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LAURA M. RICHARDS, ESQ.

David Ball, President  
Union Station Redevelopment Corporation  
10 G Street, N.E.  
Suite 504  
Washington, DC 20002

23 July 2010

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 21<sup>st</sup> 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*

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

cc: Ray LaHood, Secretary, US Department of Transportation  
Joseph Boardman, President and Chief Executive, Amtrak  
Adrian Fenty, Mayor of Washington, DC  
Richard Sarles, General Manager, Washington Metropolitan Area Transit Authority  
William R. Fashour, Assistant Chief Counsel, Federal Railroad Administration  
John Hill, CEO, Federal City Council  
John Fowler, Executive Director, Advisory Council on Historic Preservation  
David Maloney, DC State Historic Preservation Officer  
Thomas Luebke, Secretary, US Commission of Fine Arts  
Nancy Witherell, Preservation Officer, National Capital Planning Commission  
Rebecca Miller, Executive Director, DC Preservation League  
Rob Niewig, Director & Regional Attorney, National Trust for Historic Preservation