



Government of the District of Columbia
**Advisory Neighborhood
Commission 6C**

March 13, 2017

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

Re: Section 106 Process for Union Station Expansion Project & Proposed Study Area

Dear Ms. Murphy:

On March 8, 2017, at a duly noticed regularly scheduled monthly meeting of ANC 6C, with a quorum of six out of six commissioners and the public present, the current matter came before ANC 6C. The commissioners voted 6-0 to adopt the position set forth below.

Thank you for your email of February 10, 2017 in which you requested ANC 6C's concurrence on two points:

1. *The Proposed Study Area, the geographic area surrounding the proposed project area, is appropriate with the scope of the federal undertaking.*
2. *The historic properties and features within and bordering the Proposed Study Area have been appropriately identified and that the appropriate view sheds are identified.*

This project is of great significant to ANC 6C, and in fact the majority of the Proposed Study Area (PSA) lies within this ANC. The low-scale residential neighborhoods immediately east of the rail corridor will almost certainly be among those most impacted by not only the rail yard construction and expansion, but also by very closely related projects such as the reconstruction of the H Street Bridge, and the Burnham Place air-rights project. We are very concerned by the narrow scope of the current EIS project. Members of our community have previously expressed reservations about the failure to include any information about those projects within the limited scope of this EIS/Section 106 effort. We believe this results in a fundamentally flawed process that will fail to capture the complexity of this project and ultimately diminish the overall plan.

Despite our reservations regarding the scope of this project, we will endeavor to respond to your current request on the above two points.

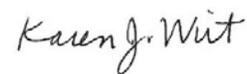
Item 1: We find the Proposed Study Area inadequate to address both the short and long term Area of Potential Effects (APE). In a meeting with USRC on March 2, you stated that the APE would be even more restricted than the PSA. We note that the PSA fails to include areas that undoubtedly would have significant traffic and other impacts under all of the concept development scenarios. As one example, it is impossible to travel from Union Station to New York Avenue without leaving the PSA. All of the development scenarios involve inter-city bus facilities and the impact of that activity must be addressed. As a second example, many of the proposed development alternatives envision a large parking structure below the rail corridor with access from the 100 block of K Street, NE. However, Third Street, NE—the closest north-south street immediately east of the H Street Bridge—is not fully included in the study area.

Item 2: This is a two-part question. For the first part, we believe you have adequately identified historic properties within the PSA. (One of those properties, No. 84 – 911 Second St., NE/former milk depot, is no longer extant.) For the second part, we believe the proposed view sheds also may be inadequate. The alternative development scenarios described potential parking structures, bus, and taxi facilities at various locations both above and below the rail corridor; and on property owned by FRA’s private sector partner. Because FRA has not more clearly defined the location and height of the project elements, we cannot determine whether the view sheds are or are not adequate. Therefore, we conclude that the appropriate view sheds have not been identified.

Finally, ANC 6C wishes once again to express in the strongest possible terms our concern for the overall project planning of the Union Station Expansion. This is a very complex project with Federal, District, and multiple private sector interests, as well as varied public/neighborhood interests. Assessment of the impacts of Union Station expansion must take account of the entirety of the project in order for the planning and design to achieve the goals we all anticipate for this very important project.

Thank you for giving great weight to the views of ANC 6C.

Sincerely,



Karen Wirt
Chair, ANC 6C