

The Association of the Oldest Inhabitants of The District of Columbia

Established Dec. 7, 1865

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August 5, 2010

Mr. David S. Ball, President
Union Station Redevelopment Corporation
10 G Street, NE Suite 504
Washington, D.C. 20002

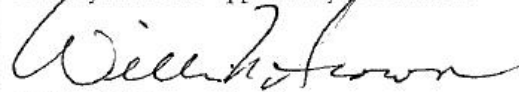
Dear Mr. Ball:

As the District's oldest civic organization – founded Dec. 7, 1865 – the Association of the Oldest Inhabitants of the District of Columbia stands with other preservation organizations in opposition to the proposed changes to the main hall of Union Station.

We disagree with the plan's attempt to improve sight-lines and pedestrian flow; in fact, we believe the design is intrusive and incompatible with Daniel Burnham's design for this historic structure. While we applaud the progress that has been made during the past quarter century to restore and return Union Station as a welcoming terminus for Washington, D.C. visitors and a destination unto itself, we feel the proposed design will significantly detract from the station's features. New York City's Grand Central Station and Philadelphia's 30th Street Station with their art deco and beaux arts design feature no such intrusive, out of scale, modern structures and historic Union Station should be no different.

Little can be added to the well researched, well thought out and concisely articulated comments provided by the Committee of 100, the DC Preservation League, the National Trust, preservationists and your neighbors to this proposal except to point out our clear, unified opposition to this plan.

Thank you for the opportunity to comment.



William N. Brown, President

Cc: David Maloney, DC State Historic Preservation Officer
George Clark, Committee of 100
Robert Nieweg, National Trust for Historic Preservation
Rebecca Miller, DC Preservation League

The Association of the Oldest Inhabitants of the District of Columbia -- the District's oldest civic organization -- was established on December 7, 1865, to preserve memories and matters of historic interest. By virtue of our long presence and participation in the city's prosperity and improvement, we continue to work and strive for the city's stability, security and advancement -- to aid in every way the prosperity and well-being of the District while preserving the heritage of its past.

COMMENT

Name: Robert Barbuto

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Organization: self

Telephone: 301-299-5717

Comments: No to potential changes to the existing center floor of Union Station Washington, DC. Why not restore the main hall to the way it was intended with ticket windows, wooden benches and cafes, ie. original from 1940's and 1950's to preserve this historic edifice. As a third generation Washington, I would like to testify and render my comments.

COMMENT

Dear Mr. Ball,

The Committee of 100 on the Federal City is a citizen planning advocacy organization dedicated to protecting, preserving, and maintaining our city's built environment. We are grateful for the opportunity to participate in the 106 review of proposed changes to Union Station.

After attending the initial 106 consultation on June 18, reviewing the changes proposed by the Ashkenazy Acquisition Corporation as presented on the USRC website (a presentation which contains a great deal of information for which we are grateful), reviewing the Union Station Master Plan (also on-line for which we are grateful), and careful consideration, The Committee of 100 concludes that it is precipitous to consider the changes being proposed by Ashkenazy in isolation of the numerous proposals that have been outlined in the master plan.

The master plan proposes four major changes, improvements, renovations, and additions to the station, at least three of which would impact the historic structure and should, therefore, come under 106 review:

1. Improve Existing Rail Concourse with priority given to passenger waiting areas, restrooms, circulation;
2. Construct a new concourse;
3. Expand Metrorail Capacity and Access by reconfiguring the north mezzanine; construction of a pedestrian walkway; creating a new entrance lobby on First Street; constructing an inner-city bus terminal; creating a new entrance from the H Street Overpass.

The Committee of 100, therefore, encourages the Union Station Redevelopment Corporation to present a more inclusive proposal at the next 106 consultation meeting, one that addresses the proposed projects as outlined above. In fact, the Union Station Master Plan, in its Appendix I, recognizes the complexity of the numerous proposals and calls for a coordinated approach to planning and implementation. The Committee further recommends that, to facilitate a comprehensive approach, the USRC conduct a pedestrian circulation study.

Regarding the proposal with which we were presented on June 18, The Committee has the following comments (which should not be construed as even partial acceptance of the piece-meal approach to the 106 review that the USRC has taken):

- Consider moving the rail ticketing and waiting area from the rail concourse, which the master plan recognizes as inadequate in size and in need of immediate renovation, to the Main Hall - as the station was originally intended to be used and as it was for more than a half century. Both the Ashkenazy Acquisition Corporation, in its June 18 presentation, and the Union Station Master Plan have given highest priority to the building as the center of intermodal transportation, not only for the city but also for the Mid-Atlantic Region. “(The) Master Plan (is) designed to propel Union Station to the forefront of seamless, state-of-the art intermodal transportation centers globally.” The master plan also states that Amtrak expects ridership to increase nationwide by 50% by 2030. In response to that, it proposes a new 45,000 square foot concourse as “a must to relieve current and future use congestion issues.” It would be far more logical, in terms of 1) the impact to the historic resource, 2) issues of sustainability, and 3) attracting even greater ridership, if the Main Hall were to be used as the rail concourse rather than as the site of intense retail development.
- Move the rental-car kiosks from the parking garage, where they are difficult to find and inconveniently located, to the main station, which will serve to reinforce the station as a center of intermodal transportation;
- Locate the ticket counter for the buses in the Main Hall;
- Redesign the visitor information counter so that it is easier to find and attracts more users, perhaps through the use of dynamic signage;
- Consider dynamic signage to guide visitors to the lower level rather than cutting a hole in the floor of the Main Hall to reveal the activity below. Such a radical approach to attracting retail clients seems unnecessary in a location that has been reported, by Washington’s most widely-circulated newspaper, as bringing the highest rental of any site in the city.
- Eliminate the current round cafe in the center of the main hall, which blocks the view, confuses visitors, and impedes visitor circulation. With the other cafes in the building, a cafe in this location is not necessary. Do not replace it with the proposed cafe structure, elevators, stairs, and two openings in the floor . If the ticketing counters were moved to the Main Hall, there would be no room for the proposed structure, elevators, stairs and openings.
- A highly visible sign advising travelers of train information, in conjunction with an information desk in this general location would be desirable
- Produce an historic structures report as recommended by the DC State Historic Preservation Officer.

In conclusion, the Committee of 100 strongly encourages the Union Station Redevelopment Corporation to consider all proposed changes, additions, and renovations in a comprehensive manner, especially during the mandated federal 106 review; and to use the station as originally intended and as proposed by the Union Station Master Plan – as a model of 21st century public transit rather than giving primacy to the building as a retail outlet.

Thank you for the opportunity to comment. We look forward to further participation in the 106 review process.

Sincerely,

George R. Clark, Chair
The Committee of 100 on the Federal City

COMMENT

Name: Wesley Paulson

Email: wesley@dctrolley.org

Organization: National Capital Trolley Museum

Telephone: 202-488-5625

Comments: 1. The suggestion of re-opening the floor in the main hall unfortunately recalls memories of the ill-fated slide show pit. Like its predecessor, the proposed new opening does not seem compatible with the original architecture of the station. It would be a loss to re-destroy the hall simply to provide access to shopping. 2. The design concept for the new pavillion/elevators/stairs is not well defined. The suggested use of glass seems too modern for the building. The present pavillion looks like a piece of furniture and works well in the space. 2. Why not remove the present pavillion and the stores in the foyer between the main hall and present shopping concourse and install elevators in the present opening in the shopping concourse floor. 3. Consider use of the west hall floor space for the elevators and stairs to the basement.

COMMENT

Name: Nancy Metzger

Email: nancymetzger@verizon.net

Organization: Capitol Hill Restoration Society

Telephone: 546-1034

Comments: Thank you for inviting the Capitol Hill Restoration Society (CHRS) to participate in the Section 106 consultation for the proposed plans to alter the Main Hall of Union Station. We found the initial consultation meeting on June 18, 2010, to be very informative and appreciate the efforts of the Union Station Redevelopment Corporation (USRC) and other project proponents to engage a wide range of consulting parties and members of the public in the consultation through a series of meetings and the publicly accessible website.

Union Station is one of the great buildings in Washington, not only in its exterior architecture but also in the sense of progression through magnificent spaces to a final destination. While modern interventions have diminished the original interior, these interventions could be reversed or modified to recapture more of the original intention and still serve modern functions. Heading into the station, a person might walk down either the west or east loggia, experiencing the rhythm of the columns that stretch along the front, light and darkness accenting the progression. Approaching directly from the front, the three great arches provide the visitor with a stunning entrance to the equally dramatic interior waiting room where the vaulted, coffered ceiling rises 96 feet above the floor. The arches and vaults, scale, symmetry, materials, and details all command the visitor's attention and contribute to a memorable interior space – except for the “centerpiece” of the Center Café, which blocks both views and traffic. Originally, a visitor would have taken cues from the architecture and from unobstructed signage to pass from the Main Hall (Waiting Room) through one of the five short barrel vaults to the grand concourse, another light-filled, vaulted space where the ticket counter would have been, with the 34 individual tracks just beyond. That concourse has also been seriously altered with new stairs for access to upper and lower levels, train and ticket information, and shops.

Members of the Capitol Hill Restoration Society well remember the unsuccessful experiment of “The Pit,” the 1970s attempt to attract visitors to Union Station which failed in that goal and profoundly impacted the Main Hall. The renovation attempt of the 1980s improved the situation somewhat by restoring the proper floor level, but the distracting Center Café that was inserted in the middle of the magnificent Main Hall makes visitors pause in confusion and forces travelers to circle around the pedestal and stairs to find the trains. Any proposed alterations should restore the original unobstructed views of the Main Hall, and we are deeply concerned about the center of this space being dominated by the proposed circulation module. This module (including floor cut-out, up and down stairs, elevators, and second-story café) may be more transparent than the present Center Café, but it would still be highly visible. It would still be a major distraction to the visual and experiential appreciation of the space as well as an obstacle to people crossing the Main Hall to the train terminal, taxi stand, or shops.

CHRS appreciates the attempt of the architect and project proponents to address the issues of pedestrian circulation, ADA accessibility, increasing ridership, economic feasibility, clarity of direction, and others mentioned in the “Project Considerations” list. However, as discussed above, we feel that the present proposal has its own problems. Other alternatives should be explored to meet the stated needs so that the solution will be in keeping with the grand, interior space and be less of an obstacle to the travelers and visitors.

We also feel that this discussion and review needs to be in context – not only in the context of a grand historic building but also in the context of a Preservation Plan for Union Station which ensures that modifications and renovations enhance rather than diminish this great building. CHRS was very pleased at the June 18 consultation meeting to hear the project team readily agree to the request by DC’s State Historic Preservation Officer (SHPO) David Maloney to prepare a Preservation Plan for Union Station, which he asserted is essential for a building of its importance, and commends the project team for doing so. Likewise, CHRS supports the recommendation made at the June 18 meeting by the National Capital Planning Commission (NCPC) that an Environmental Assessment (EA) be prepared for this project and commends the project team for agreeing to prepare an EA. We recommend that the Preservation Plan for Union Station be completed before concluding Section 106 consultation and the EA for the current project, because the Preservation Plan can then serve as a guide and frame of reference for this project, as well as for future projects. Further, we recommend that the Preservation Plan be developed as part of the Section 106 consultation, with recommendations and feedback from the consulting parties.

CHRS is concerned to read in Appendix 1 to Draft Master Plan (page 20) that there are nine Union Station “projects that can proceed with relatively little interaction or dependency on other projects.” (Those items listed in the matrix included “historic station retail improvements, integrate existing shopping areas into rail concourse, improved way-finding signage inside station”, etc.). Perhaps such projects may be accomplished independently in a physical or temporal sense, they should not be undertaken without the Preservation Plan and necessary consultation, as each of these projects will no doubt greatly impact decisions about other projects and the physical characteristics of the entire station.

Thank you for this opportunity to provide initial comments during the Section 106 consulting. We look forward to the next consultation meeting on August 5.

COMMENT

Name: Sally Berk

Email: sally@toad.net

Organization: The Committee of 100 on the Federal City

Telephone:

Comments: I've just sent the C100 comments to the interested parties by email. I hope to be able to attach them to this page by the end of the day. Meanwhile, I'd be grateful if all the comments could be made available to all the consulting parties; just as the comments of the initial meeting were made available on this page. Thank you.

COMMENT

Name: Tanya Edwards Beauchamp

Email: tebeauchamp@verizon.net

Organization: Architectural Historian & Preservation Consultant

Telephone: 703-759-3796

Comments: 23 September 2010

Union Station Section 106 initial consultation comments

As an architectural historian member of the DCSHPO staff (1973-1991), I reviewed and monitored the 1987-89 restoration/rehabilitation of Union Station for compliance with the 1985 Section 106 MOA and perhaps have a unique perspective on the project.

In 1964 Union Station was included in the original list of historic properties in the District of Columbia compiled by the Joint Committee on Landmarks of the National Capital (JCL). The JCL (predecessor of the present DC Historic Preservation Review Board) was organized that year by the National Capital Planning Commission, the US Commission of Fine Arts, and the District of Columbia Government to advise federal agencies and others in preparation for administration of the upcoming National Historic Preservation Act of 1966 (NHPA). The JCL designated Union Station "a Category I Landmark of great importance which contributes significantly to the cultural heritage of both the Nation and the District of Columbia, and which must be preserved. One of the first great union terminals, this imperial station with its vast interior spaces, was literally the cornerstone of the McMillan Commission's efforts to revive L'Enfant's original plan of the city." On 26 February 1969 the JCL nominated Union Station for listing in the National Register of Historic Places. On 24 March 1969 Union Station became one of the first DC historic properties listed on the NRHP.

The nomination hopefully cited the 1968 Public Law 90-264, providing for a Bicentennial visitors' center and transportation hub for the city, as a solution to long term maintenance and historic preservation problems at the property. In fact, the poorly conceived and under-funded partial renovation which followed was a total

disaster, brutally destroying historic fabric and totally neglecting maintenance considerations. The Union Station Redevelopment Act of 1981 promised better, including compliance with Section 106 of the NHPA.

Many compromises were made in the Section 106 review of the public-private partnership development project which followed, as seemingly incompatible commercial development and historic preservation programs were melded. Chief among these was removal of ticketing and waiting room functions to the former Concourse area in a shopping mall-like setting which provided access and ready views to multiple levels. Access to trains was pushed farther back from the station entrance to allow for this commercial development. In return the Union Station Redevelopment Corporation (USRC) meticulously and authentically restored decorative detail, skylights, and other historic features including the floor in the main hall. Maintenance failures were fully corrected and systems updated. Tenant lease agreements mandated the subordination of commercial design detail to the architectural integrity of the historic building. Preservation of the east-west axis through the building and the vast barrel-vaulted volume of the main hall—so essential to the architectural integrity of this gateway to the Federal City and the fulfillment of the McMillan Plan—were considered non-negotiable.

The USRC proposed constructing an open-air café above a central information kiosk as a focal point for visitors in the main hall. The HPRB reluctantly agreed to this as the structure would be open and finished with mahogany like the original main hall furniture. Hopefully it would have the character of furniture which would not be seen as part of the historic structure and could be easily removed. This concept averted a DCSHPO finding of adverse effect on the qualities which qualified the Union Station for listing in the NRHP.

The present proposal replaces and expands this feature, rising well above the springing of the barrel vault, obstructing axial views, and intruding into the volumetric aesthetic of the hall. It once again opens the lower floor to access and view from a central point of the room, further disrupting the architectural integrity of the space. It unnecessarily repeats a circulation feature already existing just beyond the former Concourse doors, bringing commercial mall design into the historic building in an area from which it was rightly excluded under the previous MOA. Accessibility for the handicapped and others to new lower level commercial activity below the main hall would be better served by relocation near the front entrance in the original utility spaces now occupied by restaurants. Improvements in accessibility and transportation-related signage within the former Concourse commercial space should also be explored. Consideration should be given to removal altogether of the central café. In practice, it has proved less than innocuous and its presence has contributed to the congestion of the space and the proliferation of many small intrusions there. These should also be removed. This is one of the most historically and architecturally significant interiors in the nation's capital and an essential feature of the McMillan Plan. It should be respected as such and fully protected under the provisions of Section 106 of the NHPA.

Thank you for the opportunity to comment during this Section 106 consultation process.

Tanya Edwards Beauchamp
Architectural Historian & Preservation Consultant

COMMENT

Name: Robert Nieweg

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Organization: National Trust for Historic Preservation

Telephone: 202-588-6107

Comments: The National Trust for Historic Preservation appreciates the opportunity to participate in the recently initiated Section 106 review process regarding the proposed changes to iconic Union Station in Washington, DC. These proposed changes appear to be part of the master planning project being undertaken by the Union Station Redevelopment Corporation (USRC). USRC has asked for initial comments in response to the presentation given on June 18, 2010, regarding the proposed alteration to the Main Hall. Our comments below raise concerns about the approach USRC is taking to evaluate and implement changes as part of a master plan and the specific proposal unveiled at the meeting.

The Master Plan and the Redevelopment Process

The National Trust is concerned about the disconnect between the group of projects that make up the draft master plan, the process of approving a master plan, and the individual project discussed at the June 18th meeting. USRC should be discussing the draft master plan in the context of Section 106 of the National Historic Preservation Act (NHPA). Instead, USRC is pursuing a specific proposal that will further degrade the historic integrity of the Main Hall with little or no benefit to the primary purpose of Union Station.

More generally, USRC appears to be advancing an approach in the draft master plan that separates plans for WMATA and Amtrak from retail development, utilizing different timeframes. This is problematic because, in our view, any retail proposal should build upon, and be subservient to, the character of Union Station as a station and public space. To this point, it is important for USRC to prioritize the primary purpose of Union Station in making redevelopment decisions. Without question, Union Station is well known as a historically significant transportation hub for the nation's capital, and, by design and function, it is widely understood to be a premier public place. Because Union Station's primary purpose, both historically and today, is to facilitate transportation throughout the metro area and the Mid-Atlantic, redevelopment proposals should place enhancing transportation as the top priority. We support the draft master plan's focus on elevating Union Station to a first-rate intermodal transportation center, especially given the dramatic increases in ridership projected by WMATA and Amtrak.

As discussed below, we are struggling to understand the relevance of the proposal to redesign the center of the Main Hall as it relates to Union Station's primary purpose of addressing transportation needs. The National Trust concurs with the DC Preservation League's assessment that Union Station should be a National Historic Landmark, listed among our nation's most important historic places. Consequently, an appropriate early step in the USRC's master planning process for this high-profile historic property would be the preparation of a historic preservation plan, as noted by the State Historic Preservation Officer during the June 18th meeting. In our view, master planning and the Union Station Section 106 review should begin with the preparation of a historic preservation plan.

To adequately evaluate the potential impacts of the Center Café proposal and any other individual proposal, consulting parties and the public must understand how that specific proposal fits into the larger context of

Union Station as a (1) transportation hub and (2) public place. Without the benefit of a historic preservation plan that takes into account these two primary functions, the Center Café proposal appears to us to damage the historic character of the Main Hall, and do little or nothing to facilitate better transportation operations and the flow of people. The Center Café proposal also seems inconsistent with the USRDC's stated purpose for all the individual projects proposed in the draft master plan: "providing passengers with a safer, seamless, efficient and enhanced travel experience." Revised Master Plan for Union Station Plan at 1.

In short, the National Trust is troubled by the sequence that USRC is taking to address and prepare for Union Station's short-term and long-term needs. We strongly encourage USRC to put the discussion of the Center Café proposal on hold until the draft master plan has been finalized, and ideally until a preservation plan in coordination with the master plan has been prepared. Further, we respectfully request a presentation on the overall planning effort for Union Station, including an explanation of the WMATA and Amtrak planning processes.

The Center Café Proposal in the Main Hall

With regards to the specific proposal presented at the June 18th meeting, based upon the limited information available to the National Trust, we consider that the Center Café proposal is not compatible with the character of Union Station's majestic Main Hall. From a historic preservation perspective, and by all accounts, the existing café structure was a design mistake. Removing the existing café structure would go a long way toward restoring the open, monumental character of the historic Main Hall. As originally intended, an open Main Hall would visually connect passengers to the train terminal upon entry to the station, appropriately reinforcing the premier importance of the transportation function (as opposed to retail function) of Union Station.

We also are concerned by the two proposed 750-square-foot holes connecting the Main Hall to the lower level. Although the proposed design would not damage historic fabric per se, it would inappropriately alter the historic character of the space, and – once again – allow a secondary retail function to dominate the impressive public space of the Main Hall. Finally, we agree with the comments made by Thomas Luebke, Secretary of the U.S. Commission of Fine Arts, that the proposed café structure would not be transparent, and that undue emphasis has been placed on the so-called "transparency" of the proposed materials. There is no way to make the proposed café structure invisible. The bottom line is that replacing the current structure with another structure, regardless of the material used, would not correct the design mistake, but instead perpetuate the harm to the Main Hall's historic integrity. Any proposed change to the current configuration of the Main Hall should focus on restoration of the area as an open space.

For these reasons, the National Trust cannot support the current proposal to remove the existing café, only to replace it with a design that is arguably more damaging. Our preference would be to have the current café structure removed and not replaced. We encourage the USRDC to examine alternative design solutions, including dramatically different uses for the center of the Main Hall. Alternatives should include an evaluation of other potential, less damaging access points to the lower level of Union Station. We urge the USRDC to consider alternatives which would restore the Main Hall to its original use as an open, public space serving as the entrance to transportation.

COMMENT

Name: Brian Harner

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Organization: Amtrak

Telephone: 202-906-2708

Comments: 1. Slide number five states: \"Section 106 calls for us to understand when an undertaking may directly or indirectly alter characteristics of a historic property that qualify it for inclusion in the Register. In order to do that, we need to understand the building's history and significance and the character-defining features that convey that history and significance.\" However, the presentation provided very little information relative to this historic context, including:

- a. historic uses of the station -- where was ticketing, baggage handling, waiting area, etc?
- b. a drawing illustrating changes to the station over time, i.e. which parts of the building were built when?
- c. any analysis of the relative importance of various portions of the station and their historic importance: reasons for preservation -- outstanding example of design or style, well-preserved materials, important events, etc.
- d. how the station fits into the history of stations in the U.S., the McMillan Plan, the Columbian Exposition, etc.
- e. which portions of the station have been modified from their original use
- f. are there some spaces and architectural features in the station that are more important than others? For instance, is the main hall more important than the adjoining east and west halls, or vice versa? Or are they equally important?

It is not possible to evaluate the design proposal without a more complete historic preservation analysis

2. Are there supporting documents, drawings, past reports, past preservation plans or submittals that can be referenced/made available? None are mentioned in the presentation.
3. There is a possibility of significant pedestrian congestion under the new center cafe which would be caused by the access to the elevators and stairways. Has a pedestrian flow analysis of the proposal been completed?
4. The proposed design is taller and wider than the existing design, and notwithstanding the extensive use of glass, it appears to have a more substantial visual impact than the existing (this is especially apparent in Slide 43). The glass as shown in the rendering is very transparent, but in reality will likely not appear this clear, and could create more of a visual barrier than the existing structure. What is the purpose of the elevator cylinders being sheared at an angle? Is this a functional requirement or an aesthetic choice? Is extra height being added unnecessarily?
5. Many temporary events and exhibitions are staged in the main hall, as well as parties and balls. Has the use of the structure been analyzed relative to these events?
6. Are the clocks in the main hall readily visible from all vantage points? These were not illustrated in the drawings.
7. Wayfinding for Amtrak and other transit passengers is a critical issue. The proposal does not indicate inclusion of the full range of Amtrak signage that is critical to Amtrak operations. Existing Amtrak signage is

left out of many of the illustrations -- Amtrak assumes that removing existing signage is not proposed, but if it is, this should be indicated.

8. Will the new hard surfaces have negative impacts on acoustics in the main hall? Will the open lower level have an acoustic impact on the main hall?

9. What alternatives were analyzed? Lower level access with no upper cafe? Moving lower level access to the west hall? moving lower level access to the ends of the main hall instead of the center? Any others?

COMMENT

On behalf of the DC Preservation League (DCPL), Washington's only citywide nonprofit historic preservation organization, I am writing to share with you our comments and concerns on the proposed alteration to the Great Hall at Union Station. In particular, this letter focuses on the proposed alternative presented at the June 18, 2010 consulting parties meeting that was carried out pursuant to Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. 470).

There is no question that Union Station, designed by renowned architect Daniel Burnham and built between 1903 and 1908, is a local and national treasure. The Station is an individual landmark, listed in the National Register of Historic Places and the DC Inventory of Historic Sites and is an historic gateway to the nation's capital, impressing visitors since they first arrived by train in 1907. DCPL feels strongly about the historic and architectural significance of this site, so much so, that we believe it merits designation as a National Historic Landmark.

DCPL is greatly dismayed by the proposed renovations that include major changes diminishing the historic character of the Great Hall. The structure of the Center Café is the unfortunate result of the previous rehabilitation and should be removed, not elevated and reinforced by elevator towers. No amount of transparent material will eliminate its intrusive impact on this monumental space. While the flooring may not be historic material, having been replaced previously, the floor itself is a critical historic feature of the space.

The argument that the hole cut in the floor in the 1970's establishes precedent permitting a new cut is without merit. This feature was subsequently removed as part of the 1986-1988 rehabilitation of the Great Hall when the current conditions were created. That rehabilitation of the Great Hall recognized the inappropriateness of "the pit," the associated removal of historic building fabric, and the alteration of the station's primary public space. It is the consensus of both critics and the preservation community that the earlier hole in the floor was a failure in terms of aesthetics and preservation. Neither the goals of the retail program for a secondary space nor the fact that the floor is replacement material justify its removal. This recognized mistake must not be repeated.

The proposed changes to the center of the waiting room are based solely on the Union Station Redevelopment Corporation's (USRC) decisions related to managerial, programmatic and real estate concerns, and demonstrate no consideration for the integrity of this historically significant space. Under section 110 of NHPA, agencies (in this case USRC on behalf of the Federal Railroads Administration) are required to minimize harm to a site to the maximum extent possible. A 1300 square foot hole in the center of the Great Hall, glass elevator towers or a raised café do not minimize harm. Moreover, it is not clear that stated goal of improving pedestrian flow could not be more effectively accomplished in less damaging ways.

DCPL encourages USRC to reconsider their proposed plan and to be more creative in their approaches to improving the visitor experience in this important historic context. Concerns about pedestrian flow may be addressed through effective way finding tools, the removal of the center café and other non-intrusive measures. Much could be learned by reconsidering the building's original functional design.

DCPL is further concerned about the lack of cooperative planning between the project's multiple stakeholders. Efforts to build office towers, remove parking garages, incorporate underground parking, improve the visitor experience and tenant spaces, add retail, and accommodate special events, etc., should all be coordinated. A piecemeal approach is both inefficient and more potentially damaging to the integrity of the Station. A comprehensive plan (including a preservation plan) for Union Station and grounds can provide involved parties with an understanding of each other's goals and the consulting parties with an overview of the future needs of the complex.

DCPL looks forward to an ongoing dialogue regarding this important historic resource and we thank you for the opportunity to comment.

Sincerely, Rebecca
Miller Executive
Director
DC Preservation League

COMMENT

Milford Wayne Donaldson
Chairman

Susan S. Barnes
Vice Chairman

John M. Fowler
Executive Director



July 15, 2010

The Honorable Joseph C. Szabo
Administrator
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

*Ref: Proposed Renovations at Union Station
Washington, District of Columbia*

Dear Mr. Szabo:

The Advisory Council on Historic Preservation (ACHP) will participate in consultation to consider the effects of proposed renovations at Union Station in Washington, DC. Our decision to participate in this consultation is based on the *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, contained within our regulations. The criteria are met for this undertaking because it has the potential to have substantial effects on an important historic property and will likely have widespread public interest because of its prominent location in the District of Columbia.

Section 800.6(a)(1)(iii) of our regulations requires that we notify you, as the head of the agency, of our decision to participate in consultation. By copy of this letter, we are also notifying William R. Fashouer, Assistant Chief Counsel, of this decision.

Our participation in this consultation will be handled by Blythe Semmer, who can be reached at (202) 606-8552 or via email at bsemmer@achp.gov. We look forward to working with your agency and other consulting parties to consider alternatives to avoid, minimize, or mitigate adverse effects from this undertaking.

Sincerely,

John M. Fowler
Executive Director

COMMENT

Name: James Lilly

Email: president@dcnrhs.org

Organization: Washington, D.C. Chapter NRHS

Telephone: 4432532956

Comments: Union Station Section 106 Consultation Initial Consultation Comments

Dear Union Station Redevelopment Corporation:

Thank you for the opportunity to participate in the Union Station Section 106 process for the alterations to Union Station's Main Hall. With this letter, we are sending our comments in regards to the Proposed Design Scheme presented at the Initial Consultation Meeting on June 18, 2010, which was attended by our Vice President Kevin Tankersley and Director Karl Scheetz. Our comments concern three main areas:

1. Comprehensive, Unified Station Complex Signage and Wayfinding System

Union Station is a very large, busy and confusing place. Many visitors (and sometimes even those of us who are quite familiar with the place) have difficulty in navigating the station complex. The current signage system in the station complex is disjointed and variable and consists of at least three different systems-- the Amtrak signs, the retail signs and the historic signs-- which are not applied throughout the complex. The signs in the Main Hall of the station, while very historically accurate, are not consistent with modern norms/expectations for major transportation centers, and do not meet the needs of the today\'s traveling public. Even with the view corridor opened up beneath the center cafe, the visibility through the doors of the main hall to the Amtrak ticket counter will be poor. As evidence of this, in slide #34 of the June 18th presentation which shows the current existing condition, the sign "TRAINS TICKETS" is clearly in sight through the Center Cafe, yet it is all but invisible and unreadable (this would also suggest that raising the level of the Center Cafe floor is not necessary to accomplish getting clear sightlines through to the doors leading through to the Concourse/Amtrak Ticket Counters area).

The response was made to a comment during the presentation that the signage and wayfinding system would be addressed by the station master plan; however, the current master plan statement does little to describe what is planned. We consider well-designed signs, fitting within the historic context, while meeting modern cultural expectations to be a critical component to the success of this project, especially in improving pedestrian traffic flow. Design consideration needs to be given to incorporating them into this proposed design as part of an overall system to lead visitors through the station, beyond simply replicating the existing departures board and other currently inadequate signage.

2. Main Hall Spatial

Volume/Minimum Height Intrusion

The Great Hall of historic 'Head House' is the most impressive place in the station complex. Throughout its history, it is the place most remembered by station visitors. While it is filled with rich architectural detail, the most striking and memorable part of the Main Hall is the great, uninterrupted volume of interior space beneath the arch of the ceiling. This is viewed from eye level from the perspective of the visitor standing on the floor. The current condition allows views across the Main Hall from end to end of this volume. As shown

in the presentation slide #40, the current Center Cafe structure is lower than the base of the arch, and therefore clearly subordinate to the space. We are very much concerned that raising the Center Cafe deck to a higher elevation with all the accoutrements of railings and furnishings projecting above the room's cornice line, and bringing elevator towers up into the space will significantly diminish the impressive sense of this grand space. Direct views of the ends of the arched space will clearly be substantially blocked, as seen in presentation slide #42.

Providing visual and physical access to the lower level will no doubt help with the economic success and provide some relief to the currently very busy main access ways to the lower level food court and retail. There is a great deal of study presented in the drawings of the design and the sightlines/fields of view for this access to the lower level spaces, all of which appear to be well designed.

In the historic condition of this space, as the main waiting room for the train station, there was no overhead structure, allowing visitors to experience the grand scale of the vaulted room without obstruction from any position within it. The experience of the space is critically important to the original architectural intent.

3. Glass Structure Not In Character With Historic Station Architecture

The design proposed plans to incorporate to the extent possible, transparent glass structures. We find this structure to not be in character with the Beaux-Arts style of Washington Union Station. We are also very concerned that the Center Cafe and elevators will not be as transparent as suggested in the drawings. There still needs to be significant structural support that cannot be made from glass.

The 1980's renovation of the station provides immediately accessible examples of the level of excellent adaptive design solutions that fit within the historic context of the station's original design. In many architectural designs today for additions/alterations to historic structures, the easy answer is to provide something that is simply not of the historic structures design, so it is clear that it is an alteration or addition. In this particular case, we feel that far greater effort needs to be applied in this design, providing a solution that properly fits the station and is worthy of becoming a part of this architectural masterpiece.

Since opening in 1907, the station has had a long history; that history has not been without changes. certainly the station would still be evolving in some ways even if it were still owned by Washington Terminal Company. We understand that a structure such as Union Station naturally adapts over time to fit in a manner keeping with its original purpose and mindful of economic need. We also understand and support the need to improve the Union Station experience. As users of Washington Union Station primarily through our own rail trips program, we are very much concerned about its continued success as a travel centered place.

In closing, we recognize that what happens today becomes tomorrow's history. We have endeavored to provide thoughtful comments in hopes that the ultimate design solution will be respectful of Washington Union Station's significant history, both in design and rail transportation, as a gateway to our nation's capital.

Sincerely,

James W. (Jim) Lilly, President
Washington, D.C. Chapter NRHS

COMMENT

Name: Charles W McMillion

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Comments: Slide 38 indicates a non-historic floor area and floor openings far larger than seem necessary or appropriate to provide more access to the lower fast food area while preserving historic character and the intermodal transport focus. Surely slide 42 shows the entire proposed project with slide 43 added only to illustrate the contrast with the current unfortunate wooden structure.

COMMENT

Name: Brian Soly Email:

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Organization: Resident

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Comments: The Main Hall was designed as a grand open space to wander and feel as if you were inside something larger than man. Understanding that the existing space requires modern infrastructure to remain relevant, I think permanent elevator equipment and a large overhead floor platform further denigrate height, breadth, and design of the main hall's barrel vault. The space already has so much shopping mall clutter on the periphery; this design overtakes the center of the room with larger, more obtrusive clutter. The "transparent" nature of the design almost never looks nearly as ephemeral as the renderings. Even the highly detailed, expensive Apple Stores have some weight to them in their built form. This design is nowhere near the design level of the Apple Stores. Georgetown, as you know, rejected several Apple Store designs. Hardware, electrical and mechanical systems, light reflections, and structure will be highly noticeable. The space deserves much more than a mess of equipment. The space begs for something sculptural, if nothing at all. This design that we are currently reviewing is not sculptural, it's a practical design using a sculptural kit of parts that will create distracting clutter inside a grand space. Please develop more studies. To build this design in the center of the Main Hall would be an embarrassing disgrace to both present and past Washingtonians.