

Union Station Main Hall Section 106
Consulting Party Meeting July 20, 2011 Presentation

Questions & Comments Following July 20, 2011 Presentation

1. **Steve Strauss, District Department of Transportation (DDOT):**
 - a. What is the current amount of commercial square feet open in the lower level?
 - b. What is the amount of commercial square feet that will be opened when the former theater is tenanted?
 - c. Are there any counts of the number of people entering and leaving the lower level today via all entry/exit points? I think it would be beneficial to have some of this information.

2. **K. Jackson**
 - a. Cutting into the main hall is a terrible idea! There already is escalator and stairway access to the food court just beyond it. It seems a waste of money to duplicate what's already there. If the vendors are concerned about visibility, there must be another way to direct visitors to the food court.
After all the effort, time and money spent on bringing back this building in the '80s, this seems like a tremendously wasteful idea and would ruin a magnificent space.

3. **Rosina Memolo**
 - a. I don't think chopping up the main hall is what Union Station needs. The main hall is really beautiful and impressive the way it is. I think the main thing missing from Union Station is a THEATER or some sort of destination. Not new escalators, elevators etc. I agree, it can be a pain, to enter and walk through, but for the visuals, it's worth the extra walk!

4. **Michael Latiff, Amtrak**

Comments: Below are the official Amtrak comments compiled from Amtrak personnel.

 - a. Amtrak concurs with the consulting party that mentioned that a passenger flow study be done. We also believe, as discussed during the internal Amtrak – Ashkenazy – USRC meetings that a comprehensive passenger flow study be done. It was brought up before in meetings and we are firm in our resolution that it should be done in order to determine that our passengers (and now the intercity bus passengers) can quickly and without hindrance (which conforms to our lease agreement) get through the main hall to their trains (or to the busses in the parking garage). We also would like that this be done before any work begins.
 - b. Amtrak still believes that the vertical signage may provide a better solution than the horizontal, as we believe it gives a better perception of space.
 - c. To build on a comment that was made in the meeting, Amtrak can see how some passengers unfamiliar with the station can get confused and mistakenly go down the escalators to what they think may be the way to the trains.

- d. Recommendation: The proximity of the existing escalators and the proposed new escalators should be more carefully examined by a structural engineer for any possible seismic concerns and if anything this should be resolved to eliminate safety concerns.
- e. The Luxury Marketing Units (LMUs) still appear to block sight lines to the Main Hall.
- f. The LMUs can be a potential security concern and Amtrak suggests that a vulnerability study be conducted.
- g. Amtrak believes that signage should assist passengers with wayfinding; however, signage should not be the only source for direction. The building architecture should be as intuitive as possible, with clear and multiple sight lines towards entrances and exits.

5. Erika Young

- a. I disagree with the premise that pedestrian circulation is a problem in the main hall. Residents, local businesses and tourists all seem to be able to find their way to the locations they need. If people are milling about it's partially because they're trying to take in the beauty of the main hall. Also, if you're removing the center cafe because of aesthetic purposes, what happens when one of the escalators breaks? The current escalator to the food court always looks shabby and poorly kept. If that's how the new escalators will look within the year, on top of the yellow barriers used (similar to what WMATA uses for the escalators to the metro), that isn't going to improve the look of the main hall, particularly if it looks in disrepair. Additionally, adding seating to the immediate entry area may not be as inviting as one would think. In addition to tourists and visitors, homeless often use the current benches to rest for extended periods of time. That doesn't seem like the image someone would want to attract clientele, particularly when they first walk in. I'm not sure what the impetus is for this redesign, but it just doesn't seem necessary.

6. The Rev. Stephen C. Washburn, Citizen, Member NARP

- a. The traditional bench seats have back, which are essential for passenger comfort. Flat sitting platforms without seat backs are not acceptable when passengers may have long waits and have stressed their backs with luggage handling. Make the seat backs transparent if need be, but have seat backs!

7. Mr. C.B. Hall

- a. I would consider public money better spent if it went into improving train service per se, rather than a remake of the Union Station main hall. As it stands, Union Station is the most elegant Amtrak station that I've ever seen (and I've been in most of the big ones, at least). What about other, too-often ramshackle, stations in the system? What about building longer platforms in the NEC? There must be better places to put this money, rather than making a very fancy station even fancier. I vote no on the proposal.

Thank you. C.B. Hall
Lopez Island, WA

- b. Further to the comment I just submitted, the NARP weekly hotline, right after its article on the Main Hall project, mentions that a bus terminal has been proposed for Union Station. There's a place to spend the money that would otherwise go into farcifying the Main Hall. Give people a quick, no hassle transfer between trains, the metro, and intercity and local buses. Ensuring the effective movement of travelers in this context is FAR more important than accelerating access to and from retail shops on the lower level.

Yours,
C.B. Hall
Lopez Island, WA

8. Paul Everett Vinson, National Association of Railroad Passengers

- a. My only apprehension with this design is with the glass stairs and landings. Voyeurs would look up the skirts and dresses of the women and girls on those transparent stairs and landings. A new county courthouse with a similar stairway in its lobby has to have a guard posted to turn away women in dresses and skirts from using it!

9. Rafi Guroian

- a. I strongly urge you to reconsider cutting into the floor of the Main Hall. Access to the lower level is adequate via the main stairways and escalators, and every effort to preserve the floor of the main hall should be made before taking such a drastic measure.

10. Dan Snodderly

- a. I would strongly urge NOT cutting into the floor of this magnificent space. Remember the disaster that was the National Visitors Center. Better signage would seem to be the answer.

11. Bob Dardano

- a. At first, I was completely opposed to the idea of cutting into the floor of the main hall and constructing stairwells down to the lower level. It just seemed insane. However, if done according to this proposed plan, with the stairwells part of and mostly underneath a newly designed cafe, it might look all right. I never liked the current Center Cafe; it's ugly and blocks the expansive view of the main hall. (The long expansive view inside the main hall of Grand Central Station is an iconic image for most people. Union Station should provide the same sense of space.) A new cafe would also block the view. Personally, I wouldn't have a cafe there at all, but if there is going to be one it should be new, modern and attractive. I remain unsure what there is on the lower level for these new stairwells to connect to. The food court? Is that necessary? Or is there some redevelopment of the old movie theater space that is part of this plan? Thanks for this chance to comment.

12. K. White

- a. I am a designer at local DC architecture firm, and I am certainly no purist when it comes to altering historic buildings, but this new design does nothing to compliment the grandeur and elegance of Union Station. The new design appears to be a glassier version of the existing café, which is a good idea in theory. However, the current café is mostly innocuous because it functions like a piece of furniture. Despite its transparency, the new design is much more intrusive for two reasons:
First, the new cafe, is more distracting than the previous perhaps because of the tall, post-modern, lipstick-shaped, elevator shafts, or the fact that the new café is higher than before. Either way, it blocks too much of your view of the room. If the existing two-story cafe blocks the view corridor and interrupts the circulation to the retail areas, then get rid of it, and leave the space open with small kiosks as it originally was.
Second, breaking the floor plane destroys the continuity and expansiveness of the space, which is significant to its character. Would you dig a hole through the middle of your living room to your basement to remind you that it was there? As far as circulation goes, if they need better accessibility via elevators, a glass elevator could be very nice, but it should be added discreetly in a corner of the hall or in the mall area, and it should not go above the ground floor if it is in the main hall.
If Union Station needs more revenue, they need to continue to add strong retail that will attract both tourists and locals. Despite being a Capitol Hill resident, the only reason I go to Union Station right now is to catch a bus or to eat at Chipotle. Perhaps a theater or concert venue in the old theater space might also draw more visitors.
Union Station is one of the most beautiful rooms in the country, let's not start punching holes in the floor if there other ways of addressing the building's weaknesses.

13. Maurice Walters, Capitol Hill Restoration Society

- a. The proposed openings in the main hall are not a good idea, and eliminating the center café is an improvement. The main hall should have the ability to be experienced in all of its grandeur, and not to have visual and physical obstructions in the middle.

I understand their need to bring people to all of the “dark space” under the main hall where the theaters used to be, but I think possibly looking at something like Grand Central Station might suggest better solutions. There they have significant food offerings under the grand hall, but the circulation down to these spaces is accomplished in stairs and ramps that are situated off of the great space.

At Union Station this might be accomplished by converting some of the bays of “poche” space (spaces off of the main spaces in the east and west halls, currently occupied by retail) to vertical circulation down to the lower level. The West Hall would be particularly good for this as it has much more through traffic. Also, possibly more direct connections to metro and arriving trains at the lower level would help to activate the new lower level retail.

14. Nancy Metzger, Chair, Historic Preservation Committee

- a. Dear Mr. Ball:

The Capitol Hill Restoration Society (CHRS) appreciates this opportunity to comment on the July 20, 2011 proposal for alterations to the Main Hall of Union Station. As we noted in our comments last year, Union Station is one of the great buildings in Washington, not only for its setting and architecture, which are landmarked, but also for the magnificent interior spaces of the Main, East, and West Halls which so dramatically convey the early twentieth-century experience of travel. Although the proposed alterations have been modified since the June 2010 meeting, many of our concerns remain.

- b. **Comprehensive Planning for Union Station**

Union Station is being developed as a first-rate intermodal transportation center, which is a goal that CHRS supports. Although we are told that increasing numbers of travelers will be arriving at the station by rail, subway, bus, trolley, car, bicycle, and foot, we have received minimal information about how these travelers will be accommodated as they arrive at the station at various locations and proceed through the station to other destinations.

Even the Draft Master Plan, which states that there are nine Union Station “projects that can proceed with relatively little interaction or dependency on other projects,” raises many questions. How does one evaluate in any meaningful way the goal of “integrat[ing] existing shopping areas into rail concourse”? Does “historic station retail improvements,” another worthy goal, require introducing holes in the floor of the Main Hall that would impede traveler progress or are there less intrusive means of improving retail? Each of the nine projects has the potential to greatly impact the other projects and the physical characteristics of the entire station. We urge that the USRC and other stakeholders turn their attention

to this aspect of planning before embarking on projects that would significantly alter the Main Hall of Union Station.

c. Preservation Plan

Last year at the consultation meeting, the USRC project team readily agreed to the request by DC's State Historic Preservation Officer David Maloney that a preservation plan be prepared for this iconic building. We were very surprised and disappointed to learn in July 2011 that such a plan was not part of the 2011 proposal but rather is listed as a potential mitigation measure. We strongly recommend that the Preservation Plan be developed as part of the Section 106 consultation, with recommendations and feedback from the consulting parties. The intent of SHPO Maloney's request was for the Preservation Plan to inform and guide planning and consultation for this project as well as future projects, rather than for it to be developed only at a later time. In any event, it seems to us that consideration of mitigation measures at this point is premature, given that all possible means of avoiding and/or minimizing adverse effect have not yet been comprehensively explored and considered with consulting parties. Neither, to our knowledge, has a formal finding of adverse effect been rendered, which per the Section 106 regulations at 36 CFR Part 800 is intended to precede continued consultation to address mitigation of adverse effects. Per 800.6 (a)(3), this continued consultation should involve the public.

d. Current Proposals

Representatives of the Capitol Hill Restoration Society were heartened at the July Consulting Parties meeting to see that the Center Café/circulation module that was the hallmark of the July 2010 proposal had been modified, with the mezzanine café and associated elevator eliminated from consideration. As we noted in our earlier comments, the mezzanine-level café and elevator/stairs would have been a major intrusion into the historic main hall of Union Station and a visual distraction. However, we still have significant concerns about the removal of two 17' x 31' oblong sections of the Main Hall floor and associated structures, which would introduce significant obstacles in pedestrian circulation within the Station and change the historic nature and experience of the Main Hall. This would be a destructive and obtrusive alteration, introducing visual elements that would diminish the integrity of its significant historic features and volume. Given the fact that the number of travelers using Union Station is expected to increase substantially in coming years, it seems, at the very least, counterproductive and short-sighted to introduce new obstacles into the Main Hall. Improved retail considerations are important, but this proposal seems to be all about lower-level retail, since it still presents two major obstacles to people traversing the main hall.

Since CHRS has reservations about proceeding with any alterations without a Master Plan and a Preservation Plan in place, we will not make extensive comments at this time about other important aspects of the proposal, such as signage, freestanding kiosks and seating, and enhanced retail opportunities.

Future Consultation Meetings

Given the historic nature of Union Station and its importance in the life of the region, the city, and our neighborhood , we urge that the USRC give greater thought to how to notify the public of this ongoing consultation and provide opportunities for members of the public to comment. Announcements on the web site are really not sufficient, as it is likely that few people would lurk on the USRC web site, waiting for updates, and few people would even know the website exists. The small signs placed in the Station itself were a step in the right direction but were easy to overlook, considering the press of people moving through. Ads in local papers or releases to a variety of news media, including bloggers who focus on related topics, might reach other portions of the public. There needs to be sufficient time for the public to learn of these proposals and to comment, and to this end we suggest USRC extend the comment period while significantly increasing its public outreach.

Thank you for this opportunity to provide comments and for considering the views of the Capitol Hill Restoration Society. We look forward to continuing to participate as a consulting party in the ongoing Section 106 review for this project.

Sincerely,
Nancy Metzger
Chair, Historic Preservation Committee

September 7, 2011

Mr. David Ball
President
Union Station Redevelopment Corporation
Ten G Street, N.E., Suite 504
Washington, D.C. 20002

NATIONAL
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Southern
FIELD OFFICE

Dear Mr. Ball:

The National Trust for Historic Preservation appreciates the opportunity to participate in the ongoing Section 106 review regarding proposed changes to the iconic Union Station building in Washington, DC, which, as we have argued previously, likely has the potential to be designated a National Historic Landmark. Therefore, special care must be taken to examine any proposed alterations to the station and to avoid harmful impacts to the historic structure and character of the place. Although the proposed changes to the Main Hall have improved since the June 18, 2010 meeting, many of our original concerns about the project remain unresolved.

Comprehensive Planning for Union Station

As we have previously stated, the National Trust fully supports the goal of the Union Station Redevelopment Corporation (USRC) in making Union Station a first-rate intermodal transportation center. We note, however, that although the master plan will involve major transportation upgrades to account for ridership increases projected by WMATA and Amtrak, the Section 106 review has incorporated little of these transit goals and changes into planning for the historic Main Hall. Instead, the proposed changes to the Main Hall continue to focus almost exclusively on retail concerns. In our view, given Union Station's purpose and primary character as a train station and public place, transit and the public experience should be paramount when considering treatment of the Main Hall. For this reason, we request much more detailed information about the overall proposed changes to the station, so that we may better understand the Main Hall's relationship to these primary functions.

As the National Trust noted in the July 20, 2011 meeting, one key element of this relationship is circulation. We appreciate the limited circulation information that has been provided and think it must be further developed to take into account projected ridership and proposed physical changes to the transportation infrastructure. The Main Hall is the central circulation space within Union Station and should be updated as necessary to respond, first and foremost, to the station's transportation function. In our view, much more analysis must be done and presented to the Section 106 consulting parties before USRC can responsibly consider changes - particularly major alterations such as penetrating the floor - in the Main Hall.

Preservation Planning for Union Station

As the National Trust, the DC Preservation League, the DC Historic Preservation Office and others have previously noted, the USRC should create a historic preservation plan as an early step in the master planning process for Union Station. This plan would help inform and guide any proposed alterations to the Main Hall, as well as safeguard the station's historic character through the USRC master planning process.

Currently, regrettably, a preservation plan is listed among mitigation measures for proposed alterations to the Main Hall. We cannot emphasize strongly enough that a preservation plan must be part of the initial planning for this iconic historic structure.

The July 20, 2011 Design Proposal

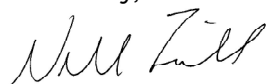
We applaud the removal of the Center Café and any similar concept in the current design proposal, and we agree that the design has been dramatically improved since 2010. However, until the outstanding concerns outlined above (*i.e.*, the relationship of the Main Hall to the overall master planning goals for transportation and circulation, as well as preservation planning for Union Station) are resolved, the National Trust cannot adequately comment on proposed changes to the Main Hall. Fundamentally, we believe that the current proposal is premature at best, and, at worst, could be unnecessarily harmful to the historic character of the place.

As the National Trust and many other consulting parties have noted, the two proposed floor penetrations are especially problematic. Without a preservation plan and more information about the relationship of the Main Hall to the other aspects of the master plan, particularly the transit portion of the master plan, we cannot meaningfully consider such a dramatic and harmful change to the station's premier public space.

As one illustration of this problem, we note that a huge opening already exists in the retail area directly beyond the Main Hall, and that this opening provides vertical circulation and also obstructs the flow of pedestrians between the Main Hall and the train platforms. It remains unclear 1) how this retail area relates to the Main Hall and the projected transit-related changes in the master plan; 2) whether or not additional vertical circulation for retail would be necessary, given the current circulation in this area; and 3) how additional openings to the lower level could support, and not detract from, a goal of improved circulation between the Main Hall entrances to the station and the train platforms. Until questions such as these are discussed and resolved, any irreversible changes in the historic Main Hall, such as floor penetrations, should not be included in the proposed design.

Thank you for considering the views of the National Trust for Historic Preservation. We look forward to continuing to participate as a consulting party in the Section 106 review for this project.

Sincerely,



Nell Ziehl
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*The mission of the DC Preservation League
is to preserve, protect, and enhance the historic
and built environment of Washington, DC,
through advocacy and education.*

September 7, 2011

Mr. David Ball
Union Station Redevelopment Corporation
10 G Street, NW, Suite 504
Washington, DC 20002

Dear Mr. Ball:

On behalf of the DC Preservation League (DCPL), I am writing to share with you our comments and concerns on the proposed alteration to the Great Hall at Union Station, an individual landmark listed in the DC Inventory of Historic Sites, and in the National Register of Historic Places. In particular, this letter focuses on the proposed alternative presented at the July 20, 2011 consulting parties meeting that was conducted pursuant to Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. 470).

DCPL was pleased to see improvements to the proposal, most notably the removal of the Center Café that has long compromised the grandness of the Great Hall. The decision to design smaller intrusions in the marble floor is a step in the right direction. However, we are still not convinced that this is the right course of action.

Statements made at the meeting by a representative of Ashkenazy Acquisition Corporation, the retail developer for the station implied the need to provide pedestrian access from the trains to the future retail space below the Great Hall. If the goal of this new retail strategy is to draw travelers from their trains into these newly developed spaces, it would seem that a way-finding plan would be necessary as well as escalator improvements from the train concourse, not from the Great Hall. As mentioned at the July 20th meeting, DCPL encourages the Union Station Redevelopment Corporation (USRC) to study visitor circulation throughout the station. This study should answer questions regarding whether or not vertical circulation linking the Great Hall with the new retail space is appropriate or necessary.

In addition to the vertical circulation issue, DCPL finds the insertion of the retail pods throughout the Great Hall to impede pedestrian flow, and are visually intrusive to both way-finding aides and the experience of the historic space. If the revenue projected by developing the retail space below the Great Hall is sufficient, we question whether it is necessary to clutter up the Great Hall with additional retail pods.

DCPL has significant concerns about the tenor of the most recent meeting in that immediately following the presentation of the latest alternative, the consultants initiated a discussion of mitigation efforts, as though a solution had been reached. The Section 106 process requires first *avoidance of impacts* and then *minimization of impacts* on historic resources. Neither USRC nor its consultants have provided any documentation that stipulates that avoidance of impacts is unachievable. At this time, there are still too many unknown impacts and unresolved issues for consulting parties to be addressing the mitigation of this proposal.

Finally, we continue to be concerned about the lack of cooperative planning between the station's multiple stakeholders. As mentioned in our comments from July 23, 2010, a comprehensive plan (including a preservation plan) for Union Station and grounds will provide the involved parties with an understanding of each other's goals and the consulting parties with an overview of the future needs of the complex. The opportunity to create and review a comprehensive plan will be lost if the process continues to move forward in an ad hoc manner and will inevitably conclude in a mediocre result.

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

Sincerely,

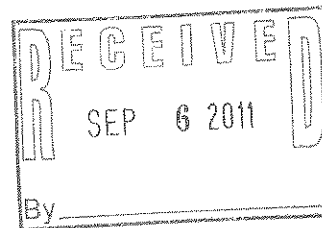
A handwritten signature in black ink that reads "Rebecca A. Miller". The signature is written in a cursive, flowing style.

Rebecca Miller
Executive Director

cc. David Maloney, State Historic Preservation Officer
Louise Brodnitz, Advisory Council on Historic Preservation
Jennifer Hirsch, National Capital Planning Commission
Thomas Luebke, US Commission of Fine Arts

The Association of the Oldest Inhabitants of The District of Columbia

Established Dec. 7, 1865



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September 1, 2011

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

Dear Mr. Ball:

Last year the AOI of DC opposed the USRC's plans for Union Station's Great Hall. While we believe the revised plans are more in keeping and consistent with Daniel Burnham's design for this historic structure and represent an improvement over the earlier design, we continue to be concerned that these modifications need to be considered within the context of a more comprehensive Preservation Plan for the historic complex.

We continue to 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, and we feel the revised design – even with further refinements and revisions – will complement many of the station's historic features without being intrusive. New York City's Grand Central Station and Philadelphia's 30th Street Station with their art deco and beaux arts design feature escalators, benches and visitor information/vendor kiosks and historic Union Station appears it, too, may benefit from these changes.

As the District's oldest civic organization – founded Dec. 7, 1865 – the Association of the Oldest Inhabitants of the District of Columbia appreciates the fact that the USRC has been responsive to the preservation community, has modified the proposed changes to the main hall of Union Station and continues to seek refinements to the plan.

Thank you for the opportunity to comment.

A handwritten signature in cursive script that reads "William N. Brown".

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.

WASHINGTON D. C. CHAPTER
NATIONAL RAILWAY HISTORICAL SOCIETY



ADDRESS REPLY TO

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September 7, 2011

Union Station Redevelopment Corporation
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Washington, DC 20002

RE: Union Station Section 106 Consultation
July 20 Consulting Party Meeting Comments

Dear Union Station Redevelopment Corporation:

Thank you for the continued 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 Preferred Design Alternative presented at the Consulting Parties Meeting on July 20, 2011, which was attended by our Vice President Kevin Tankersley.

The Preferred Design Alternative presented at that meeting shows the application of considerable study and design effort which has evolved the proposed design into a solution that comfortably fits Daniel Burnham's grand Main Hall. While we feel there is still some polishing required to perfect the smaller design details of the proposal (which will no doubt happen as the design is finalized), overall, we feel this design proposal is significantly improved over the previous one presented a year ago, and, respects the overall historic architectural aesthetic of Union Station's Main Hall, while accommodating an evolving building complex meeting today's needs.

We wish to offer comments in two areas of concern:

1. Comprehensive, Unified Station Complex Signage and Wayfinding System

In our earlier comment letter, we commented on the need for a Comprehensive Signage and Wayfinding system in the Union Station building complex. The signs presented in the Preferred Design Alternative appear to only address very limited retail/commercial development needs, and do not appear to comprehensively address wayfinding needs for all users of the Station complex. We continue to feel that this is a very critical aspect of the evolution of Union Station as the number of visitors and users grows each day. There is signage in the station complex-- at least three different systems-- the Amtrak signs, mostly located in the Train Concourse/Waiting area, the retail signs in the front and middle portions of the complex, and the historic signs in the Main Hall. None of these systems are consistently applied throughout the complex in a manner that is consistent with modern norms/expectations for major transportation centers, and do not meet the needs of the today's traveling public. We consider a comprehensive system of well designed signs, fitting within the historic context, while meeting modern cultural expectations and applied consistently throughout all of Union Station to be a critical component to the success of this project.

As an aside to this, the newly installed Amtrak Arrivals/Departures Board, which is proposed to simply be moved, does not fit well within any of the existing sign systems; what's more, its proportions do not relate at all to the architectural design of the Main Hall space in which it is to be located. The design of this particular sign as it will be a prominent feature of the Main Hall needs considerable attention.

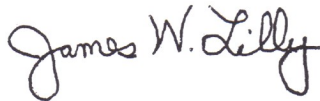
2. Cultural Resource / Heritage Awareness of Union Station

The Section 106 Review is intended to provide an opportunity to assess the status of a heritage resource. It has been nearly 25 years since the renovation of the Main Hall as part of the reconstruction of Union Station. With each modification to this grand structure and the transition of generations, the shared cultural understanding of what Union Station was and why it is a significant place becomes diminished. DCNRHS would suggest that USRC consider with the reconfiguration of the Main Hall, the incorporation a series of "limited museum exhibits" as suggested in the original 1985 MOU. These exhibits would help to explain why the station is a special place, and deserves our support.

The exhibit elements might include case exhibits of material culture (Washington Terminal artifacts), two-dimensional interpretive panels, historical markers and plaques, special exhibits on World Wars I and II describing the roles the Station served, presentations of timetables and ephemera illustrating twentieth century train travel, and similar professional grade museum elements. There are still men and women alive who could share oral histories and vivid memories of Washington Terminal and Union Station reaching back to the 1930s. At the very least, USRC might collaborate in the presentation of an Internet resource documenting the history and heritage of the Union Station site.

Since opening in 1908, Union Station has had a long history that has not been without change. We understand that a structure such as Union Station has to adapt to economic need and continue to be a successful, vital place. We also understand and support the need to improve the Union Station experience. As a historically significant place, we appreciate your care and concern with creating an ultimate design solution that is respectful of Washington Union Station's significant history, both in architectural design and rail transportation.

Sincerely,

A handwritten signature in black ink that reads "James W. Lilly". The signature is written in a cursive, flowing style.

James W. Lilly
President

The Committee of 100 on the Federal City



www.committeef100.net

September 7, 2011

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Union Station Redevelopment Corporation
10 G Street, N.E., Suite 504
Washington, D.C. 20002

Dear Mr. Ball,

The Committee of 100 on the Federal City appreciates the opportunity to comment, as part of the Section 106 review, on the July 20, 2011, proposal for alterations to the Main Hall at Union Station. As the District of Columbia's leading not-for-profit planning organization, the Committee has dedicated itself for nearly 90 years to protecting the values our city has inherited from the L'Enfant Plan and the McMillan Commission while incorporating the special challenges and needs of modern development in our nation's capital. Our goal is to improve the quality of life for visitors and residents alike.

Participants in the 106 review all recognize that Union Station is exceptionally significant both as the work of a master architect and as a center of economic and social activity in Washington for more than a century. Any alterations to it, therefore, should be considered in light of its enduring role to both the city and the nation. Below are our comments, outlined in three subject areas: design, comprehensive planning, and timing.

Improvement in and Problems with the Proposed Design

The Committee of 100 finds the new submission for the Main Hall an improvement over the one of a year ago because of its elimination of the current center café and its withdrawal of the steel and glass structure that required massive cuts in the floor. Removing the current obstruction will bring the Main Hall closer to the monumental, inspiring space that Daniel Burnham and his chief designer Peirce Anderson intended.

This change will also support the building's primary purpose: transportation. The station's 2010 master plan states that Union Station should remain an intermodal transportation hub and, further, that this function will increase dramatically in the near future. Removing the café will make it 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.

Unfortunately, while it does contain improvements, the latest proposal for the Main Hall ignores both the station's history and its master plan by heavily emphasizing retail sales at the expense of its transportation function. While the Committee of 100 applauds the architects for reducing the size of proposed holes in the floor of the Main Hall, it is disappointing that the new cuts are intended to provide access to retail space already accessible by stairs and escalators only a few feet away. The presentation refers to similar openings at Philadelphia's 30th Street Station, but the comparison is inappropriate. At 30th Street, such openings were deliberately placed from the start to support the building's primary function by providing access to the train tracks, not duplicating existing access to shopping.

The Continued Failure to Utilize a Comprehensive Plan

The Committee of 100 believes that it would be precipitous to comment more extensively on the current design alternatives because they are not placed in a comprehensive context. The proposed alteration to the Main Hall is just one of many current plans with the potential to have an enormous impact on Union Station. Both Amtrak and Metro predict significant growth in their traffic in the coming decades, increases that will demand larger facilities. The H Street streetcar still needs a termination point at the station. Intercity buses may be moved into the garage. The Union Station North project will bring thousands of new people into the area each day, and other nearby development will cause similar changes.

Each of these projects is complicated in and of itself. Together, they cry out for a comprehensive planning process, a need USRC has already acknowledged. Not only did it develop a Master Plan for Union Station in 2010, but noted in that document, "the long term success of the Station depends upon proper sequencing and coordination." In their 2010 comments, multiple stakeholders emphasized that a comprehensive approach is imperative.

Now, however, USRC is failing to follow the approach that all parties have agreed is best. The Master Plan has not been revised since June 2010, with a particularly noticeable shortage of current information about Union Station North, even though that project has advanced significantly over the last year. Regardless of its technical or legal responsibilities, USRC has an obligation to demonstrate how its current proposal fits within an updated Master Plan. 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.

This failure to produce a comprehensive plan also makes it premature to discuss mitigation measures, but it is already clear that the steps suggested in the July 2011 are either symbolic or insufficient. 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. Providing a way-finding program and removing planters are simply logical actions that would make the Main Hall function better. They are not *mitigation*—that is, creative compensations for significant features that would be lost if the current proposal was enacted. Most disingenuous is the proposal to consider a preservation plan as a mitigation measure when, in fact, the DC SHPO requested such a plan more than a year ago and it has yet to be executed.

The Severe Limitations of the Current Review Process

The Union Station Redevelopment Corporation (USRC) has proposed a review process so compressed that it will likely sacrifice thoughtful, creative outcomes for the sake of expediency. The Committee of 100 believes that the

scale of the proposed changes demand a process that gives all stakeholders—not just the dozen or so consulting parties but also the millions of users—the opportunity to collaborate in ensuring that the station retains the iconic characteristics that contribute to its significance. The current timeline makes such cooperation highly unlikely.

The Committee of 100 has identified two major problems with the review process as outlined by USRC at the July 2011 meeting. First is the diminution of opportunities to draw on ideas from the public. USRC announced in 2010 that the review would include four major groups of participants:

- The federal agencies carrying out the undertaking;
- The Advisory Council on Historic Preservation;
- Those who have been granted consulting party status, i.e the District of Columbia State Historic Preservation Office, local government, and others with legal, economic, or preservation interests; and
- The public.

In reality, USRC has shown very little interest in hearing from the public. Its July presentation contained no strategy for outreach beyond the consulting parties. Even after representatives of those parties noted this deficiency, USRC's efforts to solicit input remained minimal. It posted a solitary sign in the building asking for comments from train passengers; its website offers no obvious way to give input; and there have been few requests for the public's ideas on listservs and other electronic forums. The Committee of 100 recommends that 1) a questionnaire be distributed to visitors to Union Station—both commuters and tourists—to determine their interests; 2) the USRC website be augmented to encourage public input; and 3) USRC reach out through community-based organizations to gather ideas.

The second troubling aspect of the 106 review process favored by USRC is its schedule. After a delay of more than a year in responding to the initial comments of the consulting parties, USRC has proposed compressing the rest of the review process into a few months, holding its second consultation meeting in July and completing this crucial work by December. Five months are insufficient for meaningful input, especially from interested parties wishing to build better ideas from one another's responses.

In conclusion, the Committee of 100 is encouraged by the widespread commitment to keeping Union Station at the center of our community. Proposals for improving use of the Main Hall offer an exceptional opportunity to start a process that will ensure that Union Station will remain not just a landmark building for the next 100 years, but one which functions efficiently, serves a useful purpose, and enriches the experience of commuters, travelers, tourists and residents alike.

We look forward to working with you to reach that goal.

Sincerely,



George Clark
Chair