clark	Committee of 100	The failure to develop a master plan—or even launch a process to develop such a plan—is also an enormous concern. In their comments in both 2010 and 2011, multiple consulting parties called for an integrated master plan for the station and the surrounding area. The need for this coordinated approach is now even greater since Amtrak and Akridge released their “master plan” for the station and its air rights this July. The Committee of 100 continues to believe that it would be precipitous to entertain the current design alternative without it being placed in a comprehensive context that includes forecasted growth in Metro, Amtrak, and bus traffic at the station as well as the introduction of the H Street trolley, and the Burnham Place development. USRC has for several years acknowledged the need for a comprehensive planning process. As the trustee of Union Station and its rich heritage, it must show how each major change will integrate with current and future plans for the building. No work should begin on the Main Hall until those effects have been made clear.	USRC will work with all of the Union Station stakeholders, including USI, Amtrak and Akridge, to develop a Facilities Master Plan for the entire Union Station complex that addresses the need for improved connectivity and accessibility. USRC agrees that the new Lower Level access should be reversible and will discuss with the DCSHPO and other MOA signatories the advisability of including a provision in the MOA that requires that if the Union Station Master Plan includes an alternative access to the Lower Level that is reasonably equivalent to the proposed access, the new penetrations will be infilled.
Planning	11/15/2012	Robert Nieweg	National Trust for Historic Preservation	In our view, it is imperative that any changes to the historic Main Hall be considered within the larger framework of comprehensive planning for Union Station, which includes the Amtrak-Akridge July 2012 master plan, changes contemplated by WMATA, and the Union Station Redevelopment Corporation's own master plan. Before further development of Ashkenazy's Main Hall concept takes place, we respectfully request that USRC should direct Ashkenazy to demonstrate that the alterations to the Main Hall and lower level of the historic rail station, as proposed by Ashkenazy, would not foreclose on options presented in the July 2012 master plan. It would be a serious error, in our view, to proceed with changes to the historic Main Hall which would foreclose future opportunities to preserve the historic character and enhance the efficiency of Union Station.	USRC will work with all of the Union Station stakeholders, including USI, Amtrak and Akridge, to develop a Facilities Master Plan for the entire Union Station complex that addresses the need for improved connectivity and accessibility. USRC agrees that the new Lower Level access should be reversible and will discuss with the DCSHPO and other MOA signatories the advisability of including a provision in the MOA that requires that if the Union Station Master Plan includes an alternative access to the Lower Level that is reasonably equivalent to the proposed access, the new penetrations will be infilled.

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Planning	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	Given the considerable adverse effects the proposal would have on this historic icon, the mitigation measures also need to be considerable and, to the maximum extent possible, directly mitigate the adverse effects. While CHRS generally supports the mitigation measures proposed in FRA's June 2012 letter, the Assessment of Effect, and the September 2012 consulting parties meeting, we note that some of them further the project's goals (removal of the Center Café and planters will expedite circulation and access) or have been ignored since being called for by consulting parties over two years ago to guide this project and others (preparation of a Historic Preservation Plan for Union Station).	Comment noted. The Historic Preservation Plan is scheduled to begin later this year. It will be a guide for future preservation, rehabilitation, restoration and reconstruction efforts and will include a list of treatment options that could be utilized as possible mitigation measures.
Planning	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	A Historic Preservation Plan, as recommended from the outset by SHPO, ACHP, NCPC, and other consulting parties, ideally would have been completed by now to guide this project and other planned and potential projects. We recommend a commitment to prepare one, along with establishment of a timetable for its review and completion, and we encourage engaging the Union Station Preservation Coalition in the review and comments	The Historic Preservation Plan is scheduled to begin later this year. It will be a guide for future preservation, rehabilitation, restoration and reconstruction efforts and will include a list of treatment options that could be utilized as possible mitigation measures. USRC has already initiated the process and begun consultation with interested parties, including the Capitol Hill Restoration Society.
Planning	11/15/2012	Robert Nieweg	National Trust for Historic Preservation	Preservation Plan. In addition to the mitigation options presented by the FRA, we request that the USRC prepare a preservation plan for Union Station, which would provide a conditions assessment and recommendations for ongoing maintenance and restoration. (Please see the Union Station Preservation Coalition's recommendation for a preservation plan for Union Station in the coalition's August 2012 publication, "A Golden Opportunity to Re-Invest in Historic Union Station.")	The Historic Preservation Plan is scheduled to begin later this year. It will be a guide for future preservation, rehabilitation, restoration and reconstruction efforts and will include a list of treatment options that could be utilized as possible mitigation measures. USRC has already initiated the process and begun consultation with interested parties, including the National Trust for Historic Preservation.
Planning	11/15/2012	Rebecca Miller	DC Preservation League	Until such time that a preservation plan for the historic station and a master plan for the complex (including transportation functions) be devised, no action should progress that would further compromise the historic structure in a negative way.	USRC will work with all of the Union Station stakeholders, including USI, Amtrak and Akridge, to develop a Facilities Master Plan for the Union Station complex that addresses the need for improved connectivity and accessibility. In addition, the Historic Preservation Plan is intended to be a valuable reference tool and guide for future preservation, rehabilitation, restoration and reconstruction efforts. It will include a list of treatment options that could be utilized as possible mitigation measures. USRC will work with the DCSHPO and other interested parties to develop the MOA for this Project. The MOA could include a Stipulation that requires that if the Union Station Master Plan includes an alternative access to the Lower Level that is reasonably equivalent to the proposed access, and that alternative access is funded and implemented the new penetrations will be infilled.
Planning	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	Because the 1985 MOA needs to be updated, the MOA for the current project should stipulate development by time certain of a Programmatic Agreement to guide restoration, rehabilitation, maintenance, and commercial development of and in the Station. The PA should retain the critical heart and essence of the 1985 MOA, including that all preservation work meet the Secretary of the Interior's Standards for Rehabilitation, and that major entrances to the historic spaces provide the building user with an opportunity to view, understand, and experience the grandeur of the space (Stipulations 1,2 & 3.f.).	We agree that the 1985 MOA needs to be updated. We would support inclusion in the MOA for the current proposed Project of a stipulation requiring development by time certain of a Programmatic Agreement (PA) to guide restoration, rehabilitation, maintenance, and commercial development of and in the Station. We contemplate that the PA would retain the critical heart and essence of the 1985 MOA, including that all preservation work meet the Secretary of the Interior's Standards for Rehabilitation, and that major entrances to the historic spaces provide the building user with an opportunity to view, understand, and experience the grandeur of the space (Stipulations 1,2 & 3.f.).
Preservation Fund	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	Except for removal of the Center Café and planters and potential later removal of the escalators, no proposed measure directly and physically mitigates the adverse effects on the Main Hall. We ask that the MOA stipulate that a designated measure of increased profits be made available for maintenance, repair, renovation, and restoration of historic portions of Union Station so the harmed historic Main Hall will directly benefit from the project's anticipated commercial success.	As discussed in response to previous comments, we believe it is important to achieve a proper balance between a reasonable return on the investment for the commercial development and the long-term maintenance and preservation of the historic Station. We want to work with USI to see that a portion of the increased revenues that might be generated through the implementation of the Main Hall Project are devoted to maintenance and long term preservation of the facility. Adjustment in the contributions by USI to the Capital Maintenance Reserve Fund might be one way of accomplishing that objective.
Preservation Fund	11/15/2012	Robert Nieweg	National Trust for Historic Preservation	Preservation Fund. Since the FRA has identified a relationship between the commercial viability of the station's lower level and ongoing preservation work, we request that a percentage of additional retail revenue be returned to the USRC and applied toward the necessary preservation work that would be identified in the Union Station preservation plan. The specific terms for the establishment of a Preservation Fund should be documented in the Memorandum of Agreement.	See the response to the previous comment.



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Project Justification	11/15/2012	Rebecca Miller	DC Preservation League	<p>The assessments of effects letter, submitted by the Federal Railroad Administration (FRA) on June 25, 2012, for the proposed Great Hall project outlined four reasons for the proposed changes: to improve (1) station access; (2) circulation and orientation; (3) access to the lower level; and, (4) financial viability.</p> <p>The letter's explanation of why the criteria of adverse effect were found applicable does not seem to be supported by the information available. While the project team looked at "twelve design options over the course of two years", little evidence has been presented to indicate that alternate routes to access the retail spaces below the Great Hall were seriously studied. Only a clear case eliminating the viability of alternatives would demonstrate a genuine effort to avoid penetrations of the Great Hall floor. Avoidance of adverse effect is the first principle of the Section 106 process under the National Historic Preservation Act.</p>	Comment noted. We disagree. The Draft Assessment of Effects Report provides information on the numerous studies made to seek to avoid the Adverse Effect, as well as to minimize this effect. The Project evolved in significant ways over the course of the process. This report can be found on the USRC website.
Pylons	10/22/2012	Marie Birnbaum	Individual	The preferred alternative of two unobtrusive pairs of escalators looks harmless enough. However, the idea of moving LED lights on the proposed pylons seems too flashy for historic Union Station. The Main Hall's Center Cafe is a terrible eyesore in the Main Hall, and it should be removed.	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.
Pylons	10/24/2012	Dan Malouff	Beyond DC/ Greater Greater Washington	<p>Second, please rethink the LED signs. They are undignified and their modern design clashes with the room. I like the idea of having a vertical element there, and don't mind if it incorporates signs, but the design you've put forth is all wrong. It would be much better to replace those LED poles with a historic-style iron lamp, and then affix a fabric or metal sign to it. Something like this:</p> 	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.
Pylons	10/24/2012	Dan Malouff	Beyond DC/ Greater Greater Washington	What you have now is much better. But it could still be a little better, so please change the signs!	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.
Pylons	10/24/2012	Matthew Linsky	Georgetown University Law	The garish signage next to the escalators are out of place. A better solution should be available to achieve the same purpose.	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.
Pylons	10/24/2012	Derek Torrey	Individual	I think the new design proposal is a vast improvement over the alternatives presented last year. However, I'm concerned that the proposed escalator cuts still look a bit too modern--most specifically the LED towers. I think they would look incredibly garish in the very traditional Beaux Arts space. Perhaps look toward doing something that will blend better with the architecture (i.e. dark wood, gold lettering, something of that nature)	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.
Pylons	10/24/2012	Mark Eckenwiler	Individual	<p>The new proposal is deficient in two respects:</p> <p>1) The vertical pylons are completely inappropriate in design, materials, and profile, and should be abandoned altogether. Directional signage for the lower level would be far better located on the glass railing/enclosure for the escalators, where it would not intrude upon (or compete so violently with) the historic interior</p>	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.
Pylons	10/24/2012	John Mitchell	Individual	The design is generally not awful, with the exception of that disastrous signage pylon ruining the whole space. Stick that out at Dulles if you want to, but not at Union Station. Alternatives 12a,b and d would all be far better. The pylons are far more intrusive than the horizontal elements of those alternatives.	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.

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Pylons	10/24/2012	Michael Aiello	Individual	<p>No LED towers! Think of what you want to see when you take a picture of the space. What do you want to see when you arrive, when you depart. We don't those garish LED signs all over the internet when people Google search "Union Station".</p> <p>One of the variations of proposal 12 would be better. Perhaps something like the Metro canopies here in DC or Paris.</p> <p><del>About me: I am a graphic designer and have an architectural background.</del></p>	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.
Pylons	10/24/2012	Thoreau Bartmann	Individual	Also the signs to the shops are awful.	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.
Pylons	10/24/2012	Joe Winslow	National Association of Regional Councils	The vertical signs are tacky. A good clean design otherwise that respects the historic character of the space.	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.
Pylons	10/24/2012	Anonymous	Individual	Proposal took steps in the right direction with the exception of the signage coming out of the escalators. What a disgrace to that space. Stick to something period-appropriate.	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.
Pylons	10/24/2012	Muneer Ahmad	Individual	I think the pylons are awful. They are completely incongruous with the architecture of the Great Hall. I think it's great to play with modern elements in a traditional setting, but the pylons are gaudy. The only pylons I can think of that 'work' are those situated around LAX, and even those are an acquired taste.	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.
Pylons	10/25/2012	Gary Malasky	Individual	The signs for the businesses below are too tall.	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.
Pylons	10/25/2012	Melissa Esposito	Individual	The overall idea of the vertical signs to direct people is fine, but those LED ones are GOD-AWFUL. They add nothing but garishness to a gorgeous Beaux Arts space, and clash terribly. Please, for the love of all that is beautiful, come up with something else to do the same thing. A set of decorative wooden posts with carved letters on it, maybe, or light posts with changeable fabric banners to rotate as needed or with the seasons? But NOT anything electronic. It ruins the whole aesthetic.	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.
Pylons	10/25/2012	Paul Reber	American University	The signs are even worse and will significantly disrupt Burnham's design for the space.	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.
Pylons	10/29/2012	Charles W. McMillion	MBG Information Services	As I said at the Sept. 10 meeting, I appreciate the progress made from earlier proposals. However, the proposed, two 30 foot LCD billboards towering above the main floor -- and in the lower level -- are totally unacceptable for this space. Even from the narrow perspective of my consumer experience, these enormous LCD advertising screens would so cheapen the current beauty of the building that it would dramatically reduce my incentive to walk over for shopping or walk in on my way to/from the metro or train. Unless your goal is to transform the Union Station shopping experience into a "Times Square" type downscale tee shirt mall, you would be very foolish to turn off serious consumers with such abusive advertising towers.	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.
Pylons	11/1/2012	Graham W. Jenkins	Individual	But especially garish, if we are truly stuck with the final proposal, are the two "Shops" signs. Their neon coloring and presumably LED faces would look more at home in Times Square or on the side of the Verizon Center. Surely a more suitable replacement can be found, one that better fits the grandeur and style of Union Station. I personally would prefer one of the lattice/trellis constructs featured in earlier proposals, but if the poles are a must, then they could at least echo the columns of the station's portico, or the nearby streetlights.	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.
Pylons	11/13/2012	Geoffrey Hatchard	Individual	Please do not let the pylons (with "SHOPS" on them in the presentation graphics) come to fruition. They are hideous.	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.

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Pylons	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	While CHRS appreciates efforts made to date to scale down the design of the current proposal, with the short, transparent escalator surrounds, we find the soaring pylons with moving LED lights proposed between the escalators to be totally incompatible with the Main Hall in materials, appearance, form, scale, and movement. Even with their relatively narrow profile, they extend much too high and intrude far too much into the spatial volume of the historic Hall. Their out-of-character, colored, moving lights would distract pedestrians from the grand architecture and are completely unacceptable. We recommend that USRC continue to explore signage options, in consultation with SHPO and other consulting parties such as CHRS, to identify alternatives and compare their effects and appropriateness.	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.
Pylons	11/15/2012	George R. Clark	Committee of 100	The injury produced by the cuts is compounded by “light columns” that would beckon visitors to the lower level shops from between each set of escalators. These triangular towers, which would rise from the basement to 30 feet above the main hall floor, would have on their faces thousands of light emitting diodes that could be animated, rather like the scoreboard at a football stadium. While this style of signage can be appropriate in many situations, it is an unnecessarily distracting bit of theater for Union Station and matches no existing elements.	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.
Pylons	11/15/2012	Robert Nieweg	National Trust for Historic Preservation	If the FRA and USRC decide to move forward with the current Ashkenazy proposal, we recommend that, in general, everything possible be done to minimize the scale and visual impact of the Ashkenazy design. We encourage the USRC to re-evaluate the pylon signage concept in Alternative 12f alongside the more traditional signage option featured in Alternative 12e, so that the visual and spatial impacts of each can be fully understood and compared. In Alternative 12f, for example, the pylon itself should be minimized as much as possible, as the pylon at its proposed height would interfere with views within the station and would introduce a new and, we think, incompatible vertical element within the station’s primary historic space. We appreciate the USRC’s offer to share mock-ups of the proposed pylon on site and hope to participate in that consultation meeting. We also recommend that both static light options and moving light options be evaluated in the course of review.	A new, more compatible scheme will be prepared in place of the proposed LED pylons designed by wayfinding consultants Wyman/Whitehouse. A mock-up of the revised signage will be prepared for public review and comment prior to fabricating the signage.
Reversibility	11/15/2012	Robert Nieweg	National Trust for Historic Preservation	Reversibility. The National Trust believes that the proposed changes to the Main Hall, including the new access from the Main Hall to the lower level of the historic building, should be reversible. We would strongly support the future removal of the escalators and restoration of the Main Hall floor, and request that USRC work with the DC Historic Preservation Office, the Advisory Council on Historic Preservation, and consulting parties to determine an appropriate timeframe for removal and/or specific actions or circumstances that would trigger removal. The commitment to reversibility, timeframe, and triggers should be documented in the Memorandum of Agreement.	Any new access from the Main Hall to the Lower Level of the historic building will be designed to be reversible. USRC will work with the FRA, DCSHPO, the ACHP, and USI to determine an appropriate timeframe for removal and/or specific actions or circumstances that would trigger removal. We believe the commitment to reversibility, the timeframe, and the triggers would be an appropriate stipulation to be included in the MOA to be developed with the DCSHPO for this Project.
Reversibility	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	One of the most important mitigation measures is the provision for reversing the escalator installations and restoring the Main Hall floor. CHRS strongly supports this measure and recommends that the MOA include a timeframe for removal and/or clearly defined measures, actions, or circumstances that would serve to trigger such removal and restoration.	Any new access from the Main Hall to the Lower Level of the historic building will be designed to be reversible. USRC will work with the FRA, DCSHPO, the ACHP, and USI to determine an appropriate timeframe for removal and/or specific actions or circumstances that would trigger removal. We believe the commitment to reversibility, the timeframe, and the triggers would be an appropriate stipulation to be included in the MOA to be developed with the DCSHPO for this Project.
Reversibility	11/15/2012	Stephen J. Gardner	Amtrak	Removal of the portals in the future: we are pleased that removal of the portals in the future is one of the mitigation measures proposed and we support this. We want to ensure that this can be coordinated to occur when needed, and that when removed the circulation system will be compatible with the new circulation on the lower level developed in accordance with the master plan, and that the new vertical circulation connecting the two levels will be able to be revised in order to accommodate connections to the new Central Concourse and future parking below Columbus Circle.	Any new access from the Main Hall to the Lower Level of the historic building will be designed to be reversible. USRC will work with the FRA, DCSHPO, the ACHP, and USI to determine an appropriate timeframe for removal and/or specific actions or circumstances that would trigger removal. We believe the commitment to reversibility, the timeframe, and the triggers would be an appropriate stipulation for inclusion in the MOA to be developed with the DCSHPO for this Project.
Secretary of Interior's Standards	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	The 1985 MOA includes a provision (Stipulation 2) requiring that interior work meet the Secretary of the Interior’s Standards for Rehabilitation. While this was intended to guide interior restoration, we suggest that it would not be inappropriate for the escalator project to meet the Standards, since it proposes to undo the floor restoration that was carried out in accordance with the MOA.	All work undertaken for the Main Hall Project will meet the Secretary of the Interior's Standards for Rehabilitation.

Station Purpose	11/15/2012	Rebecca Miller	DC Preservation League	Finally, DCPL would like to remind the USRC that the Union Station Redevelopment Act of 1981 “Directs the Secretary of Transportation to rehabilitate and redevelop the Union Station complex primarily as a multiple-use transportation terminal and, secondarily, as a commercial complex, in accordance with specified goals.”	Comment noted.
Wayfinding	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	Wayfinding would be much easier if and when the Main Hall and colonnaded passages are unobstructed by retail, cafes, kiosks, pylons, and other physical and visual clutter.	We agree and believe the Project would significantly improve wayfinding in and through the Main Hall.
Wayfinding	11/15/2012	Shauna Holmes	Capitol Hill Restoration Society	CHRS is very interested in signage and wayfinding throughout the Station, especially in its historic portions, and looks forward to seeing possibilities and, if feasible, a mock-up of the proposed pylons and other possibilities.	The proposed LED pylons, designed by wayfinding consultants Wyman/Whitehouse, will be restudied to provide a less obtrusive method for including signage for the Lower Level. A mock-up of the revised signage will be prepared for public review and comment prior to implementing the signage.
Wayfinding	11/15/2012	George R. Clark	Committee of 100	There is a similar shortage of information about the proposed wayfinding system. Everyone involved in the Section 106 process has agreed that the system for directing people around the building should be much better. At the September hearing, the light columns were presented as the first element of the wayfinding system. Even though another month has passed, there has been no additional information shared with the public as to how this will relate to an overall program. That failure makes it impossible to judge the value of the new approach.	The proposed LED pylons, designed by wayfinding consultants Wyman/Whitehouse, will be restudied to provide a less obtrusive method for including signage for the Lower Level. A mock-up of the revised signage would be prepared for public review and comment prior to implementing the signage. We agree that it is important to have an overall wayfinding strategy for the Station. USRC has been working with USI and its management staff to finalize designs to update and/or expand the existing signage of the complex. Final draft renderings are currently being completed based on the comments from USRC and Amtrak. The final renderings are anticipated to be complete in the near future. USRC will submit an Undertaking Review Request (URR) with the signage package to DCSHPO for review and comment. Once all comments are received, a RFP will be issued for fabrication and installation.