Ms. Katherine Zeringue  
Federal Railroad Administration  
US Dept. of Transportation  
MS-20 RPD-13  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re:    Washington Union Station Expansion Project  
       Draft Assessment of Effects to Historic Properties

Dear Ms. Zeringue,

Advisory Neighborhood Commission 6C (ANC 6C) welcomes this opportunity to comment on the March 2019 Draft Assessment of Effects to Historic Properties. Union Station is a crown jewel of our ANC and is an integral part of our neighborhood.

Although ANC 6C is accustomed to reviewing the many PUD projects in NOMA and the Union Market area, the Washington Union Station Expansion together with Burnham Place is undoubtedly the largest project we are likely to ever address. Critical among our review criteria for all large projects in ANC 6C has been an assessment of the traffic impacts on the adjacent neighborhoods, especially within the Capitol Hill Historic District (which includes roughly half of our constituents).

We object to the draft report’s determination of “no adverse effect” on the Capitol Hill Historic District, which you concede was made without the benefit of a traffic analysis. See p. 25 n. 29. We are at a loss to understand how, as a process matter, the draft report can reach any determination of the impacts without such a traffic analysis. Substantively, we believe there will be significant adverse traffic effects on the Capitol Hill Historic District and the neighborhoods north of H Street NE directly attributable to the expansion of Union Station. Even under present conditions, these neighborhoods suffer from a sub-optimal traffic pattern that displaces traffic onto the residential streets east of Union Station.

Some of the Action Alternatives envision utilizing K Street NE as a primary vehicular entrance to underground parking areas. As we stated in our previous written comments, we strongly object to burdening the residential areas of Near Northeast with additional traffic volumes. The Action Alternatives uniformly fail to address vehicular circulation issues, and it is
sadly ironic that a project involving a multi-modal transit facility would omit meaningful analysis of the existing roadway usage.

In conclusion, ANC 6C disagrees with and objects to the determination of “no adverse effect” to the Capitol Hill Historic District. We strongly urge you to revisit the assumptions made in the draft report and to incorporate more rigorous transportation-impacts analysis.

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

Sincerely,

Karen Wirt
Chair, ANC 6C

cc: Councilmember Charles Allen, Ward 6
    Jeff Marootian, Director, DC DDOT
    C. Andrew Lewis, DC Historic Preservation Office
    Rob Nieweg, National Trust for Historic Preservation
    Ms. Beverly Swaim-Staley, USRC