

# Final Environmental Impact Statement

## Appendix F3a

Comments on the DEIS

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U.S. Department of Transportation  
Federal Railroad Administration

March 2024

## APPENDIX F3a

### INDEX OF COMMENTERS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Comments are provided as received. In comments from individuals, personal identifying information (other than names), such as addresses, phone numbers, or email addresses, has been removed. Responses to the comments are provided in Appendix F3c.<sup>1</sup>

Within each category, commenters are listed in alphabetical order, along with: Comment ID; where to find the comment in Appendix F3a (this document); and where to find the response or responses in Appendix F3c.

The number of commenters and the number of comments do not coincide. Some commenters submitted more than one comment. Conversely, some comments were submitted collectively by more than one individual or organization.

COMMENTS	COMMENT ID	Comment in Appendix F3a, Page(s) No.	Response(s) in Appendix F3c, Page(s) No.
<b>Federal Agencies</b>			
Advisory Council on Historic Preservation	ACHP_1006	9-11	6-7
Architect of the Capitol (AOC)	AOC_1002	44-46	12-14
US Department of the Interior (DOI)	DOI_0928	1-2	2
US Environmental Protection Agency (EPA)	EPA_0928	3-8	2-5
National Capital Planning Commission (NCPC)	NCPC_0714	12	7
	NCPC_0722	13-24	8
	NCPC_0925	25-43	9-12
<b>District Government; District, State, and Regional Agencies</b>			
Advisory Neighborhood Commissioner (ANC) 2A08	ANC2A08_0722	57	18
	ANC2A08_0818	58	18
ANC 6C – Commissioner Drew Courtney	ANC6C_0714	59-60	18-19
ANC 6C	ANC6C_0922	61-66	20-23
	ANC6C_Supp_0928	67	24
Council of the District of Columbia	DC Council_0922	49-53	15-16
Councilmember Charles Allen	CM Allen_0928	54-56	16-17
District of Columbia Office of Planning (DCOP)	DCOP_0928	68-141	24-28 50-71
District Department of Transportation (DDOT)	DDOT_0925	148-156	30-42

<sup>1</sup> Comments that specifically pertained to Section 106 documentation were considered and addressed separately in the context of the Section 106 consultation process. These comments are included in Attachment 1 of the Programmatic Agreement (PA) for the Project (Appendix 4 of the FEIS).

<b>COMMENTER</b>	<b>COMMENT ID</b>	<b>Comment in Appendix F3a, Page(s) No.</b>	<b>Response(s) in Appendix F3c, Page(s) No.</b>
District Department of Energy and the Environment (DOEE)	DOEE_0928	157-162	42-45
District Historic Preservation Office (SHPO)	SHPO_0928	142-147	29-30
DC Multimodal Accessibility and Advisory Council	MAAC_0714	163	45
Mayor of the District of Columbia	DC Mayor_0928	47-48	15
Virginia Department of Rail and Public Transportation (DRPT)	DRPT_0928	164-166	46
Washington Metropolitan Area Transit Authority (WMATA)	WMATA_0925	167-172	47-49
<b>Public Commenters: Groups and Organizations</b>			
Arlington Chamber of Commerce	Multiple NGOs_0928	260-261	90-91
Arm in Arm (DC)	Multiple_0807	306-320	101 114-116
Adventure Cycling Association	ACA_0928	227-229	79
Akridge	Akridge_0714 Akridge_0928	423 424-1076	119 119
American Bus Association	ABA_0714 ABA_0928	221 222-226	73 77
Amtrak	Amtrak_0928	218-220	75-77
Baltimore-DC Metro Building Trades	Multiple NGOs_0928	260-261	90-91
The BWI Business Partnership, Inc.	Multiple NGOs_0928	260-261	90-91
Capital Trails Coalition	CTC_0928	185-189	73
Capitol Hill Restoration Society	CHRS_0714 CHRS_0925	249 250-255	85 86-88
Clark Enterprises	Clark_0921	417-420	116-117
Coalition for Smarter Growth	CSG_0928 Multiple NGOs_0928	256-258 260-261	88-89 90-91
Coalition for the Northeast Corridor	Multiple NGOs_0928	260-261	90-91
Committee of 100 on the Federal City	C100_0714 C100_0928	230 231-248	79 80-85
DC Sustainable Transportation	DCST_0929	173-177	73 74
DC Trails	DCTrails_0925	194-199	74
Economic Alliance of Greater Baltimore	Multiple NGOs_0928	260-261	90-91
Federal City Council	FC2_0928 FC2_0714	178-181 259	73 74 90
Global Travel Alliance	GTA-0925	394-395	102
Greater Washington Partnership	GWP_0928 Multiple NGOs_0928	182-184 260-261	73 74 90-91

<b>COMMENTS</b>	<b>COMMENT ID</b>	<b>Comment in Appendix F3a, Page(s) No.</b>	<b>Response(s) in Appendix F3c, Page(s) No.</b>
Greyhound	Greyhound_0826	200-211	74
Guild of Professional Tour Guides of Washington DC	TourGuides_0803	272-275	97-98
JBG SMITH	Multiple NGOs_0928	260-261	90-91
KGP Design Studio	KGPDS_0928	421-422	117-118
Coach USA/Megabus	CUSA Megabus_0928	212-217	74
Montgomery County Chamber of Commerce	Multiple NGOs_0928	260-261	90-91
National Railway Historical Society, DC Chapter	NRHS_0727	266-267	93-94
National Trust for Historic Preservation	NTHP_0928	268-271	95-96
Nations Classroom	NaCL_0925	393	102
NoMA Business Improvement District	NoMA BID_0714 NoMA BID_0928	262 263-265	91 92-93
Northern Virginia Chamber of Commerce	Multiple NGOs_0928	260-261	90-91
Rail Passengers Association	Multiple NGOs_0928	260-261	90-91
Rail Passengers Maryland	Multiple NGOs_0928	260-261	90-91
Safe Streets for Hill East and Near Northeast	Multiple_0807	306-320	101 114-116
Scholastica Travel Inc.	STI-0921	391-392	102
Southern Environmental Law Center	Multiple NGOs_0928	260-261	90-91
Travelers Aid International	TravelerAid_0629	276-277	98
Uber	Uber_0713	278	98
Virginia Bicycling Federation	VABF_0928	279	99
Virginians for High Speed Rail	Multiple NGOs_0928	260-261	90-91
Virginia Transit Association	Multiple NGOs_0928	260-261	90-91
Washington Area Bicyclist Association	WABA_0928 Multiple_0807	190-193 306-320	73 101
WorldStrides	WS_0924	396-398	103
<b>Public Commenters: Individuals</b>			
Anonymous	PI_0626_002	400	104
Anonymous	PI_0714_006	402	105
Jay Adams	PI_0714_007	403	106
Andrew	PI_0714_011	290	101
Mike Aiello	PI_0727_001	296	101
Chandini Bachman	PI_0925_002	367	102
See Baker	PI_0706_001	401	104
Karthik Balasubramanian	PI_0728_001	297	101
Christina Bauer	PI_0928_004	380-381	102
Yasmin Bhalloo	PI_0910_004	335	102
Harvey Botzman	PI_0928_007	415	112

<b>COMMENTS</b>	<b>COMMENT ID</b>	<b>Comment in Appendix F3a, Page(s) No.</b>	<b>Response(s) in Appendix F3c, Page(s) No.</b>
Josh Boxerman	PI_0924_003	300	101
Louise Brodnitz	PI_0607_001 PI_0828_001	280 298-299	101
William Wright Bryan III	PI_0626_001	282	101 103
Dawn Bryant	PI_0910_003	333-334	102
Peter Carlson	PI_0928_001	409-410	108
James Carr	PI_0922_001	343	102
Katie Chambers	PI_0923_001	355-356	102
John Days	PI_0923_005	363	102
Andrew DeFrank	PI_0630_001	284	101
Randy Downs	PI_0714_015	294	101
Robb Dooling	Multiple_0807	306-320	101 114-116
Christen Eliason	PI_0915_003	341-342	102
Garrett Ethridge	PI_0922_004	347	102
Hannah Follweiler	PI_0724_001	295	101
Bill Gallagher	PI_0928_013	304	101 113-114
Noah Gillespie	PI_0714_002	287	101 105
Marvin Gerber	PI_0818_001	328	102
Kevin Golden	PI_0922_008	354	102
Sean Grant	PI_0924_001	364	102
Rebecca Grawl	PI_0922_005	348-349	102
P. Cole Hanner	PI_0922_007	352-353	102
Nathan Harrington	PI_0817_003	324	102
Bill Harris	PI_0928_006	382-383	102
Michael Hollingsworth	PI_0927_001	373-374	102
Brent Huggins	PI_0714_005	288	101
Edmund Hull	PI_0612_001	399	103
Kimberley Indovina	PI_0927_003	377-378	102
Jeff Johnson	PI_0928_009	303	101
Karen	PI_0714_008	404	106
Matthew Keitelman	PI_1001_001	305	101
Stewart Kerr	PI_0627_001	283	101
Steven Kline	PI_0911_001	336-337	102
Katie Kolodzie	PI_0926_002	408	107
Gary Kushnier	PI_0928_002	379	102
Charlotte Liebig	PI_0923_003	359-360	102
Maria Limarzi	PI_0928_011	386-387	102
Alex Lopez	PI_0714_012	291	101
Barton Lynch	PI_0926_001	302	101

COMMENTS	COMMENT ID	Comment in Appendix F3a, Page(s) No.	Response(s) in Appendix F3c, Page(s) No.
Ellen Malasky	PI_0910_002	332	102
Marina	PI_0714_014	293	101
Mary Beth	PI_0714_003	390	102
Taquann McKinney	PI_0701_001	285	101
Jay Melrose	PI_0925_001	407	107
Troy Michalak	PI_0925_003	301	101
Jeffrey Miller (DC Cycling Concierge)	PI_0928_005	413-414	110-112
Julie Moody	PI_0922_003	346	102
Laura Moore	PI_0928_008	384-385	102
Elaine Moulder	PI_0923_002	357-358	102
Russ Norfleet	PI_0923_004	361-362	102
Thomas Olmstead	PI_0928_003	411-412	109
Teresa Pezzi	PI_0817_001	321-322	102
William Plenefisch	PI_0927_002	375-376	102
Russell Preble	PI_0922_002	344-345	102
Rohulamin Quander	PI_0923_006	412a-412b	102
Paul Rose	PI_0926_005	371-372	102
Michael Ruggieri	PI_0819_001	329	102
Angalee Schmidt	PI_0924_002	365-366	102
James Schulman	PI_0714_001	286	101
Matthew Schwartz	PI_0928_010	416	113
David Shaw	PI_0910_001	330-331	102
W. Bart Smith	PI_0926_004	370	102
Richard Snowden	PI_0817_005	327	102
Anthony Spadafora	PI_0921_001	412c	102
Mili Steel-Hollenbeck	PI_0817_002	323	102
Joe Steinbock	PI_0928_012	388-389	102
Sally Stotter	PI_0926_003	368-369	102
Mary Thorne	PI_0912_001	338	102
Brenda Tidwell	PI_0915_002	406	107
Rami Turayhi	PI_0616_001	281	101
Andrew Turner	PI_0714_013	292	101
Valerie	PI_0714_010	405	106
Helga Warren	PI_0915_001	339-340	102
Alan Weinstein	PI_0817_004	325-326	102
Debra Wiley	PI_0922_006	350-351	102
Unidentified	PI_0714_009	289	101



IN REPLY REFER TO:

# United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Custom House, Room 244  
200 Chestnut Street  
Philadelphia, Pennsylvania 19106-2904

September 28, 2020

9043.1  
ER 20/0246

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Subject: Draft EIS and Draft Section 4(f) Evaluation for the Washington Union Station  
Expansion Project

Dear Mr. Valenstein,


This letter provides the Department of the Interior's (Department) comments on the Draft Environmental Impact Statement (DEIS) for the Washington Union Station (WUS) Expansion Project in Washington, D.C. The WUS being proposed by Union Station Redevelopment Corporation (USRC) and the National Railroad Passenger 4 Corporation (Amtrak), would expand and modernize WUS's multimodal transportation facilities to meet current and future transportation needs while preserving the historic station building. The Federal Railroad Administration (FRA) is the lead federal agency. The DEIS has been prepared by the FRA, USRC, and Amtrak, in cooperation with the National Park Service (NPS). The NPS is a Cooperating Agency because of Union's Station proximity to Columbus Circle, an administrative unit of the National Park System managed by National Mall and Memorial Parks.

The NPS has reviewed the DEIS and understands that the project will avoid any direct impacts to Columbus Circle, and that there are no approvals or permits required from the NPS in order for FRA to implement the project. If during the development of the Final EIS, FRA makes changes in the alternatives that require the use of or impact NPS property or resources, or the NPS is required to make a federal decision, it is expected that the NPS would be notified as soon as these new impacts are realized to reevaluate the need for NPS involvement in the project.

With regard to the draft Section 4(f) evaluation, the Department understands no feasible and prudent alternatives that avoid the use of Section 4(f) properties were identified. The Department also notes that the draft Section 4(f) evaluation states that while all action alternatives would generally have similar impacts on the same three Section 4(f) properties, Alternative A-C offers the best opportunities for successful mitigation and, consequently, would result in least overall harm due to that mitigation as compared to the other action alternatives. While the Department is not in disagreement with this determination, we cannot concur at this time. As stated in the document, FRA is seeking public review and comment on the *de minimis* findings proposed in this draft section 4(f) evaluation as part of the DEIS public review and will incorporate those public comment in the final Section 4(f) evaluation, as applicable. The Department will provide its concurrence decision on the Final Section 4(f) documentation once the *de minimis* findings have been confirmed, and it is assured that no modifications to Alternative A-C were made that would alter the least overall harm analysis.

The Department has a continuing interest in working closely with the FRA in this complicated planning effort. For continued consultation and coordination with the NPS, please contact Tammy Stidham, Deputy Associate Area Director - Lands and Planning, National Park Service, Region 1 - National Capital Area, 1100 Ohio Drive, S.W., Washington, D.C., 20242. Ms. Stidham can be reached at [Tammy\\_Stidham@nps.gov](mailto:Tammy_Stidham@nps.gov) or 202-438-0028. The Department appreciates the opportunity to provide these comments.

Sincerely,

 Digitally signed by  
JOHN NELSON  
Date: 2020.09.28  
09:40:43 -04'00'

John Nelson  
Acting Regional Environmental Officer  
Office of Environmental Policy and Compliance





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

September 27, 2020

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: Washington Union Station Expansion Project Draft Environmental Impact Statement,  
Washington, D.C. CEQ #20200120

Dear Mr. Valenstein:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for the proposed Washington Union Station (WUS) Expansion Project in Washington, D.C. Our review was conducted in accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508). The U.S. Department of Transportation Federal Railroad Administration (FRA) prepared a draft EIS to support a proposal by Union Station Redevelopment Corporation and the National Railroad Passenger Corporation (Amtrak), to expand and modernize the WUS multimodal transportation facilities to meet current and future transportation needs while preserving the historic building.

The purpose and need of the proposed action is to provide reliability, safety, efficiency, accessibility, security and improve rail capacity for both current and long-term railroad operations at WUS. EPA acknowledges the purpose and need and recognizes the level of analysis as appropriate. Please find enclosed suggestions regarding design, construction, air conformity analysis, and reducing potential adverse impacts to communities, for consideration in preparation of the final EIS and Record of Decision.

We appreciate having the opportunity to review the study and welcome the opportunity to discuss any of these comments. Please feel free to contact Joy Gillespie at (215) 814-2793.

Sincerely,

**BARBARA** Digitally signed  
by BARBARA  
**A** RUDNICK  
**RUDNICK** Date: 2020.09.27  
15:56:09 -04'00'

Barbara Rudnick  
Office of Communities, Tribes and  
Environmental Assessment

Enclosure

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**Enclosure****Detailed Comments for Draft Environmental Impact Statement  
Washington Union Station Expansion Project**

EPA has the following recommendations for consideration in the development of the final EIS:

- The study would benefit from a more detailed discussion on how the private air-rights developments will be integrated with the station expansion project. Please discuss if concerns regarding the proposed preferred alternative including station access and neighborhood integration, will be addressed by the private development.
- Please define for the reader what “Wayfinding” entails. Consider including the term in the glossary.
- The study states that dewatering of the excavation site will be pumped to the D.C.’s Municipal Separate Storm Sewer System (MS4) rather than DC Water’s Combined Sewer System (CSO). It is not clear why FRA has selected to discharge to the MS4. EPA suggests that the final EIS explain rationale.
- EPA understands that a 2017 geotechnical investigation found that groundwater samples taken of the alluvial aquifer contained no total petroleum hydrocarbons and associated contaminants as well as low concentrations of metals that did not exceed D.C. Water’s sewer discharge limits. It was not clear if FRA will be sampling the ground water prior to discharge to the stormwater collection system or if a groundwater discharge monitoring plan will be in place. EPA suggests a groundwater discharge monitoring plan be established during construction to ensure groundwater is suitable for discharge to the local storm sewer system. Employing siltation bags are also recommended where appropriate.
- EPA appreciates your commitment to include green infrastructure practice into the project.
- EPA recommends FRA consider a further evaluation of the need for the 24 designated taxis spaces, which, according to the study, have been observed to idle for up to 90 minutes as they wait for a fare. The use of ride share (Uber/Lyft) has steadily increased over the last several years. The potential decrease in demand for taxis may lead to longer idling times and fill temporary parking spaces that could be utilized by other vehicles. We believe the study would benefit from an evaluation of the shift in demand in taxi service from passive taxis to on-demand ride share, and its potential impact on the pick-up and drop-off space usage, design and implications to air quality.
- There is consideration in the EIS to relocating the tour and charter bus daily parking/storage to another location; this option is dismissed. It may be appropriate to expand the evaluation of this option and the justification for dismissal, as benefits are possible, including congestion relief and increase safety for the users of the station.
- The study states that removal of excavated spoil from the work site by truck would require up to 120 trips a day spread over a 20-hour day. Truck traffic has potential to, in the short term, increase congestion, decrease local air quality and contribute to increase in noise. EPA recommends pursuing the use of trains, as discussed in the study, to haul spoils from the site to reduce noise and congestion in the local area.
- A time-of-day consideration for the construction activity to minimize impacts to residents neighboring the project site is recommended. The study suggest it will be a 20 hour a day operation. EPA recommends that activities that create excessive noise and vibration be limited to a 7 am to 10 pm time frame which is in-line with the District of Columbia noise ordinance.

- The methodology used for determining the areas of potential Environmental Justice (EJ) concern is reasonable. There are numerous census block groups in the study area that are at or near screening criteria thresholds when identifying communities of EJ concerns. Efforts should be made to assure appropriate outreach and participation of any at-risk populations in the study area. Efforts should include measures to assure that populations for which English is not their first language can participate meaningfully.
- EPA notes the study was finished prior or near the beginning of the Covid-19 pandemic. The project may benefit from evaluation of potential ridership demand analysis which consider scenarios of expanded telework acceptance in the future. The additional information may be important to inform the public and the decision.
- Public comment has raised concerns regarding congestion associated with parking (size and configuration), the drop-off/pick up facility, and the bus facility. EPA appreciates FRA's consideration of comments and FRA continuing to work closely with stakeholders and the general public on project design and construction.

EPA Air Program also provided the following comments on the study's general conformity discussion. Please consider recommendation below on General Conformity Comments:

- We recommend including a table summarizing total estimated annual emissions (for each alternative) in comparison to *de minimis* limits: Throughout Section 5.6 – Air Quality in Chapter 5 of the DEIS and Section 6 – Air Quality of Appendix C3 of the DEIS, estimated annual emissions for various components of the Alternatives are shown in tables (e.g., “Table 5-88. Mesoscale Inventory Comparison, Alternative A-C”, “Table 6-7. Mesoscale Inventory, No-Action Alternative”, “Table 6-12. Construction Emissions per Phase, Alternative A (All Truck Scenario)”).<sup>1, 2</sup> However, total estimated annual emissions for each alternative are not shown in a single table. This makes it difficult to compare total direct and indirect emissions between alternatives and relative to general conformity *de minimis* thresholds. Although Table 6-54 and Table 6-55 show a “comparison of mesoscale emissions” and a “construction emissions analysis comparison”, respectively, they do not appear to evaluate combined total direct and indirect emissions for each alternative for purposes of comparison to the *de minimis* thresholds. In order to make an accurate conformity determination, total direct and indirect emissions must be shown.<sup>3</sup>
- We note that Table 6-54 shows estimated annual emissions for carbon monoxide (CO) that are either over or very close to being over the *de minimis* threshold of 100 tons/year; these emissions estimates would be higher when combined with the estimates in Table 6-55, both for CO and for nitrogen oxides (NOx).<sup>4</sup>
- Without a single table showing all direct and indirect estimated annual emissions for each alternative, it is unclear whether the project is in fact under *de minimis* limits. We note that if total annual emissions resulting from the action in any year exceed the *de minimis* limit for an

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<sup>1</sup> USDOT | Federal Railroad Administration – Washington Union Station Expansion Draft Environmental Impact Statement [June 2020] – Chapter 5 – Environmental Consequences

<sup>2</sup> USDOT | Federal Railroad Administration – Washington Union Station Expansion Draft Environmental Impact Statement [June 2020] – Appendix C3 – Environmental Consequences Technical Report

<sup>3</sup> 40 CFR §93.152, 40 CFR §93.153

<sup>4</sup> USDOT | Federal Railroad Administration – Washington Union Station Expansion Draft Environmental Impact Statement [June 2020] – Appendix C3 – Environmental Consequences Technical Report

applicable NAAQS pollutant or precursor, conformity must be demonstrated using one of the methods set forth in 40 CFR 93.158.

- 2- Please include Annualized Estimated Emissions Associated with Construction
  - Throughout Section 5.6 – Air Quality in Chapter 5 of the DEIS and Section 6 – Air Quality of Appendix C3 of the DEIS, estimated annual emissions associated with project construction for each action alternative are shown in phases (i.e., Phase 1, Phase 2, Phase 3, and Phase 4). EPA recommends these tables include net total annualized estimated emissions associated with the entirety of the action, including construction emissions, including net emissions results from the no action versus the selected alternative and including all planned construction phases. The intent of the general conformity rule is to account for all emissions impact (including total direct and indirect emissions from the project, and any benefits or disbenefits from a selected alternative in relation to the no action case) to aid emissions comparison between action alternatives and relative to *de minimis* thresholds.
- 3- EPA suggests addition of visual aid(s) showing Annualized Emissions data in comparison to *de Minimis* limits: Throughout Section 5.6 – Air Quality in Chapter 5 of the DEIS and Section 6 – Air Quality of Appendix C3 of the DEIS, estimated annual emissions for various components of the Alternatives are shown in tables (e.g., “Table 5-88. Mesoscale Inventory Comparison, Alternative A-C”, “Table 6-7. Mesoscale Inventory, No-Action Alternative”, “Table 6-12. Construction Emissions per Phase, Alternative A (All Truck Scenario)” ).<sup>5, 6</sup>
  - While it is useful to have exact numbers, it would also be helpful to visualize this data in charts (e.g., bar graphs) along with the cited *de minimis* levels for NEPA General Conformity; this would allow easier comparison of estimated annual emissions levels between Alternatives and relative to applicable *de minimis* levels.

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<sup>5</sup> USDOT | Federal Railroad Administration – Washington Union Station Expansion Draft Environmental Impact Statement [June 2020] – Chapter 5 – Environmental Consequences

<sup>6</sup> USDOT | Federal Railroad Administration – Washington Union Station Expansion Draft Environmental Impact Statement [June 2020] – Appendix C3 – Environmental Consequences Technical Report

- 4- EPA suggests elaboration on why emissions associated with column removal work were omitted from Quantitative Modeling: In Section 5.6.3 of Chapter 5 of the DEIS, which outlines the methodology used to analyze impacts to air quality, the DEIS states that “the quantitative modeling of construction impacts does not include emissions associated with the column removal work, which would be the same in all Action Alternatives.”<sup>7</sup> Although the DEIS further states that this work is “not machine-intensive” and that this activity is not “anticipated to exceed 50 percent of the applicable *de minimis* levels” in any of the Action Alternatives, the EPA respectfully requests further information as to why these emissions were not included as part of the cumulative emissions impact of the project (accounted as part of direct or indirect emissions).
- 5- Please elaborate on anticipated reductions in MSAT emissions due to anticipated decrease in regional traffic: In Section 5.6.2.4 of Chapter 5 of the DEIS analysis on impacts to air quality for Alternative A, the DEIS states that “relative to the No-Action Alternative, Alternative A may result in localized, higher levels of [Mobile Source Air Toxics] MSAT emissions in the Local Study Area. Information to quantitatively assess these impacts is not available. Based on existing information, they are anticipated to be minor.” The DEIS further states that “most Project-generated motor vehicle traffic would be light-duty vehicles, which are not a substantial source of MSAT.” The DEIS also acknowledges that under Alternative A, “the increase in bus [Vehicle Miles Traveled] and rail activity would lead to higher diesel particulate matter emissions (a component of MSAT) near [Washington Union Station]. The higher emissions could be partly offset by two factors: the decrease in regional traffic due to greater use of commuter rail and increased speed on area highways due to the decrease in commuter traffic.”<sup>8</sup>
  - The EPA respectfully requests more detailed information on why these two factors would lead to an offset in MSAT emissions, particularly since they rely on decreases in regional traffic that would include reductions related to light-duty vehicle traffic, which the DEIS acknowledges are not a substantial source of MSAT.

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<sup>7</sup> USDOT | Federal Railroad Administration – Washington Union Station Expansion Draft Environmental Impact Statement [June 2020] – Chapter 5 – Environmental Consequences

<sup>8</sup> USDOT | Federal Railroad Administration – Washington Union Station Expansion Draft Environmental Impact Statement [June 2020] – Chapter 5 – Environmental Consequences



October 6, 2020

Mr. David Valenstein  
 U.S. Department of Transportation  
 Federal Railroad Administration  
 Office of Railroad Policy and Development  
 1200 New Jersey Avenue, SE  
 Washington, DC 20590

Ref: *Proposed Washington Union Station Expansion Project*  
*Washington, District of Columbia*  
*ACHP Project Number: 009904*

Dear Mr. Valenstein:

On June 4, 2020, the Federal Railroad Association (FRA) provided the Advisory Council on Historic Preservation (ACHP) with its draft revised Section 106 Assessment of Effects to Historic Properties Report (Effects Report) for the referenced undertaking. The Effects Report is submitted as part of the FRA's compliance with Section 106 (54 U.S.C. § 306108) of the National Historic Preservation Act (NHPA) (54 U.S.C. § 300101 et seq.) and its implementing regulations, "Protection of Historic Properties" (36 C.F.R. Part 800). As the ACHP is participating in consultation, we are providing our comments regarding FRA's revised assessment of effects. Our comments are also informed by the June 18, September 2, and September 21, 2020, consultation meetings.

The Effects Report responds to the consulting parties' comments and requests for additional information and detail regarding the undertaking's effects, particularly regarding traffic. The ACHP appreciates the time and effort undertaken by FRA to conduct additional consultation meetings and address questions regarding the undertaking's potential traffic effects, FRA's preferred alternative, and the Effects Report.

The ACHP offers the following comments on the Effects Report. We ask FRA to take these comments into account prior to proceeding with the drafting of the programmatic agreement (PA) for this undertaking:

- *Modifications to the Preferred Alternative.* The District of Columbia State Historic Preservation Officer (DC SHPO) and several consulting parties have requested that FRA modify the preferred alternative to avoid adversely affecting historic properties, including the Washington Union Station, the Washington Union Station Historic Site, and the Capitol Hill Historic District prior to drafting the PA. The ACHP supports all the comments in the DC SHPO letter sent on September 28, 2020. The ACHP recommends FRA address these concerns from the DC SHPO and the consulting parties, and modify the preferred alternative A-C to the extent possible prior to drafting the PA. It appears this point in the Section 106 review process is the best opportunity to make these modifications.

- *Cumulative Effects.* In the revised Effects Report, FRA restricts its analysis to the cumulative effects from the proposed undertaking itself, and does not include consideration of any other past, present, and future planned actions that would be completed by other agencies and individuals (Section 5.2; pages 49 – 71). This limited analysis is inconsistent with our regulations. As provided in 36 C.F.R. § 800.5(a)(1), adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative. When the Section 106 regulations were revised in 1999 to include this language, the ACHP looked to the consideration of direct and indirect effects, including consideration of cumulative effects, as was similarly done at that time in the implementation of the National Environmental Policy Act (NEPA) (64 FR 27044, 27064 (May 18, 1999); see also 65 FR 77698, 77719-20 (Dec. 12, 2000)). Prior to the recent comprehensive revision, the NEPA regulations defined cumulative impact as “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.” (15 C.F.R. § 1508.7) Therefore, the ACHP interprets this language in the Section 106 regulations to mean that a federal agency must consider the cumulative effects of the proposed undertaking when added to the context of other occurring and proposed actions in the area of potential effects, regardless of the actor.

The projects listed under the No-Action alternative are the type of projects that should be considered in the cumulative effects analysis for the Section 106 review of this undertaking (Section 5.1; page 50). While the effects considered in the Effects Report currently primarily focus on the rail right-of-way and its vicinity, FRA’s consideration of cumulative effects should not be limited to just the undertaking itself and its related parts. A revised analysis that appropriately takes into account the potential cumulative effects of this undertaking with other occurring and proposed actions within the area of potential effects would assist FRA and consulting parties to understand whether the preferred alternative may be modified to minimize the undertaking’s effects on historic properties, or to assist in identifying potential mitigation measures that could offset the undertaking’s adverse effects to historic properties.

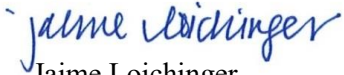
- *Reasonably foreseeable effects and the proposed private air-rights development.* The ACHP requested in our letter sent on May 21, 2019, that FRA assess the reasonably foreseeable effects of the undertaking as they relate to the proposed private air-rights development. However, FRA has stated in the Effects Report that “the Section 106 process for the Project **does not** assess effects to historic properties from all projects included in the No-Action Alternative, including the development of the private air-rights” (Section 2.1; page 19). While we recognize that FRA may have no jurisdiction or approval authority over the development of the private air-rights, we do believe the proposed undertaking may have reasonably foreseeable effects related to those air-rights, such as increased development within the air-rights, that is dependent on and coordinated with the work to be done for the undertaking. We understand that private development is currently being proposed immediately adjacent to and in certain places directly above the undertaking. Such proposals do not appear in this situation to be either speculative or remote. Consulting parties have raised concerns about the cumulative visual effects that may occur as a result of the undertaking and the private development. We request FRA further consider these potential effects and consult with consulting parties to address these concerns.

We note that similar recommendations were made after reviewing the first draft of the Effects Report in May 2019. Given that these recommendations appear to have not been incorporated into the revised Effects Report, it would be helpful for FRA to articulate the rationale it used in revising the Report. The ACHP is available to participate in a teleconference at FRA’s convenience to discuss the matter further.



We appreciate the opportunity to provide our comments, and look forward to continued consultation. Should you have questions or concerns, please contact Ms. Sarah Stokely at (202) 517-0224, or via e-mail at [sstokely@achp.gov](mailto:sstokely@achp.gov).

Sincerely,

A handwritten signature in blue ink that reads "Jaime Loichinger". The signature is written in a cursive style with a small flourish at the beginning.

Jaime Loichinger  
Assistant Director  
Federal Permitting, Licensing, and Assistance Section  
Office of Federal Agency Programs

Good morning. My name is Matthew Flis, Senior Urban Designer with the National Capital Planning Commission. NCPC is the federal planning agency for the National Capital Region, and we have a significant interest in the long-term plans to protect and enhance this important gateway to the capital. NCPC staff does appreciate the [inaudible 00:19:13] Railroad Administration regarding this project. We will be providing detailed written comments in the next several weeks as we continue to complete our review of the document. However, today I'm just going to provide an overview of our review responsibility and the comments we have heard from our Commission thus far.

NCPC is the central planning agency for the federal government in the National Capital Region and as such, NCPC also has zoning authority for projects on federal land and the District of Columbia. Therefore, our Commission is ultimately responsible for final approval of the project and as such, NCPC's review of the project will be comprehensive and will continue through final design development. It is about 50 to 70%.

In January, the Commission reviewed the concept plans for the project and provided a series of comments and recommendations. Overall, the Commission supported the project goals and several aspects of the project, including the new train hall and modern bus facilities. However, the proposed parking was a significant source of discussion and the Commission did request FRA to substantially reduce parking. More recently, the Commission held an information presentation last week, in which NCPC staff provided an update on the draft EIS. The Commission reiterated its request to substantially reduce parking and expressed concern that no changes to the parking count had occurred thus far. Video of both the concept review and the information presentation will be available online at [ncpc.gov](http://ncpc.gov).

In accordance with our submission guidelines, additional concept reviews will be necessary for our Commission to resolve the major planning issues and ultimately align the Preferred Alternative with the Commission's guidance thus far. We ask that this occur before the EIS and the Record of Decision is finalized. The major planning issues that need to be resolved include the amount of parking, vehicle [crosstalk 00:20:56].

This stage of review should provide a better sense of the vision of the development and how the design will achieve the project goal. The Commission will finalize its Record of Decision at the time of final approval. Regarding parking, I mentioned the Commission has discussed this issue at length, both at the concept review and information presentation. As the parking count has not changed, we request FRA to describe how it envisions the NEPA process unfolding if changes are mandated to the EIS based on our Commission or other public comments. As you know, the District has also provided reports advocating significantly less parking, and Amtrak has indicated they do not require parking as well. Therefore, we believe the burden remains with the Union Station Redevelopment Corporation and FRA to justify the higher parking.

As I mentioned, we will provide formal written comments as well. We look forward to continuing to work with FRA on the EIS process, and we'll continue to provide comments and planning expertise as this is a critical multimodal infrastructure project in the nation's capital. Again, we appreciate the coordination of FRA and the ability to comment on this project. Thank you.



401 9<sup>th</sup> Street, NW North Lobby, Suite 500 Washington, DC 20004 Tel: 202.482.7200 Fax: 202.482.7272 www.ncpc.gov

IN REPLY REFER TO:  
NCPC FILE No. 7746

July 21, 2020

Mr. David Valenstein  
Senior Advisor  
Federal Railroad Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: Comments on Washington Union Station Expansion Project Draft Environmental Impact Statement – Parking Program

Dear Mr. Valenstein:

In January 2020, NCPC reviewed the concept plans for the Washington Union Station Expansion Project. The Commission provided a series of comments and recommendations to help facilitate the project development. In particular, they requested that FRA substantially reduce the number of parking spaces. The Commission also asked that the applicant, private development owner, and staff work with the District of Columbia Office of Planning (DCOP) and District Department of Transportation (DDOT) to evaluate and confirm the appropriate amount of parking given the mix of uses, traffic and urban design impacts, and transit-oriented nature of the project, prior to the next stage of review. The result of this request was the creation of the parking working group which met through the spring of 2020 to discuss the proposed parking program.

At the July 9, 2020 Commission meeting, NCPC staff presented an initial analysis of the parking program included in the Draft Environmental Impact Statement (DEIS) for the project. Staff advised that FRA had not altered the proposed parking levels in the DEIS since the concept review in January. Commission members were unanimous in expressing significant concern that FRA had not undertaken a good-faith effort to reduce the parking program per the Commission's previous request, and further, expressed frustration that their initial comments did not appear to have been heard by FRA. The Commission was clear that the next project submission should include a substantial parking reduction and that it is incumbent upon FRA to accommodate that reduction in the EIS documentation.

Commission members noted the unusual consensus from a number of stakeholders about reducing the parking program, including the Advisory Neighborhood Commission, (ANC), Congresswoman Eleanor Holmes Norton, the District agencies, and several District Councilmembers. They noted that such unanimity is unusual in such a large and complex project.

The Commission underscored the importance of accommodating the projected increase in ridership while recognizing the project's implications for infrastructure, urban design, and land use will likely impact federal, District and neighborhood interests. The Commissioners also expressed the need for an overarching vision that will help frame these issues and provide a guide to the decision-making necessary for such a complex and interwoven undertaking. While the Commission's comments largely focused on parking, staff will provide additional comments on circulation, urban design and other aspects of the alternatives during the public comment period.

### Proposed Parking

Staff noted the parking report developed by the District Office of Planning and the District Department of Transportation recommended substantially less parking (300 spaces) than proposed by FRA (1,600 spaces). Commissioner Trueblood, in prepared remarks (attached), stated that there are federal, District, and neighborhood concerns. And further, the project does not meet good land use or urban design standards. He maintained that the context has changed substantially since the station was last redeveloped, and the assumptions about how the facility will operate into the future are outdated. He concluded requesting the Commission ensure that FRA will advance a project that is not only respectful of the historic laws and context, but also embodies the highest quality urban design and transportation infrastructure for this highly transit accessible area of the District.

The Commission requested additional clarity about the process moving forward, and particularly how a substantial reduction in the parking program would be reconciled with the NEPA process and NCPC's review responsibilities. They reiterated that NCPC has approval authority regarding the project, and the Commission could make a separate determination regarding the appropriate parking levels. They strongly recommended FRA work collaboratively now to avoid delays, cost increases, and changes to the project later in the process.

The Commission reiterated that the burden of proof remained with FRA and USRC to justify the necessary parking, and thus far had not done so. Below are a series of comments and requests to assist in better understanding both the existing parking needs and the future trends that may inform the proposed parking program:

- The number of train users parking at the garage appears to be declining, according to more recent Amtrak ridership information. Further, Amtrak has indicated they do not require passenger parking for their operations at Union Station (see attached Amtrak Memorandum). The District of Columbia has reiterated that they do not believe long-term parking for train and bus users is necessary at the station given its multimodal function. Given this, FRA should provide additional documentation or support to justify the inclusion of long-term parking at the station.
- An increase in monthly parkers and decrease in train riders parking at the station suggest the purpose of the garage may be shifting from traveler-oriented to one more serving neighboring commercial uses. FRA should evaluate whether these trends are in fact

changing the occupancy and nature of the garage, and if so, whether the need for substantial long-term parking for Union Station users remains justified.

- The District of Columbia agencies recommend no parking for retail uses and some limited parking for office uses. They note that retail may be supported by increased station visitation through 2040. Therefore, FRA and USRC should evaluate whether parking is necessary for retail uses at the station given the station's anticipated growth in visitation and high level of multimodal accessibility.
- While parking demand for train riders appears to be declining, the overall parking occupancy levels appear constant. This suggests other users are taking advantage of the available parking supply. FRA and USRC should evaluate if this is the case. Further, NCPC is interested in understanding whether parking related to non-station office use is increasing and whether the provision of such parking is consistent with the project's purpose and need. The Commission's perspective on such parking may be a consideration for the next concept review.
- Based on FRA information, existing rental operations support both station and local neighborhood users. At the same time, some amount of parking within the garage also appears to be dedicated to other car-sharing services for whom the primary user is not clear. DCOP and DDOT found that there was not sufficient data to support a rental car facility within that station at this time. As such, FRA and USRC should provide additional information to explain how these services support multimodal functionality at the station.
- Commissioners questioned how the project will advance given the still-outstanding questions about the parking program. In particular, FRA should describe how it envisions the NEPA process unfolding if changes are mandated to the EIS based on Commission and other public comments. It was also recommended that the EIS be robust enough to accommodate any potential changes to the parking program to not require backtracking. We recommend that FRA include an alternative reflecting the District's recommended parking level to capture the potential minimum program. This is in FRA's best interest since it would ultimately save time and effort down the road should the selected parking count fall between this number and the one initially proposed by FRA.

### Project Vision

Commissioners underscored the need for an overarching vision and high-quality urban design. At this time, the DEIS does not speak to these aspects of the project clearly. Over the next few months, staff will review the DEIS and provide additional comments regarding access, circulation and urban design. Overall, the project should maximize accessibility for station users, including the surrounding neighborhoods. Circulation should prioritize pedestrian and bicycle movement, effective passenger pick-up and drop-off, and avoid or minimize conflicts with vehicles. In terms of urban design, the overall height and bulk of the new development should respect the historic station building. Active ground floor uses, civic spaces and other placemaking opportunities,

should be integrated into the project plans. These components should be clearly described in the revised concept submission to the Commission.

NCPC advises continued dialogue with Akridge, the private developer of Burnham Place. We recognize the two projects are independent and will be implemented separately, but given the scale and adjacencies of each development, great opportunities exist to align the transit-oriented visions for each in a manner that is mutually beneficial. Together, the Washington Union Station Expansion Project and Burnham Place will be one of the most complex and consequential interventions proposed within the District of Columbia. Continued conversations and coordination among both owners is critical to getting each accomplished.

NCPC will continue to work with FRA on the EIS process and will continue to provide comments and planning expertise as this is a critical multimodal infrastructure investment in the nation's capital. We will also rely on the expertise of the District Office of Planning and District Department of Transportation, per the direction of the Commission at the January 2020 meeting, in evaluating the project and making further recommendations to the Commission. Again, we appreciate the coordination of FRA on this important and complex project. If you have any questions or would like to further discuss the review process or the Commission's actions thus far, please do not hesitate to contact me or Matthew Flis at [matthew.flis@ncpc.gov](mailto:matthew.flis@ncpc.gov) or (202) 482-7236.

Sincerely,



Marcel Acosta  
Executive Director

Cc: Andrew Trueblood, Director, DC Office of Planning  
Jeff Marootian, Director, DC Office of Transportation  
Beverly Swaim-Staley, President and CEO, Union Station Redevelopment Corporation  
Frederick Lindstrom, Assistant Secretary, US Commission of Fine Arts

Attachments: January 2020 - Commission Action  
July 2020 - Testimony of Commissioner Trueblood  
January 2020 – Amtrak Memorandum



## Commission Action

January 9, 2020

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<p><b>PROJECT</b>  <b>Washington Union Station Expansion Project</b>          Union Station          50 Massachusetts Avenue, NE          Washington, DC</p> <p><b>SUBMITTED BY</b>          United States Department of Transportation          Federal Railroad Administration</p> <p><b>REVIEW AUTHORITY</b>          Federal Projects in the District          per 40 U.S.C. § 8722(b)(1) and (d)</p>	<p><b>NCPC FILE NUMBER</b>          7746</p> <p><b>NCPC MAP FILE NUMBER</b>          1.11(38.00)45049</p> <p><b>APPLICANT'S REQUEST</b>          Approval of comments on concept plans</p> <p><b>ACTION TAKEN</b>          Approved comments on concept plans</p>
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The Commission:

**Finds** the primary goal of the project is to support current and future growth in rail service and multimodal connectivity for Washington, DC and the National Capital Region well into the 21<sup>st</sup> Century.

**Finds** it is the federal interest to support multimodal connections and transportation alternatives in the regional system.

**Supports** the overall project purpose, including accommodating future growth in rail service; improving accessibility and egress; enhancing the user experience; enhancing integration with surrounding uses; sustaining the station's economic viability; and preserving the historic train station.

**Finds** that Union Station is an important historic resource and is a gateway into the National Capital, and therefore the function, design and experience of the facility impacts the first impression of visitors. At the same time, the station is a critical transportation hub for residents and workers.

**Notes** Union Station Redevelopment Corporation (USRC) oversees the station operations and maintenance, and USRC funding supports preservation of the station, maintains the station as a multimodal transportation center, and enhances the retail and amenities within the station.

**Notes** the major project components include reconfiguration of the station tracks, a new train hall, bus facilities, and replacement parking facilities.

**Finds** the realignment and placement of the station tracks form the foundation of the design and configuration of other project elements. Changes in grade, limited points of access, constrained

site boundaries, and varying jurisdictions also create constraints that influence the placement of the proposed facilities.

**Notes** the applicant has developed six alternatives (A, B, C-East and West, D, E, and “A-C”) that share the same project components, but differ primarily in the placement of the train hall, parking and bus facilities.

**Notes** the applicant has indicated that Alternative “A-C” is their preferred alternative because it minimizes the duration, depth, complexity, and cost of construction as there would be no extensive construction below the concourses; keeps intermodal uses close to each other and close to the main station like today; and minimizes operational traffic impacts on the H Street Bridge and public street network by optimizing deck-level vehicular circulation and re-using the existing east and west ramps.

*Regarding the transportation facilities:*

**Supports** the reconfiguration of the train platforms to create greater efficiency, improve accessibility, and enhance the user experience.

**Finds** the addition of a new concourse level with pedestrian entrances at 1<sup>st</sup> Street and 2<sup>nd</sup> Street will greatly improve pedestrian access from the adjacent neighborhoods.

**Supports** the addition of a new east-west train hall that helps create a large, gracious entry to the track platforms, creates a setback from the historic train station and brings natural light into the facility.

**Finds** that the rail station, bus facility and Metrorail Station should be located in close proximity to each other to facilitate intermodal connections for travelers.

**Supports** the creation of new pedestrian entrances at the level of the H Street bridge and new train hall to improve accessibility to the station, and to relieve demand for drop-offs at the front of the station.

**Notes** the traffic impacts of the proposed alternatives were not part of the concept submission, but will be included as part of the impacts analysis within the Draft Environmental Impact Statement.

**Requests** the applicant coordinate with the District Department of Transportation to evaluate the proposed circulation system and any impacts to the transportation network, including Columbus Circle, the H Street Bridge, and adjacent streets.

*Regarding the parking facilities:*

**Notes** the site currently has about 2,200 striped parking spaces with an average utilization rate over 80 percent. Rental car areas and the mezzanine accommodate about 250 additional vehicles.



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Presently, a majority of the spaces (1390) appear to be used by monthly pass holders whereas the use of the garage for daily retail or rail users appears substantially less.

**Notes** the preferred alternative reduces the proposed number of spaces by approximately one-third to 1,575 spaces, with approximately 600 spaces for retail, 900 flexible spaces for general use, and 75 spaces for rental cars.

**Notes** the federal Transportation Element provides specific guidance for federal employee parking, but in this case, much of the parking is for non-federal commercial use and other station users.

**Notes** the proposed 2019 federal Transportation Element of the Comprehensive Plan states agencies should consult the parking policies of local jurisdictions to determine appropriate parking standards for non-workplace federal uses, including residential, commercial, and institutional uses.

**Requests** the applicant substantially reduce the number of parking spaces, and that the applicant, private development partner, and staff work with the District Office of Planning and the District Department of Transportation to evaluate and confirm the appropriate amount of parking given the mix of uses, traffic and urban design impacts, and transit-oriented nature of the project prior to the next stage of review.

**Notes** the applicant has evaluated off-site locations for parking, including other federal properties and private sites, but has determined they all face significant challenges regarding acquisition or implementation.

*Regarding historic preservation and urban design:*

**Finds** the applicant seeks to enhance the functionality of the Union Station, and the proposed alternatives generally do not directly alter the historic station building itself.

**Notes** that proposed development behind the station should consider the setting of the historic building and the critical views from the National Mall, U.S. Capitol, and other viewsheds.

**Supports** the use of the east-west train hall to create a wider setback between the historic train station and new development to the north, as a way to help mitigate the visual impacts of the new development.

**Supports** the provision of a pedestrian access corridor between the top of the H Street Bridge and the station / train hall to create a new way to access the station from the H Street-Benning Streetcar Station. The “access zone” will require coordination with adjacent private development.

**Finds** the placement of parking beneath the station tracks and lower concourses may be challenging due to constructability and cost and therefore, the smaller the massing of the above grade garage, the better.

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**Finds** that bus and parking facilities can be designed in a manner that can support compatibility with other adjacent uses, including the integration of retail and other active uses, the architectural treatment of buildings and facades, and the incorporation of other public amenities.

**Requests** for the next review the applicant further develop plans and renderings that show how active uses, amenities and architectural features can enhance the public realm and create a design that is compatible with adjacent development.

**Requests** the applicant prepare elevations and renderings to show how the height and mass of the alternatives will look from key viewsheds, including from the U.S. Capitol building, the National Mall, Delaware Avenue, and 1<sup>st</sup> Street, NE. The renderings should also include the massing of any private development permitted in the USN zone.

*Regarding further coordination:*

**Requests** the applicant coordinate with the Washington Metropolitan Area Transit Authority regarding the proposed improvements and new entry to the Metrorail station along 1<sup>st</sup> Street, NE.

**Requests** the applicant coordinate with District Department of Energy and Environment regarding stormwater management and other environmental issues related to the site.

**Requests** the applicant provide a phasing plan that describes the timing and implementation of each project component, where applicable, as part of the next review.

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Julia A. Koster  
Secretary to the National Capital Planning Commission

**Introductory Remarks Delivered by Commissioner Trueblood at the  
NCPC Meeting of July 9, 2020, RE: the DEIS for the Washington Union Station  
Expansion Project**

Thank you, Mr. Flis, I think your presentation was quite helpful and accurately summarized quite a complex set of issues.

Since I'm first-up on responding to NCPC's staff presentation, I think that it is important to take a quick step back and underscore that the driver of the Union Station Expansion Project is to accommodate a projected increase in rail ridership in the year 2040 that is approximately 2.5 times today's ridership. How we accommodate this passenger increase is the key to this project and has implications across infrastructure, urban design, and land use that impact federal, District and neighborhood interests.

While the infrastructure planning for the project as proposed is quite good in terms of accommodating this increase in ridership, its land use planning is poorly developed, reflecting an outmoded suburban condition rather than an immensely vibrant, urban context in the heart of our Nation's Capital. While the alternatives do not delve deeply into urban design, it is clear that the current approach would make high-quality urban design impossible to achieve.

While the District is strongly in support of the expansion and renovation of Union Station, I am quite concerned that Preferred Alternative A-C, as proposed in the DEIS, remains unchanged since its release last fall. I worry that the time and effort this Commission put into reviewing and commenting on the proposed Project at our January 9 meeting was ignored. At that meeting, the Commission explicitly directed FRA to substantially reduce the number of parking spaces and to work with OP and DDOT to evaluate and confirm the appropriate amount of parking given the mix of uses, traffic and urban design impacts, and transit-oriented nature of the Project, prior to the next stage of review.

In response to NCPC's request, OP and DDOT, along with NCPC staff, devoted hundreds of hours to analyzing, meeting about, and supporting development of a reasonable approach to parking at Union Station, as documented in the District's Parking Memo referenced by NCPC staff today. It seems that our effort had no effect on FRA's Preferred Alternative A-C, which has been incorporated into the Draft EIS without change.

But it isn't just feedback from NCPC and DC government agencies that this proposal has failed to account for. Congresswoman Norton, the DC Council, the ANC, nearby landowners, and other stakeholders have expressed strong opposition to too much parking. In fact, other than FRA, I have not heard a single voice in favor of the proposed excessive parking. In a place known for diverse perspectives and robust debates about appropriate development, particularly for projects of this complexity, the level of consensus that the planned parking should be substantially reduced speaks volumes. Recognizing the value of such input is even more important given that this is a major, long-term, public infrastructure project.

Opposition aside, one of the most troubling aspects about FRA's approach is its attachment to outdated parking assumptions and disregard for their negative impacts on the project and the

surrounding area. The existing parking garage may have made economic and land use sense in 1983 when USRC was tasked with overseeing a revitalized Station, when the District was in a starkly different economic position, when shopping malls were an economic driver, when rail travel's future was uncertain at best, and when private cars were planned for as the primary mode of transportation.

It is clear to me, and the other parties examining this project, that the context has significantly changed since then, and so should the perspective and approach to parking needs. If it does not, this obsolete perspective will constrain the station for the next 100 years and hamper the potential of the Project to add to, rather than detract from, the excellence of urban form and optimal uses the Station can and absolutely should contribute to the District.

The District is preparing comments to share with FRA during the DEIS review period. But I want to emphasize that FRA's approach of retaining Preferred Alternative A-C largely unchanged has put a much greater burden on the community to review and analyze the proposal than, in my opinion, is appropriate. My concern is magnified by a similar lack of consideration of response we have seen on the Section 106 review for compliance with the National Historic Preservation Act.

If I have one piece of advice for the project sponsors it is that what may on paper appear to be easiest and fastest path now may become the opposite later if it does not have the support of the various parties involved. Such an approach for such a complex project is all but certain to result in numerous delays and increased costs. It is better to work collaboratively together now. That may result in some additional costs or complexity on the front end, but it is better to plan for those now than to be caught changing plans midstream or stuck in litigation later. I hope the project sponsors are able to change their approach and views to be more collaborative moving forward, as without significant adjustments to the project in line with our recommendations, the District will be unable to support this project.

As for today, I hope my fellow NCPC Commissioners will join me in underscoring our previous recommendation for a substantially reduced parking program at Union Station. As importantly, I hope we can commit to hold the project to such reduced parking program when it comes before the Commission for approval. In addition, I hope NCPC will continue to ensure that FRA produces a project that is not only fully respectful of the historic laws and context, but also embodies the highest quality urban design and transportation infrastructure for this critical part of our city.

We look forward to continuing to work with FRA, USRC, Amtrak and NCPC to ensure that Washington Union Station is positioned to continue to be a gem in our city for the next century and beyond.



# Memorandum

**To:** David Valenstein; Beverley Swaim-Staley  
**CC:** David Handera; Daniel Sporik; Kevin Forma; Bradley Decker  
**From:** Gretchen Kostura  
**Date:** January 7, 2020  
**Re:** Amtrak Parking for the Washington Union Station Expansion Project

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Passenger parking is not essential to Amtrak's operation of intercity passenger rail at Washington Union Station and is regarded as an ancillary passenger amenity. Although existing conditions provide for rail passenger parking, a majority of Amtrak and commuter rail passengers access the Station via alternate transportation modes. Amtrak strongly encourages passengers to travel to the Station through modes other than private vehicle to park. This advocacy coupled with major planned rail infrastructure investments north and south of the Station and a shifting culture away from private automobile use leads Amtrak to anticipate passenger parking demand to continually decrease in the future.

Currently, based on our ridership and survey responses from passengers, Amtrak estimates 600-700 passengers are parking at the Station<sup>1</sup>. We do not assume that parking will increase proportionally as rail ridership increases. Additionally, there will likely be a considerable period where there is no parking available at the Station during construction and passengers will need to figure out an alternative means of accessing the Station. Therefore, Amtrak believes the current parking program targeted for Amtrak passengers in the Station Expansion Project is over planned and Amtrak supports refinement of the parking estimate in the future. Amtrak does not support any entity building a parking garage specifically to support Amtrak passengers.

In a public setting, Amtrak will continue to support Alternative A-C and will offer testimony to the elements directly related to the core business of operating intercity passenger rail. However, given the parking garage is located on federal property and overseen by Union Station Redevelopment Corporation, Amtrak will defer to the property owner and operator to determine the appropriate use for their property given market demand, land use analysis and transportation mode shifts as the planning progresses into design. The City should also be involved with determining the overall appropriate amount of parking for the Station as they are responsible for setting parking requirements for development projects in DC. Amtrak, FRA, USRC, and the City should commence a working group to refine the parking program.

*January 27, 2020*

We do not believe the EIS process needs to be stalled or postponed as this refinement work can move in parallel to the current process with the current numbers serving as a stress test for the Project.

Finally, in the event the property owner and operator, in coordination with local and regional transportation officials and Amtrak, determines the parking program should be downsized, Amtrak encourages the reevaluation of locating the parking facility below the tracks and platforms.

<sup>1</sup> Daily Amtrak ridership is approximately 16,000. It can be assumed that Union Station is the origin station for half those riders and 8% of those riders are parking at the Station given our survey results from 2017. Note that the most recent survey of passengers in December 2019, only 4% of riders from Union Station drove and parked.



401 9<sup>th</sup> Street, NW North Lobby, Suite 500 Washington, DC 20004 Tel: 202,482,7200 Fax: 202,482,7272 www.ncpc.gov

IN REPLY REFER TO:  
NCPC FILE No. 7746

September 28, 2020

Mr. David Valenstein  
Senior Advisor  
Federal Railroad Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: Comment of Draft Environmental Impact Statement –  
Washington Union Station Expansion Project

Dear Mr. Valenstein:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Washington Union Station Expansion Project (Project). The Union Station Redevelopment Corporation (USRC), in coordination with the National Railroad Passenger Corporation (Amtrak), has proposed expanding and modernizing the multimodal transportation facilities at Washington Union Station, while preserving the historically significant station building. The Project includes reconstructing and relocating tracks, developing new concourse facilities, maintaining multimodal transportation services, and improving and expanding infrastructure and other facilities.

National Capital Planning Commission (NCPC) staff appreciates the on-going coordination with the Federal Railroad Administration (FRA) regarding the Project, and we look forward to continued collaboration through the remainder of the National Environmental Policy Act (NEPA) process, Section 106 of the National Historic Preservation Act (NHPA) process, and ultimately the Commission's review and approval of the project. NCPC is a cooperating agency as part of the project to satisfy the Commission's own NEPA compliance requirements because of its approval over projects on federal land. The historic station, existing parking structure, and bus facilities are located on federal (FRA) land.

The primary goal of the project is to support current and future growth in rail service and to support multimodal connectivity for Washington, DC and the National Capital Region well into the 21st Century. Union Station is an important historic resource and is a gateway into the National Capital, and therefore the function, design and experience of the facility impacts the first impression for visitors. At the same time, the station is a critical transportation hub for residents and workers.

Policy language in the 2019 federal Transportation Element of the *Comprehensive Plan for the National Capital* expresses support for the expansion of high speed and high capacity passenger rail to improve inter-city connectivity across the eastern United States, with Washington Union Station as a regional hub. The Commission has expressed support for the overall project purpose, including accommodating future growth in rail service; improving accessibility and egress; enhancing the user experience; enhancing integration with surrounding uses; sustaining the station's economic viability; and preserving the historic train station.

As noted in the Memorandum of Understanding executed in 2016, NCPC is the central planning agency for the federal government in the National Capital Region. Pursuant to 40 U.S.C. § 8722(d), NCPC also has zoning authority for projects on federal land in the District of Columbia. As such, NCPC's review of this project will be comprehensive and will continue through 50-70 percent design development. At the concept review held in January 2020, the Commission raised several planning issues including the amount of parking, vehicle access and circulation, general massing and placement of uses. Following the DEIS, and prior to releasing the Final EIS (FEIS), FRA should address these issues in a revised concept design to the Commission. It is critical this occur before the FEIS is issued so that FRA and NCPC can align on a single preferred alternative.

This letter identifies the five areas of comment which should be addressed prior to the next iteration of the EIS. These include: 1) coordination of other regional rail projects; 2) urban design and the user experience; 3) historic preservation and viewsheds; 4) transportation and circulation; and 5) the parking program. We also provide an overview of the NCPC review process moving forward. NCPC previously provided a comment letter regarding the proposed parking program, dated July 21, 2020. We supplement those prior comments here, as they are covered extensively in our previous correspondence. However, a copy of that letter is attached so that it may be included in the record.

#### *Regional Rail Plan Coordination*

According to the DEIS, existing rail capacity is insufficient to meet long-term passenger service needs. We understand that the NEC FUTURE study provides a basis for the analysis and findings for the expected growth in service. It is unclear, however, how the Long Bridge Project and the Washington DC to Richmond Southeast High Speed Rail (DC2RVa) projects have been accounted for in the proposed train volumes and infrastructure needs. While the DEIS does reference these studies, it suggests they may have different approaches and therefore some discrepancies may exist between the analyses. In particular, it is unclear if all three projects have been coordinated to address the expected rail volumes and the potential for through-running service by MARC or VRE. The recent agreement between the Commonwealth of Virginia and CSX for rail lines between Washington, DC and Richmond also does not appear to be included in the analysis. It will be helpful to understand how this new agreement will change rail service to/from Union Station, particularly from the south.



We recommend clarifying how the WUS analysis incorporates the findings and analysis of the related studies (NEC FUTURE, Long Bridge and DC2RV). Further, it may be necessary to consider and incorporate any changes resulting from the new Virginia/CSX agreement that may impact projected levels of rail service from the south. NCPC staff seeks to ensure that the proposed improvements at Union Station have best accommodated the expected growth in service projected by each of these studies.

### *Urban Design and User Experience*

At the EIS level of design development, it can be difficult to fully ascertain the impacts of proposed development on the urban environment. In this instance, the proposed project, along with the adjacent Burnham Place development, will alter this portion of central Washington, DC by introducing new, higher-density development. If designed appropriately, the expansion project will create opportunities for better access, improved multimodal functionality, and a more lively public realm.

The Commission has underscored the need for an overarching vision and high-quality urban design. At this time, the DEIS does not speak to these aspects of the project clearly. Overall, the project should maximize accessibility for station users, including the surrounding neighborhoods. Circulation should prioritize pedestrian and bicycle movement, effective passenger pick-up and drop-off, and avoid or minimize conflicts with vehicles. The height and bulk of the new development should respect the historic station building. Active ground floor uses, civic spaces and other placemaking opportunities, should be integrated into the project plans. In January 2020, the Commission requested that, as part of the next review, the applicant further develop plans and renderings that show how active uses, amenities and architectural features can enhance the public realm and create a design that is compatible with adjacent development. These components should be clearly and specifically described in the revised concept submission to the Commission.

The Urban Design Element of the *Comprehensive Plan for the National Capital* states that activated uses, such as retail or other commercial enterprises, be provided at the ground level to help enhance the pedestrian experience. Active uses, such as retail, be incorporated to support pedestrian activity, particularly along streets, pedestrian routes and facing other active uses. The existing bus and garage facility, an exposed structure, is not particularly attractive or conducive to a quality urban experience and should not be replicated. Similarly, the location and treatment of the proposed parking program is an issue that has been raised by many stakeholders and consulting parties in the Section 106 process. Locating a more limited parking program below grade could address many of the urban design challenges faced by accommodating a large parking structure above-grade. However, it will be helpful to understand the implications of access, circulation and constructability for such an approach.

The DEIS does not appear provide sufficient detail to assess the user experience, which is described as a part of the project purpose, however each of the action alternatives appear to have challenges. The urban experience can be evaluated through a number of measures, including pedestrian and bicycle accessibility, distance to or proximity of amenities, and the overall comfort of the user, including access to daylighting, shade, wayfinding and public spaces. As such, it may be necessary to include in the EIS a framework for how these issues will be measured or accommodated as the project is further designed.

### *Historic Preservation and Viewshed Impacts*

Staff appreciates the detailed assessment of effects prepared pursuant to Section 106 of the NHPA. In particular, the renderings and massing diagrams are helpful in understanding the proposed impacts of the project on views and the setting. The Commission has expressed support for the east-west train hall to create a wider setback between the historic train station and new development to the north, as a way to help mitigate the visual impacts of the new development. While the setback is beneficial, we concur that the project will still have an adverse visual effect on the historic Union Station due to the bulk and height of the development that will occur to the north. The views from the south, including First Street and C Street NE will be impacted by the preferred alternative.

Likewise, we find there will be adverse visual effects on the Union Station Historic Site due to the bulk and height of the proposed project as viewed from the south. We also find that the proposed development will also adversely effect views from the north, including H Street and New York Avenue, which alter the setting of the station and railyard, as well as its relationship to the surrounding context. The alternatives should be evaluated for changes to help further avoid adverse effects prior to the consideration of minimization or mitigation measures. We agree that design guidelines and a design review process could be considered to help ensure the expansion project meets the high level of design quality reflected in the historic station. Given NCPC's in-lieu of zoning authority, the Commission may consider these and other factors when reviewing and approving the ultimate design for the project, including the height and bulk of new development.

### *Transportation and Circulation*

The Commission has found the primary goal of the project is to support current and future growth in rail service and multimodal connectivity for Washington, DC and the National Capital Region well into the 21st Century. It is an important federal interest to support multimodal connections and transportation alternatives in the regional system. The Commission has expressed support for many of the proposed transportation improvements, including reconfiguration of the station platforms, the new concourse level with pedestrian entrances at 1st Street and 2nd Street to

improve access from the surrounding neighborhoods, and the creation of new pedestrian entrances at the level of the H Street bridge and new train hall to improve access to the station. The Commission has also found that the rail station, bus facility and Metrorail Station should be located in close proximity to each other to facilitate intermodal connections for travelers. Several stakeholders have questioned the size of the bus program, and we recommend FRA further evaluate those comments to confirm the facility size necessary to accommodate long-term bus growth at the station.

Ultimately, the project must reduce single-occupancy vehicle use as much as possible, while maximizing pedestrian and bicycle access, as well as promoting other transit access to the station, including bus and rail. Related to this, the project must minimize impacts on the local street network as much as possible, or otherwise mitigate those impacts if necessary. It is clear from the DEIS that there will be impacts to the transportation network as a result of the expected user growth at the station. We concur that a robust transportation management plan (TMP) must be developed with a variety of transportation demand management (TDM) strategies to help achieve the plan goals. FRA should provide detailed TDM measures and commit to them as part of the EIS.

NCPC staff agrees that pick-up and drop-off (PUDO) is an important issue that must be addressed. We request continued coordination with the District Department of Transportation (DDOT) and District Office of Planning (DCOP) regarding the feasibility of a purpose-built PUDO facility to assist in the further distribution of vehicular trips around the station. Additional discussions with the private developer of Burnham Place will also be necessary. Finally, we reiterate the Commission's previous request that FRA coordinate with DDOT to evaluate the proposed circulation system and any impacts to the transportation network, including Columbus Circle, the H Street Bridge, and adjacent streets.

### *Parking Program*

Pursuant to the Commission's comments to substantially reduce the number of proposed parking spaces at the concept review in January 2020, we recommend the EIS include an alternative that responds to this request. The District has provided documentation in support of significantly less parking and Amtrak has indicated that they do not require parking for their riders. Therefore, the burden is on FRA and the Union Station Redevelopment Corporation (USRC) to justify the higher parking numbers proposed for the EIS analysis.

Regarding the DEIS analysis, questions remain as to the sources of the baseline parking information as well as the assumptions about future need. The existing conditions analysis (from 2015) data is not clear, and it does not appear that detailed data on user trends for the parking garage are available. As this is the case, it raises questions regarding the baseline parking and how parking use may have changed over the past five years.

NCPC previously provided a comment letter regarding the proposed parking program, dated July 21, 2020. We will not repeat those comments here, but they are attached so that they may be made part of the record. We reiterate again it will be necessary to revise or update one or more alternatives to include a parking program that responds to the Commission's request that substantially reduces parking.

#### *NCPC Review Process*

Following the DEIS, and prior to releasing the Final EIS, FRA should submit the project as a revised concept design to the Commission. This submission must address the planning issues raised by the Commission during the initial concept review in January 2020. The major issues that must be resolved through the next review include the amount of parking, vehicle access and circulation, general massing and placement of uses. It is critical this occur before the FEIS is issued so that FRA and NCPC can align on a single preferred alternative. If the Commission determines that a new or revised alternative is necessary, then additional NEPA analysis may be required.

NCPC will conduct preliminary review of the project when design for the entire project is at 30-50 percent development. Final review will occur when all of the design decisions have been made (including building and landscape materials) and prior to advertisement and award of construction contracts (e.g. 50-70 percent design development). The Commission will finalize its Record of Decision at the time of final approval. Please refer to NCPC's *Submission Guidelines* for more information.

We recognize that the expansion project and private air rights development will be implemented independently. While NCPC will not take action on adjacent private development as part of FRA's submission, it will review the zoning case in the future. In fact, the Commission is the only entity that will review both projects. For both projects, it is the Commission's role to consider general neighborhood interests as well as cumulative impacts. While the expansion project is independent of adjacent private development, all projects can significantly benefit from coordination. The Commission has clearly articulated their interest in the relationship of circulation, parking and urban design. As part of future submissions to the Commission, it is critical to show how the expansion project will relate to the context, including Burnham Place and any other future projects, to maximize the potential for beneficial synergies.

#### *Next Steps*

The expansion project is a critical multimodal infrastructure investment in the nation's capital. NCPC will continue to work with FRA on the EIS and review process. We will also utilize the expertise of DCOP and DDOT, per the direction of the Commission, in evaluating the project and making further recommendations. As the process advances, we request FRA provide an updated schedule and a request FRA outline next steps and how it anticipates responding to all comments.

Again, we appreciate the coordination of FRA on this important and complex project. If you have any questions or would like to further discuss the review process or the Commission's actions thus far, please do not hesitate to contact me or Matthew Flis at [matthew.flis@ncpc.gov](mailto:matthew.flis@ncpc.gov) or (202) 482-7236.

*Diane Sullivan* 09/25/20

Sincerely,

Diane Sullivan  
Director, Urban Design and Plan Review Division

cc: Andrew Trueblood Director, DCOP  
David Maloney, State Historic Preservation Officer, DCOP  
Jeff Marootian, Director, DDOT  
Frederick Lindstrom, Assistant Secretary, US Commission of Fine Arts

Attachments: July 21, 2020 Letter – Parking Program



401 9<sup>th</sup> Street, NW North Lobby, Suite 500 Washington, DC 20004 Tel: 202.482.7200 Fax: 202.482.7272 www.ncpc.gov

IN REPLY REFER TO:  
NCPC FILE No. 7746

July 21, 2020

Mr. David Valenstein  
Senior Advisor  
Federal Railroad Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: Comments on Washington Union Station Expansion Project Draft Environmental Impact Statement – Parking Program

Dear Mr. Valenstein:

In January 2020, NCPC reviewed the concept plans for the Washington Union Station Expansion Project. The Commission provided a series of comments and recommendations to help facilitate the project development. In particular, they requested that FRA substantially reduce the number of parking spaces. The Commission also asked that the applicant, private development owner, and staff work with the District of Columbia Office of Planning (DCOP) and District Department of Transportation (DDOT) to evaluate and confirm the appropriate amount of parking given the mix of uses, traffic and urban design impacts, and transit-oriented nature of the project, prior to the next stage of review. The result of this request was the creation of the parking working group which met through the spring of 2020 to discuss the proposed parking program.

At the July 9, 2020 Commission meeting, NCPC staff presented an initial analysis of the parking program included in the Draft Environmental Impact Statement (DEIS) for the project. Staff advised that FRA had not altered the proposed parking levels in the DEIS since the concept review in January. Commission members were unanimous in expressing significant concern that FRA had not undertaken a good-faith effort to reduce the parking program per the Commission's previous request, and further, expressed frustration that their initial comments did not appear to have been heard by FRA. The Commission was clear that the next project submission should include a substantial parking reduction and that it is incumbent upon FRA to accommodate that reduction in the EIS documentation.

Commission members noted the unusual consensus from a number of stakeholders about reducing the parking program, including the Advisory Neighborhood Commission, (ANC), Congresswoman Eleanor Holmes Norton, the District agencies, and several District Councilmembers. They noted that such unanimity is unusual in such a large and complex project.

The Commission underscored the importance of accommodating the projected increase in ridership while recognizing the project's implications for infrastructure, urban design, and land use will likely impact federal, District and neighborhood interests. The Commissioners also expressed the need for an overarching vision that will help frame these issues and provide a guide to the decision-making necessary for such a complex and interwoven undertaking. While the Commission's comments largely focused on parking, staff will provide additional comments on circulation, urban design and other aspects of the alternatives during the public comment period.

### Proposed Parking

Staff noted the parking report developed by the District Office of Planning and the District Department of Transportation recommended substantially less parking (300 spaces) than proposed by FRA (1,600 spaces). Commissioner Trueblood, in prepared remarks (attached), stated that there are federal, District, and neighborhood concerns. And further, the project does not meet good land use or urban design standards. He maintained that the context has changed substantially since the station was last redeveloped, and the assumptions about how the facility will operate into the future are outdated. He concluded requesting the Commission ensure that FRA will advance a project that is not only respectful of the historic laws and context, but also embodies the highest quality urban design and transportation infrastructure for this highly transit accessible area of the District.

The Commission requested additional clarity about the process moving forward, and particularly how a substantial reduction in the parking program would be reconciled with the NEPA process and NCPC's review responsibilities. They reiterated that NCPC has approval authority regarding the project, and the Commission could make a separate determination regarding the appropriate parking levels. They strongly recommended FRA work collaboratively now to avoid delays, cost increases, and changes to the project later in the process.

The Commission reiterated that the burden of proof remained with FRA and USRC to justify the necessary parking, and thus far had not done so. Below are a series of comments and requests to assist in better understanding both the existing parking needs and the future trends that may inform the proposed parking program:

- The number of train users parking at the garage appears to be declining, according to more recent Amtrak ridership information. Further, Amtrak has indicated they do not require passenger parking for their operations at Union Station (see attached Amtrak Memorandum). The District of Columbia has reiterated that they do not believe long-term parking for train and bus users is necessary at the station given its multimodal function. Given this, FRA should provide additional documentation or support to justify the inclusion of long-term parking at the station.
- An increase in monthly parkers and decrease in train riders parking at the station suggest the purpose of the garage may be shifting from traveler-oriented to one more serving neighboring commercial uses. FRA should evaluate whether these trends are in fact

changing the occupancy and nature of the garage, and if so, whether the need for substantial long-term parking for Union Station users remains justified.

- The District of Columbia agencies recommend no parking for retail uses and some limited parking for office uses. They note that retail may be supported by increased station visitation through 2040. Therefore, FRA and USRC should evaluate whether parking is necessary for retail uses at the station given the station's anticipated growth in visitation and high level of multimodal accessibility.
- While parking demand for train riders appears to be declining, the overall parking occupancy levels appear constant. This suggests other users are taking advantage of the available parking supply. FRA and USRC should evaluate if this is the case. Further, NCPC is interested in understanding whether parking related to non-station office use is increasing and whether the provision of such parking is consistent with the project's purpose and need. The Commission's perspective on such parking may be a consideration for the next concept review.
- Based on FRA information, existing rental operations support both station and local neighborhood users. At the same time, some amount of parking within the garage also appears to be dedicated to other car-sharing services for whom the primary user is not clear. DCOP and DDOT found that there was not sufficient data to support a rental car facility within that station at this time. As such, FRA and USRC should provide additional information to explain how these services support multimodal functionality at the station.
- Commissioners questioned how the project will advance given the still-outstanding questions about the parking program. In particular, FRA should describe how it envisions the NEPA process unfolding if changes are mandated to the EIS based on Commission and other public comments. It was also recommended that the EIS be robust enough to accommodate any potential changes to the parking program to not require backtracking. We recommend that FRA include an alternative reflecting the District's recommended parking level to capture the potential minimum program. This is in FRA's best interest since it would ultimately save time and effort down the road should the selected parking count fall between this number and the one initially proposed by FRA.

### Project Vision

Commissioners underscored the need for an overarching vision and high-quality urban design. At this time, the DEIS does not speak to these aspects of the project clearly. Over the next few months, staff will review the DEIS and provide additional comments regarding access, circulation and urban design. Overall, the project should maximize accessibility for station users, including the surrounding neighborhoods. Circulation should prioritize pedestrian and bicycle movement, effective passenger pick-up and drop-off, and avoid or minimize conflicts with vehicles. In terms of urban design, the overall height and bulk of the new development should respect the historic station building. Active ground floor uses, civic spaces and other placemaking opportunities,



should be integrated into the project plans. These components should be clearly described in the revised concept submission to the Commission.

NCPC advises continued dialogue with Akridge, the private developer of Burnham Place. We recognize the two projects are independent and will be implemented separately, but given the scale and adjacencies of each development, great opportunities exist to align the transit-oriented visions for each in a manner that is mutually beneficial. Together, the Washington Union Station Expansion Project and Burnham Place will be one of the most complex and consequential interventions proposed within the District of Columbia. Continued conversations and coordination among both owners is critical to getting each accomplished.

NCPC will continue to work with FRA on the EIS process and will continue to provide comments and planning expertise as this is a critical multimodal infrastructure investment in the nation's capital. We will also rely on the expertise of the District Office of Planning and District Department of Transportation, per the direction of the Commission at the January 2020 meeting, in evaluating the project and making further recommendations to the Commission. Again, we appreciate the coordination of FRA on this important and complex project. If you have any questions or would like to further discuss the review process or the Commission's actions thus far, please do not hesitate to contact me or Matthew Flis at [matthew.flis@ncpc.gov](mailto:matthew.flis@ncpc.gov) or (202) 482-7236.

Sincerely,



Marcel Acosta  
Executive Director

Cc: Andrew Trueblood, Director, DC Office of Planning  
Jeff Marootian, Director, DC Office of Transportation  
Beverly Swaim-Staley, President and CEO, Union Station Redevelopment Corporation  
Frederick Lindstrom, Assistant Secretary, US Commission of Fine Arts

Attachments: January 2020 - Commission Action  
July 2020 - Testimony of Commissioner Trueblood  
January 2020 – Amtrak Memorandum



## Commission Action

January 9, 2020

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<p><b>PROJECT</b>  <b>Washington Union Station Expansion Project</b>          Union Station          50 Massachusetts Avenue, NE          Washington, DC</p> <p><b>SUBMITTED BY</b>          United States Department of Transportation          Federal Railroad Administration</p> <p><b>REVIEW AUTHORITY</b>          Federal Projects in the District          per 40 U.S.C. § 8722(b)(1) and (d)</p>	<p><b>NCPC FILE NUMBER</b>          7746</p> <p><b>NCPC MAP FILE NUMBER</b>          1.11(38.00)45049</p> <p><b>APPLICANT'S REQUEST</b>          Approval of comments on concept plans</p> <p><b>ACTION TAKEN</b>          Approved comments on concept plans</p>
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The Commission:

**Finds** the primary goal of the project is to support current and future growth in rail service and multimodal connectivity for Washington, DC and the National Capital Region well into the 21<sup>st</sup> Century.

**Finds** it is the federal interest to support multimodal connections and transportation alternatives in the regional system.

**Supports** the overall project purpose, including accommodating future growth in rail service; improving accessibility and egress; enhancing the user experience; enhancing integration with surrounding uses; sustaining the station's economic viability; and preserving the historic train station.

**Finds** that Union Station is an important historic resource and is a gateway into the National Capital, and therefore the function, design and experience of the facility impacts the first impression of visitors. At the same time, the station is a critical transportation hub for residents and workers.

**Notes** Union Station Redevelopment Corporation (USRC) oversees the station operations and maintenance, and USRC funding supports preservation of the station, maintains the station as a multimodal transportation center, and enhances the retail and amenities within the station.

**Notes** the major project components include reconfiguration of the station tracks, a new train hall, bus facilities, and replacement parking facilities.

**Finds** the realignment and placement of the station tracks form the foundation of the design and configuration of other project elements. Changes in grade, limited points of access, constrained

site boundaries, and varying jurisdictions also create constraints that influence the placement of the proposed facilities.

**Notes** the applicant has developed six alternatives (A, B, C-East and West, D, E, and “A-C”) that share the same project components, but differ primarily in the placement of the train hall, parking and bus facilities.

**Notes** the applicant has indicated that Alternative “A-C” is their preferred alternative because it minimizes the duration, depth, complexity, and cost of construction as there would be no extensive construction below the concourses; keeps intermodal uses close to each other and close to the main station like today; and minimizes operational traffic impacts on the H Street Bridge and public street network by optimizing deck-level vehicular circulation and re-using the existing east and west ramps.

*Regarding the transportation facilities:*

**Supports** the reconfiguration of the train platforms to create greater efficiency, improve accessibility, and enhance the user experience.

**Finds** the addition of a new concourse level with pedestrian entrances at 1<sup>st</sup> Street and 2<sup>nd</sup> Street will greatly improve pedestrian access from the adjacent neighborhoods.

**Supports** the addition of a new east-west train hall that helps create a large, gracious entry to the track platforms, creates a setback from the historic train station and brings natural light into the facility.

**Finds** that the rail station, bus facility and Metrorail Station should be located in close proximity to each other to facilitate intermodal connections for travelers.

**Supports** the creation of new pedestrian entrances at the level of the H Street bridge and new train hall to improve accessibility to the station, and to relieve demand for drop-offs at the front of the station.

**Notes** the traffic impacts of the proposed alternatives were not part of the concept submission, but will be included as part of the impacts analysis within the Draft Environmental Impact Statement.

**Requests** the applicant coordinate with the District Department of Transportation to evaluate the proposed circulation system and any impacts to the transportation network, including Columbus Circle, the H Street Bridge, and adjacent streets.

*Regarding the parking facilities:*

**Notes** the site currently has about 2,200 striped parking spaces with an average utilization rate over 80 percent. Rental car areas and the mezzanine accommodate about 250 additional vehicles.

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Presently, a majority of the spaces (1390) appear to be used by monthly pass holders whereas the use of the garage for daily retail or rail users appears substantially less.

**Notes** the preferred alternative reduces the proposed number of spaces by approximately one-third to 1,575 spaces, with approximately 600 spaces for retail, 900 flexible spaces for general use, and 75 spaces for rental cars.

**Notes** the federal Transportation Element provides specific guidance for federal employee parking, but in this case, much of the parking is for non-federal commercial use and other station users.

**Notes** the proposed 2019 federal Transportation Element of the Comprehensive Plan states agencies should consult the parking policies of local jurisdictions to determine appropriate parking standards for non-workplace federal uses, including residential, commercial, and institutional uses.

**Requests** the applicant substantially reduce the number of parking spaces, and that the applicant, private development partner, and staff work with the District Office of Planning and the District Department of Transportation to evaluate and confirm the appropriate amount of parking given the mix of uses, traffic and urban design impacts, and transit-oriented nature of the project prior to the next stage of review.

**Notes** the applicant has evaluated off-site locations for parking, including other federal properties and private sites, but has determined they all face significant challenges regarding acquisition or implementation.

*Regarding historic preservation and urban design:*

**Finds** the applicant seeks to enhance the functionality of the Union Station, and the proposed alternatives generally do not directly alter the historic station building itself.

**Notes** that proposed development behind the station should consider the setting of the historic building and the critical views from the National Mall, U.S. Capitol, and other viewsheds.

**Supports** the use of the east-west train hall to create a wider setback between the historic train station and new development to the north, as a way to help mitigate the visual impacts of the new development.

**Supports** the provision of a pedestrian access corridor between the top of the H Street Bridge and the station / train hall to create a new way to access the station from the H Street-Benning Streetcar Station. The “access zone” will require coordination with adjacent private development.

**Finds** the placement of parking beneath the station tracks and lower concourses may be challenging due to constructability and cost and therefore, the smaller the massing of the above grade garage, the better.

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**Finds** that bus and parking facilities can be designed in a manner that can support compatibility with other adjacent uses, including the integration of retail and other active uses, the architectural treatment of buildings and facades, and the incorporation of other public amenities.

**Requests** for the next review the applicant further develop plans and renderings that show how active uses, amenities and architectural features can enhance the public realm and create a design that is compatible with adjacent development.

**Requests** the applicant prepare elevations and renderings to show how the height and mass of the alternatives will look from key viewsheds, including from the U.S. Capitol building, the National Mall, Delaware Avenue, and 1<sup>st</sup> Street, NE. The renderings should also include the massing of any private development permitted in the USN zone.

*Regarding further coordination:*

**Requests** the applicant coordinate with the Washington Metropolitan Area Transit Authority regarding the proposed improvements and new entry to the Metrorail station along 1<sup>st</sup> Street, NE.

**Requests** the applicant coordinate with District Department of Energy and Environment regarding stormwater management and other environmental issues related to the site.

**Requests** the applicant provide a phasing plan that describes the timing and implementation of each project component, where applicable, as part of the next review.

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Julia A. Koster  
Secretary to the National Capital Planning Commission

**Introductory Remarks Delivered by Commissioner Trueblood at the  
NCPC Meeting of July 9, 2020, RE: the DEIS for the Washington Union Station  
Expansion Project**

Thank you, Mr. Flis, I think your presentation was quite helpful and accurately summarized quite a complex set of issues.

Since I'm first-up on responding to NCPC's staff presentation, I think that it is important to take a quick step back and underscore that the driver of the Union Station Expansion Project is to accommodate a projected increase in rail ridership in the year 2040 that is approximately 2.5 times today's ridership. How we accommodate this passenger increase is the key to this project and has implications across infrastructure, urban design, and land use that impact federal, District and neighborhood interests.

While the infrastructure planning for the project as proposed is quite good in terms of accommodating this increase in ridership, its land use planning is poorly developed, reflecting an outmoded suburban condition rather than an immensely vibrant, urban context in the heart of our Nation's Capital. While the alternatives do not delve deeply into urban design, it is clear that the current approach would make high-quality urban design impossible to achieve.

While the District is strongly in support of the expansion and renovation of Union Station, I am quite concerned that Preferred Alternative A-C, as proposed in the DEIS, remains unchanged since its release last fall. I worry that the time and effort this Commission put into reviewing and commenting on the proposed Project at our January 9 meeting was ignored. At that meeting, the Commission explicitly directed FRA to substantially reduce the number of parking spaces and to work with OP and DDOT to evaluate and confirm the appropriate amount of parking given the mix of uses, traffic and urban design impacts, and transit-oriented nature of the Project, prior to the next stage of review.

In response to NCPC's request, OP and DDOT, along with NCPC staff, devoted hundreds of hours to analyzing, meeting about, and supporting development of a reasonable approach to parking at Union Station, as documented in the District's Parking Memo referenced by NCPC staff today. It seems that our effort had no effect on FRA's Preferred Alternative A-C, which has been incorporated into the Draft EIS without change.

But it isn't just feedback from NCPC and DC government agencies that this proposal has failed to account for. Congresswoman Norton, the DC Council, the ANC, nearby landowners, and other stakeholders have expressed strong opposition to too much parking. In fact, other than FRA, I have not heard a single voice in favor of the proposed excessive parking. In a place known for diverse perspectives and robust debates about appropriate development, particularly for projects of this complexity, the level of consensus that the planned parking should be substantially reduced speaks volumes. Recognizing the value of such input is even more important given that this is a major, long-term, public infrastructure project.

Opposition aside, one of the most troubling aspects about FRA's approach is its attachment to outdated parking assumptions and disregard for their negative impacts on the project and the

surrounding area. The existing parking garage may have made economic and land use sense in 1983 when USRC was tasked with overseeing a revitalized Station, when the District was in a starkly different economic position, when shopping malls were an economic driver, when rail travel's future was uncertain at best, and when private cars were planned for as the primary mode of transportation.

It is clear to me, and the other parties examining this project, that the context has significantly changed since then, and so should the perspective and approach to parking needs. If it does not, this obsolete perspective will constrain the station for the next 100 years and hamper the potential of the Project to add to, rather than detract from, the excellence of urban form and optimal uses the Station can and absolutely should contribute to the District.

The District is preparing comments to share with FRA during the DEIS review period. But I want to emphasize that FRA's approach of retaining Preferred Alternative A-C largely unchanged has put a much greater burden on the community to review and analyze the proposal than, in my opinion, is appropriate. My concern is magnified by a similar lack of consideration of response we have seen on the Section 106 review for compliance with the National Historic Preservation Act.

If I have one piece of advice for the project sponsors it is that what may on paper appear to be easiest and fastest path now may become the opposite later if it does not have the support of the various parties involved. Such an approach for such a complex project is all but certain to result in numerous delays and increased costs. It is better to work collaboratively together now. That may result in some additional costs or complexity on the front end, but it is better to plan for those now than to be caught changing plans midstream or stuck in litigation later. I hope the project sponsors are able to change their approach and views to be more collaborative moving forward, as without significant adjustments to the project in line with our recommendations, the District will be unable to support this project.

As for today, I hope my fellow NCPC Commissioners will join me in underscoring our previous recommendation for a substantially reduced parking program at Union Station. As importantly, I hope we can commit to hold the project to such reduced parking program when it comes before the Commission for approval. In addition, I hope NCPC will continue to ensure that FRA produces a project that is not only fully respectful of the historic laws and context, but also embodies the highest quality urban design and transportation infrastructure for this critical part of our city.

We look forward to continuing to work with FRA, USRC, Amtrak and NCPC to ensure that Washington Union Station is positioned to continue to be a gem in our city for the next century and beyond.



# Memorandum

**To:** David Valenstein; Beverley Swaim-Staley  
**CC:** David Handera; Daniel Sporik; Kevin Forma; Bradley Decker  
**From:** Gretchen Kostura  
**Date:** January 7, 2020  
**Re:** Amtrak Parking for the Washington Union Station Expansion Project

---

Passenger parking is not essential to Amtrak's operation of intercity passenger rail at Washington Union Station and is regarded as an ancillary passenger amenity. Although existing conditions provide for rail passenger parking, a majority of Amtrak and commuter rail passengers access the Station via alternate transportation modes. Amtrak strongly encourages passengers to travel to the Station through modes other than private vehicle to park. This advocacy coupled with major planned rail infrastructure investments north and south of the Station and a shifting culture away from private automobile use leads Amtrak to anticipate passenger parking demand to continually decrease in the future.

Currently, based on our ridership and survey responses from passengers, Amtrak estimates 600-700 passengers are parking at the Station<sup>1</sup>. We do not assume that parking will increase proportionally as rail ridership increases. Additionally, there will likely be a considerable period where there is no parking available at the Station during construction and passengers will need to figure out an alternative means of accessing the Station. Therefore, Amtrak believes the current parking program targeted for Amtrak passengers in the Station Expansion Project is over planned and Amtrak supports refinement of the parking estimate in the future. Amtrak does not support any entity building a parking garage specifically to support Amtrak passengers.

In a public setting, Amtrak will continue to support Alternative A-C and will offer testimony to the elements directly related to the core business of operating intercity passenger rail. However, given the parking garage is located on federal property and overseen by Union Station Redevelopment Corporation, Amtrak will defer to the property owner and operator to determine the appropriate use for their property given market demand, land use analysis and transportation mode shifts as the planning progresses into design. The City should also be involved with determining the overall appropriate amount of parking for the Station as they are responsible for setting parking requirements for development projects in DC. Amtrak, FRA, USRC, and the City should commence a working group to refine the parking program.



*January 27, 2020*

We do not believe the EIS process needs to be stalled or postponed as this refinement work can move in parallel to the current process with the current numbers serving as a stress test for the Project.

Finally, in the event the property owner and operator, in coordination with local and regional transportation officials and Amtrak, determines the parking program should be downsized, Amtrak encourages the reevaluation of locating the parking facility below the tracks and platforms.

<sup>1</sup> Daily Amtrak ridership is approximately 16,000. It can be assumed that Union Station is the origin station for half those riders and 8% of those riders are parking at the Station given our survey results from 2017. Note that the most recent survey of passengers in December 2019, only 4% of riders from Union Station drove and parked.

**Architect of the Capitol**

U.S. Capitol, Room SB-16

Washington, DC 20515

202.228.1793

www.aoc.gov

September 30, 2020

David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Mr. Valenstein,

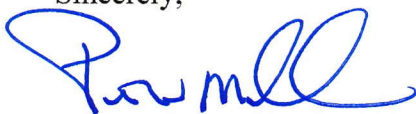
Thank you for the opportunity to review and submit comments as a part of the Washington Union Station Expansion Project (WUSEP) Draft Environmental Impact Statement (DEIS) and Section 106 public review period ending September 28, 2020. After careful deliberation by numerous Capitol complex stakeholders, the Architect of the Capitol (AOC) submits the following comments:

1. Traffic analyses and projections do not, and should, account for AOC-owned streets, which can be (temporarily or permanently) closed at any time. Please see the enclosed Capitol complex jurisdiction map for properties owned and controlled by the AOC.
2. Traffic impacts to the Thurgood Marshall Federal Judiciary Building should be reevaluated. Day-to-day Marshall Building operations should not be impacted.
3. The Federal Railroad Administration (FRA) should implement additional pedestrian safety precautions on the Union Station Drive NE lane curve between the station and the Marshall Building. Pedestrian safety and experience throughout all of Columbus Circle should be reevaluated.
4. The FRA should coordinate with the AOC and the District Department of Transportation on appropriate bicycle accommodations and wayfinding that connect the Second Street NE shared-use portion of Metropolitan Branch Trail and the First Street, NE bike lanes to existing and future bicycle infrastructure within the Capitol complex.
5. The Construction Transportation Management Plan and truck traffic plan should be coordinated with the AOC. Construction vehicles are not permitted to regularly travel within or throughout the Capitol complex (AOC-owned streets). More specifically, construction vehicles should not impede access to the immediately adjacent Marshall Building.
6. The Safety and Security Operations Plan should be coordinated with the AOC's Office of Security Programs and the U.S. Capitol Police.
7. The Capitol complex land use designation is incorrect on page 4-511 and should be adjusted.
8. The AOC supplies chilled water and steam to Union Station. Page B-21 of Appendix A5c outlines projected capacity increases due to the redevelopment's expanded floor area and states, "The AOC has confirmed that they can increase the quantities available." The FRA should initiate conversations with the AOC to verify proposed capacity increases and revise the existing memorandum of understanding (MOU). Additionally, the proposed capacity increases should not negatively impact the Marshall Building's existing or future capacity.

9. The FRA should pursue additional preventive measures during excavation and underground construction to prevent the former Union Station underground storage tanks from leaking hazardous materials.
10. Stormwater flooding has been a historic issue around Massachusetts Avenue NE, adjacent to the Marshall Building. As the WUSEP design develops, impacts (both temporary and permanent) to the stormwater and sanitary systems should be carefully evaluated. Large construction projects may require rerouting of these systems and the designer may be unaware of existing infrastructure challenges.
11. The FRA should seek congressional approval if the WUSEP requires digging or excavation on government property.
12. High construction vibration and noise levels have been noted in close proximity to the Marshall Building. The FRA should reevaluate the Marshall Building and propose additional mitigation measures — especially since this vibration and noise will last 11 to 14 years. Expected (and more accurately defined) levels should be provided to the AOC during the design phase, along with options to mitigate destructive/disruptive levels over the course of the project. As a part of this analysis, the FRA should conduct a geotechnical settlement analysis to ensure the approximately 945 drilled shafts do not affect or impact the Marshall Building's structural integrity and existing granite façade cladding system.
13. High construction noise levels have been noted in close proximity to the Senate office buildings. The FRA should reevaluate the buildings and propose additional mitigation measures —especially since this noise will last 11 to 14 years. Expected (and more accurately defined) levels should be provided to the AOC during the design phase, along with options to mitigate disruptive levels over the course of the project.
14. While the 2020 DEIS and Section 106 determinations do not include effects caused by the private air rights development, future efforts to execute this project should coordinate with the AOC given impacted views to and from the Capitol complex.
15. The DEIS and Section 106 identify impacts to Senate parks but do not specify said impacts. These impacts should be clarified.
16. The DEIS should identify mitigation measures in the event construction adversely impacts the Capitol complex. The AOC recommends the FRA enter into an MOU to address said measures and to avoid negatively impacting congressional and U.S. Supreme Court operations.

Once again, thank you for the opportunity to review and submit comments. If there are any questions related to the recommendations above, please contact Nancy L. Skinkle at [nskinkle@aoc.gov](mailto:nskinkle@aoc.gov).

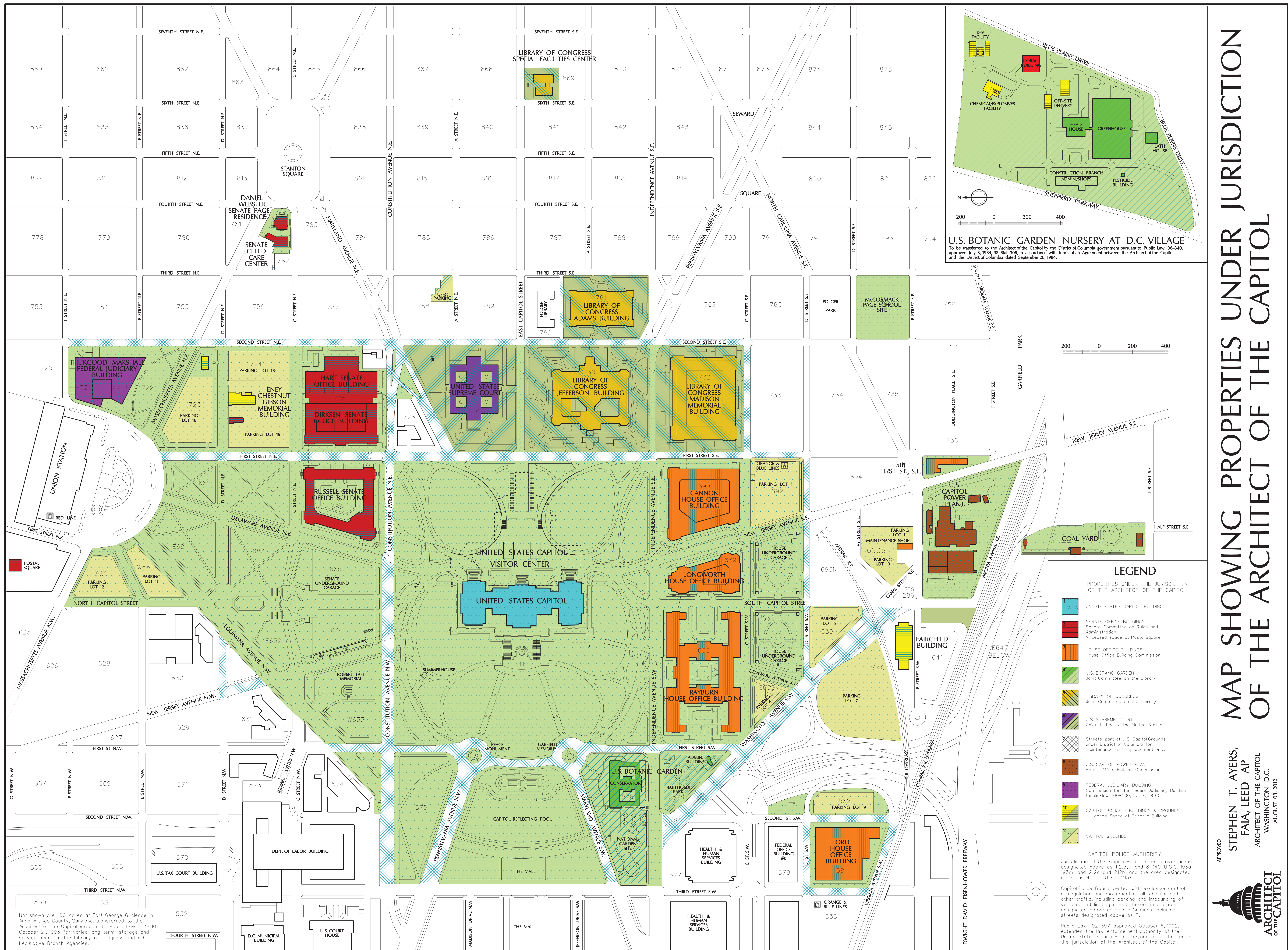
Sincerely,



Peter W. Mueller, PE, PMP  
Chief Engineer  
Architect of the Capitol

Enclosure

Doc. No. 200911-18-01



**U.S. BOTANIC GARDEN NURSERY AT D.C. VILLAGE**  
 To be transferred to the Architect of the Capitol by the District of Columbia government pursuant to Public Law 98-340, approved July 3, 1984, 98 Stat. 308, in accordance with terms of an Agreement between the Architect of the Capitol and the District of Columbia dated September 29, 1984.

200 0 200 400

**LEGEND**

- PROPERTIES UNDER THE JURISDICTION OF THE ARCHITECT OF THE CAPITOL
- UNITED STATES CAPITOL BUILDING
- SENATE OFFICE BUILDINGS  
Senate Committee on Rules and Administration  
\* Leased space at Postal Square
- HOUSE OFFICE BUILDINGS  
House Office Building Commission
- U.S. BOTANIC GARDEN  
Joint Committee on the Library
- LIBRARY OF CONGRESS  
Joint Committee on the Library
- U.S. SUPREME COURT  
Chief Justice of the United States
- Streets, part of U.S. Capitol Grounds under District of Columbia for maintenance and improvement only.
- U.S. CAPITOL POWER PLANT  
House Office Building Commission
- FEDERAL JUDICIARY BUILDING  
Commission for the Federal Judiciary Building (Public Law 100-480, Oct. 7, 1988)
- CAPITOL POLICE - BUILDINGS & GROUNDS  
\* Leased Space at Fairchild Building.
- CAPITOL GROUNDS

**CAPITOL POLICE AUTHORITY**  
 Jurisdiction of U.S. Capitol Police extends over areas designated above as 1, 2, 3, 7 and 8 (40 U.S.C. 193a, 193m and 212a and 212b) and the area designated above as 4 (40 U.S.C. 215).

Capitol Police Board vested with exclusive control of regulation and movement of all vehicular and other traffic, including parking and impounding of vehicles and limiting speed thereof in all areas designated above as Capitol Grounds, including streets designated above as 7.

Public Law 102-397, approved October 6, 1992, extended the law enforcement authority of the United States Capitol Police beyond properties under the jurisdiction of the Architect of the Capitol.

**MAP SHOWING PROPERTIES UNDER JURISDICTION OF THE ARCHITECT OF THE CAPITOL**

APPROVED  
**STEPHEN T. AYERS,**  
 FAIA, LEED AP  
 ARCHITECT OF THE CAPITOL  
 WASHINGTON, D.C.  
 AUGUST 08, 2012



Not shown are 100 acres at Fort George G. Meade in Anne Arundel County, Maryland, transferred to the Architect of the Capitol pursuant to Public Law 103-110, October 21, 1993 for varied long term storage and service needs of the Library of Congress and other Legislative Branch Agencies.



**MURIEL BOWSER**  
**MAYOR**

September 28, 2020

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Mr. Valenstein:

As the Mayor of the District of Columbia, I am pleased to support the comments of District of Columbia government agencies to the Federal Railroad Administration's (FRA) Draft Environmental Impact Statement (DEIS) published for comment on June 12, 2020 for the proposed Washington Union Station Expansion Project, in accordance with requirements of the National Environmental Policy Act (NEPA).

Washington Union Station is a vital local, regional, and national transportation hub and cultural destination. A leading example of civic infrastructure on the East Coast, it has a significant history in the District of Columbia serving residents and visitors for over 110 years. Union Station has seen many iterations in its service to the District, as a bustling train hub, a national visitor center, a place of civic convening, an underinvested reminder of a previous time, an urban retail destination, and most recently as a multimodal transportation hub. Union Station's next century of life will be determined by ongoing activities, including preliminary design and analysis of its expansion, as part of this NEPA review process. As such, it is critical that this process not only improve rail and intermodal transportation, but that it also create a best-in-class urban anchor. This is an essential vision for ensuring that the rich legacy of Union Station continues to serve our residents and visitors in an iconic design of intermodal excellence and sustainability.

The Preferred Alternative presented by the FRA in the DEIS does not present this vision. Instead, it is built on outdated 20th century ideals and approaches, including an unnecessary emphasis on single-occupancy vehicles and their storage. These assumptions compromise the future of Union Station by:

- Underutilizing a uniquely important location in the District and nation,
- Negatively impacting the public realm,
- Detracting from preservation of the historic station, and
- Failing to generate meaningful revenue to support the Project's costs.

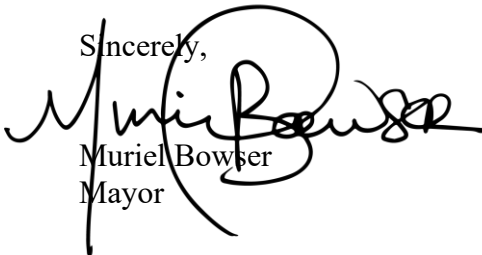
To be successful, the next chapter for Union Station must focus on its relationship to surrounding neighborhoods, its historic context, its long-term effects on—and contributions to—the District's transportation systems, and its anchoring position in our nation's capital and along the Eastern Seaboard. Comments from various District and federal agencies with broad and deep technical, policy, and design expertise (including the District of Columbia Department of Transportation, the District of Columbia Office of Planning, and the National Capital Planning Commission) unanimously support this assessment and provide numerous ways to change the project in order for it to be successful. At a high level, a Preferred Alternative for the expansion project must be developed that integrates:

- An intermodal transportation system (including pedestrian and bike connections, intercity bus, Metro access, taxicabs, and rideshare services) with a significantly reduced parking program,
- A well-designed land use program that aligns with private air rights development to both support transportation needs and create economic development opportunities through use of air rights that are proper for the urban context and can serve to financially support the Station,
- A dedicated pick-up/drop-off facility to support movement of taxicabs and rideshares supporting safe transportation to and from the Station,
- High-quality public space that is pedestrian-oriented and highlights the historical and civic character of the Station, and
- An overall design that intentionally and appropriately connects with the surrounding neighborhoods.

I urge FRA to accept and incorporate the comments from District and federal agencies into the Preferred Alternative in the DEIS. As currently proposed in the DEIS, the Project falls far short of what District residents, visitors, workers, and other stakeholders need and deserve.

Thank you for your consideration.

Sincerely,



Muriel Bowser  
Mayor



**COUNCIL OF THE DISTRICT OF COLUMBIA**  
THE JOHN A. WILSON BUILDING  
1350 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D.C. 20004

**SEP 22 2020**

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Mr. Valenstein:

Enclosed is a copy of Council Resolution 23-509, the "Sense of the Council Regarding the Union Station Expansion Project Resolution of 2020", adopted by the Council at the September 22, 2020 Legislative Meeting.

If you have any questions regarding this resolution, please contact Nyasha Smith, Secretary to the Council, at 202-724-8080 or [nsmith@dccouncil.us](mailto:nsmith@dccouncil.us).

Sincerely,

A handwritten signature in blue ink, appearing to read "Phil Mendelson".

Phil Mendelson  
Chairman of the Council

enc.



ENROLLED ORIGINAL

A RESOLUTION

23-509

IN THE COUNCIL OF THE DISTRICT OF COLUMBIA

September 22, 2020

RESOLVED, BY THE COUNCIL OF THE DISTRICT OF COLUMBIA, That this resolution may be cited as the “Sense of the Council Regarding the Union Station Expansion Project Resolution of 2020”.

Sec. 2. The Council finds that:

(1) Union Station, which is the largest transit hub in the District and the second busiest Amtrak station in the country, sees as many as 100,000 passengers each day and is a national landmark situated in a growing neighborhood. It serves District residents, commuters, business travelers, and tourists traveling on Metrorail, Metrobus, Circulator, intercity buses, regional and national train lines, bicycles, and foot.

(2) In June 2020, the Federal Railroad Administration (“FRA”) issued a draft environmental impact statement (“DEIS”) for the proposed Union Station Expansion Project that intends to expand and modernize Union Station’s multimodal transportation facilities to meet current and future transportation needs in the District and Amtrak’s Northeast Corridor.

(3) The project includes a major realignment and renovation of the existing train tracks, renovations to the existing building, a new rail terminal, a new parking garage, and a new bus facility. The project is proposed by the Union Station Redevelopment Corporation (“USRC”), which manages and operates Union Station under a long-term lease from FRA and Amtrak. FRA is the lead agency preparing the Environmental Impact Statement detailing design alternatives for the Federal government.

(4) Mixed-use development adjacent to Union Station has the potential to transform the surrounding neighborhood, providing office, residential, and retail uses, in addition to new public spaces. In order for any such development to be compatible with the surrounding neighborhood, it is essential that all aspects of the Union Station redevelopment be done in concert with local planning efforts and best practices.

(5) The DEIS released by FRA falls short of the needs of District residents, workers, visitors, and project stakeholders, and does not take into account comments by the National Capital Planning Commission, the District of Columbia Office of Planning, members of the Council, and the impacted Advisory Neighborhood Commission (“ANC”). Major changes



**ENROLLED ORIGINAL**

are needed to the DEIS. Any preferred alternative identified in a final environmental impact statement must reflect both the needs of FRA and sound urban design principles.

(6) The preferred design alternative that the FRA identified in the DEIS proposes 1,600 parking spaces in a new Union Station garage, even though extensive analysis by the District of Columbia Office of Planning concluded that fewer than 300 spaces are actually needed. This conclusion has been supported by Federal planners at the National Capital Planning Commission (“NCPC”) as well as District residents, Advisory Neighborhood Commissions, adjacent landowners, and Congresswoman Eleanor Holmes Norton. NCPC has reported that nearly two-thirds of the current parking spots are monthly parking contracts — that is, not needed for commuters, travelers, and shoppers coming to Union Station. Overparking this project ignores changing trends in this multimodal core, will have a negative effect on adjacent development, is counter to the trend to reduce parking at many other large urban stations in the Amtrak system, and will induce additional traffic in the neighborhood.

(7) ANC 6C, which includes Union Station, has repeatedly emphasized that “[a]s currently envisioned, the expanded Union Station would be surrounded by a snarl of cars and buses, creating a barrier to access for the residents of the surrounding neighborhoods.” In addition to creating a pedestrian-unfriendly environment at a dense transit hub, FRA’s preferred design ignores the place-making potential at this gateway to the District. The preferred design also frustrates the intent of the Council, which budgeted more than \$200 million to remake the adjoining pedestrian bridge at H Street, N.E., as a safe pedestrian crossing to the private development adjoining the federal site.

(8) The DEIS also does not adequately consider the placement and scale of the proposed parking garage, the impact of the proposed garage access points on multimodal circulation around the facility, and northern viewsheds impacted by the proposed garage. The expanded garage is predicated, in part, on preserving a legacy revenue stream for USRC that relies on parking fees as it has since 1981. This does not reflect the changing transportation dynamics of the past 40 years and assumes that USRC is incapable of reimagining its business model.

Sec. 3. It is the sense of the Council that:

(1) Multimodal transit options, including bus, rail, transit, rideshare, bicycle, and pedestrian access, must be prioritized over parking in the FRA’s environmental impact statement for the proposed Union Station Expansion Project;

(2) The Union Station Expansion Project and neighboring development must enhance the quality of life for those who live around Union Station and for those who come to work in or visit the city by considering input from neighbors about how to integrate the design into the neighborhood; and

(3) The FRA must reduce the size and scale of the proposed parking garage consistent with the District of Columbia Office of Planning’s projections.

**ENROLLED ORIGINAL**

Sec. 4. The Council shall transmit a copy of this resolution to the Federal Railroad Administration (for inclusion in the record), the Union Station Redevelopment Corporation, the National Capital Planning Commission, and the District of Columbia Office of Planning.

Sec. 5. This resolution shall take effect immediately.



COUNCIL OF THE DISTRICT OF COLUMBIA  
DCCouncil\_0922  
WASHINGTON, DC, 20004

Docket No. **PR23-0936**

ITEM ON CONSENT CALENDAR

ACTION

**Final Reading**

VOTE DATE

**September 22, 2020**

VOICE VOTE

RECORDED VOTE ON REQUEST

ABSENT

ROLL CALL VOTE – Result

**Passed**

Council Member	Aye	Nay	NV	AB	Rec	Council Member	Aye	Nay	NV	AB	Rec	Council Member	Aye	Nay	NV	AB	Rec
Chairman Mendelson	X					Grosso	X					Silverman	X				
Allen	X					McDuffie	X					T. White	X				
Bonds	X					Nadeau	X					Todd	X				
Cheh	X					Pinto	X										
Gray	X					R. White	X										
<b>X - Indicate Vote</b>			<b>AB – Absent</b>			<b>NV - Present, Not Voting</b>			<b>Rec - Recused</b>								

CERTIFICATION RECORD

  
Secretary to the Council

9/22/20  
Date



**COUNCIL OF THE DISTRICT OF COLUMBIA**  
**THE JOHN A. WILSON BUILDING**  
**1350 PENNSYLVANIA AVENUE, NW**  
**WASHINGTON, DC 20004**

**Charles Allen**  
**Councilmember, Ward 6**  
**Chairperson**  
**Committee on the Judiciary and Public Safety**

**Committee Member**  
**Business and Economic Development**  
**Education**  
**Transportation and the Environment**

September 28, 2020

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Mr. Valenstein,

I am writing to submit my comments on the Draft Environmental Impact Statement (“DEIS”) for the Washington Union Station Expansion Project. In addition to my comments in this letter, I request that the Federal Railway Administration incorporate the comments in D.C. Council PR23-936, the [Sense of the Council Regarding the Union Station Expansion Project Resolution of 2020](#). I represent Ward 6 on the Council of the District of Columbia, which includes Union Station, and I also serve as First Vice Chair of the National Capital Region Transportation Planning Board. My perspective on this project is both hyper-local and regional. From both of those perspectives, I have been shocked that the planning for one of the busiest transit hubs in the region continues to be so short-sighted. I hope that as this project moves forward, it will reflect input from local leaders; right now, it does not.

The Union Station Expansion Project is a once in a century opportunity. This project can ensure that Union Station remains a nationally significant landmark, showcasing excellence in urban planning and design while also knitting the project into the fabric of the community. This project can also ensure that Union Station is a model 21<sup>st</sup> (and perhaps even 22<sup>nd</sup>) century local and regional transportation hub. I am very supportive of the elements that enhance and substantially expand the train capacity at Union Station, as well as the reorientation of the train hall, and believe it shows a commitment to attracting and accommodating the expected growth in rail passengers with a well-lit, welcoming environment inside the station. But the Federal Railway Administration’s (“FRA”) preferred alternative, in particular the urban planning elements, including a massive garage and ill-considered circulation plan, poses a threat that will miss the opportunity before us and serve to isolate the station rather than integrate it within the surrounding community, businesses, and planned development. The direction of the current plan would

be a costly investment in infrastructure that undermines rather than enhances the District of Columbia's efforts to increase economic vitality, livability, and urban experience. I have three particular concerns.

First, while I appreciate that the preferred alternative does contemplate fewer parking spaces than in the current garage, I believe parking must be even further reduced at this dense, urban transit hub. The preferred alternative includes nearly 1,600 parking spaces in a large above-ground parking structure. A National Capital Planning Commission report on the project notes that 1,390 of the 2,200 parking spots *currently* in the Union Station parking garage are used by monthly parkers—generally, neither retail customers at Union Station nor rail passengers. In this light, 1,575 parking spaces in the preferred alternative are nearly double the approximately 800 parking spots currently dedicated to actual Union Station uses. The District of Columbia's Office of Planning recommends less than 300 parking spaces—in line with planning goals for the District at large that seek to avoid inducing additional demand for single-occupancy vehicles. While reports note that 70% of revenue for the Union Station Redevelopment Corporation ("USRC"), which oversees the station, comes from parking, that alone is not enough reason to ignore planning trends and projections from the District of Columbia's own planning body. USRC performs essential functions for Union Station, and all parties are invested in its continued success, but we should not assume that USRC's business model cannot change.

Second, any design going forward must create a Union Station that is better integrated into the rest of the neighborhood and serves the place-making role that this national gateway to the District of Columbia represents. In this respect, I take seriously the concerns raised in the past by Advisory Neighborhood Commission ("ANC") 6C, which directly represents Union Station's neighbors. In a letter to Mayor Muriel Bowser and D.C. Council Chairman Phil Mendelson, ANC 6C noted "grave concerns that the interest of community members . . . are being given short shrift in the planning process[,]” and that “[a]s currently envisioned, the expanded Union Station would be surrounded by a snarl of cars and buses, creating a barrier to access for the residents of the surrounding neighborhoods.” While ANC 6C has nominally been part of the process, there have been no changes to the design that would suggest FRA has taken seriously the commissioners' comments on design; that must change going forward. Additionally, the District has budgeted more than \$200 million to rebuild H Street, N.E.—currently a bridge that isolates Union Station from the neighborhood north of H Street—to allow for better pedestrian connections across H Street. The design for Union Station must consider the planned reconstruction of H Street and the planned private development that adjoins the federal site. Doing anything less will lead to design decisions that isolate the station, damage the District's long-term interests in Union Station's potential, and create substantial harm that cannot be easily reversed in the future.

Third, providing underground bus slips and passenger pick-up-and-drop-off zones will be essential to reducing traffic congestion and ensuring that the new Union Station is integrated into the rest of the neighborhood. With the proliferation of transportation network companies ("TNC"), especially in urban areas, thoughtful planning for pick-up-and-drop-off zones is essential at major transportation hubs like Union Station. Good planning that allows for TNC vehicles that drop off to make immediate pick-ups could even help to reduce total trips in and out of the new Union Station. Further, the above-ground space at Union Station is a prime opportunity to provide retail and restaurants in a dense neighborhood, and it should not be wasted on bus and TNC pick-ups and drop-offs that can more easily be done underground.

The Union Station expansion and related projects are an exciting opportunity to produce a vital and nationally significant transportation center with great public spaces on par with those of any world class city. I ask that FRA recognize the moment before us, with shared goals and expectations, and demonstrate a course correction in the design, to better shape this historic and monumental investment that will determine Union Station's vital and necessary role for generations to come.

Thank you for your consideration of this matter. If you have any additional questions, please feel free to contact me or my Chief of Staff, Laura Marks.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charles Allen", written in a cursive style.

Councilmember Charles Allen, Ward 6  
Chair, Committee on the Judiciary and Public Safety

cc: Chairman Phil Mendelson, Chair, Committee of the Whole  
Councilmember Mary M. Cheh, Chair, Committee on Transportation and Environment  
Director Jeff Marootian, District of Columbia Department of Transportation  
Director Andrew Trueblood, District of Columbia Office of Planning  
Advisory Neighborhood Commissioner Karen Wirt, Chair, Advisory Neighborhood Commission 6C

**From:** Harnett, James (SMD 2A08)  
**To:** [Union Station Expansion](#)  
**Subject:** Comments on the FRA Draft Environmental Impact Statement for Union Station  
**Date:** Wednesday, July 22, 2020 1:56:13 AM

---

Hello,

The Union Station Environmental Impact Statement cannot move forward without significant reductions or a complete elimination to the planned space capacity of the parking garage. The expectation that demand for parking will increase—let alone that it should be made policy to acquiesce to this “need”—is fatally flawed.

The imminent threat of global man-made climate change and the fact that the District government is purposely and rightly implementing policies to make it more difficult, expensive, and cumbersome for people to drive in D.C. stands at odds with the planned parking garage in this concept. Space that would be dedicated for this use would be much better served not existing at all, or being repurposed as an electric bus vehicle charging station, expanded bus loading capacity, public housing, or literally any other use than what is proposed.

The goal of the redesign of Union Station needs to center around *public transit*, not the needs of private vehicle drivers and owners. We should be seeing as aggressive a plan towards making public transit the centerpiece of mobility in the District of Columbia. None of those goals are accomplished by moving forward with a parking garage that only sets us back in our goals.

Please confirm that these comments have been received. Thank you.

Sincerely,

Commissioner James Harnett

—

James Harnett (he/him)  
Commissioner of the District of Columbia for district 2A08  
Chair of the Foggy Bottom and West End Commission  
Government of the District of Columbia

[\(202\) 854-0654](tel:(202)854-0654) | [www.anc2a.org](http://www.anc2a.org)  
[2A08@anc.dc.gov](mailto:2A08@anc.dc.gov)

For the latest information on the District Government’s response to COVID-19 (Coronavirus), please visit [coronavirus.dc.gov](http://coronavirus.dc.gov).

## Union Station Expansion

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**Subject:** FW: Comments on the FRA Draft Environmental Impact Statement for Union Station

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**From:** Harnett, James (SMD 2A08) <2A08@anc.dc.gov>

**Sent:** Tuesday, August 18, 2020 3:28 PM

**To:** Union Station Expansion <info@wusstationexpansion.com>

**Subject:** Re: Comments on the FRA Draft Environmental Impact Statement for Union Station

Thank you for receiving my earlier comments. Due to the ongoing work of advocates and elected officials in the District and the greater region—and the continually developing climate emergency—I feel it is important and necessary to update my comments to the FRA.

**I would like to flatly reject the need for any above-ground short or long-term parking structure at Union Station. Zero.** The climate emergency we are living through is nothing short of cataclysmic. As the youngest elected official in the District of Columbia, I have a moral duty to stand up to efforts that would take us backwards. We cannot continue to permit—and enshrine for decades—an attitude that cars should be a dominant mode of transit for so many. It should not.

**My constituents want to see highly functional, high speed, high frequency, free public, regional, and national transit options from Union Station.** Anything chance we have to re-engineer a piece of public infrastructure, we need to take these guiding principles and put them into action.

Thank you for the FRA's consideration of these updated comments.

All the best,

James

—

James Harnett (he/him)  
Commissioner of the District of Columbia for district 2A08  
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[2A08@anc.dc.gov](mailto:2A08@anc.dc.gov)



Statement of Commissioner Drew Courtney, 6C06  
Concerning Washington Union Station Expansion Project  
Federal Rail Administration Public Hearing  
July 14, 2020

Good morning.

My name is Drew Courtney, and I serve as Advisory Neighborhood Commissioner for ANC6C06; I'm presenting testimony today on behalf of our full commission.

I should start by saying how excited our neighbors are about the possibility this project represents. It's a truly unique opportunity for our city to create a world class transit hub for the 21st century and to transform a barrier that divides our neighborhood into an asset that connects and strengthens it.

Unfortunately, that's not what the proposed alternatives would accomplish. Instead, they would harm the urban setting and exacerbate traffic problems in our neighborhood.

The size of the parking structure envisioned in the alternatives presented would do real harm to the fabric of our community. Space is precious, and devoting such an enormous amount of it to overbuilding parking for cars and buses precludes the development of public spaces or buildings that would both enliven our street life and bring meaningful benefits to our neighborhood.

Perhaps even more importantly, the amount of parking proposed runs directly counter to our ongoing efforts to reduce automobile travel and to encourage the use of other modes of transportation. It would send an unambiguous message that Union Station is a destination designed not to fit within a rich urban landscape but to be driven to and from by private vehicle. There is no doubt that drivers will respond: more cars, more traffic, more congestion, more pollution, more collisions. All that baked in for the next hundred years.

I'm distressed not only that the proposed alternative would overbuild parking, but by the intransigence planners have displayed in ignoring community feedback throughout this process. Our ANC has repeatedly raised grave concerns about the amount of parking in this project, as has Councilmember Charles Allen, Chairman Phil Mendelson, Director of the Office of Planning Andrew Trueblood, Delegate Eleanor Holmes Norton and others. I attended the National Capital Planning Commission meeting at which that body explicitly directed the FRA to reduce the number of parking spaces. All that feedback seems to have been flatly ignored.

Our ANC is also deeply concerned about traffic circulation, including the process for pick-up and drop-off. As anyone who has recently driven to Union Station knows, station access and circulation is already a serious problem. That's more than an inconvenience for drivers; it detracts from our efforts to build a livable, walkable community. Our concern remains that the expanded Union Station would be surrounded by a snarl of cars and buses, creating a barrier to access for the residents of the surrounding neighborhoods and leading to an increase in traffic on neighborhood streets, including the narrow streets of the Capitol Hill historic district. Again, the

ANC's concerns are not adequately addressed by Preferred Alternative A-C, which we believe will place too great a stress on neighborhood streets.

I'm concerned about these features of the proposed alternatives, but in a deeper sense I'm concerned with the attitude they represent.

These proposals are premised on the idea that we're captive to the transportation habits of the last century. We should not assume that a project of this magnitude and symbolic importance can only respond to today's demands or project our past practices into the future. The expansion of Union Station can, and will, shape our transit system, our neighborhood and the capital region for the next century.

The billions of dollars that will be spent on transforming Union Station will either contribute to or help solve some of the most pressing challenges we face. In either case, the effects will last a lifetime.

FRA needs to reexamine these alternatives and choose a path that's responsible, forward looking, and sustainable.

Thank you.

###



Government of the District of Columbia

## Advisory Neighborhood Commission 6C

P.O. Box 77876 Washington, D.C. 20013 | (202) 547-7168

September 22, 2020

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

Re: Union Station Expansion Project DEIS Comments

Dear Mr. Valenstein:

We are writing to provide comments pertaining to the Washington Union Station expansion project Draft Environmental Impact Statement (DEIS).<sup>1</sup>

Advisory Neighborhood Commission (ANC) 6C is a District of Columbia body of elected commissioners who represent the residents of the neighborhood in which the Washington Union Station is located. As such, we have a thorough understanding of the fabric of the neighborhood and its connectedness with the rest of the District and the greater DC region, and are uniquely qualified to speak to the effects that the proposed Washington Union Station expansion project will have on the surrounding community at a human level. We thus respectfully submit these comments expressing our serious and significant concerns about the Draft Environmental Impact Statement (DEIS) for the Washington Union Station Expansion Project.<sup>2</sup> We strongly urge the Federal Railroad Administration to modify the proposed project in the Final Environmental Impact Statement consistent with our views expressed here and in other recent statements.

Washington Union Station is a critical transportation hub for the entire mid-Atlantic and Northeast United States. We support its expansion and modernization to meet the transportation needs of this century and the next. Among historic Union Station's greatest attributes is that it is a centrally located, urban station already featuring connections to sustainable modes of transportation that are the future of mobility. We believe that successful expansion and modernization of the station must support and build on these qualities. Serious flaws with the proposed action alternatives found in the DEIS will undermine these attributes of the historic station, and thus, ANC 6C cannot support the expansion project as proposed.

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<sup>1</sup> On September 9, 2020 at a regularly scheduled, duly noticed monthly meeting of ANC 6C, conducted on the WebEx platform, with a quorum of 6 out of 6 commissioners and the public present, the above-mentioned item came before us. The commissioners voted unanimously, 6:0:0, to send this letter to express our continued concerns regarding the Union Station Expansion Project.

<sup>2</sup> This is one of a series of letters and testimony ANC 6C has submitted expressing its concerns; see, e.g., testimony to FRA of July 14, 2020; testimony to NCPC of January 9, 2020; Section 106 letter of September 22, 2020..

ANC 6C believes the expansion project must create a Union Station that is functional not only for passenger rail travel, but also for the array of other modes of transportation that will interact at the station. Critically, the Final DEIS must right-size private automobile parking and the intercity bus facility and redesign automobile pick up and drop off. The expanded Union Station must be welcoming and inviting to all of its travelers and visitors and contribute to a vibrant urban environment. Failure to achieve these goals will squander this once-in-a-lifetime opportunity and leave Washingtonians with an outdated and ineffective transportation hub that only exacerbates the transportation and sustainability challenges we will face over the next 100 years.

The station action alternatives presented in the Draft Environmental Impact Statement appear to have been developed based almost exclusively on throughput and storage capacity of automobiles and buses, to the detriment of effective operability, the user experience and the neighborhood fabric. This prioritization of automobile access not only encourages continued dependence on a mode of transportation that is unsustainable and inappropriate for dense urban environments, but also leaves little opportunity for creating the open, accessible public spaces that are critical for the success of the Union Station area. **We believe the Final Environmental Impact Statement for the Washington Union Station Expansion Project must be reconceived with the following new priorities:**

1. Easy access by all modes of transportation—especially person-scale and sustainable modes such as walking, biking, and public transportation;
2. Creation of active, inviting public spaces that enhance quality of life for those visiting the station and surrounding area and for those living nearby;
3. Prioritization of the sustainable transportation modes that are the future of mobility and right-sizing private automobile parking and the intercity bus garage.

As currently proposed, the design alternatives of the expansion of Union Station preclude realization of these goals due to two principal and interconnected elements: (1) centralization of traffic elements north of the train hall; and (2) over-reliance on private automobiles. Specifically, FRA's Preferred Alternative A-C places the automobile and bus garage where lively public spaces should be. It will create severe traffic congestion around the station, diminish the visitor experience and bring excessive noise and pollution. Furthermore, the proposal lacks a viable plan for connections to transit and fails to include adequate bicycle access and storage elements which should be central to any modern urban transportation project. We believe correcting these flaws can be done within the context of the Final Environmental Impact Statement and allow for the creation of an expanded Washington Union Station that is admired and enjoyed by the people it serves.

### **Traffic Element Centralization, Over-Reliance on Private Automobiles, Circulation Issues**

FRA's Preferred Alternative A-C centralizes bus traffic, parking, and a significant amount of pick-up/drop-off in the most prime real estate—directly north of the new train hall—preventing the creation of strong public spaces and posing major obstacles to accessing the new train hall by foot or bicycle.

- ANC 6C has clearly and repeatedly opposed the building of an above-ground, oversized parking and bus structure. It will loom over the station, as an eyesore and civic embarrassment. Its placement between H Street NE and the station will create an uninviting approach to the train hall and prevent creation of elements such as parks, restaurants and cafés, or retail shops, all of which are critical to creating active, engaging public spaces.
- A major share of automobile traffic servicing the new train hall—including both personal and for-hire pick-up/drop-off traffic, plus traffic entering and exiting the parking garage—is directed through the main road along the northern face of the train hall. In order to handle the volume of traffic directed through it, this main road will become a multi-lane traffic snarl, constantly clogged with cars, much like the current situation on Columbus Circle at the entrance to the historic station. As is the case on Columbus Circle, the new train hall will be difficult to approach by foot, and any public spaces designed to its north will be unappealing and underutilized thanks to the constant circling of cars and buses.
- Most traffic through the central road will enter via one intersection on H Street to the west and exit through another intersection on H Street to the east. The entire H Street bridge will be consumed with this circling traffic, hindering any attempts to create a lively, walkable streetscape along this important corridor that connects the station to the surrounding neighborhood and causing excessive traffic congestion. In addition, all bus traffic must exit the facility and head eastward on H Street, directly into a vibrant, mixed-use neighborhood corridor that has already been negatively impacted by bus traffic. In 2018, a 19-year old bicyclist was fatally struck at 3rd and H Street NE by a charter bus that had recently left Union Station. FRA's Preferred Alternative A-C further encourages buses to dangerously negotiate neighborhood spaces and detrimentally impacts the safety and well-being of those in ANC 6C neighborhoods.

The entrance to the new train hall should be surrounded by inviting, well-designed, and accessible public spaces, including park space and commercial establishments like restaurants and shops. These spaces should lead pedestrians easily and comfortably into the station without major obstacles like wide roads or large, inaccessible structures. To encourage use of these spaces, surrounding automobile traffic must be minimized and a focus placed instead on accessibility by foot and bicycle. The proposed design instead does the opposite—it obscures access to the train hall by any means other than automobiles by placing a busy, congested road directly at its entrance. The traffic generated on and around this road will make an entirely unappealing environment for anyone outside of a car (and a frustrating experience for those in cars). Furthermore, the enormous parking garage is placed in the most desirable location for people-focused development, eliminating any opportunity for urban placemaking.

### **Solutions and Desired Outcomes**

The sheer volume of bus and car traffic—envisioned by the excessive number of parking spots and bus slips—undermines an effective design. The solution is three-fold:

1. Further reduce the amount of private automobile parking to no more than 295 spaces;

2. Reduce the number of bus slips to no more than 20; and
3. Put all parking and the majority of pick-up/drop-off in underground facilities.

Members of this ANC, along with many other stakeholders, including Congresswoman Eleanor Holmes Norton, the National Capital Planning Commission, Council Member Charles Allen, Chairman Phil Mendelson, and the Director of the DC Office of Planning, have raised serious concerns over the size of the parking facility. We reiterate those concerns here and insist that reducing and relocating private automobile parking and the majority of pick-up/drop-off to underground facilities are necessary for the sustainability of the project and to allow for creation of the public spaces and positive visitor experience critical to its success. Moving the automobile parking program underground and placing the bus slips below the deck enables the creation of public spaces along H Street and the approach to the train hall. Reducing the size of the automobile parking facility enables its relocation to a single, underground level. Right-sizing the intercity bus facility ensures intercity buses remain a complementary transportation mode at the station and not a dominant feature. Providing multiple entrances and exits to the underground facility (potentially, for example, on Louisiana Avenue NE, E Street NE, G Street NE, G Place NE, 1st Street NE, and/or 2nd Street NE) ensures adequate dispersion of traffic around the station, particularly to the west, and alleviates many of the concerns ANC 6C has raised in the past over proposed alternatives that located massive underground parking with a single entrance/exit on K Street NE. With private automobile parking and a dedicated pick-up/drop-off facility relocated below ground, the land between the train hall and H Street will then be much more amenable for the creation of vibrant and pleasing public spaces, and the entrance to the train hall can be designed to be welcoming and accessible by foot and bicycle.

### **Inadequate Bicycle Facilities**

Washington, DC, is one of the top U.S. cities for bicycling. The mild climate in DC allows for a long riding season, and the District is installing major bicycling infrastructure throughout the city. Union Station is adjacent to three major, city-wide bicycling routes, including the Metropolitan Branch Trail, the 1st Street NE cycle track (which is planned to be connected to the Pennsylvania Avenue cycle track), and the soon-to-be installed K Street crosstown bike lanes. Cyclists need to be more than an afterthought in the design process, and the Washington Union Station Expansion Project DEIS's failure to adequately acknowledge this important transportation mode is a major shortcoming. The current plans do not do enough to support bicycle access to the station or integrate it with key pieces of cycling infrastructure that already exist.

Local, urban travel by bicycle is an important and growing component of modern and future transportation norms. The advent and increasing availability of e-bikes will only hasten the importance of the bicycle for local transportation. To support this crucial element, the Washington Union Station Expansion Project must provide state-of-the-art bicycle facilities, including expansive, protected bicycle parking with ride-up access and direct connection to one or more of the major cycling routes in the vicinity. Currently, FRA's Preferred Alternative A-C includes a woefully inadequate number of bikeshare stations and outdoor bike racks, and lacks indoor bicycle parking and connections to local bike routes. Enabling easy bicycle access to the station will create a more vibrant connection to the entire surrounding neighborhood and further decrease reliance on automobiles and other congestion-contributing modes of transportation.

People arriving on bicycle will be more likely to utilize public spaces and visit the surrounding commercial establishments.

### **Solutions and Desired Outcomes**

The Washington Union Station Expansion Project requires two elements to create a better-integrated station that attracts cyclists:

1. Incorporate substantial, state-of-the-art bicycle parking with ride-up access; and
2. Leverage direct connection to nearby cycling routes.

The few, outdoor bike racks scattered around the station as proposed in the DEIS are insufficient for the needs of an expanded and modern train station. Around the world, modern train stations are providing indoor parking for thousands of bicycles. These facilities are frequently accessible by ramps or travelators that simplify approach, sometimes without even dismounting. A modernized Union Station should include such a facility.

Direct access to protected bicycle parking from one or more of the major cycling routes approaching Union Station is essential. The First Street NE cycle track is a popular bike route that runs directly adjacent to Union Station along the western side, one level below the proposed deck level. A bicycle parking facility at this level could easily be accessed by this route. Additionally, the Metropolitan Branch Trail is a major north-south bike route consisting of an off-street multi-use path that continues for five miles to the Fort Totten area of DC and further connects to Silver Spring, MD, via signed routes and bike lanes on local roads. As the trail enters the NoMa neighborhood from the north, it is at approximately the same level as the proposed deck level of the Union Station expansion project. However, riders must exit the trail a few blocks short of Union Station via a ramp to M Street NE, then connect to the 1st Street cycle track to continue south toward the station. An extension of the trail to connect to Union Station, allowing riders to bypass the exit to street level and directly enter the station at deck level, would have an outsized impact relative to its cost.

### **Conclusion**

ANC 6C supports modernization and expansion of the Washington Union Station. However, we join with those who believe the Draft Environmental Impact Statement is seriously flawed. Nevertheless, we also stand ready to work with the project sponsors and other stakeholders for a

new preferred alternative in the Final Environmental Impact Statement that enhances rail travel, facilitates intermodal transportation connections, protects the historic station and nearby neighborhoods, and creates a vibrant urban area nearby.

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

On behalf of ANC 6C,



Karen Wirt  
ANC 6C Chair

Cc: The Honorable Eleanor Holmes Norton  
Mayor Muriel Bowser  
Chairman Phil Mendelson  
Council Member Charles Allen  
Andrew Trueblood, OP  
Jeff Marootian, DDOT  
C. Andrew Lewis, SHPO  
Johnette Davies, Amtrak  
Marcel Acosta, NCPC  
Beverley Swaim-Staley, USRC



September 28, 2020

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

Re: Union Station Expansion Project DEIS and Section 106 Comments

Dear Mr. Valenstein:

Last week, you received two letters from ANC6C, responding to the Draft Environmental Impact Statement (DEIS) and Section 106 process for the Washington Union Station redevelopment process.

Those letters reflect the work of several members of our Commission and its Transportation and Public Space Committee, and were authorized by a unanimous vote at our September 9, 2020 meeting.

After that meeting, at Section 106 Consulting Parties Meeting #10, held on September 22, presenters highlighted on several occasions that one reason for the proposal of Alternative A-C as the "Preferred Alternative" was the shorter construction time required by this plan. In particular, the shorter construction timeframe was cited as a reason not to locate the parking or pick-up/drop-off (PUDO) facilities underground.

Although our commission does not have a meeting before the deadline to approve further comments, we felt it appropriate as individual commissioners to make clear that we do not believe the difference in construction timelines should be the priority keeping FRA from choosing to build the best possible station, particularly as the expansion project will result in structures that should last for decades. We appreciate attention to the short term impacts on our community that construction represents, but we believe the most important priority is to develop a preferred alternative that adequately addresses the long term impacts of the expansion project, impacts not resolved but instead exacerbated by Alternative A-C.

Thank you for giving consideration to our views.

Sincerely,

Drew Courtney  
Commissioner, ANC 6C06


Christine Healey  
Commissioner, ANC 6C01

Jay Adelstein  
Commissioner, ANC 6C03

District of Columbia Office of Planning

**MEMORANDUM**

To: David Valenstein  
Senior Advisor, Federal Railroad Administration

From: Andrew Trueblood  
Director 

Date: September 28, 2020

Subject: Comments on the Washington Union Station Expansion Project Draft Environmental Impact Statement from the DC Office of Planning

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The District of Columbia Office of Planning (OP) is pleased to provide comments on the Draft Environmental Impact Statement (DEIS) released by the Federal Railroad Administration (FRA) on June 12, 2020, for the proposed Washington Union Station Expansion Project, in accordance with requirements of the National Environmental Policy Act (NEPA). These comments are furnished by the comment deadline of September 28, 2020.

OP has been an active participant in the NEPA process and has used the additional time to identify key concerns with the DEIS and conduct a detailed review of the DEIS. This transmittal includes themes from our early review (noted in a DC Office of Planning Director Statement, see Attachment 1), and a more-detailed comment matrix (see Attachment 2).

As noted in the August 28 Director Statement, OP's review of the DEIS highlighted six key concerns:

1. Parking
2. Urban Design
3. Optimizing Land Use for the Long-Term, 100-Year Vision for the Station
4. Pick-Up-and-Drop-Off
5. Circulation and Access
6. Proposed Mitigation Measures

Throughout the NEPA process OP has emphasized the importance of the following principles (also highlighted in Attachment 1):

- Prioritizing intermodal effectiveness and efficiency (including intercity bus, rideshare services and bicycle connections);
- Providing continued and enhanced quality of life for those who live, work, and visit the Washington Union Station area;
- Affirming the civic identity rooted in the transportation infrastructure at Washington Union Station;
- Reaffirming the importance of retaining intercity bus service at Washington Union Station; and
- Prioritizing pedestrian mobility in the design.



Attachment 1 provides specific areas of concern to my agency and includes OP's requests for modifications to the Preferred Alternative and additional analyses that should be conducted by FRA in advance of the release of the Final Environmental Impact Statement (FEIS).

The District also provides additional attachments (Attachments 3, 4, 5 and 6, below), that reflect prior correspondence on this project that directly pertain to the DEIS as currently proposed and should be made part of the official comment record for the DEIS.

I urge the FRA to develop a Project Alternative in the FEIS that is both visionary and implementable, since none of the DEIS Project Alternatives exhibits these combined characteristics. The attachments in this Transmittal provide an array of guidance, analysis, and approaches that collectively will help FRA build a new Project Alternative that can effectively accomplish this outcome.

Please accept the below attachments, which collectively represent the OP comments on the DEIS for the Washington Union Station Expansion Project; and please reach out should you have any questions.

We look forward to FRA's formal response to our comments and integration of our requests into the DEIS and FEIS processes.

cc: Eleanor Holmes Norton, Congresswoman, U.S. House of Representatives  
John Falcicchio, Deputy Mayor, Planning and Economic Development, District of Columbia  
Phil Mendelson, Chairman, Council of the District of Columbia  
Charles Allen, Councilmember, Council of the District of Columbia  
Karen Wirt, Chair, Advisory Neighborhood Commission 6C, District of Columbia  
Marcel Acosta, Executive Director, National Capital Planning Commission  
Gretchen Kostura, Director, Major Stations, Washington Union Station at Amtrak  
Beverley Swaim-Staley, President and CEO, Union Station Redevelopment Corporation  
Jeff Marootian, Director, District Department of Transportation  
Tommy Wells, Director, District Department of Energy and Environment  
David Maloney, State Historic Preservation Officer, Office of Planning

## ATTACHMENTS:

Attachment 1: District of Columbia Office of Planning Director's Statement - Key Comments and Concerns on the Washington Union Station Expansion Project DEIS (August 28, 2020)

Attachment 2: District of Columbia Office of Planning Comments on the Washington Union Station Expansion Project DEIS (September 24, 2020)

Attachment 3: District of Columbia Office of Planning Director's Introductory Remarks to NCPC Commissioners at the July 9, 2020 NCPC Meeting (July 9, 2020)

Attachment 4: District of Columbia Request to FRA for Extension of Public Comment Period for the Washington Union Station DEIS (June 19, 2020)

Attachment 5: OP/DDOT Report to NCPC re: Appropriate Parking Numbers for the Washington Union Station Expansion Project (June 3, 2020)

Attachment 6: District of Columbia Office of Planning Director's Letter to FRA re: DC Comments on Preferred Alternative for Washington Union Station Expansion Project (April 30, 2020)

August 28, 2020

## **Statement from Director Andrew Trueblood on the District of Columbia Office of Planning's Key Comments and Concerns on the Washington Union Station Expansion Project DEIS**

The District of Columbia Office of Planning (OP) has reviewed the Draft Environmental Impact Statement (DEIS) for Washington Union Station Expansion Project (Project). OP has identified several areas of critical concern for the Project Sponsor, the Federal Railroad Administration (FRA), so I am issuing this statement to support stakeholders who seek to review the DEIS and submit comments, by the rapidly approaching deadline of September 28. OP's documents related to this process can be found at: [planning.dc.gov/washington-union-station](https://planning.dc.gov/washington-union-station).

As proposed in the DEIS, the Project falls short of what District residents, workers, visitors and stakeholders deserve and appears to be on a path to failure. To be successful, the Project must focus on the Station's relationship to the surrounding neighborhoods, its historic context, its impact on the District's transportation network, and its anchoring position in the District and the Eastern Seaboard. OP agrees with the strong and broadly-supported feedback provided by NCPC which made clear that the Project as outlined by the DEIS would not be approved and major changes, many of which are in line with those discussed in this statement, are required if the Project Sponsors want to achieve an approvable project and avoid years of redoing NEPA analyses.

This statement highlights problems that OP has identified with the DEIS in six areas:

1. Parking
2. Urban Design
3. Optimizing Land Use for the Long-Term, 100-Year Vision for the Station
4. Pick-Up-and-Drop-Off
5. Circulation and Access
6. Proposed Mitigation Measures

OP has actively participated in the National Environmental Policy Act (NEPA) process for the Washington Union Station Expansion Project and throughout the process OP has emphasized the importance of:

- Prioritizing intermodal effectiveness and efficiency (including intercity bus, rideshare services and bicycle connections);
- Providing continued and enhanced quality of life for those who live, work, and visit the Washington Union Station area;
- Affirming the civic identity rooted in the transportation infrastructure at Washington Union Station;
- Reaffirming the importance of retaining intercity bus service at Washington Union Station; and
- Prioritizing pedestrian mobility in the design.

The [Transportation Element](#) of the proposed Comprehensive Plan Update that Mayor Bowser submitted to the Council of the District of Columbia in April of this year articulates the District's goals for the expansion:

***Policy T-2.2.4: Union Station Expansion***

Ensure that expansion and modernization of Union Station supports its role as a major, intermodal, transit-focused transportation center. Changes to Union Station should improve intermodal connections and amenities; facilitate connections with local transportation infrastructure with an emphasis on transit, pedestrian and bicycle mobility; enhance integration with adjacent neighborhoods; minimize private and for-hire vehicle trips; reduce on-site parking; and provide a continued high quality of life for District residents and visitors.

As detailed below, these closely interrelated objectives are *collectively* critical to the Project's near- and, especially, long-term success and should be reflected in any Preferred Alternative identified in a Final Environmental Impact Statement (FEIS) if FRA truly wants to ensure a viable project without lengthy rework.

**1. The Project Is Vastly Overparked**

As the District articulated in a June 3, 2020 [Union Station Parking Working Group Memo](#) (Parking Memo) submitted to the National Capital Planning Commission (NCPC), the currently proposed 1,600 space parking program recommended for Union Station in Preferred Alternative A-C is excessive and not reflective of the 295 spaces the District recommends would adequately meet the station's parking needs.

In addition to incorporating District comments and points from the above Memo into the FEIS, OP encourages FRA to integrate the [comments](#) made, including my [statement](#) addressing the need for a reduced parking number, and [actions](#) taken by the NCPC at its July 9, 2020 meeting, into the FEIS.

OP calls for a significantly reduced parking program in the FEIS. This is not only consistent with the District's technical analysis, but also responds to concerns expressed by NCPC, Congresswoman Eleanor Holmes Norton, the Council of the District of Columbia, District Advisory Neighborhood Commission (ANC) 6C, the Federal City Council, nearby landowners and residents, and multiple other stakeholder groups and community members.

Additionally, OP disagrees with the following statement in the DEIS, which inaccurately characterizes the District's Parking Memo:

*Neither DDOT nor DCOP provided projections supporting the recommended parking program. The agencies based their program on stated policy goals to reduce vehicular parking in the District's downtown core, generally shift users away from using private vehicles, and provide more space for residential, commercial, or mixed development (Washington Union Station DEIS, Chapter 3: Alternatives, page 3-36, lines 830-384).*

This statement should be revised to reflect the fact that the District provided significant [data and analysis](#) in support of our recommended parking program, including parking demand by land use and travel mode, District policies, and a review of comparable facilities at a national level.

**2. The Project's Urban Design Must Create a Great Place for Passengers and Surrounding Community**

The DEIS for the Washington Union Station Expansion Project is not yet in the design stage, so the multitude of urban design opportunities and impacts associated with the expanded Station along with future private air-rights development cannot yet be fully assessed. However, despite the early stage of the current alternatives, there is not enough consideration given to the quality of the future Station's urban design and its surroundings. Greater emphasis should be placed on the following:

- The placement and scale of the parking garage and its potential impact on future open space activation, connectivity, vibrancy and character;
- The impact of parking access points, circulation, and potential queuing on pedestrian experience and on the streets and neighborhoods surrounding the Station;
- The importance of pedestrian-friendly connections between the H Street Bridge and the train halls, taking into account the challenged pedestrian streetscape and ensuring the new design creates a more vibrant, accessible, pedestrian-oriented streetscape through consideration of street furniture, lighting, wayfinding, street trees, and other means;
- The importance of enhanced pedestrian and bicycle connections between the multiple entrances of the Station, and to the surrounding neighborhood's sidewalks and bicycle network; and
- Greater consideration of northern views toward the Station from the direction of New York Avenue, which has a significantly higher elevation that will afford prominent views towards the new decking and buildings over the rail yards.

### **3. The Project's Land Use Program Is Obsolete and Must Look to the Long-Term, 100-Year Vision for Union Station**

While the DEIS horizon year is 2040, the narrative for the long-term vision for Union Station does not match the significant opportunity or the needs for such a critical location, land uses, and multi-modal transit services in the District.

The proposed project design and improvements should maximize the investments proposed, which collectively will serve the District for the next 100 years and beyond. The DEIS's focus on preserving legacy revenue streams, especially for more than a thousand spaces of private automobile parking, weakens the proposal in several important ways, which include the following:

- Compromising the public realm,
- Detracting from historic preservation of the historic station, especially the head-house,
- Underutilizing a uniquely important location, and
- Failing to generate meaningful revenue to support the Project's costs.

OP also would like to point out that while the project horizon year is 2040, it is likely that a year or more will elapse before the NEPA process concludes when a Record of Decision (ROD) is issued. The Project will then undergo further local review and permitting, followed by over a decade of construction as described in the DEIS. Thus, 2040 is much more likely to be an opening year than horizon year for the Project.

The significant land use, design, and historic preservation potential surrendered by inclusion of the large above-ground parking garage in Preferred Alternative A-C also overlooks the significant income-generating and place-based enhancements that office, residential, hotel or other uses could provide to the Federal Air Rights development.

The existing parking garage may have been beneficial both to the Station and broader area in 1981 when USRC was established, when far fewer transportation options and lower demand for transit-oriented development existed. However, both Union Station and its local and citywide context have changed significantly, and so should the perspective and approach to parking. If the new Station does not evolve with its context, this obsolete perspective will constrain the Station for the next 100 years. This, along with the other constraints highlighted above, fatally compromise the proposed Project's potential to enhance and contribute to the excellence of urban form, vibrancy, and optimal uses the Station can and absolutely should contribute to the District.

This disconnect, among the Project's proposed retention of 1981 parking assumptions, the 2040 horizon year, and the Project's 100-year lifespan, clearly highlight the need to focus on a future for Union Station that accounts for the mobility needs of the 21<sup>st</sup> and well into the 22<sup>nd</sup> centuries, rather than replicating a 20<sup>th</sup> century obsolete vision for the design, uses, role and potential for the Station. This future will not be achieved without a significantly reduced parking program; a well implemented land use program that maximizes the potential of the location; public space that is pedestrian oriented and highlights the historical character of the Station; and a design that intentionally integrates into the surrounding neighborhoods.

#### **4. A Dedicated Pick-Up-and-Drop-Off Facility Is Necessary for Efficiency and Convenience**

OP appreciates the distributed pick-up-drop-off (PUDO) locations that FRA has included in many of its alternatives, intended to lessen the traffic impact on any one location. However, there continues to be a risk of queuing on District roadways from some of the PUDO locations. Therefore, OP encourages FRA to examine if a purpose-built PUDO facility, that in addition to the distributed facilities, could alleviate some of the traffic impacts and improve the ability of intercity travelers to connect with for-hire vehicles. OP is flexible as to the location of such a facility and encourages FRA to examine both above- and below-ground options. OP would expect to see such a facility explicitly integrated into the design of the alternatives so its impacts, including safe ingress and egress, can be analyzed. It will also be important to understand the effects of the facility on the surrounding transportation network, including impacts to pedestrian and cyclist comfort and safety.

#### **5. Circulation and Access at the Station Need to Be Simplified to Reduce Conflicts**

OP would like to see more flexibility articulated in each of the DEIS/FEIS Project Alternatives in order to accommodate future turning movement needs, site circulation, and to adjust for potential changes in demand. OP would also like to see the access points along H Street NE consolidated to reduce the number of curb cuts on the bridge deck. The significant number of access points and required signalization will create a challenging environment for all users, including pedestrians, cyclists, drivers, and transit vehicles.

OP is aware that DDOT requested that the following principles be integrated into the design of Project Alternatives during previous review. OP echoes this request and submits the following as part of this formal DEIS review and comment process:

- Higher flexibility for one-way movements and turn restrictions;
- The ability for intercity buses to move either east or west from the bus facility;
- No offset intersections; and
- Greater internal storage capacity within the site roadways for the overflow vehicles (which may be addressed by the PUDO facility noted above).



OP would like to see the following elements improved in the FEIS to address the negative impacts of the current design of Preferred Alternative A-C:

- The four closely spaced signalized intersections on the H Street Bridge;
- The restriction that buses can only make an eastbound right turn from the bus facility;
- The offset western intersection on H Street NE, which would require complex signal phasing; and
- The limited internal storage for vehicle queuing.

## 6. Mitigation Measures to Address Congestion and Construction Impacts

The following two sections address OP's concerns regarding mitigations for the Project when complete, and for the mitigations needed during the construction of the Project. We recognize that the DEIS contains an illustrative list of potential mitigations and that more detailed and additional mitigations will be developed as part of the FEIS development process. Therefore, comments address the set of mitigations currently contained in the DEIS and indicates what OP would like to see addressed as part of the FEIS.

### Mitigation to Address Congestion

The FEIS should include a commitment from FRA and the Project Sponsors to a robust Transportation Demand Management (TDM) plan that details how the Project will achieve the needed mode split. This will require District agencies, WMATA, and the private air rights developer to work together to achieve an overall 20 percent reduction in total vehicle trip generation, across existing, no-action, and build alternatives. While this reduction has not been modeled, it is our opinion that this reduction in vehicular traffic will be critical to achieving a sustainable level of traffic. This level of traffic reduction would require multiple strategies and stakeholder collaboration, including the District's.

More detail should be included in the documentation of each Project Alternative that demonstrates how all trips are arriving to the Station. Tables should be included that show all modes of access to the Station, rather than providing this exclusively for vehicles. This table should include the following:

- |                |                    |
|----------------|--------------------|
| • Walk         | • Private PUDO     |
| • Bike/Scooter | • Parking          |
| • Metrorail    | • For-Hire Vehicle |
| • Transit Bus  | • Rental car       |
| • Streetcar    |                    |

It is currently difficult for the DEIS reader to identify how all visitors are arriving to the Station without searching through multiple sections of the transportation assessment for each alternative.

Transportation Mitigation 29 in the DEIS currently references that the Project Proponents will work with DDOT to identify solutions to address increased traffic volumes generated using multiple approaches (Washington Union Station DEIS, Chapter 7: Mitigation Measures, Project Commitments, and Permits, page 7-6). This approach includes using a suite of solutions out of a toolbox of traffic mitigation tactics, coordination with WMATA to increase transit capacity, and a TDM strategy coordinated with DDOT. In the FEIS, OP expects that transportation mitigations will be expanded beyond what is described. Specific interventions should be detailed, including expectations of and points of collaboration with District agencies. Additional mitigations should be added that consider the

Project Proponent's ability to enhance transit access to the Station, including, but not limited to, the following:

- Enhanced bus infrastructure including priority treatments such as bus lanes and transit signal priority;
- Bus stop infrastructure;
- Charging and other supportive infrastructure for electric and alternative fuel buses; and
- Wayfinding and physical connections to facilitate intermodal transfers and incentivize transit bus use over for-hire vehicles.

OP is supportive of improvements to transit capacity in and around Union Station and believes that they should be prioritized as a means of improving access to the Station and managing the demand associated with the proposed expansion. The current narrative of the transportation assessment in Chapter 5: Environmental Consequences of the DEIS focuses on the traffic impacts associated with the Project and does not adequately contemplate or consider the improvements needed to encourage greater mode shift. As stated previously, OP believes that walk, bike and transit are the most important modes of access to the Station and should be prioritized and expanded by this project, consistent with the goals expressed in the [Transportation Element](#) of the Proposed Comprehensive Plan.

#### Mitigations to Address Construction Impacts

OP notes that there are several construction impacts that will push Station uses onto District roadways. These include storage and loading of intercity and charter buses, for-hire vehicles, parking, and private pick-up-and-drop off, among others. OP acknowledges that there are many unknowns at this time and that project proponents cannot commit to off-site locations for many of these uses. However, explicit acknowledgement of these impacts and a commitment to identifying a combination of off-site locations, a TDM program, and surface transit enhancements as mitigations should be included in the FEIS. OP also notes that construction will have significant impacts on people experiencing homelessness both at Union Station as well as surrounding areas, and request that the FEIS include more analysis on how the Project will address their needs and potential displacement induced by construction and long-term operation of the Station once it reopens.

OP recognizes that a final mitigation program will be included in the FEIS and emphasizes that FRA should engage DDOT as active participant in development and review of the transportation mitigation program for construction impacts.

As previously indicated, many of the same comments and concerns outlined above are also applicable to the [Project's Section 106 National Historic Preservation Act](#) review process. As has been expressed by the DC State Historic Preservation Officer and several Section 106 consulting parties, the excessive parking program does not contribute to the civic character that the historic context demands; the failure to maximize and better define the visual and daylight access zones falls short of the exemplary urban design goals that the Station warrants; and more analysis is needed to understand the impacts of additional traffic on adjacent historic neighborhoods. Addressing these issues by modifying the Preferred Alternative in meaningful ways in advance of the FEIS is critical to fulfill FRA's responsibilities to avoid and minimize adverse effects on historic properties.

Addressing the principles and themes detailed above will be critical to ensuring a successful project, one that maximizes opportunity and fully addresses challenges, and that therefore can shape an FEIS that truly supports, rather than detracting from, a forward-looking vision.

OP urges FRA to fully address all these issues before releasing the FEIS, in part by making the following specific modifications to the Preferred Alternative:

- Per Section 1, above, reduce the overall parking program from the current proposal of 1,600 vehicular parking spaces to 295 spaces (since the existing parking structure is slated for demolition and new construction to take its place, it makes no sense to rebuild a similarly oversized parking garage);
- Per Section 3, above, integrate land uses that are significantly more appropriate (such as retail, office, housing, hotel, etc.) than a vehicular parking structure, and retain an inter-city bus facility on site to ensure Union Station provides equitable and affordable transportation options;
- Per Section 4, above, add a dedicated pick-up-drop-off facility to the Preferred Alternative, assess its benefits, and develop mitigations for negative impacts;
- Per Sections 2 and 5, above, revise the design for the portion of the deck that lies south of H Street to address circulation and urban design concerns, including the four intersections that are too closely spaced, and eliminate intersections that are off set; and
- Per Section 6, above, provide detailed mitigation measures that include enhanced transit access and TDM measures (such as wayfinding, incentives for transit ridership, improved pedestrian/bicycle access, etc.), to enhance multimodal access to the Station. The current DEIS only provides a general outline of TDM measures; FRA should specify and commit to these measures.

OP is interested in facilitating the identification of a Preferred Alternative for the Project that provides for enhanced rail service well into the 22<sup>nd</sup> century, creates a vibrant community north of Union Station and emphasizes the importance of multimodal access to it. We recognize that a number of the issues we have identified present unique challenges, and we encourage FRA to work with our agency along with DDOT, NCPD, and stakeholders to identify a Preferred Alternative that allows for the future success of Union Station.

OP looks forward to continued engagement in the Union Station Expansion Project and will provide detailed comments on the DEIS by September 28, 2020.

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
1	ES	ES.11.4 Summary of Impacts	ES-45	Table ES-6. Summary of Direct and Indirect Operational Impacts	The Table states that there is a total loss of revenue due for Parking at Union Station, under the Social and Economic Conditions Impacts in Alternatives B, C, D, and E.	More clarity is needed around the assumptions that determined that Alternatives B, C, D, and E represent a total loss of parking revenue, though they continue to have approximately 2,000 parking spaces. It is also flawed to only consider revenue generated by parking and not the potential income generated by the Federal Air Rights if developed under USN zoning.
2	ES	ES.13.2 What is the Status of the Section 106 Consultation Process for the Project?	ES-59 through ES-61	772-778	...adverse effects [on WUS, WUS Historic Site and the REA Building]... would result from permeant physical and visual impacts... and from construction-related vibration impacts...; ... a portion of the Capital Hill HD may potentially experience adverse effects from an increase in traffic;... the rail terminal has moderate to high potential to contain archaeological resources...	While SHPO generally agrees with this summation, our previous letter on the draft assessment of effects raised questions about a wider range of potential adverse effects including possible adverse effects on the interior of the historic station and others. FRA should acknowledge that, as pointed out on lines 792-794, Section 106 is ongoing and the assessment of effects report requires further consultation to identify the full range of adverse effects.
3	ES	ES.13.3 What are the Next Steps in the Section 106 Consultation Process?	ES-62	795-806	Once FRA has finalized the assessment of effects and received concurrence from SHPO...FRA will continue working to avoid, minimize or mitigate adverse effects... FRA anticipates preparing a Programmatic Agreement... that would include exploration of avoidance and minimization measures... [and] a process for on-going review...	SHPO requests that FRA revise the Preferred Alternative in ways that avoid the adverse effects that have already been identified in this process, rather than attempting to do so in a future consultation process (as defined in a Programmatic Agreement). This modification of the Preferred Alternative is consistent with coordination through the NEPA and Section 106 Process. The Preferred Alternative should mitigate adverse effect, rather than rely on the Programmatic agreement, because our ability to affect change is likely to be more limited once the Preferred Alternative is formally endorsed by the FEIS.
4	1	1.5 Union Station History	1-5	64 to 71	Designed by the architecture firm of D.H. Burnham & Company, ...	The history of site selection and visual relationship between the US Capitol and Union Station, as well as views toward the station along city streets and avenues, are critical for setting the context for urban design criteria, particularly the view of the station looking north on Delaware Avenue. Other important views that need to be discussed in this context are those from Louisiana Avenue, Massachusetts Avenue, and F Street. An understanding of the rail yards, imposing stone walls that support the elevated rail yard (aka. the Burnham Wall), and the H Street bridge are also needed to understand their relationship to any proposed changes. The design and layout of the rail yard, loading platforms, and ancillary facilities like the Railway Express Building all need to be discussed here too. Their relationship to the station and historic importance could lead to specific urban design recommendations. There should also be a discussion of the hierarchy of civic spaces in the Center City, the station's role in defining the neighborhoods, and its hierarchical relationship to its surroundings. Much of this research is already done, so what might be useful is to include a link to the report or documents that gives this full history.
5	3	3.3.1.2 Public and Agency Coordination	3-35	808-811	The commissioners requested that FRA and the Proponents further coordinate with the District to evaluate and confirm the appropriate amount of parking given the mix of uses, traffic and urban design impacts, and transit-oriented nature of the project prior to the next stage of NCPC review.	This text should reflect the totality of NCPC's request ( <a href="https://www.ncpc.gov/docs/actions/2020January/7746_Washington_Union_Station_Expansion_Project_Commission_Action_Jan2020.pdf">https://www.ncpc.gov/docs/actions/2020January/7746_Washington_Union_Station_Expansion_Project_Commission_Action_Jan2020.pdf</a> ), which included:  <i>Requests the applicant substantially reduce the number of parking spaces, and that the applicant, private development partner, and staff work with the District Office of Planning and the District Department of Transportation to evaluate and confirm the appropriate amount of parking given the mix of uses, traffic and urban design impacts, and transit-oriented nature of the project prior to the next stage of review.</i>

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
6	3	3.1.1 Identification of Project Elements	3-3	54-60	Project Elements are the different components of the multimodal Station. The key program elements for the Project are: historic station, tracks and platforms, bus facility, train hall, parking, concourse and retail, for-hire vehicles, and bicycle and pedestrian access. The Project Proponents identified the program elements through feedback received during stakeholder engagement activities conducted between Fall 2015 and Spring 2016 and from a review of the statutory requirements stated in the Union Station Redevelopment Act of 1981 (USRA).	Remove parking as an identified key program element in the refinement of the Preferred Alternative in the FEIS. Parking is a supportive use to station needs, and not a key element around which other station components should be designed.
7	3	3.1.1.5 Parking	3-7	103-109	Parking has been a component of the WUS program since the USRA and is a primary source of revenue for USRC. Parking at WUS serves Amtrak passengers, WUS users, and car rental companies. During concept development, the Proponents estimated 2040 peak parking demand to be 2,730 spaces to meet the needs of Amtrak passengers, WUS users, and rental car companies. Current total parking capacity is approximately 2,450 vehicles. The Proponents initially identified and evaluated eleven options for a parking facility, including five off-site options.	Revise this section to reflect existing parking utilization at Union Station. Existing Parking at Union Station does not primarily serve passenger rail, commuter rail or intercity bus. This minimal utilization is documented in Amtrak's passenger survey conducted December 12, 2019 through March 26, 2020. Parking is a secondary supportive use, and currently the majority of spaces are used by monthly parkers and minimally by Amtrak passengers or WUS users. This section must be modified to reflect the existing conditions at Union Station.
8	3	3.3.1.3 Parking Working Group	3-36	830-833	Neither DDOT nor DCOP provided projections supporting the recommended parking program. The agencies based their program on stated policy goals to reduce vehicular parking in the District's downtown core, generally shift users away from using private vehicles, and provide more space for residential, commercial, or mixed development.	The statement that OP and DDOT's parking recommendations were not supported by data or analysis is false and appears to be calculated to justify FRA's failure to consider reasonable parking alternatives. This statement should be revised to reflect the fact that the District provided significant data and analysis in support of our recommended parking program, including parking demand by land use and travel mode, District policies, and a review of comparable facilities at a national level. This analysis can be found here: <a href="https://planning.dc.gov/sites/default/files/dc/sites/op/page_content/attachments/June%203%202020_OP-DDOT%20Report%20to%20NCPC_Appropriate%20Parking%20Numbers%20for%20the%20Washington%20Union%20Station%20Expansion%20Project%20%28With%20Attach.pdf">https://planning.dc.gov/sites/default/files/dc/sites/op/page_content/attachments/June%203%202020_OP-DDOT%20Report%20to%20NCPC_Appropriate%20Parking%20Numbers%20for%20the%20Washington%20Union%20Station%20Expansion%20Project%20%28With%20Attach.pdf</a>
9	3	3.4.1.5 Private Air-Rights Development	3-43	951-956	Through this transaction, the private developer acquired air rights for a 14-acre area starting 70 to 80 feet above the tracks and extending from north of the historic station to K Street NE, excluding the areas currently occupied by the Claytor Concourse, vehicular ramps, WUS's bus and parking facility, and the H Street Bridge.	The text needs to be modified to reflect that the appropriate height above the tracks is closer to 30 feet.

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
10	3	3.4.1.5 Private Air-Rights Development	3-44	957-967	Following the acquisition, the private developer applied for specific zoning for the property. In response to the request, the District of Columbia Office of Planning (DCOP) developed the Union Station North (USN) Zoning District specifically for the private air rights. On June 3, 2011, the District issued a Notice of Final Rulemaking setting forth the USN Zoning District regulations. The USN Zoning District encompasses a total of 14 acres and two parcels: Lot 7000, which extends from H Street NE north to K Street NE; and Lot 7001, which extends from H Street NE south to WUS, east of the existing parking garage. The USN Zoning Regulations set maximum heights for buildings within the private air rights. These range from a maximum of 90 feet above the height of the H Street Bridge for areas closer to the historic station building to a maximum of 130 feet in those areas south of H Street NE closest to the bridge and in all areas north of H Street NE	Revise text for technical accuracy, as follows: Following the acquisition, <del>the private developer applied for specific zoning for the property. In response to the request;</del> the District of Columbia Office of Planning (DCOP) developed the Union Station North (USN) Zoning District specifically for the private air rights. On June 3, 2011, the District issued a Notice of Final Rulemaking setting forth the USN Zoning District regulations. The USN Zoning District encompasses a total of 14 acres, <u>consisting of the following lots: Square 717, Lots 7001 and 7002 (area north of H Street); and Square 720, Lots 7000 and 7001, (area between H Street and Union Station, east of the existing parking garage).</u> <del>and two parcels: Lot 7000, which extends from H Street NE north to K Street NE; and Lot 7001, which extends from H Street NE south to WUS, east of the existing parking garage.</del> The USN Zoning Regulations set maximum <u>matter-of-right</u> heights for buildings within the private air rights. These range from a maximum of 90 feet above the height of the H Street Bridge for areas closer to the historic station building to a maximum of 130 feet in those areas south of H Street NE closest to the bridge and <u>most of the area in all areas</u> north of H Street NE. <u>All development in the USN zone is subject to mandatory design review by the District's Zoning Commission.</u>
11	3	3.4.1.5 Private Air-Rights Development	3-44	968-974	In the sections where maximum permitted heights are below 130 feet, density bonuses are available that would add 20 feet of height (to a maximum of 110 feet adjacent to the station and 130 feet elsewhere). The USN District allows as a matter of right any use permitted in the C-3-C Zoning District, with the stipulation that 100 percent of the ground floor uses along the H Street Bridge must be retail, service, or arts uses. The regulations set a maximum nonresidential floor area ratio (FAR)57 of 5.5 with no minimum requirements for parking. At all heights, an additional 20 feet of inhabitable penthouse are permissible.	Revise text for technical accuracy, as follows: In the <del>areas sections</del> where maximum permitted heights are below 130 feet, <u>the Zoning Commission may permit, subject to review criteria, height increases</u> <del>density bonuses are available that would add of u to 20 feet. of height (to a maximum of 110 feet adjacent to the station and 130 feet elsewhere).</del> The USN District allows <u>a mix of uses consistent with the uses permitted in similar zones in downtown, DC</u> <del>as a matter of right any use permitted in the C-3-C Zoning District,</del> with the stipulation that 100 percent of the ground floor uses along the H Street Bridge must be retail, service, or arts uses. The regulations set a maximum nonresidential floor area ratio (FAR)57 of 5.5 with no minimum requirements for parking. At all heights, an additional 20 feet of <del>in</del> habitable penthouse are permissible.
12	3	3.4.1.5 Private Air-Rights Development	3-44	Footnotes	55 District of Columbia Municipal Regulations (DCMR) Section 11-2905. 56 DCMR Section 11-741. 57 The floor area ratio is the ratio of a building's total floor area to the size of the lot on which the building is built. 58 DCMR Section 11-2908.	Revise text for technical accuracy, as follows: 55 <u>11-K DCMR (District of Columbia Municipal Regulations) (DCMR) § 305 Section 11-2905.</u> 56 <u>11-K DCMR §§ 313 and 314 Section 11-741.</u> 57 The floor area ratio is the ratio of a building's total floor area to the size of the lot on which the building is built. <u>58 11-K DCMR § 308.</u> <del>58.5 11-K DCMR § 311 Section 11-2908.</del>
13	3	3.4.1.5 Private Air-Rights Development	3-45	989-990	Buildings with heights in accordance with Section 2905 (up to 130 feet above the elevation of H Street NE);	Revise text for technical accuracy, as follows: Buildings with heights in accordance with <u>11-K DCMR § 305 Section 2905</u> (up to 130 feet above the elevation of H Street NE);
14	3	3.4.7.1 Summary Description	3-81	1694-1696	The portion of the Federally-owned air rights not used for the multimodal surface transportation center would be available for potential future development.	The term 'multimodal surface transportation center' is not an appropriate description of a structure's whose predominant function is to provide private vehicle storage. The facility should be referred to the Inter-city bus facility and parking garage. This comment is applicable to the use of 'multimodal surface transportation center' in all DEIS Project Alternatives.

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
15	3	3.4.7.1 Summary Description	3-82	1725-1728	Potential Development of Federal Air Rights: The Federal air rights not needed for the new bus and parking facilities would be available for potential future transfer and development. The potentially developable envelope would encompass approximately 380,000 GSF.	<p>The FEIS should recognize that there would be significantly more development potential for office, hotel, or residential if the amount of GSF dedicated to parking were reduced; and that these uses would be a more productive use of developable area at this highly accessible locations.</p> <p>The footnote on the GSF available should be included in the body of the document; or at a minimum modify the last sentence to say: ...<b>380,000 GFA, based on an assumption of rezoning the property from PDR-3 to USN.</b></p> <p><i>This is based on the assumption that development of the Federal air rights would be consistent with the USN zoning applied to the adjacent private air rights. This assumption is consistent across all Action Alternatives and supports a realistic assessment of potential indirect impacts. FRA determined that a change to USN zoning in the Federal air rights parcel was reasonably foreseeable based on coordination with the DCOP; the limitations of the existing zoning (PDR-3 precludes residential development), which is inconsistent with the adjacent USN zoning; and the goals of the DC SHPO to promote a symmetrical development north of the historic station. The nature of the potential future Federal air-rights development is undetermined. However, commercial development is likely. For the purposes of the impact analysis, the DEIS assumes that it would consist of office space. This is a conservative assumption because, of the likely uses for the Federal air rights in Alternative A-C, office space would generate the most vehicular trips. Per the ITE Trip Manual 10th Edition, 1,000 square feet of office space generate more trips than the same amount of residential uses.</i></p>
16	3	3.4.7.4 Bus Facility	3-85	1779-1781	Buses would exit the facility via a dedicated ramp directly onto H Street NE similar to the existing configuration. Only right turns would be possible.	There needs to be more flexibility in the future alternatives in the FEIS if right turns are only being provided at this location. Alternatives should show how intercity buses could access H Street heading west, which would allow for the possibility of different routes out of the District.
17	3	3.4.7.7 Pick-up and Drop-off Areas	3-87	1815-1816	Additionally, the second level of the bus facility could potentially be used for for-hire and private pick-up and drop-off activities if not needed for buses.	OP supports the inclusion of an on site inter-city bus facility as part of the project. There should also be a dedicated pick-up-drop-off facility integrated into the alternative, not included as a possibility. The impacts of this facility need to be analyzed and understood, and included in the FEIS.
18	3	3.5.7.2 Bus	3-94	1985-1987	At that time, in all Action Alternatives except Alternative C, East Option, temporary off-site bus facilities or loading zones would be needed, as provided by the District of Columbia, to help maintain operations.	The District has not committed to and does not anticipate having sole responsibility for proving an off-site bus facility. This narrative should be updated to note that one will need to be identified and its impacts assessed, but the reference to the District' providing a facility should be removed.
19	4	4.3.1 Regulatory Context and Guidance	4-6	108 - 114	District policies, regulations, and guidance that may pertain to water resources include:	Add Sustainable DC and the Comprehensive Plan as relevant District policy guidance.
20	4	4.4.1 Solid Waste and Hazardous Materials	4-13	243 - 266	District policies, regulations, and guidance that may pertain to solid waste and hazardous materials include:	Add Sustainable DC and the Comprehensive Plan as relevant District policy guidance.
21	4	4.5.2 Study Area	4-18	410-412	The Regional Study Area is the Metropolitan Washington Council of Governments (MWCOG) area of jurisdiction. MWCOG includes local Metropolitan Planning Organizations (MPO) in Maryland, the District, and Virginia.	Modify this text to reflect that MWCOG is the local MPO and that it includes local jurisdictions in Maryland, the District and Virginia.

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
22	4	4.7.1 Regulatory Context and Guidance	4-42	904 - 906	District policies, regulations and guidance that pertain to GHG and resilience include:	Add D.C. Law 22-257. Clean Energy DC Omnibus Amendment Act of 2018
23	4	4.8.1 Regulatory Context and Guidance	4-45	969-971	District policies, regulations, and guidance that may pertain to energy resources include:	Include Sustainable DC, Clean Energy DC, and the 2018 Clean Energy Omnibus Act
24	4	4.9.1 Regulatory Context and Guidance	4-48	1012	NA	Update the list of applicable plans to include the District's Downtown East Framework Plan, Ward 5 Works, Florida Avenue Market Small Area Plan to provide a complete list of associated guidance.
25	4	Land Use, Zoning, and Local and Regional Planning	4-51	null	Figure 4-10. Local Study Area Land Uses	It is unclear what the land use base is for this map. The title needs to be updated with its relevant source, e.g. If it is Local Zoning, it is unclear if the map is based on current zoning, existing use, or the FLUM.
26	4	4.9.4.1 Land Use, Zoning, and Local and Regional Planning	4-52	1073-1074	Atlas District/H Street Corridor: The corridor is bounded by 2nd Street NE to the 1073 west...	Revise text for technical accuracy, as follows: Atlas District/H Street Corridor: The corridor, <b>for the purpose of this EIS</b> , is bounded by 2nd Street NE to the 1073 west...
27	4	4.9.4.1 Land Use, Zoning, and Local and Regional Planning	4-52	1081-1082	The corridor also has several Planned Urban Developments where specific land use proposals can be accommodated.	Revise text for technical accuracy, as follows: The corridor also has several Planned <b>unit</b> Developments where specific <b>development</b> proposals <b>are approved by the District's Zoning Commission</b> .
28	4	4.9.4.1 Land Use, Zoning, and Local and Regional Planning	4-52	Footnote	Planned Urban Developments can be implemented throughout the District.	Revise text for technical accuracy, as follows: Planned <del>Urban</del> <b>Unit</b> Developments can be <b>approved in many parts of the District, subject to a finding by the Zoning Commission that the proposed development would not be inconsistent with the District's Comprehensive Plan</b> .
29	4	4.9.4.1 Land Use, Zoning, and Local and Regional Planning	4-52	1083	This neighborhood is bounded by...	Revise text for technical accuracy, as follows: This neighborhood, <b>for the purpose of this EIS</b> , is bounded by...
30	4	4.9.4.1 Land Use, Zoning, and Local and Regional Planning	4-52	1083-1092	NA	A reference to the NoMa BID is needed as there is narrative around the Mount Vernon Triangle the text references the CID.



Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
31	4	4.9.4.1 Land Use, Zoning, and Local and Regional Planning	4-53	1112-1115	Between K Street and Florida Avenue, adjacent uses on the east are mostly industrial with rowhouses beyond. The east is zoned PDR-1, a commercial and industrial zone, immediately adjacent to the tracks while the residential areas are zoned RF-1. On the west, uses are a mix of surface parking lots and mixed-use developments zoned D-5.	This description of the areas along the tracks from K Street, to Florida Avenue sounds 5 years old. On the east of the tracks there used to be PDR uses and buildings but they have all been redeveloped into mixed use residential buildings. On the west side of the tracks there are high density office, residential, mix use buildings with one more planned and one under construction, and there are minimal parking lots. The narrative in the FEIS needs to updated to reflect existing land use conditions.
32	4	4.9.4.1 Land Use, Zoning, and Local and Regional Planning	4-53	1103	Much of the land is Federally owned and not subject to zoning.	Revise text for technical accuracy, as follows: Much of the land is Federally owned and <b>federal use therefore</b> not subject to zoning.
33	4	4.9.4.1 Land Use, Zoning, and Local and Regional Planning	4-53	1104-1106	Other areas have D zoning that promotes a dense downtown development with a mix of uses and a strong concentration of Federal uses.	This is an incorrect paraphrasing of the zoning code, and makes it sounds like the purpose of the D zone is to promote a mix of uses AND a strong concentration of Federal uses when the purpose is quite the opposite and it's one of incentivizing a mix of uses where a concertation of federal uses create ghost areas after 5pm.  Revise text for technical accuracy to reflect that of the Zoning Office as follows: <b><u>The purpose of the D-4 zone is to provide for the orderly development and use of land and structures in areas the Comprehensive Plan generally characterized as Central Washington and appropriate for a high-density mix of office, retail, service and residential, entertainment, lodging, institutional and other uses, often grouped in neighborhoods with distinct identities.</u></b>
34	4	4.9.4.1 Land Use, Zoning, and Local and Regional Planning	4-53	1093 and 1101	Mount Vernon Triangle is the area bounded by... The Monumental Core includes the...	Revise text for technical accuracy, as follows: Mount Vernon Triangle, <b>for the purpose of this EIS</b> , is the area bounded by.... The Monumental Core, <b>for the purpose of this EIS</b> , includes the....
35	4	4.11.1 Regulatory Context and Guidance	4-70	1331	District policies, regulations, and guidance that may pertain to aesthetics and visual quality include:	Revise this list to include the DC Comprehensive Plan, specifically the Urban Design Element. There is specific language in the Urban Design Element about view corridors, Center City, and civic buildings and places. The Public Realm Design Manual should also be listed as a reference for general public space and streetscape regulations, standards, guidelines, etc.
36	4	4.11.2 Study Area	4-71	1341	In addition to individual cultural resources, the APE also include culturally significant viewsheds from . . .	Modify this text to include significant views not listed including: Louisiana Avenue, Massachusetts Avenue, and F Street. Please also acknowledge the view from New York Avenue, south toward the station and rail yards.  These are included in Figure 4-18 but are worth mentioning here.
37	4	4.11.4.2 Existing Visual Quality	4-71	1361 to 1391	The visual quality of the environment surrounding WUS is influenced by topography, open space, vegetation, and the scale, form, location, and materials of the built environment.	Modify this section by integrating the important views toward the station from New York Avenue which is at a significantly higher elevation that will afford significant views toward the addition over the rail yards. This section should also note that architectural forms to the east, south, and west tend to be more traditional, while some buildings to the north in NoMA have tried to break from traditional forms and are more sculptural.
38	4	4.11.4.3 Existing Street Views and Significant Viewsheds	4-73	Figure 4-18	28. H Street Bridge looking south.	Modify the text to acknowledge that, all other view corridors along city streets will be lined with standard sidewalks, street trees, and landscaped areas framing views to and from the station. H Street is notable as a bridge because it will not have street trees and its urban condition is strikingly different. This should be identified as it could create opportunities for how the building relates to the street in a way not possible or supportable in other urban contexts in the District.

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
39	4	Architectural History	4-82 through 4-84	Table 4-15	Table 4-15 Cultural Resources within the Area of Potential Effect	Please confirm, and update the table if needed, that the information listed in the table is accurate and comprehensive, we note two examples have issues: - The Railway Express (REA) Building is pending DC landmark and National Register Eligible - The City Post Office (Postal Museum) is listed in the DC Inventory, but also eligible for listing in the National Register. Double checking the status of each resource may be warranted - especially for resources that are adversely affected.
40	4	Architectural History	4-85	1513-1520	Description of WUS Historic Site	Modify the text to recognize that the First Street Tunnel which passes underneath Union Station is also a contributing element of the WUS Historic Site and that the WUS Expansion Project may have effects on this historic feature as well as the headhouse and related features in the rail yard.
41	4	4.13.1 Regulatory Context and Guidance	4-86	1553-1554	NCPC and District of Columbia Parks and Recreation (DCPR), Comprehensive Plan for the National Capital (2011);	This reference needs to be updated to accurately reflect the Comprehensive Plan for the District of Columbia. The Comprehensive Plan for the National Capital is a unified plan comprised of two components - the District Elements and the Federal Elements. The District Elements are authored by OP, including the Parks, Recreation and Open Space element of the Comprehensive Plan. NCPC authors the Federal Elements including the Parks and Open Space element. DPR and NCPC also collaborate and are responsible for Capital Space.
42	4	4.13.1 Regulatory Context and Guidance	4-86	1549	Relevant Federal and District policies, regulations, and guidance include:	This list should include DCMR Title 24: Public Space and Safety. Part of the District's right-of-way set aside as landscaped "parking" is legally part of the District's park and open space system. Its effect is to create a park-like character on all residential streets, which may be relevant for some public space around Union Station. The List should also include the NoMa Small Area Plan that has specific recommendations for the Metropolitan Bike Trail as well as Downtown East Re-Urbanization Strategy that has recommendations for connectivity and open space networks to the west of the station. There are other District documents (DDOT) related to the bike trail that should be listed here.
43	4	4.13.2 Study Area	4-88	Figure 4-28	Parks and Recreation Areas, Study Area	Update the park sites on this map as the information displayed is no longer correct. Many changes have happened in the area that should be reflected on this map including: Plans for the Plaza at Story Park Development which have changed significantly reducing the size of this space and should be assessed to determine if it should still be included on this list. NoMa also has plans for the NoMa Meander (shared alley spaces) that should be listed here, if this is to include all significant proposed outdoor spaces. NoMa has also created a small park on 2nd (or 3rd) Street that should be added to this inventory. "Public Parking" along city streets should also be considered as a park resource that will have views impacted. NoMa Parks foundation has also completed the Swampoodle Park.  Each of these locations should be assessed to determine if they should be reflected as parks in the Study Area.
44	4	4.14.1 Regulatory Context and Guidance	4-90	Lines 1567 through 1573	The following are District regulations and guidance pertaining to social and economic conditions that are most relevant to the Project. DC Code 8-109.01 – 8.109.12, Subchapter V: Environmental Impact Statements; 1570 DC Workforce Investment Council, Workforce Innovation and Opportunity Act 2016-2020 Unified State Plan; 118 1571 and 1572 DC Office of the Deputy Mayor for Planning and Economic Development, DC's Economic Strategy: Strategy Report.	Modify this section to include The Comprehensive Plan for the National Capital in the list of regulatory guidance. Additionally, the Plan is also referenced in the subsequent section.

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45	4	4.14.4 Existing conditions	4-92-93	Lines 1585 through 1611	Full section of text. Included by reference.	Demographic data is assembled using 2015 data. These are among the oldest data in the document. Given the high-rate of housing production in the study area, these figures need to be updated in the FIES using the most recent possible data to more accurately reflect the impacts on the surrounding community.
46	4	4.14.4.4 Economic Planning Policy	4-94	Lines 1633 through 1635	The DC's Economic Strategy report provides two specific goals: raise the private sector GDP by 20 percent and reduce unemployment rates below 10 percent by the end of 2021.	This section mischaracterizes the unemployment component of the Economic Strategy's goal. These goals should be revised as follows: 1) grow the DC private sector economy to \$100 billion (by 20%), by the end of 2021. 2) Reduce unemployment across wards, races, and educational attainment levels, bringing unemployment levels below 10% in all segments by the end of 2021. This goal translates to the following targets: Reduce unemployment levels of African-American residents. Reduce unemployment levels of high school graduates without a Bachelor's degree. Reduce unemployment levels of Wards 7 and 8.
47	4	4.15.4.2 Fire and Medical Emergency Response	4-97	1705-1707	Five hospitals are located within 3 miles of WUS: Howard University Hospital, a Level 1 Trauma Center; 138 Bridgepoint Hospital, Capitol Hill Campus; and Children's National Medical Center	The narrative says there are 5 hospitals located within 3 miles of WUS, but only lists 3 hospitals. The number of hospitals needs to be confirmed and the language updated to reflect the accurate number.
48	4	4.16.4.1 Existing Conditions	4-106	NA	Table 4-19: Concentrations of Sensitive Populations in the Local Study Area	No primary or secondary schools are listed in the table, but are included in the map. Elementary and secondary schools, including public schools and charter schools, should be included in the table to reflect the risks to all school children, not just those in early learning centers.
49	4	4.16.4.1 Existing Conditions	4-106	1833-1835	Existing conditions pertaining to these aspects of the environment are characterized in Section 4.3, Water Resources and Water Quality, Section 4.4, Solid Waste 1834 Disposal and Hazardous Materials, and Section 4.10, Noise and Vibration. Air quality is the main potential stressor in the Local Study Area.	Modify this section to reflect the public health concerns mentioned in the Solid Waste Disposal and Hazardous Materials including the "High Risk: Former Underground Storage Tanks (USTs) and Spills, and Hazardous Materials Generated and Stored Identified Within the Project Area" or the "Moderate Risk: Active Railroad Right of Way Within the Project Area." Currently the Public Health section only calls out the potential impact of air quality on sensitive populations. This section limits the understating of impacts by only naming air quality impacts when there are other risks mentioned.
50	4	4.16.4.1 Existing Conditions	4-106	1840-1841	Children and the elderly are most susceptible to environmental stressors. There are several facilities in the Local Study Area that cater to these sensitive populations (Table 4-19).	In addition to senior wellness centers, FRA should consider other places that support special populations as susceptible places. FRA should consider public housing as susceptible places as well since they house both children, seniors, and other low-income individuals who may have health risks. FRA should also consider treatment facilities as susceptible places since they treat persons seeking treatment from substance abuse. FRA should consider shelters for persons experiencing homelessness as susceptible places since they provide services to individuals of all ages and individuals with higher health risks. FRA should include the public housing sites, treatment centers, and homeless shelters within the Local Study Area in the FEIS.
51	4	4.16.4.1 Existing Conditions	4-106	1840-1841	Children and the elderly are most susceptible to environmental stressors. There are several facilities in the Local Study Area that cater to these sensitive populations (Table 4-19).	It is well documented that low-income populations, including populations experiencing homelessness, are also high risk to environmental stressors, including air pollution, and face higher risks of poor health. The narrative needs to be updated to incorporate and evaluate the public health risks to low-income populations and populations experiencing homelessness that live in the Local Study Area.
52	4	4.16.4.1 Existing Conditions	4-106	1840-1841	Children and the elderly are most susceptible to environmental stressors. There are several facilities in the Local Study Area that cater to these sensitive populations (Table 4-19).	In addition to the early childcare centers listed, Table 4.19 should be revised to include: public housing sites, homeless shelters, and treatment centers. (Explanation provided above). There are several of each facilities located within the Local Study Area.

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
53	4	4.16.4.2 Transportation and Mobility of the Elderly and Persons with Disabilities	4-107	1854-1856	According to ACS data for 2015, there were an estimated 1,350 individuals older than 65 within the Local Study Area in that year, or approximately 6.9 percent of the total population 1856 in the area.	The narrative needs to be modified to include ACS information on persons with disabilities since they are a special population in this section. There should be information on the District's total population of persons with disabilities. Information can be found here: <a href="https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/2015%20Disability%20Characteristics%20Among%20DC%20Residents.pdf">https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/2015%20Disability%20Characteristics%20Among%20DC%20Residents.pdf</a>
54	4	4.16.4.2 Transportation and Mobility of the Elderly and Persons with Disabilities	4-107	1843-1853	WUS received its last major renovation in the 1980s and some of its elements do not meet current accessibility standards. Such limitations impair mobility for the elderly and persons with disabilities with respect to accessibility to WUS, transit services, and facilities. Ramps that allow passengers access from WUS to the train level are difficult to navigate for wheelchair users and those with limited mobility. Amtrak Red Cap service is available to help users with reduced mobility reach their trains. However, existing platforms do not meet ADA requirements for warning strips, safety zones, vertical circulation, or pedestrian circulation. Existing platforms lack level boarding and have an excessive gap between the platform and train. Congestion within corridors and platforms; the narrow width of platforms; and single points of access and egress are a hazard to those with impaired mobility due to increased chances of trip and fall accidents.	According to a 2013 National Disability Rights Network report, while Union Station was mostly accessible, "access to the platform serving tracks 27 and 28, which serve trains going south to the Carolinas and Florida and other southern destinations, continues to lack an elevator. Thus, passengers heading south or detraining from trains using tracks 27 and 28 must wait for carts operated by Amtrak personnel that take a circuitous route out along uncovered portions of the platforms and crossing tracks to get to and from the station."  The narrative needs be updated to reflect that there is no elevator to assist passengers to tracks 27 and 28. It is addressed later in the Environmental Consequences Section but not here and is important to note when discussing ADA accessibility.
55	4	4.16.4.2 Transportation and Mobility of the Elderly and Persons with Disabilities	4-107	1859-1861	The Local Study Area partially overlaps with the campus of Gallaudet University, an educational institution for the deaf and hard-of-hearing.	The size of the student body at Gallaudet needs to be included as parallel information to the size of the senior population. It is important to note the relative size of this population in the study area.

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
56	4	4.17.3 Methodology	4-109	1902-1919	<p>The data source used to identify minority populations was the 2010 Census. Minority populations were considered at the block level. The CEQ guidance threshold of 50 percent was used as an indicator of minority population requiring consideration. The data source for identifying low-income populations was the ACS five-year average data for 2011 to 2015 and HHS poverty guidelines. Due to high median income in the District, households below 150 percent of the HHS poverty guidelines were considered low-income. Low-income populations were considered at the block group level. A threshold of 27 percent was used to identify concentrations of low-income residents requiring environmental justice consideration.</p> <p>Due to the rapid demographic change at WUS since 2010, additional data sources were used to confirm the location of minority and low-income populations. For Census blocks where the minority population was below the threshold, the presence of places of worship with predominantly minority congregations was used to determine whether distinct environmental justice populations may exist. Distinct low-income populations were confirmed through mapping the locations of low-income housing units. Populations in Census blocks without housing units were considered homeless if confirmed through newspaper articles or field observations.</p>	<p>In the FEIS the data for this section needs to be updated to Census data from 2014-2018 American Community Survey (ACS) 5-Year Estimates at the block group level. The other research and data points discussed in this section seem reasonable to include in the analysis.</p> <p><b>Minority Populations</b> It was noted that rapid change has taken place in the study area since the 2010 Census, which was the data source used for the analysis. The 2014-2018 American Community Survey (ACS) 5-Year Estimates would provide a more recent snapshot of the population. The ACS data are available at the block group level. Not sure if using the block level data in the analysis was a requirement for this part of the analysis, but block group level data was used in the income analysis. At the very least, the 2014-2018 ACS data could verify if the original findings are still accurate.</p> <p><b>Low-Income Population</b> 2011-2015 ACS data was used in the analysis. The 2014-2018 ACS estimates would provide an updated snapshot of income levels, and the data are available at the block group level.</p>
57	4	4.17.3 Methodology	4-109	1912-1913	<p>Due to the rapid demographic change at WUS since 2010, additional data sources were used to confirm the location of minority and low-income populations.</p>	<p>Revise the narrative to say: 'due to the rapid demographic change <b>in the area surrounding</b> WUS' as WUS did not experience demographic change.</p>
58	4	Figure 4-36	4-114	Figure	NA	<p>The map appears to be out of date as EJ population still shows Sursum Corda as an existing public housing. OP suggests potentially change the map to "future mixed-income, affordable community" to reflect continuing changes in affordable housing.</p>
59	5	3.4.3 Alternative	5-27	457-458	<p>Groundwater withdrawal has the potential to cause soil settlement in the vicinity of the withdrawal. Due to lack of information, the extent of the area that could be affected cannot be determined at this time.</p>	<p>The lack of information about potential soil settlement makes it difficult (if not impossible) to evaluate what the potential impacts of the soil settlement from Alternatives B, C, D, and E will be on surrounding utilities, roadways, the WUS Metro Station, and nearby buildings. Obtaining further information about these potential impacts should be a priority, as they could have major impacts on infrastructure systems critical to the District. The text should specify the point in the process when the soil settlement information will be available to allow for an understand of the settlement impacts on the project.</p>
60	5	5.3.6 Avoidance, Minimization and Mitigation Evaluation	5-45	858-862	<p>Project Proponents to ensure that stormwater management features, including green infrastructure practices such as rainwater collection and reuse, green roofs, and bioretention facilities, are included in Project design as appropriate to manage post-construction stormwater flows in accordance with DOEE's Stormwater Management Guidebook.</p>	<p>In addition to DOEE's Stormwater Management Guidebook, the Green Area Ratio, found under Subtitle C of the District's 2016 Zoning Regulations, should be referenced as a tool to help to manage stormwater flows and would need to be adhered to for the private air-rights portion of the project.</p>

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
61	5	5.5.3 Methodology	5-70	50-51	FRA developed projections for each mode through a detailed multimodal model (model) using existing and projected ridership and developments, and estimated mode splits.	Clarify what modeling tool used to develop the projections. This will allow for a better understanding of the projections. OP also requests that the mode splits for arrival to the Station that are assumed under the No Action and Action Alternatives be documented in the DEIS to allow for a common understanding of how trips are made to and from the Station.
62	5	5.5.4.1 No-Action Alternative	5-73	151-154	The increase in Metrorail ridership at WUS in the No-Action Alternative would adversely affect passenger circulation. Passenger circulation is an existing issue at the station. It can take up to 8 minutes for passengers to clear the two sets of escalators from the platform level.	Clarify which of the two exits from Union Station the text is referring to. While it is likely the northern exit closer to the train platforms, the specific portal should be indicated so the impacts on Metrorail riders are better understood.
63	5	5.5.4.2 Alternative A	5-101	783-784	Alternative A, all parking and rental car activity would be in a new above-ground facility (multimodal surface transportation center) located within the same general foot print as the existing WUS parking garage, with access via H Street NE (west intersection) and the new southwest road.	Trying to rename the new parking garage multimodal surface transportation center is not an appropriate way to characterize a space which dedicated over 80% of its square footage to storing private vehicles.  This facility should be referred to as the Intercity Bus Facility and Parking Garage, which explicitly reflects its nature.  This comment carries forward to all uses of the term multimodal surface transportation center in each Action Alternative.
64	5	5.5.4.2 Alternative A	5-111	974-979	In Alternative A, approximately 323,720 square feet of air rights above the bus and parking facility would be potentially available for development, separately from the Project. Because the relatively small amount of available space, and its location on top of a multistory ground transportation facility with no direct street access, it was assumed for the purposes of the analysis that this space would be for additional parking. It was further conservatively assumed that the space would operate near capacity. Table 5-37 shows the trips the Federal air-rights development would generate under this assumption.	Assuming that the Federal Air Rights would be developed as parking in Alternative A is not appropriate. More appropriate use of the development potential needs to be integrated for Alternative A in the FEIS. Specific consideration should be given to office, hotel, residential or retail in this space. The impacts of this alternative will also need to be assessed in the FEIS.
65	5	5.5.4.2 Alternative A	5-117	1161-1175	The loss of parking capacity would likely lead WUS visitors or passengers to use alternative modes of transportation, including Metrorail, for-hire vehicles, and private pick-ups and drop-offs. Based on projected mode daily Metrorail trips, 431 daily for-hire trips, and 431 daily private pick-up and drop-off trips. Given the overall daily volumes of these modes, the added trips would be manageable.	The FEIS should include a discussion on the implications of providing parking on site, once users of Union Station have found alternative means of accessing intercity travel. If users can find new ways to the Station during the construction phase, it can be assumed that they can continue to travel to the station by means other than personally owned vehicles once the expansion is complete. The construction assumption for all Action Alternatives shows that it is possible for travelers to Union Stations to find other modes, or other near by locations to park.  The FEIS should reflect on if it is necessary to include a garage once other viable ways of accessing the station are found during the construction phase.

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66	5	5.5.4.7 Alternative A-C (Preferred Alternative)	5-175	Figure 5-20: Key Transportation Elements, Alternative A-C	NA	OP appreciates the distributed pick-up-drop-off (PUDO) locations that FRA has included in many of its alternatives, intended to lessen the traffic impact on any one location. However, there continues to be a risk of queuing on District roadways from some of the PUDO locations. Therefore, OP encourages FRA to examine if a purpose-built PUDO facility, that in addition to the distributed facilities, could alleviate some of the traffic impacts and improve the ability of intercity travelers to connect with for-hire vehicles. OP is flexible as to the location of such a facility and encourages FRA to examine both above- and below-ground options. OP would expect to see such a facility explicitly integrated into the design of the alternatives so its impacts, including safe ingress and egress, can be analyzed. It will also be important to understand the effects of the facility on the surrounding transportation network, including impacts to pedestrian and cyclist comfort and safety.
67	5	5.5.4.7 Alternative A-C (Preferred Alternative)	5-178	2320	Adjacent to the north-south train hall on the deck level.....	Confirm if the narrative here is correct. OP's understanding is that the train hall in Alternative A-C is east-west.
68	5	5.5.4.7 Alternative A-C (Preferred Alternative)	5-181	Figure 5-21: Deck Level Circulation (All Movements), Alternative A-C	NA	More flexibility is needed in the FEIS Project Alternatives in order to accommodate future turning movement needs, site circulation, and to adjust for potential changes in demand. The following elements should be improved in the FEIS to address the negative impacts of the current design of Preferred Alternative A-C: <ul style="list-style-type: none"> <li>• The four closely spaced signalized intersections on the H Street Bridge;</li> <li>• The restriction that buses can only make an eastbound right turn from the bus facility;</li> <li>• The offset western intersection on H Street NE, which would require complex signal phasing; and</li> <li>• The limited internal storage for vehicle queuing.</li> </ul>
69	5	5.4.4.7 Alternative A-C (Preferred Alternative)	5-255	464-476	All Action Alternatives would have: No direct operational impacts because no Action Alternatives would create sources of CO2 emissions in the Project Area. Negligible indirect operational impacts, because CO2 emissions from energy consumption or vehicular and rail traffic would be small, amounting to 1 percent or less of both the District's 2017 CO2e emissions and its 2032 emission target. Negligible construction impacts, as the highest level of annual emissions (during Phase 4 if only trucks are used to remove excavation spoils) would amount to 1 percent or less of both the District's 2017 CO2e emissions and its 2032 emission target.	OP disagrees that a 1 percent impact on the District's 2032 emissions target is a negligible impact for a single project. FRA should update its analysis to more appropriately characterize the Project's significant impact on citywide emissions in the FEIS, and include mitigation measures to offset this significant impact.
70	5	5.8.4.1 No-Action Alternative	5-261	59-63	The additional electrical load from the private air-rights development may require a new substation. The new substation is likely to increase the electrical load on the local distribution system and could result in other necessary upgrades to ensure stable and reliable delivery of electricity to local customers. Such upgrades are typical for development project of that size.	A net-zero energy strategy should be considered and discussed in the FEIS, particularly for the development potential of the Federal air rights. The District's building energy codes, which are updated every three years, will soon be updated to require that all new buildings achieve net-zero energy use or better.
71	5	5.8.6 Avoidance, Minimization and Mitigation Evaluation	5-274-275	305-313	5.8.6 Avoidance, Minimization, and Mitigation Evaluation	Overall, the project proposal is carbon positive, which is directly in conflict with the District's carbon neutrality goals. The overall increase in energy use compared to existing uses may be defined as 'minor', but that baseline is soon to be antiquated relative to new development projects in the District. FRA should include tools and mitigation measures in the FEIS that will offset the carbon impact of the Preferred Alternative.

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
72	5	5.9.3.1 Operational Impacts	5-277	42-45	USN zoning allows development to a maximum height of up to 130 feet above the crest of the H Street Bridge with a 20-foot height step down to 110 feet within 300 feet of the historic station building and another 20-foot height step down to 90 feet within 150 feet of it.	Add the following sentence to the end of the paragraph to correctly reflect what the USN zone allows: "Greater heights are permissible in the 110' and 90' areas if permitted by the Zoning Commission."
73	5	5.9.3.1 Operational Impacts	5-277	42-45	USN zoning allows development to a maximum height of up to 130 feet above the crest of the H Street Bridge with a 20-foot height step down to 110 feet within 300 feet of the historic station building and another 20-foot height step down to 90 feet within 150 feet of it.	Add this preamble to the statement to correctly reflect what the USN zone allows: "The USN zone permits greater heights and a mix of uses, but sets forth a mandatory design review process by the Zoning Commission."
74	5	5.9.4.1 No-Action Alternative	5-278	64-65	The No-Action Alternative would be consistent with DC Office of Planning (DCOP)'s Future Land Use Map.	Revise the narrative to correctly reflect the FLUM: "The No-Action Alternative would be consistent with the District of Columbia's Comprehensive Plan's Future Land Use Map."
75	5	Table 5-115	5-279	Table 5-115	NA	Integrate the following plans into this table as they provide relevant guidance to the Project: Downtown East Framework Plan, Ward 5 Works, Florida Avenue Market Small Area Plan and move DC.  Please also include a clarification in the text noting that both the District of Columbia and NCPC have sections of the Comprehensive Plan that are applicable to this DEIS.
76	5	5.9.4.1 No-Action Alternative	5-280	105	surrounded by low-density residential	Update the text to correctly reflect that the Station is "surrounded by moderate-density residential".
77	5	5.9.4.2 Alternative A	5-281 & 5-285	132, 226	Federal property is not subject to local zoning...	This statement is incorrect. Federal public buildings are exempt from local zoning. Air rights development on Federal land for private use would be subject to zoning and is expected to comply with USN zoning.
78	5	5.9.4.2 Alternative A	5-281	149	DCOP Future Land Use Map.	Update the text to correctly reference the FLUM as follows: "the District of Columbia's Comprehensive Plan's Future Land Use Map".
79	5	5.9.4.2 Alternative A	5-284	Table 5-116	[Comp Plan Analysis]	The description of the Comprehensive Plan for the National Capital is currently only reflective of NCPC's Federal Elements. There should be a section that describes the District's portion of Comprehensive Plan, and its elements including the Central Washington Element, the Land Use Element, the Urban Design Element, the Economic Development Element, and the Transportation Element be included in this table. This comment carries forward to all other alternatives.



Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
80	5	5.9.4.2 Alternative A	5-285	233-240 (including bottom page reference 7)	<p>Because of its relatively modest size and location on top of a bus facility and parking facility, with no opportunity for direct access from the street level, it is assumed for the purposes of this DEIS that the space would be used for additional parking. This would be a beneficial impact because it would contribute to supporting WUS operations by making use of potentially developable space that otherwise would remain unproductive in a manner consistent with surrounding land uses. This beneficial impact would be minor because such a development would not be fully consistent with DCOP's Future Land Use Map, which shows mixed-use development with residential, retail, and office space at this location.</p>	<p>It is not appropriate to assume that the air rights left in this option should automatically be developed as parking, and it should not be assumed to be a benefit considering the oversupply of parking and its negative externalities. As stated in previous comments, please modify Alternative A to include land uses other than parking above the Bus Facility and assess their impacts in the FEIS.</p> <p>Comments on the FLUM (Carry Forward for All Alternatives) The characterization of the FLUM is incorrect, it is not OP's FLUM it is the District's. Update the text to reflect this.</p> <p>Impact can not be evaluated based on the use proposed uses in relation to the FLUM. The FLUM only displays uses that would not be inconsistent with the Comprehensive Plan. Whether it is mixed use or a single use does not matter and confers no greater or lesser benefit. Please note that the FLUM does not have "retail" and "office" categories, rather it has a Commercial. Also, the called out designation is not correct, the site of the parking garage is mixed use Comm HD / Federal. The narrative in the text should be updated to reflect these comments, and should no longer compare the use with the FLUM designation.</p> <p>The expansion project should be compared against the Comprehensive Plan in its totality, not just against the FLUM in the FEIS.</p>
81	5	5.9.4.6 Alternative E	5-304	729-735	<p>Relative to existing conditions, Alternative E would have major adverse indirect operational impacts on zoning. This is because the height of the potential Federal air-rights development would exceed what the existing PDR-3 zoning allows. Other impacts of Alternative E on land use, property ownership, and plans would be the same relative to existing conditions as they would be relative to the No-Action Alternative. These impacts would result from features of Alternative E or the Study Area that would not change with the baseline.</p>	<p>It is incorrect to characterize positive or negative impacts on zoning, which can be changed by the Zoning Commission and the change is not inherently an adverse impact. Modify this characterization of the impacts to zoning to reflect neutrality. There should also be a reference to the positive impact including parking underground in Alternative E would create by making more space available for active uses above ground and improving the project's overall design.</p>

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
82	5	5.11.3 Methodology	5-378	11 - 34	This section summarizes the methodology for evaluating the impacts of the alternatives on aesthetics and visual quality. Appendix C3, Washington Union Station Expansion Project Environmental Consequences Technical Report, Section 11.4, Methodology, provides a description of the analysis methodology. A summary is below. The assessment of impacts on aesthetics and visual quality was conducted based on 22 significant street views and six culturally significant viewsheds with views toward the Project Area, for a total of 28 views as shown in Figure 5-57 (viewsheds A, C, and D contain one view each and viewshed B containing three views). To assess the visual impacts of the alternatives, visual simulations were developed by superimposing building volumes onto photographs of the 28 views. These simulations convey building mass, height, and setback. Building volumes reflect the anticipated size of the Project elements or maximum allowable zoning volumes. They do not incorporate specific design elements, which are not known at this time. The simulations can be found in Appendix C3a, Washington Union Station Expansion Project Aesthetics and Visual Quality: Visual Assessment.	There is not enough consideration given to the quality of the future Station's urban design and its surroundings. Greater emphasis should be placed on the following: <ul style="list-style-type: none"> <li>• The placement and scale of the parking garage and its potential impact on future open space activation, connectivity, vibrancy and character;</li> <li>• The impact of parking access points, circulation, and potential queuing on pedestrian experience and on the streets and neighborhoods surrounding the Station;</li> <li>• The importance of pedestrian-friendly connections between the H Street Bridge and the train halls, taking into account the challenged pedestrian streetscape and ensuring the new design creates a more vibrant, accessible, pedestrian-oriented streetscape through consideration of street furniture, lighting, wayfinding, street trees, and other means;</li> <li>• The importance of enhanced pedestrian and bicycle connections between the multiple entrances of the Station, and to the surrounding neighborhood's sidewalks and bicycle network; and</li> <li>• Greater consideration of northern views toward the Station from the direction of New York Avenue, which has a significantly higher elevation that will afford prominent views towards the new decking and buildings over the rail yards.</li> </ul>
83	5	5.11.3 Methodology	5-380	Figure 5-57	The assessment of impacts on aesthetics and visual quality was conducted based on 22 16 significant street views and six culturally significant viewsheds with views toward the Project 17 Area, for a total of 28 views as shown in Figure 5-57 (viewsheds A, C, and D contain one view 18 each and viewshed B containing three views).	Include the significant views of Union Station from New York Avenue (in addition to the one shown) east of the railroad tracks in this section. Analysis of this viewshed will be important as the addition to Union Station is on the back of the station, and the elevation of New York Avenue allows for a view where the additional will be most visible.
84	5	5.11.4.1 No-Action Alternative	5-382	Table 5-121	Relative to existing conditions, the No-Action Alternative would result in direct operational impacts on 21 out of 28 views, as shown in Table 5-121	The view from New York Avenue east of the railroad tracks should be included as part of this assessment as the view would be most impacted by the proposed Air Rights development.
85	5	5.11.4.1 No-Action Alternative	5-384	Table 5-122	Moderate Adverse - 1 - H Street Bridge (#28)	The view from New York Avenue east of the railroad tracks should be included as part of this assessment as the view would be most impacted by the proposed Air Rights development.
86	5	5.11.4.2 Alternative A	5-384	NA	Alternative A	The view from New York Avenue east of the railroad tracks should be included as part of this assessment as the view would be most impacted by the proposed Air Rights development.
87	5	5.11.4.3 Alternative B	5-387	NA	Alternative B	The view from New York Avenue east of the railroad tracks should be included as part of this assessment as the view would be most impacted by the proposed Air Rights development.
88	5	5.11.4.4 Alternative C	5-389	NA	Alternative C	The view from New York Avenue east of the railroad tracks should be included as part of this assessment as the view would be most impacted by the proposed Air Rights development.
89	5	5.11.4.5 Alternative D	5-391	NA	Alternative D	The view from New York Avenue east of the railroad tracks should be included as part of this assessment as the view would be most impacted by the proposed Air Rights development.
90	5	5.11.4.6 Alternative E	5-393	NA	Alternative E	The view from New York Avenue east of the railroad tracks should be included as part of this assessment as the view would be most impacted by the proposed Air Rights development.
91	5	5.11.4.7 Alternative A-C (Preferred Alternative)	5-395	NA	Alternative A-C (Preferred Alternative)	The view from New York Avenue east of the railroad tracks should be included as part of this assessment as the view would be most impacted by the proposed Air Rights development.

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
92	5	5.11.5 Comparison of Alternatives	5-399	Table 5-140	Comparison of Impacts, Aesthetics and Visual Quality	The view from New York Avenue east of the railroad tracks should be included as part of this assessment as the view would be most impacted by the proposed Air Rights development.
93	5	5.11 Aesthetics and Visual Quality	Entire Section	Mitigation	NA	Mitigation for impacted views should include aesthetic improvements to railroad bridges over K, L, and M streets and Florida Avenue wherever possible.
94	5	5.12.3 Methodology	5-403	51-53	Definition of adverse effect	The following section should be revised to be consistent with Section 106 regulations in the following manner: "An adverse effect is an effect that would alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for listing in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling and association."
95	5	5.12.3.1 Operational Impacts	5-404	72	negligible, minor, or adverse impact under NEPA	Update the narrative to read as moderate was left off the types of adverse impacts that are considered: "negligible, minor or <b>moderate</b> adverse impact under NEPA"
96	5	5.12.3.2 Construction Impacts	5-406	110-113	Assessment of noise and vibration impacts used the FTA thresholds applicable to construction noise and vibration. Steps to evaluate potential construction impacts to cultural resources included: identifying what physical construction effects may occur; potential visual impacts to cultural resources or visual character due to construction activities; and indirect impacts of noise and vibration.	The text should be updated to reflect the potential indirect impacts construction may have on congestion, specifically resulting from "temporary" road closures (which could be closed for long periods given the extensive construction schedules).
97	5	5.12.4.2 Alternative A	5-412	Table 5-145 (erroneously labeled 5-4151)	Major Adverse Impacts of Alternative A	The list is not exhaustive. Additional adverse impacts associated with Alt A should be added to the list, these include but are not necessarily be limited to, the visibility of the parking garage from the north (i.e. parking garages do not contribute to civic space); the loss of views to WUS from the central north-south oriented concourse; etc. This comment carries forward to the additional adverse impacts which may also result for other similar alternatives.
98	5	5.12.4.2 Alternative A	5-415	Table 5-148	Potential Adverse Effects on WUS, WUS Historic Site and REA Building	It is unreasonable from a Section 106 perspective to describe an 11-year construction schedule as anything but major adverse on the WUS Historic Site - especially when considering that it involves reconstruction of every track, removal of every historic umbrella shed etc. Similarly, the visual effects (e.g. fencing, construction equipment, temporary road closures etc.) of such a long period of construction would very likely result in major adverse effects on the WUS and REA Building.  This significant impact should be recognized in the FEIS, and its impacts addressed and mitigated. This comment is applicable across all alternatives.
99	5	5.12.4.3 Alternative B	5-421	Table 5-151	Potential Adverse Effect on WUS, WUS Historic Site and REA Building	It is unreasonable from a Section 106 perspective to describe an 14-year construction schedule as anything but major adverse on the WUS Historic Site - especially when considering that it involves reconstruction of every track, removal of every historic umbrella shed etc. Similarly, the visual effects (e.g. fencing, construction equipment, temporary road closures etc.) of such a long period of construction would very likely result in major adverse effects on the WUS and REA Building.  This significant impact should be recognized in the FEIS, and its impacts addressed and mitigated. This comment is applicable across all alternatives.

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
100	5	5.12.4.4 Alternative C	5-422	329	Visual Impacts of Alt C (East & West Option)	<p>Although Alt C will probably still result in an adverse effect on WUS, it is worth noting that this is the first option that significantly minimizes the adverse visual impact through the introduction of a "visual access zone" to provide views to the historic station from the north.</p> <p>The condition discussed above should be integrated into the assessment of the impacts of the alternative. This comment is applicable to all Alts that incorporate the visual access zone rather than a central north-south concourse.</p>
101	5	5.12.4.4 Alternative C	5-427	Table 5-156	Comparison of Alt C Operational Visual Impacts on Cultural Resources Relative to the No-Action Alternative and Existing Conditions	Union Station should be integrated and evaluated in this table. Not including Union Station suggests there is no potential for adverse effects. Perhaps it has something to do with it being relative to no-action and existing conditions but it seems unlikely that there is no potential for adverse effects on WUS in either scenario.
102	5	5.12.4.5 Alternative D	5-433	Table 5-160	Comparison of Alt D Operational Visual Impacts....	Union Station should be integrated and evaluated in this table. Not including Union Station suggests there is no potential for adverse effects. Perhaps it has something to do with it being relative to no-action and existing conditions but it seems unlikely that there is no potential for adverse effects on WUS in either scenario.
103	5	5.12.6 Alternative E	5-442 & 443	628-647	Avoidance, Minimization and Mitigation Evaluation	<p>This section suggests that avoidance of adverse effects can be achieved through development of a Section 106 programmatic agreement. While this may be true to some degree, avoidance of the most significant adverse effects (e.g. the lack of civic space on the north side of WUS resulting, in part, from construction of too much parking rather than the grand, context specific architecture that WUS warrants) must be completed before the FEIS because the ROD will significantly limit FRA's ability to consider design alternatives that could avoid adverse effects in a meaningful way.</p> <p>Therefore, a Programmatic Agreement should be reached for the project prior to the issuance of the FEIS and associated ROD to ensure that adverse historic impacts are appropriately mitigated.</p>
104	5	5.13 Parks and Recreation Areas	5-444	Entire Section	Impact Analysis	Landscaped "Public Parking" should be added as a park and recreation resource assessed for impacts, as they provide park-like amenities for the area.
105	5	5.13 Parks and Recreation Areas	5-444	Entire Section	Impact Analysis	The impact of increased trips on Columbus Plaza and other parks and open space resources in the area should be assessed in the FEIS.
106	5	5.14.4.1 No-Action Alternative	5-462	166-173	<p>The H Street Bridge replacement would have the most impact, as it would make travel between the east and west sides of the Local Study Area more difficult during the construction period. DDOT would likely implement measures to minimize this impact. The private air-rights development construction would likely require temporary sidewalk and roadway closures along First Street NE (north of H Street) and 2nd Street NE and generate construction vehicle traffic along those streets. No sufficient information is available to assess the intensity and duration of those impacts but they would be those typical of medium- to large-scale urban construction projects.</p>	FRA should reassess the impact closing of the H Street Bridge would have. It is currently characterized as a minor impact. This characterization requires further consideration. Closing a major thoroughfare in an area with significant structural barriers pertaining to the Union Station viaduct may prove more impactful than the initial assessment suggests. Alternate routes are narrow and have poorer connections to transit service.

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
107	5	5.14.4.2 Alternative A	5-465	238-241	Alternative A would reduce the number of revenue-generating parking spaces at the station from approximately 2,205 in the No-Action Alternative to approximately 1,750, a 21 percent reduction. Assuming a proportional reduction in revenue, this would cause a loss of approximately \$1.79 million (2017 dollars) to WUS.	FRA should include more analysis of the potential parking revenue in the FEIS. The assumption that a reduced number of parking spaces reduces revenue by the same amount is not appropriate, especially when considering the premium pricing the remaining spaces could achieve due to the demand for fewer conveniently located parking spaces and the projected ridership growth. This analysis should also look at the potential revenue generated by potential air rights development consistent with what would be allowed under USN Zoning.
108	5	5.14.4.2 Alternative A	5-466	272-277	Alternative A may indirectly encourage development near WUS. As explained in <b>Section 5.9.4.2, Alternative A, Indirect Operational Impacts</b> , the District's zoning regulations and applicable plans would continue to guide the density and character of potential future development, including the development of the Federal air rights into parking space, as assumed for the purposes of the DEIS. This would avoid developments that could disrupt or dislocate local communities.	While OP acknowledges that the cited regulations and plans mitigate direct displacement, the FEIS should assess the project's potential to displace residents by establishing higher-market rents be evaluated.
109	5	5.14.4.2 Alternative A	5-466	287-290	Alternative A would have no indirect operational impacts on WUS revenue. The loss of parking and retail revenue described above in <b>Section 5.14.4.2, Alternative A, Direct Operational Impact</b> would cancel out any marginal increase in revenue that greater activity at the station could generate.	FRA should reassess their parking revenue assumptions, specifically the assumption that revenue drops at an equal rate per parking space. FRA should evaluate the price premium the reduced number of spaces can achieve, not assume that the price would remain static. This analysis should also look at the potential revenue generated by potential air rights development consistent with what would be allowed under USN Zoning.
110	5	5.14.4.2 Alternative A	5-467	316-318	This impact cannot be quantified at this time but it would at least partially offset the loss of revenue from the reduction in parking capacity.	The revenue generated by the potential land use development program for the site be included in the analysis for the FEIS. Without included this revenue, the benefit cost is skewed in favor of parking as a revenue source.
111	5	5.14.4.3 Alternative B	5-472	417-420	Therefore, WUS would not receive any revenue from the new parking. Based on fiscal year 2016 data, this would represent a loss of approximately \$8.5 million. In that year, parking revenue represented 59 percent of the station's total revenue.	The parking revenue generated by the garage, approximately \$8.5 million in 2016, is vastly disproportionate to the total estimated Project costs, estimated between \$5.8 and \$7.5 billion. The FEIS should acknowledge that USRC's authority to generate revenue will need to be revised, and increased in order to support a successful Project.
112	5	5.14.4.4 Alternative C	5-473	447-448	This impact cannot be quantified at this time but it would at least partially offset the loss of revenue from the reduction in parking capacity.	The revenue generated by the potential land use development program for Union Station should be included in the analysis for the FEIS. Without including this revenue, the benefit cost is skewed in favor of parking as a revenue source.
113	5	5.14.4.4 Alternative C	5-477	541-542	loss in revenue would be a major adverse impact as parking represents the majority of WUS's revenue.	The characterization of the loss of parking revenue as a major adverse impact is not appropriate. The amount of revenue highlighted in the DEIS as forgone if parking levels are diminished represents a small percentage of the overall project costs. As an example, approximately \$8.5 million in revenue was reported by USRC in 2016 which is a very small amount compared to total project costs estimated to be between \$5.8 billion to \$7.5 billion. If this revenue loss is, in fact, a major adverse impact, the Union Station Expansion Project will need very significant additional financial assistance to carry out the proposed project.  This makes clear that any weight given to forgone parking revenues concern should be seriously limited. Moreover, and perhaps more importantly, the DEIS fails to provide an alternative use the Federal Air Rights that could be a revenue generator - such as commercial office, retail or hotel uses (such uses generally can generate far more revenue than parking uses). Thus, the claimed impact to revenue generation needs to be reassessed and a broader narrative around funding for the entirety of the Project should be integrated into the FEIS and include a clear analysis of revenues and costs for the project.

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
114	5	5.14.4.4 Alternative C	5-478	562-566	The development of the remaining Federal air rights as approximately 952,600 square feet of office space, as is assumed for the purposes of the impact analysis, would have a beneficial impact on WUS revenue through the lease of the space (or other mechanism through which development would be achieved). This impact cannot be quantified at this time but it would at least partially offset the loss of revenue from the reduction in parking capacity.	The revenue generated by the potential land use development program for Union Station should be included in the analysis for the FEIS. Without including this revenue, the benefit cost is skewed in favor of parking as a revenue source.
115	5	5.14.4.5 Alternative D	5-483	698-699	This impact cannot be quantified at this time but it would at least partially offset the loss of revenue from the reduction in parking capacity.	The revenue generated by the potential land use development program for the site should be included in the analysis for the FEIS. Without including this revenue, the benefit cost is skewed in favor of parking as a revenue source.
116	5	5.14.4.7 Alternative A-C (Preferred Alternative)	5-490	828-830	This order-of- magnitude estimate does not account for the fact that decreasing the total number of spaces may increase the revenue generated by each space due to reduced supply and steady or increasing demand.	FRA should reassess the revenue it assumes parking at the station will command in the FEIS. Its asserted premium value should be accounted for, and if it is this alternative is unlikely to have a significantly negative impact on WUS revenue.
117	5	5.14.4.7 Alternative A-C (Preferred Alternative)	5-490	835-838	Altogether, Alternative A-C would cause a net loss in revenue for WUS. The loss would be a moderate adverse impact because all parking, which is the main source of income for WUS, would continue to generate revenue while the permanent loss of retail, if it occurs, would likely be small.	The proposed project design and improvements should maximize the investments proposed, which collectively will serve the District for the next 100 years and beyond. The DEIS's focus on preserving legacy revenue streams, especially for more than a thousand spaces of private automobile parking, weakens the proposal in several important ways, which include the following: <ul style="list-style-type: none"> <li>• Compromising the public realm,</li> <li>• Detracting from historic preservation of the historic station, especially the head-house,</li> <li>• Underutilizing a uniquely important location, and</li> <li>• Failing to generate meaningful revenue to support the Project's costs.</li> </ul>
118	5	5.14.4.7 Alternative A-C (Preferred Alternative)	5-491	860-861	This impact cannot be quantified at this time but it would at least partially offset the loss of revenue from the reduction in parking capacity.	An analysis of parking price sensitivity at WUS should be integrated into the FEIS. We believe this analysis would indicate the extent to which modified pricing could mitigate revenue losses generated from further reductions in parking spaces in the project. It is not clear that a negative impact is likely to be caused to WUS revenue. Preceding discussion for this alternative indicates that a price premium for parking at this high-value location may be able to offset revenue lost due to the reduced number of parking spaces after construction. The addition of revenue generating office indicates that WUS is likely to experience a beneficial impact to its revenue under this alternative.
119	5	5.14.5 Comparison of Alternatives	5-493	909-914	Among the Action Alternatives, the primary differentiator would be the employment and economic impacts from construction, which would be a function of cost and duration. Taking both factors into account, Alternatives B and E would support the most jobs and Alternatives A and A-C the fewest, with Alternatives C and D in the middle. Similarly, Alternatives B and E would generate the greatest total economic output and Alternatives A and A-C the smallest, with Alternative C and D generating a little more than Alternatives A and A-C.	The FEIS should include a more detailed analysis of employment generated by construction and use of air rights office developments be incorporated in these assessments. Given that some alternatives include large office developments exceeding 600,000 square feet in the federal air rights, these buildings could house thousands of employees and should be detailed more thoroughly.

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
120	5	5.14.6 Avoidance, Minimization and Mitigation Evaluation	5-493	922-933	All Action Alternatives would result in a permanent loss of revenue for WUS due to a partial or complete loss of parking.	This statement should be modified in the FEIS, as this potential issues is likely overstated due to the underdeveloped assessment of the federal air rights components and the lack of analysis on the premium price that parking at the Station could demand and the potential revenue generated by the development of the Federal Air Rights.
121	5	5.14.4.1 No-Action Alternative	5-515	36-37	Relative to existing conditions, in the No-Action Alternative, there would be no direct operational impacts on public health.	This section should be modified in the DEIS to reflect the fact that there are still public health risks with air pollution levels (further detailed below) and may have some direct operational impacts on public health.
122	5	5.14.4.1 No-Action Alternative	5-515	52-53	Increases in pollutant concentrations that do not exceed the NAAQS would not result in adverse health impacts, even on the most sensitive populations.	According to a 2018 study, air pollution less than NAAQS can still have impacts on health of sensitive populations. The results of that study "show that even low levels of air pollution raise mortality risk for older adults. For locations where annual-mean PM2.5 concentrations were lower than the level of the NAAQS, an increase of 10 micrograms per cubic meter in PM2.5 was associated with increases in mortality of 13.6%. The effect was most pronounced among African Americans, men, and people with low income." The narrative should reflect this update in public health knowledge that there are still public health risks with air pollution levels under the NAAQS. <a href="https://www.nejm.org/doi/full/10.1056/NEJMoa1702747?query=featured_home&amp;">https://www.nejm.org/doi/full/10.1056/NEJMoa1702747?query=featured_home&amp;</a>  This impact should be acknowledged and reflected in the FEIS to appropriate reflect the adverse impacts NAAQs can have on residents health.
123	5	5.16.4.1 No-Action Alternative	5-515	54-57	The No-Action Alternative would have beneficial impacts on the transportation and mobility of the elderly and persons with disabilities. These beneficial impacts would be moderate because, while they would make noticeable improvements, they would still leave some known deficiencies unaddressed.	More information should be included in this section. The current statement is vague and more details or examples of how the mobility of the elderly and persons with disabilities are improved by the Alternative would be helpful.
124	5	5.16.4.1 No-Action Alternative	5-516	64-66	However, several of WUS's shortcomings, such the lack of level boarding and excessive gaps between platforms and trains, or the insufficient number of van-accessible spaces in the parking garage, would not be remedied under the No-Action Alternative.	These shortcomings should be reflected in the narrative in the Affected Environment Public Health Section (4.16.4.2 Transportation and Mobility of the Elderly and Persons with Disabilities) in the FEIS. In addition, OP would like to see a definition of "insufficient" defined in the FEIS for the number of van-accessible spaces?
125	5	5.16.4.1 No-Action Alternative	5-516	70-72	As explained above in Section 5.6.4.1, No-Action Alternative, Indirect Operational Impacts, regional emissions of several criteria pollutants would decrease over the coming decades. Emissions of PM10 would increase but would remain below the de minimis threshold.	As mentioned above, it is well established that there are still public health risks with air pollution levels under the NAAQS. <a href="https://www.nejm.org/doi/full/10.1056/NEJMoa1702747?query=featured_home&amp;">https://www.nejm.org/doi/full/10.1056/NEJMoa1702747?query=featured_home&amp;</a>  This risk should be reflected and integrated into the findings of FIES.
126	5	5.16.4.1 No-Action Alternative	5-516	77-78	Risk of hearing loss becomes a consideration with long and repeated exposure to noise levels of 85 dBA and higher. Noise and vibration analysis (Section 5.10.4.1, No-Action Alternative, Direct Operational impacts) shows that in this alternative, anticipated noise levels near WUS would not exceed 60 to 75 dBA.	It is OP's understanding that the 85 dBA standard (over a period of 8 hours) is an occupational standard to prevent hearing loss among workers. It should not be used to determine risk among non-worker populations, including sensitive populations. The EPA standards which indicate that repeated exposure (24 hours) for non-occupational populations should be limited to 70 dBA should be used for this analysis.

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
127	5	5.16.4.1 No Action Alternative	5-517	96-105	Direct impacts may arise from the physical disturbance associated with construction, such as excavation of open trenches or pits; the movement and operation of large motorized equipment and trucks, and associated emissions of air pollutants and dust; or the closure of sidewalks, disruption of well-used pathways, and changes in traffic patterns. Potential adverse impacts on public health from these activities would be minor because best management practices that minimize risks from physical disturbance are a standard feature of all large construction sites. These include, for instance, fencing, clear separation of storage and staging area from the public way; and warning signs and alternative pathways during sidewalk closures.	This analysis should recognize that there are still mobility concerns, especially for persons with disabilities and seniors. The statement should be modified to in the FEIS, because as written it minimizes the impacts that the changes would have on persons with disabilities and seniors.
128	5	5.16.4.2 Alternative A	5-518	124-132	Emissions from increased railroad operations, combined with emissions from greater vehicular traffic on the adjacent roadways, would result in higher localized concentrations of CO and PM2.5. However, concentrations of these two pollutants would not exceed the applicable NAAQS 131 see Section 5.6.4.2, Alternative A, Direct Operational Impacts). Therefore, anticipated increases would not result in health-related impacts, even on the most sensitive populations	As mentioned above, it is well established that there are still public health risks with air pollution levels under the NAAQS. <a href="https://www.nejm.org/doi/full/10.1056/NEJMoa1702747?query=featured_home&amp;">https://www.nejm.org/doi/full/10.1056/NEJMoa1702747?query=featured_home&amp;</a>  This risk should be reflected and integrated into the findings of FIES.
129	5	5.16.4.2 Alternative A	5-519	162	Alternative A would cause additional regional emissions of all criteria pollutants relative to the No-Action Alternative (Section 5.6.4.2, Alternative A, Indirect Operational Impacts. However, Alternative A-related emissions would remain below the applicable de minimis levels. As such, there would be no public health impacts.	As mentioned above, it is well established that there are still public health risks with air pollution levels under the NAAQS. <a href="https://www.nejm.org/doi/full/10.1056/NEJMoa1702747?query=featured_home&amp;">https://www.nejm.org/doi/full/10.1056/NEJMoa1702747?query=featured_home&amp;</a>  This risk should be reflected and integrated into the findings of FIES.
130	5	5.16.4.2 Alternative A	5-519	165-168	Relative to the No-Action Alternative, ambient noise levels would increase at several locations under Alternative A (Section 5.10.4.2, Alternative A, Direct Operational Impacts). However, increases would not exceed three dBA and would be barely perceptible if at all. Nowhere would noise levels reach levels that could cause NIHL.	The increased noise levels of 3 dBAs in this alternative would be higher than the EPA standards of 70 dBAs for repeated exposure (24 hours) for non-occupational populations. Figure 5.34 Noise Levels shows that areas immediately surrounding the tracks are expected to have 75-80 dBAs, which may disproportionately impact residents experiencing homelessness (but those impacts are not detailed because the study failed to consider the homeless population).  The narrative in the FEIS should be updated to incorporate and evaluate the impact of noise levels on non-occupational populations in the study area including persons experiencing homelessness.
131	5	5.16.4.2 Alternative A	5-520	210-215	While construction activities would cause air pollutant emissions, the amount of emissions would vary with, and within, each construction phase and with the type of activity. Quantitative estimates of construction related criteria pollutant emissions in Alternative A are presented in Section 5.6.4.2, Alternative A, Construction Impacts. The analysis showed that there would be no construction year during which emissions of criteria pollutants would exceed the applicable de minimis levels. Therefore, these emissions would not adversely affect public health.	As mentioned above, it is well established that there are still public health risks with air pollution levels under the NAAQS. <a href="https://www.nejm.org/doi/full/10.1056/NEJMoa1702747?query=featured_home&amp;">https://www.nejm.org/doi/full/10.1056/NEJMoa1702747?query=featured_home&amp;</a>  This risk should be reflected and integrated into the findings of FIES.



Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
132	5	5.16.4.2 Alternative A	5-521	266-268	Relative to existing conditions, Alternative A would also have no adverse indirect operational impacts on public health and minor adverse indirect operational impacts on the transportation and mobility of the elderly or persons with disabilities outside WUS.	This summary statement should reflect the major adverse impacts that were shared in lines 237-529 in the FEIS.
133	5	5.16.4.3 Alternative B	5-522	275	Alternative B would have no adverse direct operational impacts on public health for the same reasons as Alternative A.	As mentioned above, it is well established that there are still public health risks with air pollution levels under the NAAQS. <a href="https://www.nejm.org/doi/full/10.1056/NEJMoa1702747?query=featured_home&amp;">https://www.nejm.org/doi/full/10.1056/NEJMoa1702747?query=featured_home&amp;</a>  This risk should be reflected and integrated into the findings of FIES.
134	5	5.16.4.3 Alternative B	5-522	279-287	Alternative B's parking would be in two below-ground levels along the west side of the rail terminal, between K Street NE and the back of the historic station building. The walking distance from parking spaces to the back of the historic station building would increase by up to approximately 1,000 feet relative to the No-Action Alternative. Navigating the parking facility to the nearest WUS access point could be more challenging to persons with reduced mobility than in the No-Action Alternative. While Alternative B would generally improve conditions at WUS for the elderly and persons with disabilities, resulting in a net beneficial impact, the parking facility location would offset some of the benefits, making the impact moderate.	There should be more discussion of the impacts on access for persons with disabilities and the elderly. The current assessment appears to over state the general improvements, while the negative impacts of the parking changes are understated. Please include more detail in the FEIS, as it is possible that the calculus is closer to minor positive impacts when the negative impact of the mobility concerns are taken into account.
135	5	5.16.4.3 Alternative B	5-522	288-290	Relative to the No-Action Alternative, Alternative B would have no adverse indirect operational impacts on public health and minor adverse indirect operational impacts on the transportation and mobility of the elderly or persons with disabilities outside WUS.	There should be more information in the FEIS used to justify the finding o no adverse indirect impacts on public health and the determination of minor adverse indirect impacts on transportation and mobility of the elderly or persons with disabilities outside WUS; the information currently provided is not detailed enough to make these assertions.
136	5	5.16.4.3 Alternative B	5-522	298-301	Although Alternative B would cause higher noise levels during the early phase of construction due to the type of cut-off wall used, the potential for members of the public to be exposed to levels that could cause NIHL would be as limited as in Alternative A. Similarly, construction-related air pollutant emissions in Alternative B would remain below de minimis levels.	Same as above; air pollutant emissions may be below the standard levels, but there may still be impacts on health. The FEIS should use noise standard based on occupational standards, not non-occupational standards.
137	5	5.16.4.3 Alternative B	5-523	311-313	Alternative B would represent a greater improvement relative to existing conditions than relative to the No-Action Alternative, but the beneficial impact would remain moderate because of the relocation of parking to a two-level, below-ground facility	As stated above, the FEIS should better assess impacts on access for persons with disabilities and the elderly. The current assessment appears to over state the general improvements, while the negative impacts of the parking changes are understated. Please include more detail in the FEIS, as it is possible that the calculus is closer to minor positive impacts when the negative impact of the mobility concerns are taken into account.
138	5	5.16.4.3 Alternative C	5-523	316-322	Relative to the No-Action Alternative, Alternative C (either option) would have no adverse direct operational impact on public health... Alternative C (either option) would not have adverse direct operational impacts on public	Based on the analysis commented on above related to air and noise, Alternative A should be characterized to have minor adverse direct operational impacts on public health from the noise levels and air quality levels. Due to their similar characteristics, Alternative C would have minor impacts as well.

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
139	5	5.16.4.3 Alternative C	5-523	318-319	It would have a moderate beneficial direct operational impact on the transportation and mobility of the elderly or persons with disabilities within WUS.	The FEIS should reassess this finding, as the finding of a moderate beneficial direct impact on mobility of the elderly or persons with disabilities, is not reflective of the findings noted in section about the challenges that the parking garage will create for elderly populations and persons with disabilities. "Relative to the No-Action Alternative, this layout would increase the maximum walking distance from the bus facility and a majority of the parking spaces to other parts of WUS. Bus passengers would have to walk approximately an additional 1,100 feet in the East Option and an additional 250 feet in the West Option to reach the back of the historic station building. The connection would be through the new concourses, which would be ADA-compliant but could still represent a challenge for persons with reduced mobility."
140	5	5.16.4.3 Alternative C	5-523	344-349	Relative to the No-Action Alternative, Alternative C (either option) would have no adverse indirect operational impacts on public health and minor adverse indirect operational impacts on the transportation and mobility of the elderly or persons with disabilities outside WUS. The indirect operational impacts of Alternative C would be the same as those described for Alternative A in Section 5.16.4.2, Alternative A, Indirect Operational Impacts.	Based on the analysis commented on above related to air and noise, OP Alternative C should be characterized to have minor adverse direct operational impacts on public health from the noise levels and air quality levels.
141	5	5.16.4.5 Alternative D	5-525	379-382	Persons parking in the above-ground parking facility would need to use surface streets to reach the nearest access point to WUS on H Street NE, approximately 600 feet away. This would require them to be outside and exposed to weather conditions. This may present a challenge to people with reduced mobility. Once within WUS, they would need to walk another 900 feet or so to reach the back of the historic station building, though this would be in air conditioned concourses. Also, more than half of the parking spaces would be one below-ground level on the west side of the rail terminal between K Street NE and the back of the historic station building. Some parkers would need to walk approximately 1,000 feet to reach the back of the station.	The access from the parking facility in Alternative D contains challenges for those with limited mobility. FRA should highlight and mitigate these challenges in the FEIS.
142	5	5.16.4.5 Alternative D	5-525	399-403	Overall, like the other Action Alternatives, Alternative D would generally improve conditions at WUS for the transportation and mobility of the elderly and persons with disabilities, resulting in a net beneficial impact. The remote location of the parking facility and lack of private pick-up and drop off area next to the train hall would offset some of the benefits, making the impact moderate	As Stated above, the FEIS needs more discussion of the impacts on access for persons with disabilities and the elderly. The current assessment appears to over state the general improvements, while the negative impacts of the parking changes are understated. More detail is needed in the FEIS, as it is possible that the calculus is closer to minor positive impacts when the negative impact of the mobility concerns are taken into account.
143	5	5.16.4.6 Alternative E	5-526	429-430	Alternative E would have no adverse direct operational impact on public health for the same reasons as Alternative A (Section 5.16.4.2, Alternative A, Direct Operational Impacts).	Based on the analysis commented on above related to air and noise, Alternative E should be characterized to have minor adverse direct operational impacts on public health from the noise levels and air quality levels.
144	5	5.16.4.6 Alternative E	5-527	456-458	Alternative E would 456 represent a greater improvement relative to existing conditions than relative to the No Action Alternative, but the beneficial impact would remain moderate because of the relocation of all parking to a two-level, below-ground facility.	As Stated above, the FEIS needs more discussion of the impacts on access for persons with disabilities and the elderly. The current assessment appears to over state the general improvements, while the negative impacts of the parking changes are understated. More detail is needed in the FEIS, as it is possible that the calculus is closer to minor positive impacts when the negative impact of the mobility concerns are taken into account.

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
145	5	5.16.4.7 Alternative A-C (Preferred Alternative)	5-527	461-464	Relative to the No-Action Alternative, Alternative A-C would have no adverse direct operational impact on public health	Based on the analysis commented on above related to air and noise, Alternative A-C should be characterized to have minor adverse direct operational impacts on public health from the noise levels and air quality levels.
146	5	5.16.5 Comparison of Alternatives	5-529	487-491	The Action Alternatives would have no adverse operational impacts and minor adverse construction impact on public health. They would all include the same air conditioning strategy to maintain temperature and air quality within WUS. Outside WUS, increases in air pollutant emissions from more railroad operations and vehicular traffic would remain below the applicable NAAQS.	Based on the analysis commented on above related to air and noise, OP FRA should reassess the impacts of construction on public health in the FEIS.
147	5	5.16.5 Comparison of Alternatives	5-529	497-500	In all Action Alternatives except Alternatives A and A-C, average walking distances from and to the bus facility, parking, or both would increase relative to the No-Action Alternative, which may adversely affect users with reduced mobility. This is most evident in Alternative C with the East Option, followed by Alternative C with the West Option.	There should be mitigation measures in the FEIS to reduce the impact on users with reduce mobility.
148	5	5.16.5 Comparison of Alternatives	5-529	Table	Table 5-183: Comparison of Alternatives, Public Health, Elderly and Persons with Disabilities	This finding should be reassessed in the FEIS, as the finding of a moderate beneficial direct impact on mobility of the elderly or persons with disabilities, is not reflective of the findings noted in section about the challenges that the parking garage will create for elderly populations and persons with disabilities. "Relative to the No-Action Alternative, this layout would increase the maximum walking distance from the bus facility and a majority of the parking spaces to other parts of WUS. Bus passengers would have to walk approximately an additional 1,100 feet in the East Option and an additional 250 feet in the West Option to reach the back of the historic station building. The connection would be through the new concourses, which would be ADA-compliant but could still represent a challenge for persons with reduced mobility."
149	5	5.18.4.11 Aesthetics and Visual Quality	5-579 & 580	774-818	Cumulative Impacts of the Project on Aesthetics and Visual Quality	More analysis of the visual impacts of the parking garages needs to be included in the FEIS for the alternatives with large parking structures (all Alternatives except for B and E). The contention that the private air rights development "would surround, obscure, encompass, or balance" the various new visual elements, including the parking garage, seems incorrect, and needs to be demonstrated in the visual impact analysis more clearly. The FEIS should include updated diagrams showing visual impacts which better reflect different building types, as the current colored boxes used in view diagrams do not differentiate between building types that tend to be eyesores (parking garages) and those that are more visually appealing.
150	5	5.18.4.12 Cultural Resources	5-579 - 5-580	819-849	Cumulative Impacts of the Project on Cultural Resources	This section acknowledges the likelihood for cumulative adverse impacts on cultural resources; however, the current language downplays the degree to which these impacts would occur by referring to avoidance, minimization and mitigation measures that would result from review under Section 106 and DC Historic Preservation Law. The magnitude of these impacts need to be reassessed and reflected in the FEIS due to the significant adverse effects that are likely to result explicitly from the expansion project.

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
151	7	Mitigation Measure 29	NA	NA	Proponents to coordinate with DDOT on transportation demand management, for-hire, and transit strategies to reduce the total number of 2040 trips by 20%.	<p>The FEIS should indicate what the total number of 2040 trips compared to; specifically, if it is the forecasted number of for-hire vehicle trips, existing vehicle trips. There should be more narrative about this shift, and a statement about what the number being reduced from is. Also, the District would like to see a greater commitment to mode shift (walking, biking, transit) expressed in the mitigation measures.</p> <p>The FEIS should include a commitment from FRA and the Project Sponsors to a robust Transportation Demand Management (TDM) plan that details how the Project will achieve the needed mode split. This will require District agencies, WMATA, and the private air rights developer to work together to achieve an overall 20 percent reduction in total vehicle trip generation, across existing, no-action, and build alternatives. This level of traffic reduction would require multiple strategies and stakeholder collaboration, including the District's.</p>
152	7	Mitigation Measure 29	NA	NA	<p>Proponents to work with DDOT to identify solutions out of a toolbox of traffic mitigation approaches, including, but not limited to, regular monitoring activities, turn restrictions, alternative intersection phasing, lane reassignment, parking restrictions, and street pattern changes, at the most severely impacted intersections in the study area.</p> <p>Proponents to coordinate with DDOT and WMATA on opportunities to achieve greater core transit capacity through additional lines or services, in order to accommodate a greater mode shift from vehicles to transit.</p>	<p>Mitigation 29 includes using a suite of solutions out of a toolbox of traffic mitigation tactics, coordination with WMATA to increase transit capacity, and a TDM strategy coordinated with DDOT. In the FEIS, OP expects that transportation mitigations will be expanded beyond what is described. Specific interventions should be detailed, including expectations of and points of collaboration with District agencies. Additional mitigations should be added that consider the Project Proponent's ability to enhance transit access to the Station, including, but not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Enhanced bus infrastructure including priority treatments such as bus lanes and transit signal priority;</li> <li>• Bus stop infrastructure;</li> <li>• Charging and other supportive infrastructure for electric and alternative fuel buses; and</li> <li>• Wayfinding and physical connections to facilitate intermodal transfers and incentivize transit bus use over for-hire vehicles.</li> </ul>
153	7	Mitigation Measure 34	NA	NA	Greenhouse Gas Emissions and Resilience (see also Energy Resources and Air Quality)	The reduction of vehicle trips, private, drop off and parking should also be recommended as a way to reduce greenhouse gas emissions and resilience. Transportation is one of the largest contributors to these areas, mode shift to less impactful forms of transportation should be identified.
154	Appendix A6	1.3.2.3 Parking Program Policy	11 of 12	NA	Such a program would be consistent with USRC's 99- year lease agreement with Union Station Investco (USI), which manages WUS retail.	The reference to the lease agreement should be struck from this location and should not dictate terms of this project. Moreover, it seems implausible that the lease agreement would not be renegotiated as part of the impacts associated with project construction.
155	Appendix A6	2.2.4 Conclusion	21 of 22	NA	FRA and the Proponents' 2017 decision to reduce the parking program below the estimated 2040 demand level of 2,730 as well as below the existing parking capacity of 2,450 is consistent with the District's policy goal. This determination is reflected in the DEIS Action Alternatives, each of which is grounded in data and analysis and greatly reduces the existing WUS parking capacity despite significant projected increases in activity at WUS over the next 20 years and beyond.	The parking program still represents a significant amount of parking at a highly multimodal location. The District would argue that while 1,600 spaces is a reduction from an excessive projected need of 2,730, it is still in excess of what is needed to support the station and in fact will detract from its urban context and historical nature.
156	Appendix A6	2.2.4 Conclusion	21 of 22	NA	FRA considers the provision of adequate parking as an important factor to attract passengers to the Federally owned station and provide different modes of access for station users.	The 295 spaces recommended by the District is an adequate number to meet WUS needs. The 1,600 spaces included in the Preferred alternative is an excessive amount of space dedicated to storing private vehicles in a multimodal urban area. The FEIS should reflect 295 spaces.

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
157	Appendix A6	2.2.4 Conclusion	21 of 22	NA	The Action Alternatives with the current parking program also support the Project's Purpose and Need by maintaining full multimodal functionality at WUS and a reliable source of commercial revenue used for the preservation of the historic station building.	Parking is not the only use for this develop-able area, uses such as office, residential or hotel could provide just as steady a revenue stream. Arguing that parking is needed for USRC's viability is inaccurate and not appropriate.
158	Appendix A6	2.2.4 Conclusion	21 of 22	NA	In the absence of substantial evidence of reduced parking needs, it is necessary to plan for the parking amount proposed.	The District research and Amtrak's letter are both substantial evidence of reduced parking needs.
159	Appendix A6	3 Assessment of Impacts of Reduced Parking Program	23 of 24	NA	The purpose of this section is to help inform public and agency comment by providing a qualitative assessment of how a substantial reduction in the parking program would change the environmental impacts of the Action Alternatives as analyzed in Chapter 5 of the DEIS.	Indicate the number of parking spaces assumed in a reduced parking program.
160	Appendix A6	3.2.1 Alternative A	23 of 24	NA	Reducing the parking program would change how station users travel to and from the station, affecting several transportation modes, including Metrorail, for-hire vehicles, and private pick-up and drop off. Metrorail and pick-up and drop-off modes would see increased demand. This shift in turn would potentially have a minor effect on traffic operation impacts and air quality impacts associated with vehicular traffic. While parking-related traffic may decrease, increased pick-up and drop-off activities may contribute to traffic congestion elsewhere.	This assumes that a dedicated PUDO facility is not created to accommodate these trips. The impacts of reduced parking on the surrounding area should be assessed in combination with the implementation of an enhanced and dedicated PUDO facility for Union Station. The negligible increase in trips should not impact air quality in any substantial manner.
161	Appendix A6	NA	27 of 28	NA	Table 3.1. Changes in the Anticipated Impacts of Alternatives A and A-C with Reduced Parking Program as Compared to the Impacts Identified for Alternatives A and A-C in the DEIS	The general assumption that there would be more impacts associated with land use development and a smaller parking footprint is misleading. These impacts would need more detailed analysis than is given in this Appendix.
162	Appendix A6	NA	28 of 29	Table 3.1	Under the Social and Economic Conditions: Direct Operational Impacts assume Greater Adverse Impacts on WUS revenue.	This operational impact does not account for the opportunity use of the developable areas as a new use, which would likely meet, if not exceed, the revenue of parking.
163	Appendix A6	NA	28 of 29	Table 3.1	FRA notes adverse impacts related to energy, water, emissions, etc. due to the proposed greater footprint of office development.	It is inaccurate to assume that there would be adverse impact from developing the air rights as a productive land use, in lieu of parking. More analysis is required in the FEIS of a land use program in lieu of parking at this location.
164	Appendix C3	5.5.7.1 Direct Operational Impacts	5-184	NA	WUS activity in Alternative A-C would generate more peak-hour parking trips than would be the case in the No-Action Alternative as shown in Table 5-119. In the AM peak, the difference between Alternative A-C and the No-Action Alternative would be 88 trips (47 percent). In the PM peak, the difference would be 11 trips (4 percent).	While there are more train riders in Alternative A-C than in in the No-Action alternative more narrative and discussion is needed around why there are more trips assumed to be generated by the garage/parking in Alternative A-C (which assumes 1,600 parking spaces) than in the No-Action which has over 2,400 parking spaces.
165	Appendix C3	5.5.7.1 Direct Operational Impacts	5-190	NA	Table 5-123. AM Peak-hour Traffic Volumes, Alternative A-C; Table 5-124. PM Peak-hour Traffic Volumes, Alternative A-C	It would be helpful to see tables that show how all trips are arriving at Union Station in one table, not just vehicular trips. Including Metrorail, bus, streetcar, walk, and bike in these tables, and all similar tables will better help the reader and reviewer understand the mode split for patrons of Union Station.

## **Introductory Remarks Delivered by Commissioner Trueblood at the NCPC Meeting of July 9, 2020, RE: the DEIS for the Washington Union Station Expansion Project**

Thank you, Mr. Flis, I think your presentation was quite helpful and accurately summarized quite a complex set of issues.

Since I'm first-up on responding to NCPC's staff presentation, I think that it is important to take a quick step back and underscore that the driver of the Union Station Expansion Project is to accommodate a projected increase in rail ridership in the year 2040 that is approximately 2.5 times today's ridership. How we accommodate this passenger increase is the key to this project and has implications across infrastructure, urban design, and land use that impact federal, District and neighborhood interests.

While the infrastructure planning for the project as proposed is quite good in terms of accommodating this increase in ridership, its land use planning is poorly developed, reflecting an outmoded suburban condition rather than an immensely vibrant, urban context in the heart of our Nation's Capital. While the alternatives do not delve deeply into urban design, it is clear that the current approach would make high-quality urban design impossible to achieve.

While the District is strongly in support of the expansion and renovation of Union Station, I am quite concerned that Preferred Alternative A-C, as proposed in the DEIS, remains unchanged since its release last fall. I worry that the time and effort this Commission put into reviewing and commenting on the proposed Project at our January 9 meeting was ignored. At that meeting, the Commission explicitly directed FRA to substantially reduce the number of parking spaces and to work with OP and DDOT to evaluate and confirm the appropriate amount of parking given the mix of uses, traffic and urban design impacts, and transit-oriented nature of the Project, prior to the next stage of review.

In response to NCPC's request, OP and DDOT, along with NCPC staff, devoted hundreds of hours to analyzing, meeting about, and supporting development of a reasonable approach to parking at Union Station, as documented in the District's Parking Memo referenced by NCPC staff today. It seems that our effort had no effect on FRA's Preferred Alternative A-C, which has been incorporated into the Draft EIS without change.

But it isn't just feedback from NCPC and DC government agencies that this proposal has failed to account for. Congresswoman Norton, the DC Council, the ANC, nearby landowners, and other stakeholders have expressed strong opposition to too much parking. In fact, other than FRA, I have not heard a single voice in favor of the proposed excessive parking. In a place known for diverse perspectives and robust debates about appropriate development, particularly for projects of this complexity, the level of consensus that the planned parking should be substantially reduced speaks volumes. Recognizing the value of such input is even more important given that this is a major, long-term, public infrastructure project.

Opposition aside, one of the most troubling aspects about FRA's approach is its attachment to outdated parking assumptions and disregard for their negative impacts on the project and the

surrounding area. The existing parking garage may have made economic and land use sense in 1983 when USRC was tasked with overseeing a revitalized Station, when the District was in a starkly different economic position, when shopping malls were an economic driver, when rail travel's future was uncertain at best, and when private cars were planned for as the primary mode of transportation.

It is clear to me, and the other parties examining this project, that the context has significantly changed since then, and so should the perspective and approach to parking needs. If it does not, this obsolete perspective will constrain the station for the next 100 years and hamper the potential of the Project to add to, rather than detract from, the excellence of urban form and optimal uses the Station can and absolutely should contribute to the District.

The District is preparing comments to share with FRA during the DEIS review period. But I want to emphasize that FRA's approach of retaining Preferred Alternative A-C largely unchanged has put a much greater burden on the community to review and analyze the proposal than, in my opinion, is appropriate. My concern is magnified by a similar lack of consideration of response we have seen on the Section 106 review for compliance with the National Historic Preservation Act.

If I have one piece of advice for the project sponsors it is that what may on paper appear to be easiest and fastest path now may become the opposite later if it does not have the support of the various parties involved. Such an approach for such a complex project is all but certain to result in numerous delays and increased costs. It is better to work collaboratively together now. That may result in some additional costs or complexity on the front end, but it is better to plan for those now than to be caught changing plans midstream or stuck in litigation later. I hope the project sponsors are able to change their approach and views to be more collaborative moving forward, as without significant adjustments to the project in line with our recommendations, the District will be unable to support this project.

As for today, I hope my fellow NCPC Commissioners will join me in underscoring our previous recommendation for a substantially reduced parking program at Union Station. As importantly, I hope we can commit to hold the project to such reduced parking program when it comes before the Commission for approval. In addition, I hope NCPC will continue to ensure that FRA produces a project that is not only fully respectful of the historic laws and context, but also embodies the highest quality urban design and transportation infrastructure for this critical part of our city.

We look forward to continuing to work with FRA, USRC, Amtrak and NCPC to ensure that Washington Union Station is positioned to continue to be a gem in our city for the next century and beyond.



Office of the Directors

June 19, 2020

David Valenstein, Senior Advisor  
Federal Railroad Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

RE: District of Columbia Request for Extension of Public Comment Period for the Washington Union Station Draft Environmental Impact Statement (DEIS)

Dear Mr. Valenstein,

The District of Columbia Office of Planning (OP) and the District Department of Transportation (DDOT) respectfully request that the Federal Railroad Administration (FRA) extend the comment period for the Draft Environmental Impact Statement and Draft Section 4(f) Evaluation for the Washington Union Station Expansion Project (DEIS) from July 27, 2020 to September 28, 2020. OP and DDOT have both been active participants in the NEPA process for the Washington Union Station Expansion Project, which looks to expand future operations at the station. Given the complexity of the Project, the voluminousness of the DEIS, and FRA's request for public comment on the Project's parking program, for which the DEIS fails to consider any alternative with reduced parking, as requested by the National Capital Planning Commission, OP, DDOT, DC Council, and the local Advisory Neighborhood Commission, among others, this extension is more than justified.

On Thursday, June 6, 2020, the FRA informed our agencies that the DEIS and Section 4(f) Evaluation were available for review and comment and stated that the deadline for sending comments is July 27, 2020. Considering the exigencies of the COVID-19 public health crisis, the comment period should have been set for the longer 60-day period allowed under 23 C.F.R. § 771.123(k), not the 45-day minimum.

Regardless, an extension to September 28, 2020 is necessary to give our agencies, the public, and other stakeholders adequate time to review the 1,017-page main body of the DEIS and its 3,733 pages of appendices. The proposed expansion of Union Station has the potential to dramatically change the urban environment in the station's surrounding area and requires a thorough review. The current 45-day review period does not provide adequate time for staff to review the technical document and coordinate a response that reflects the potential magnitude



of impact the proposed action in the DEIS would have on transportation, urban design, air quality, land use, noise and other topic areas.

An extension is further justified by FRA's call for comment on the Project's parking program, which, at approximately 1,600 spaces, greatly exceeds the amount needed to serve a project that is accessible by Metrorail, Streetcar, MARC, VRE, Circulator and WMATA bus routes, and is located adjacent to the District's highly walkable and bikeable downtown. This accessibility highlights the limited role private vehicle access should have in sustaining the future land use components of Union Station. On April 30, 2020, OP and DDOT sent a letter to FRA requesting that the DEIS include a substantially reduced parking program that substitutes the difference in parking with additional land use programming, and integrates pick-up and drop-off facilities. The request was supplemented by the District's Parking Report to NCPC, provided to FRA in advance of the DEIS release, that highlighted a recommendation for a reduced parking program based on District policies, analysis of the project's parking demand, and a review of comparable facilities.

Lacking analysis of an alternative with substantially reduced parking, we are concerned that the DEIS fails to "rigorously explore and objectively evaluate all reasonable alternatives" as required under 40 C.F.R. § 1502.14, or to "inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment," the fundamental purpose of an Environmental Impact Statement, 40 C.F.R. § 1502.1. Instead, it places the onus on the public and other stakeholders to identify and analyze the impact of such a reasonable alternative, a burden shift that necessitates the requested extension.

We are similarly concerned about the aggressive schedule proposed for the consultation process required under Section 106 of the National Historic Preservation Act. The DC State Historic Preservation Office (SHPO), housed at OP, wrote to FRA on May 19, 2020 to request that additional consulting parties meetings be held in advance of the release of the Revised Draft Assessment of Effects Report (AOE) and DEIS so that there is a meaningful opportunity to discuss alternatives that might avoid adverse effects. FRA failed to respond to SHPO's request. Additional time to review the revised AOE and relevant sections of the DEIS is necessary to facilitate meaningful discussions about potential adverse effects, especially those related to traffic, urban design and open space.

The first Section 106 meeting is scheduled less than one month following the release of the DEIS, providing too little time to review the detailed technical document. A second meeting is tentatively scheduled the following week to address both the AOE and the Programmatic Agreement envisioned to conclude initial Section 106 consultations. To provide consulting parties adequate time to prepare for these discussions, these meetings should be rescheduled to a later date.

Thank you for considering our request to extend the DEIS public comment period to September 28, 2020 and to revise the Section 106 meetings schedule. Doing so will serve everybody's interest in allowing for substantive comments that will identify issues and offer recommendations to support an EIS that will provide for a successful future for Washington Union Station.

Sincerely,



Andrew Trueblood  
Director  
District of Columbia Office of Planning




Jeff Marootian  
Director  
District of Columbia Department of Transportation


CC: John Falcicchio, Deputy Mayor for Planning and Economic Development  
Councilmember Phil Mandelson, Chair, Committee of the Whole  
Councilmember Charles Allen, Ward 6  
Advisory Neighborhood Commissioner Karen Wirt, Chair, ANC 6C  
Beverley Swaim-Staley, President and CEO, Union Station Redevelopment Corporation  
Marcel Acosta, Executive Director, National Capital Planning Commission  
Gretchen Kostura, Senior Program Manager, Washington Union Station, Amtrak



## MEMORANDUM

To: Marcel Acosta  
Executive Director, National Capital Planning Commission (NCPC)

From: Andrew Trueblood   
Director, Office of Planning

Jeff Marootian   
Director, Department of Transportation

Date: June 3, 2020

Subject: Report to NCPC re: Appropriate Parking Numbers for the Washington Union Station Expansion Project

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### National Capital Planning Commission Request

At its January 9, 2020 National Capital Planning Commission (NCPC) meeting, the Commission discussed concept plans presented by the Federal Railroad Administration (FRA) for the proposed Washington Union Station (WUS) Expansion Project.

It is the District's understanding that NCPC's January review was conducted by the Commission both in its role as a Cooperating Agency for the project's environmental impact review process pursuant to the National Environmental Policy Act (NEPA), and in NCPC's capacity as the Federal Zoning Approval Authority. It is also the District's understanding that for the NEPA process, FRA is serving as the designated Lead Agency, and that the Project Proponents are the National Railroad Passenger Corporation (Amtrak) and the Union Station Redevelopment Corporation (USRC).

During the January meeting, NCPC supported the project's overall goals to improve and expand rail service; however, NCPC questioned the amount of parking proposed for the project and issued an action (see Attachment 1) that requested that the applicant (FRA):

*...substantially reduce the number of parking spaces, and that the applicant, private development partner, and staff work with the District Office of Planning and the District Department of Transportation to evaluate and confirm the appropriate amount of parking given the mix of uses, traffic and urban design impacts, and transit-oriented nature of the project prior to the next stage of review.*

The District submits this memorandum in response to NCPC's request. It includes the District's overall parking recommendation for the Union Station Expansion Project of 295 spaces, along with policies and analyses supporting the recommendations. Unfortunately, multiple convenings among the identified entities were unsuccessful in arriving at a consensus with the applicant on the need to reduce parking numbers, therefore this memorandum includes only the District's recommendations for reduced parking.

#### WUS Expansion Project Parking Working Group

Following NCPC's request, the District's Office of Planning (OP), Department of Transportation (DDOT), the USRC, and FRA met on February 7, 2020 to kick off a series of working group meetings focused on reevaluating the parking needs generated by each use case from a land use perspective. The Office of Planning advised the group that it would start with assumption of zero parking for all use cases and parking types (long-term, short-term, rental, etc.), and would analyze each parking type to develop a proposed parking maximum for the overall project.

Representatives from OP, DDOT, USRC, NCPC, Amtrak, FRA and FRA's consultants met on February 14, February 28 and March 6 to discuss parking needs for the Preferred Alternative that FRA presented to NCPC.

As part of the Parking Working Group meetings, participants jointly produced a Parking Matrix that identified all potential parking uses cases, as well as the District and FRA/USRC positions and policies related to the amount of parking needed to support Union Station in the year 2040 (the Build Year for the project). Attachment 2 is a Parking Matrix containing the District's parking numbers and justifications for each of the use cases, which include the following:

- Parking to serve land uses (Retail and Office)
- Parking to serve intercity travel: Amtrak and Intercity Bus (short- and long-term parking)
- Accessible Parking (consistent with the Americans with Disabilities Act (ADA))
- Special facilities for rental cars and pick-up/drop-off (PUDO) activity

The parties had valuable dialogue and exchange of information and jointly developed the matrix. However, the project sponsor's parking calculations and numbers for use cases were not finalized and Attachment 2 therefore provides only the District's parking numbers. In spite of extensive technical and policy discussion among the parties during Parking Working Group Meetings, the project sponsor was ultimately unwilling to reduce their proposed number of parking spaces as part of this process from the number presented to NCPC on January 9<sup>th</sup> of 1,575 spaces<sup>1</sup>.

The District recognizes that parking is a driver of current revenue for USRC, and while revenue considerations are beyond the scope of this analysis, the District believes that parking revenue

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<sup>1</sup> It is the District's understanding that there may be parking requirements in a long-term lease agreement between USRC and commercial tenants that requires the provision of parking. However, this is beyond the scope of the current analysis.

lost through a reduced parking program would be offset by the opportunity to develop the space that would be dedicated to above-ground parking as more productive uses including, but not limited to, office, residential, retail, and/or hotel.

#### District Policies Supporting Reduced Parking for Union Station

One of the District's top transportation priorities is a robust multimodal transportation system that transitions from private vehicle use to higher-capacity, more sustainable modes of travel. One key approach for achieving this is to reduce the availability and ease of parking for private vehicles. The District has conducted a multi-year amendment process for the District Elements of the Comprehensive Plan. This process has included multiple stages of public review; its latest stage included publication of a proposed Comprehensive Plan Draft in October of 2019 followed by public review, including by Advisory Neighborhood Commissions (ANCs), which submitted related resolutions during the Winter of 2019/2020. These comments were integrated into the most recent version of the Comprehensive Plan, submitted to Council of the District of Columbia on April 23, 2020 for review and consideration. We include specific policies from this latest version of the Comprehensive Plan relating to parking reduction in Attachment 3, which include the following:

##### *Policy T-1.1.8: Minimize Off-Street Parking*

An increase in vehicle parking has been shown to add vehicle trips to the transportation network. In light of this, excessive off-street vehicle parking should be discouraged.

Additionally, moveDC, the District's long-range transportation plan, has the goal of achieving 75 percent non-auto commute trips, which would be supported by a reduction in private vehicle parking. The Comprehensive Plan also contains a policy that specifically addresses mobility goals applicable to the WUS Expansion Project:

##### *Policy T-2.2.4: Union Station Expansion*

Ensure that expansion and modernization of Union Station supports its role as a major, intermodal, transit-focused transportation center. Changes to Union Station should improve intermodal connections and amenities; facilitate connections with local transportation infrastructure with an emphasis on transit, pedestrian and bicycle mobility; enhance integration with adjacent neighborhoods; minimize private and for-hire vehicle trips; reduce on-site parking; and provide a continued high quality of life for District residents and visitors.

#### District Parking Recommendations

The District's proposed parking numbers by use case are discussed below and shown in the Parking Matrix (Attachment 2) along with supporting justifications.

#### *Land Use*

Two distinct land uses proposed in the 2040 WUS Expansion Project are expected to generate trips: 1) office uses (to be retained) and the new office uses associated with the FRA-owned Federal Air Rights development, 2) an expanded retail program.

The uniqueness of Union Station's location and multimodal accessibility were important considerations in the District's development of parking numbers for retail and office. Aside from its intercity mobility role, Union Station is accessible by Metrorail, DC Streetcar, MARC, VRE, DC Circulator, and WMATA bus routes, and is located adjacent to the District's highly walkable and bikeable downtown. This accessibility highlights the diminished role private vehicle access should have in sustaining the future land use components of Union Station.

#### Retail Uses

The expansion of Union Station will include approximately 280,000 square feet of retail uses<sup>2</sup>, which is 72,000 net new square feet from today's program. OP and DDOT reviewed Zoning Regulations governing retail parking as well as relevant sections of the District's Guidance for Comprehensive Transportation Review ("CTR Guidelines")<sup>3</sup>. The CTR Guidelines strongly encourage projects located less than one-quarter of a mile from a Metrorail station to provide zero on-site vehicle parking, where allowable by zoning. The District is often supportive of zoning relief when a project is in close proximity to transit in order to provide less parking than Zoning Regulations would normally require. In this instance, for 280,000 square feet of retail, the normal zoning requirement would be a minimum of 184.2 spaces<sup>4</sup>; however, the Regulations provide for instances where other modes of travel are proximate and allow for reductions to zero parking. Additionally, NCPC holds federal in-lieu-of-zoning authority over the subject property and can therefore establish parking standards different from local zoning requirements.

The District strongly recommends a maximum of zero retail parking spaces for the subject project. Numbers provided by FRA in January 2020 show that the station currently sees a combined total of approximately 48,600 passengers per day attributable to Amtrak, MARC, VRE, and Intercity Bus operations; and that in the year 2040, that number is expected to more than double to approximately 116,300 passengers per day. This is due to the anticipated increases in passengers that the proposed project seeks to accommodate. The District believes that the future retail operations will be fully supported by this significant increase in foot traffic, generated by transportation modes that do not require private vehicle parking. Additionally, this increase in foot traffic does not account for additional increase in Metrorail ridership or increases in tourist and local neighborhood foot traffic due to population growth. The District believes the tens of thousands of additional persons walking through Union Station who do not require on-site private vehicle parking will be more than adequately

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<sup>2</sup> FRA's preferred Alternative A-C contains 280,000 square feet of retail; however, there is a possibility of up to 380,000 square feet of retail depending up on how existing flex space at Union Station is used.

<sup>3</sup> District Department of Transportation, Guidance for Comprehensive Transportation Review, Version 1.0, June 2019

<sup>4</sup> The District of Columbia Municipal Regulations require a zoning minimum of 0.665 spaces per 1,000 sf applicable to square footage in excess of 3,000 sf for the PDR-3 zone. Applying these parameters to a retail program of 280,000 sf, the minimum number of parking spaces required would be 184.2.

support the future retail program; moreover, the District does not view WUS's retail program as one for which people will drive to as a destination and park, either today or in the future. Therefore, the District's position is that no parking is needed at Union Station to support the future retail program.

#### Office Uses

Union Station currently has approximately 136,000 square feet of office space. The proposed project includes up to 380,000 square feet of additional office space for a total of approximately 516,000 square feet of office space in 2040.

The CTR Guidelines recommend a maximum of 0.4 spaces per 1,000 square feet of office space, which would yield 206 parking spaces for the proposed 516,000 square feet of office uses. As with retail, the CTR Guidelines strongly encourage projects located less than one-quarter of a mile from a Metrorail station to provide zero on-site vehicle parking, where allowable by zoning. Applying relevant Zoning Regulations to the proposed office program would normally require a minimum of 128.25 spaces<sup>5</sup>.

While office uses at Union Station have a similarly high multimodal accessibility as retail, office uses have a different trip generation profile than retail. Work trips associated with office uses occur at regular intervals during workdays and often originate farther away. OP and DDOT understand that office leases often require a specific amount of parking and also recognize the need to ensure that office uses at Union Station remain competitive with those elsewhere in the city. This is a different approach than that applied to the retail uses (provided in the preceding section).

Accounting for the above factors, the District finds it appropriate to recommend a total of 206 parking spaces (the maximum recommended by the CTR Guidelines) to serve future office uses at Union Station.

#### *Intercity Travel Supportive Parking*

This section covers two use cases related to intercity travel: long-term parking for travelers and short-term parking for individuals assisting travelers. Intercity travel at Union Station refers to travel by intercity bus or by Amtrak to locations outside the Washington Metropolitan Region. Commuter rail traffic is excluded as it is highly unlikely to generate parking at Union Station, as it is primarily used as people's means of accessing their jobs in the District from farther away suburbs.

#### Long-Term Parking

The District does not believe that long-term parking should be provided on site for Amtrak or intercity bus riders for the following reasons:

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<sup>5</sup> The District of Columbia Municipal Regulations require a zoning minimum of 0.25 spaces per 1,000 sf applicable to square footage in excess of 3,000 sf for the PDR-3 zone. Applying these parameters to an office program of 516,000 sf, the minimum number of parking spaces required would be 128.25 spaces.

1. Amtrak indicated in a January 7, 2020 letter to FRA that parking is not necessary to support their operation (see Attachment 4):

*Therefore, Amtrak believes the current parking program targeted for Amtrak passengers in the Station Expansion Project is over planned and Amtrak supports refinement of the parking estimate in the future. Amtrak does not support any entity building a parking garage specifically to support Amtrak passengers.*

2. OP conducted background research (see Attachment 5) on urban train stations similar to WUS that do not provide long-term parking at all, including New York's Penn Station and Chicago's Union Station. Additionally, Philadelphia's 30<sup>th</sup> Street Station is drastically reducing its parking supply and providing an intermodal bus facility as part of its redevelopment.
3. Within the Washington Metropolitan Region, there are significant parking options for travelers at appropriate locations that are more auto-oriented. These include Prince George's County's New Carrollton Garage, which provides over 1,000 parking spaces including long term parking and is regionally accessible via I-495, as well as the BWI Airport Rail Station Garage, which provides over 3,000 parking spaces. Also, there are many existing, underutilized parking garages within walking distance in the area surrounding WUS that, given market demand, could adapt to provide private overnight parking.
4. Recent rider surveys conducted by Amtrak for their passengers indicate a continued decline in utilization of long-term parking by Amtrak riders (see Attachment 6). At the start of the EIS process, approximately eight percent of Amtrak riders self-reported that they parked at the station. The most recent Amtrak survey of riders, from January to March 2020, indicated that only three percent of riders drove to Union Station and parked as their means of access to the Station. This significant decrease in parking demand is also being observed at our regional airports, which have seen parking demand drop by up to 44 percent in the last two years<sup>6</sup>. Union Station is colloquially referred to as the region's fourth airport, as it handles 37 million visitors (including passengers) annually – a number substantially higher than the number of passengers served by any one of the region's three airports, which each serve between 20 and 22 million passengers annually<sup>7</sup>.

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<sup>6</sup> <https://www.mwcog.org/newsroom/2020/04/07/how-did-people-get-to-the-airport-in-2019-and-how-much-were-they-willing-to-spend/>

<sup>7</sup> [https://plandc.dc.gov/sites/default/files/dc/sites/op/page\\_content/attachments/Chapter%204\\_Public\\_Review\\_Draft\\_Transportation\\_Oct2019.pdf](https://plandc.dc.gov/sites/default/files/dc/sites/op/page_content/attachments/Chapter%204_Public_Review_Draft_Transportation_Oct2019.pdf)



### Short-Term

OP and DDOT recognize that some intercity passengers may need help getting to or from the train hall or intercity bus facility, or that family and friends may want to greet or say goodbye at the gate. Incorporating short-term parking, where the driver leaves their private vehicle for a short time, is an important use to include at Union Station. The current peak hour of travel at Union Station, 5-6 pm, will see approximately 4,000 total Amtrak passengers when combining boardings and alightings in the 2040 buildout. The District recommends that short-term parking to accommodate these needs range from a minimum of one percent of all travelers to a maximum of three percent of all travelers, which is equivalent to a recommended range of a minimum of 40 to a maximum of 120 short-term parking spaces.

### *Accessible Parking*

According to FRA, Union Station currently provides 49 ADA-designated spaces out of a total of 2,250 parking spaces. For the year 2040, FRA's Preferred Alternative A-C proposes a maximum of 1,575 total parking spaces. Federal ADA regulations<sup>8</sup> establish minimum requirements for the provision of ADA-designated parking spaces. These requirements are calculated based on a given project's total parking spaces. Applying these regulations to FRA's proposed 1,575 parking spaces yield a requirement for a minimum of 26 ADA parking spaces in the year 2040.

While the District has not been provided with data regarding utilization of the existing 49 ADA spaces, the District recommends this number be maintained at Union Station if it can be shown they are well utilized and needed. This number is seven times the minimum of seven (7) ADA spaces that would be required by ADA regulations when applied to the District's recommendation of 295 total parking spaces (discussed below) for the project.

### District Recommended Parking Program for Union Station

Considering the parking use cases and needs detailed above, the District of Columbia recommends a total of 295 parking spaces are needed to support the WUS Expansion Project. This overall number, the District's Recommended Parking Program, is derived from consideration of individual parking use cases and adding together recommendations for each.

The District does not see a viable path to success of the project if it contains 1,575 spaces and believes that a NEPA Record of Decision that includes this number will require additional process to create a viable project. The District recommends that to achieve a viable EIS and project that is buildable, FRA modify the existing Preferred Alternative (or develop a new Preferred Alternative) that includes a substantially reduced parking program, substitutes the difference in parking with additional land use programming, and integrates pick-up and drop-off (PUDO) facilities and related details for capacity, location, and design. The District recognizes that reducing the parking would impact PUDO and stands ready to collaborate with

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<sup>8</sup> <https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-ada-standards/guide-to-the-ada-standards/chapter-5-parking>

FRA and surrounding communities and developments to ensure an appropriate facility or facilities are dedicated to facilitating PUDO activity.

The District acknowledges and understands the importance of ensuring the long-term financial viability of Washington Union Station and believes that a recalibrated approach to parking can support and achieve multiple project benefits for its stakeholders. The District believes that developing uses such as hotel, office, and retail instead of parking could provide robust funding for operations as part of the future project. While the District believes that the retail at Union Station serves patrons of the station and is not destination retail which customers drive to and park for, the District understands that parking presents a challenge in terms of an existing lease agreement between USRC and commercial tenants at the station. The District would be happy to work with FRA and USRC on questions relating to the lease and to identify the land uses that we strongly believe can provide long-term financial viability for USRC in its role as steward of Washington Union Station, and affirm the District's principles and policies for this important civic and transportation asset.

Additionally, as part of the Parking Working Group process, the District developed a range (maximums and minimums) for the appropriate amount of parking that could be considered for project analysis. The minimum total parking program the District believes is appropriate for the DEIS is 47 spaces, which would accommodate short-term parkers and include seven ADA spaces. The maximum total parking program the District believes is appropriate for the DEIS is 375 spaces, which differs from the District's Recommended Parking Program as it includes enough short-term parking spaces to accommodate three percent of intercity Amtrak travelers during the evening peak hour.

The breakdown of parking by use case can be found in Table 1 below and more detailed breakdown can be seen in Attachment 2.

*Table 1: District Proposed Parking for Union Station*

Program	Case	District Rec. Parking #	Min	Max
Land Use	Retail	0	0	0
	Office	206	0	206
Long-Term Parking	Amtrak	0	0	0
	Bus	0	0	0
Short-Term Parking	Driver leaves car temporarily	40	40	120
ADA Parking		49	7	49
Total Parking		295	47	375

### District Position on For Hire Vehicle Uses

#### *Pick Up Drop Off (PUDO)*

The Parking Working Group meetings did not address for-hire vehicles and private PUDO activity in depth. However, DDOT has worked closely with FRA on traffic circulation, trip distribution, and potential traffic impacts over the past few years. The District offers these principles in guiding future policies and infrastructure for PUDO:

1. With a decrease in the number of parking spaces, DDOT would expect a higher number of pick-up and drop-off trips. This number would be split between private vehicles (family and friends) and for-hire vehicles.
  - The private vehicle drop-off and pick-up would result in approximately double the number of vehicle trips as a parking trip. For example, a private vehicle would enter the station to drop off a passenger, then exit the station to return to the driver's origin. If the passenger were to drive themselves to park, they would have only one trip to enter the station.
  - The District and USRC can and should take actions to increase the internal capture rate<sup>9</sup> for for-hire vehicles; with the goal that every for-hire drop-off trip becomes a for-hire pick-up trip.
  
2. The number of for-hire vehicle trips assumed in the DEIS for 2040 is already high in all of the build alternatives and will likely contribute to significant congestion on the roadway network. For context, the number of for-hire trips is expected to be 10 to 13 times greater than the number of trips generated by parking in the Preferred Project Alternative A-C<sup>10</sup>. To decrease this impact, the District and the project proponents can do several things:
  - Enact policies and management strategies to increase the internal capture rate for for-hire vehicles;
  - Provide distributed loading for for-hire and pick-up and drop-off vehicles around the Union Station site to minimize impacts at any one location and on adjacent neighborhoods; and
  - Include in the preferred alternative a dedicated high capacity facility for for-hire vehicles to increase efficiency and concentrate many of the for-hire trips.

DDOT and OP are not making recommendations as to the capacity, design, or location of a PUDO facility at this time.

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<sup>9</sup> An internal capture rate of 100% means that every vehicle that enters Union Station to drop off a passenger picks up a new for-hire passenger before exiting the station. An internal capture rate of 0% means every vehicle that enters Union Station to drop off a passenger exits the station *without* picking up a new passenger.

<sup>10</sup> Numbers are based on trip generation figures provided by FRA to DDOT earlier in transportation analysis process.

### *Rental Car Facility*

The District does not have enough data to show that the inclusion of a traditional rental car facility is appropriate for Union Station to support the needs intercity travelers in the year 2040. Without such data, it may be more appropriate for a rental car facility to locate in the surrounding area if needed to serve residents.

### Acknowledgements/Next Steps

- The District supports the expansion of Union Station as a major multimodal transportation hub for the District.
- The District supports continuation of the NEPA process, and OP recommends that to achieve a buildable and successful EIS, the applicant develop a modified Preferred Alternative that includes a substantially reduced parking program; substitutes the difference in parking with additional land use programming; and integrates a PUDO facility and details for its capacity, location, and design. OP and DDOT will continue to work closely with FRA, project proponents, and all coordinating agencies through the remainder of the NEPA, zoning, planning, and construction processes.
- Per the NCPC request, the Parking Working Group focused on substantially reducing the number of parking spaces at Union Station. Because the parties did not come to an agreement on that number, the District did not further pursue discussion on location of parking or details of circulation.
- DDOT will continue to work with FRA as a Cooperating Agency in the NEPA process, as it has been doing through monthly meetings over the past three years. As such, DDOT will continue to provide comments on traffic and circulation analysis and impacts upon the District's multimodal transportation system.

### Conclusion

In an email dated May 27, 2020 from FRA to OP, FRA highlighted its intent to use the formal DEIS public comment period to receive and consider further public agency input regarding the parking program and stated that it intends to further coordinate with OP, DDOT, and NCPC after conclusion of the comment period. However, the District still has concerns about the long-term feasibility of the latter approach, and encourages FRA to revise its parking numbers prior to release of the DEIS.

The District appreciates the opportunity to share our parking recommendation for Union Station with NCPC. We strongly feel that the number we have arrived at, 295 spaces, is appropriate to meet the needs of travelers and workers in the future buildout of Washington Union Station, the second busiest Amtrak Station in the nation.

We look forward to continued collaboration on the Union Station EIS with FRA and USRC and hope to see our parking recommendations addressed through the NEPA process or subsequent applicable District review processes during project design and implementation stages of the work.

ATTACHMENTS

- Attachment 1: NCPC Action from January 9, 2020 meeting
- Attachment 2: Parking Matrix (District Numbers)
- Attachment 3: District Policies on Reduction of Parking
- Attachment 4: Amtrak Letter to FRA
- Attachment 5: Comparative Research on Stations
- Attachment 6: Amtrak Rider Survey



## Commission Action

January 9, 2020

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<p><b>PROJECT</b>  <b>Washington Union Station Expansion Project</b>          Union Station          50 Massachusetts Avenue, NE          Washington, DC</p> <p><b>SUBMITTED BY</b>          United States Department of Transportation          Federal Railroad Administration</p> <p><b>REVIEW AUTHORITY</b>          Federal Projects in the District          per 40 U.S.C. § 8722(b)(1) and (d)</p>	<p><b>NCPC FILE NUMBER</b>          7746</p> <p><b>NCPC MAP FILE NUMBER</b>          1.11(38.00)45049</p> <p><b>APPLICANT'S REQUEST</b>          Approval of comments on concept plans</p> <p><b>ACTION TAKEN</b>          Approved comments on concept plans</p>
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The Commission:

**Finds** the primary goal of the project is to support current and future growth in rail service and multimodal connectivity for Washington, DC and the National Capital Region well into the 21<sup>st</sup> Century.

**Finds** it is the federal interest to support multimodal connections and transportation alternatives in the regional system.

**Supports** the overall project purpose, including accommodating future growth in rail service; improving accessibility and egress; enhancing the user experience; enhancing integration with surrounding uses; sustaining the station's economic viability; and preserving the historic train station.

**Finds** that Union Station is an important historic resource and is a gateway into the National Capital, and therefore the function, design and experience of the facility impacts the first impression of visitors. At the same time, the station is a critical transportation hub for residents and workers.

**Notes** Union Station Redevelopment Corporation (USRC) oversees the station operations and maintenance, and USRC funding supports preservation of the station, maintains the station as a multimodal transportation center, and enhances the retail and amenities within the station.

**Notes** the major project components include reconfiguration of the station tracks, a new train hall, bus facilities, and replacement parking facilities.

**Finds** the realignment and placement of the station tracks form the foundation of the design and configuration of other project elements. Changes in grade, limited points of access, constrained

site boundaries, and varying jurisdictions also create constraints that influence the placement of the proposed facilities.

**Notes** the applicant has developed six alternatives (A, B, C-East and West, D, E, and “A-C”) that share the same project components, but differ primarily in the placement of the train hall, parking and bus facilities.

**Notes** the applicant has indicated that Alternative “A-C” is their preferred alternative because it minimizes the duration, depth, complexity, and cost of construction as there would be no extensive construction below the concourses; keeps intermodal uses close to each other and close to the main station like today; and minimizes operational traffic impacts on the H Street Bridge and public street network by optimizing deck-level vehicular circulation and re-using the existing east and west ramps.

*Regarding the transportation facilities:*

**Supports** the reconfiguration of the train platforms to create greater efficiency, improve accessibility, and enhance the user experience.

**Finds** the addition of a new concourse level with pedestrian entrances at 1<sup>st</sup> Street and 2<sup>nd</sup> Street will greatly improve pedestrian access from the adjacent neighborhoods.

**Supports** the addition of a new east-west train hall that helps create a large, gracious entry to the track platforms, creates a setback from the historic train station and brings natural light into the facility.

**Finds** that the rail station, bus facility and Metrorail Station should be located in close proximity to each other to facilitate intermodal connections for travelers.

**Supports** the creation of new pedestrian entrances at the level of the H Street bridge and new train hall to improve accessibility to the station, and to relieve demand for drop-offs at the front of the station.

**Notes** the traffic impacts of the proposed alternatives were not part of the concept submission, but will be included as part of the impacts analysis within the Draft Environmental Impact Statement.

**Requests** the applicant coordinate with the District Department of Transportation to evaluate the proposed circulation system and any impacts to the transportation network, including Columbus Circle, the H Street Bridge, and adjacent streets.

*Regarding the parking facilities:*

**Notes** the site currently has about 2,200 striped parking spaces with an average utilization rate over 80 percent. Rental car areas and the mezzanine accommodate about 250 additional vehicles.

Presently, a majority of the spaces (1390) appear to be used by monthly pass holders whereas the use of the garage for daily retail or rail users appears substantially less.

**Notes** the preferred alternative reduces the proposed number of spaces by approximately one-third to 1,575 spaces, with approximately 600 spaces for retail, 900 flexible spaces for general use, and 75 spaces for rental cars.

**Notes** the federal Transportation Element provides specific guidance for federal employee parking, but in this case, much of the parking is for non-federal commercial use and other station users.

**Notes** the proposed 2019 federal Transportation Element of the Comprehensive Plan states agencies should consult the parking policies of local jurisdictions to determine appropriate parking standards for non-workplace federal uses, including residential, commercial, and institutional uses.

**Requests** the applicant substantially reduce the number of parking spaces, and that the applicant, private development partner, and staff work with the District Office of Planning and the District Department of Transportation to evaluate and confirm the appropriate amount of parking given the mix of uses, traffic and urban design impacts, and transit-oriented nature of the project prior to the next stage of review.

**Notes** the applicant has evaluated off-site locations for parking, including other federal properties and private sites, but has determined they all face significant challenges regarding acquisition or implementation.

*Regarding historic preservation and urban design:*

**Finds** the applicant seeks to enhance the functionality of the Union Station, and the proposed alternatives generally do not directly alter the historic station building itself.

**Notes** that proposed development behind the station should consider the setting of the historic building and the critical views from the National Mall, U.S. Capitol, and other viewsheds.

**Supports** the use of the east-west train hall to create a wider setback between the historic train station and new development to the north, as a way to help mitigate the visual impacts of the new development.

**Supports** the provision of a pedestrian access corridor between the top of the H Street Bridge and the station / train hall to create a new way to access the station from the H Street-Benning Streetcar Station. The “access zone” will require coordination with adjacent private development.

**Finds** the placement of parking beneath the station tracks and lower concourses may be challenging due to constructability and cost and therefore, the smaller the massing of the above grade garage, the better.



**Finds** that bus and parking facilities can be designed in a manner that can support compatibility with other adjacent uses, including the integration of retail and other active uses, the architectural treatment of buildings and facades, and the incorporation of other public amenities.

**Requests** for the next review the applicant further develop plans and renderings that show how active uses, amenities and architectural features can enhance the public realm and create a design that is compatible with adjacent development.

**Requests** the applicant prepare elevations and renderings to show how the height and mass of the alternatives will look from key viewsheds, including from the U.S. Capitol building, the National Mall, Delaware Avenue, and 1<sup>st</sup> Street, NE. The renderings should also include the massing of any private development permitted in the USN zone.

*Regarding further coordination:*

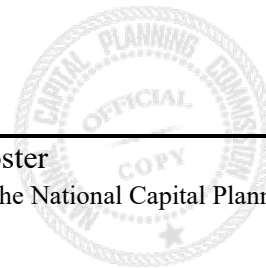
**Requests** the applicant coordinate with the Washington Metropolitan Area Transit Authority regarding the proposed improvements and new entry to the Metrorail station along 1<sup>st</sup> Street, NE.

**Requests** the applicant coordinate with District Department of Energy and Environment regarding stormwater management and other environmental issues related to the site.

**Requests** the applicant provide a phasing plan that describes the timing and implementation of each project component, where applicable, as part of the next review.

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Julia A. Koster  
Secretary to the National Capital Planning Commission



Parking Numbers for the Washington Union Station Expansion Project, June 3, 2020

Washington Union Station Expansion Project - 2040 Program				DISTRICT Recommendation						DISTRICT NOTES
				Calculated Parking			Parking Range			
				Factor	Factor Unit	DC Rec	Min	Medium	Max	
Land Use	Retail	380,000	SF	0.00	Spaces/ 1000sf	0	0	0	0	<p>The expansion of Union Station will include approximately 280,000 square feet of retail uses*, which is 72,000 net new square feet from today's program. OP and DDOT reviewed Zoning Regulations governing retail parking as well as relevant sections of the District's Guidance for Comprehensive Transportation Review ("CTR Guidelines")**. The CTR Guidelines strongly encourage projects located less than one-quarter of a mile from a Metrorail station to provide zero on-site vehicle parking, where allowable by zoning. The District is often supportive of zoning relief when a project is in close proximity to transit in order to provide less parking than Zoning Regulations would normally require. In this instance, for 280,000 square feet of retail, the normal zoning requirement would be a minimum of 184.2 spaces***; however, the Regulations provide for instances where other modes of travel are proximate and allow for reductions to zero parking. Additionally, NCPC holds federal in-lieu-of-zoning authority over the subject property and can therefore establish parking standards different from local zoning requirements.</p> <p>The District strongly recommends a maximum of zero retail parking spaces for the subject project. Numbers provided by FRA in January 2020 show that the station currently sees a combined total of approximately 48,600 passengers per day attributable to Amtrak, MARC, VRE, and Intercity Bus operations; and that in the year 2040, that number is expected to more than double to approximately 116,300 passengers per day. This is due to the anticipated increases in passengers that the proposed project seeks to accommodate. The District believes that the future retail operations will be fully supported by this significant increase in foot traffic, generated by transportation modes that do not require private vehicle parking. Additionally, this increase in foot traffic does not account for additional increase in Metrorail ridership or increases in tourist and local neighborhood foot traffic due to population growth. The District believes the tens of thousands of additional persons walking through Union Station who do not require onsite private vehicle parking will more than adequately support the future retail program; moreover, the District does not view WUS's retail program as one for which people will drive to as a destination and park, either today or in the future. Therefore, the District's position is that no parking is needed at Union Station to support the future retail program.</p> <p>*FRA's preferred Alternative A-C contains 280,000 square feet of retail; however, there is a possibility of up to 380,000 square feet of retail depending up on how existing flex space at Union Station is used.                      **District Department of Transportation, Guidance for Comprehensive Transportation Review, Version 1.0, June 2019.                      ***The District of Columbia Municipal Regulations require a zoning minimum of 0.665 spaces per 1,000 sf applicable to square footage in excess of 3,000 sf for the PDR-3 zone. Applying these parameters to a retail program of 280,000 sf, the minimum number of parking spaces required would be 184.2.</p>
	Office (In-Station)	136,000	SF	0.4	Spaces/ 1000sf	54	0	27	54	<p>Union Station currently has approximately 136,000 square feet of office space. The proposed project includes up to 380,000 square feet of additional office space for a total of approximately 516,000 square feet of office space in 2040. The CTR Guidelines recommend a maximum of 0.4 spaces per 1,000 square feet of office space, which would yield 206 parking spaces for the proposed 516,000 square feet of office uses. As with retail, the CTR Guidelines strongly encourage projects located less than one-quarter of a mile from a Metrorail station to provide zero on-site vehicle parking, where allowable by zoning. Applying relevant Zoning Regulations to the proposed office program would normally require a minimum of 128.25 spaces*. While office uses at Union Station have a similarly high multimodal accessibility as retail, office uses have a different trip generation profile than retail. Work trips associated with office uses occur at regular intervals during workdays and often originate farther away. OP and DDOT understand that office leases often require a specific amount of parking and also recognize the need to ensure that office uses at Union Station remain competitive with those elsewhere in the city. This is a different approach than that applied to the retail uses (provided in the preceding section). Accounting for the above factors, the District finds it appropriate to recommend a total of 206 parking spaces (the maximum recommended by the CTR Guidelines) to serve future office uses at Union Station.</p>
	Office (Federal Air Rights)	380,000	SF	0.4	Spaces/ 1000sf	152	0	76	152	<p>*The District of Columbia Municipal Regulations require a zoning minimum of 0.25 spaces per 1,000 sf applicable to square footage in excess of 3,000 sf for the PDR-3 zone. Applying these parameters to an office program of 516,000 sf, the minimum number of parking spaces required would be 128.25 spaces.</p>
	<b>Total Land Use</b>						<b>206</b>	<b>0</b>	<b>103</b>	<b>206</b>
Amtrak & Bus	2040 Amtrak Passenger Volume	31,968	Daily Passengers	0.0	Spaces / Daily Passenger	0	0	0	0	<p>1. Amtrak indicated in a January 7, 2020 letter to FRA that parking is not necessary to support their operation: "...Amtrak believes the current parking program targeted for Amtrak passengers in the Station Expansion Project is over planned and Amtrak supports refinement of the parking estimate in the future. Amtrak does not support any entity building a parking garage specifically to support Amtrak passengers."</p> <p>2. OP conducted background research (see Attachment 5) on urban train stations similar to WUS that do not provide long-term parking at all, including New York's Penn Station and Chicago's Union Station. Additionally, Philadelphia's 30th Street Station is drastically reducing its parking supply and providing an intermodal bus facility as part of its redevelopment.</p> <p>3. Within the Washington Metropolitan Region, there are significant parking options for travelers at appropriate locations that are more auto-oriented. These include Prince George's County's New Carrollton Garage, which provides over 1,000 parking spaces including long term parking and is regionally accessible via I-495, as well as the BWI Airport Rail Station Garage, which provides over 3,000 parking spaces. Also, there are many existing, underutilized parking garages within walking distance in the area surrounding WUS that, given market demand, could adapt to provide private overnight parking.</p> <p>4. Recent rider surveys conducted by Amtrak for their passengers indicate a continued decline in utilization of long-term parking by Amtrak riders (see Attachment 6). At the start of the EIS process, approximately eight percent of Amtrak riders self-reported that they parked at the station. The most recent Amtrak survey of riders, from January to March 2020, indicated that only three percent of riders drove to Union Station and parked as their means of access to the Station. This significant decrease in parking demand is also being observed at our regional airports, which have seen parking demand drop by up to 44 percent in the last two years*. Union Station is colloquially referred to as the region's fourth airport, as it handles 37 million visitors (including passengers) annually – a number substantially higher than the number of passengers served by any one of the region's three airports, which each serve between 20 and 22 million passengers annually**.</p> <p>*<a href="https://www.mwco.org/newsroom/2020/04/07/how-did-people-get-to-the-airport-in-2019-and-how-much-were-they-willing-to-spend/">https://www.mwco.org/newsroom/2020/04/07/how-did-people-get-to-the-airport-in-2019-and-how-much-were-they-willing-to-spend/</a>                      **<a href="https://plandc.dc.gov/sites/default/files/dc/sites/op/page_content/attachments/Chapter%204_Public_Review_Draft_Transportation_Oct2019.pdf">https://plandc.dc.gov/sites/default/files/dc/sites/op/page_content/attachments/Chapter%204_Public_Review_Draft_Transportation_Oct2019.pdf</a></p>
	2040 Bus Passenger Volume	11,900	Daily Passengers	0.0	Spaces / Daily Passenger	0	0	0	0	
	<b>Total Amtrak &amp; Bus</b>						<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Short-Term Parking (related to intercity travel)		4,000	Peak Hour Passengers	0.01	Spaces / Peak Hour Passenger	40	40	80	120	<p>The current peak hour of travel at Union Station, 5-6 pm, will see approximately 4,000 total Amtrak passengers when combining boardings and alightings in the 2040 buildout. The District recommends that short-term parking to accommodate these needs range from a minimum of one percent of all travelers to a maximum of three percent of all travelers, which is equivalent to a recommended range of a minimum of 40 to a maximum of 120 short-term parking spaces.</p>
	<b>Total for Intercity Short-Term</b>					<b>40</b>	<b>40</b>	<b>80</b>	<b>120</b>	
<b>Total Parking</b>						<b>246</b>	<b>40</b>	<b>183</b>	<b>326</b>	
ADA Parking						49	7	28	49	<p>According to FRA, Union Station currently provides 49 ADA-designated spaces out of a total of 2,250 parking spaces. For the year 2040, FRA's Preferred Alternative A-C proposes a maximum of 1,575 total parking spaces. Federal ADA regulations* establish minimum requirements for the provision of ADA-designated parking spaces. These requirements are calculated based on a given project's total parking spaces. Applying these regulations to FRA's proposed 1,575 parking spaces yield a requirement for a minimum of 26 ADA parking spaces in the year 2040. While the District has not been provided with data regarding utilization of the existing 49 ADA spaces, the District recommends this number be maintained at Union Station if it can be shown they are well utilized and needed. This number is seven times the minimum of seven (7) ADA spaces that would be required by ADA regulations when applied to the District's recommendation of 295 total parking spaces (discussed below) for the project.</p> <p>The District therefore recommends the following: Minimum of 7 spaces (minimum ADA requirement for a project with 295 parking spaces); provide 28 spaces as the midpoint between the minimum and maximum if evidence demonstrates that the existing 49 spaces are not well utilized by intercity travelers; and for the maximum, provide 49 spaces, maintaining the existing number of ADA spaces, if evidence demonstrates these existing spaces are well utilized by intercity travelers.</p> <p>*<a href="https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-ada-standards/guide-to-the-ada-standards/chapter-5-parking">https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-ada-standards/guide-to-the-ada-standards/chapter-5-parking</a></p>
<b>Total Station Parking</b>						<b>295</b>	<b>47</b>	<b>211</b>	<b>375</b>	
FHV Facility	PUDO (driver does not leave vehicle)									<p>The number of for-hire vehicle trips assumed in the DEIS is already high in all of the build alternatives and will likely contribute to significant congestion on the roadway network. To decrease this impact, the District and the project proponents can do several things:</p> <ul style="list-style-type: none"> <li>- Enact policies and management strategies to increase the internal capture rate for for-hire vehicles;</li> <li>- Provide distributed loading for for-hire and pick-up and drop-off vehicles around the Union Station site to minimize impacts at any one location; and</li> <li>- Include in the preferred alternative a dedicated high capacity facility for-hire vehicle to increase efficiency and concentrate many of the for-hire trips.</li> </ul>
	Rental Cars (which operate very differently than parking)									<p>The District does not feel the inclusion of a traditional rental car facility is appropriate for Union Station, unless there is data to support that the facility is needed to intercity travelers. Without such data, it would be more appropriate for a rental car facility to locate in the surrounding area to serve residents.</p>

**District of Columbia Report-Back to NCPC re: Appropriate Parking Numbers for the Washington Union Station Expansion Project, June 3, 2020**

**I. District of Columbia Comprehensive Plan Parking Policies**

Specific policies in the Mayor's Comprehensive Plan Update (submitted to Council) that reinforce the desire for reduce parking in the District include:

***Policy T-1.1.8: Minimize Off-Street Parking***

An increase in vehicle parking has been shown to add vehicle trips to the transportation network. In light of this, excessive off-street vehicle parking should be discouraged.

***Policy T-1.2.3: Discouraging Auto-Oriented Uses***

Discourage certain uses, like drive-through businesses or stores with large surface parking lots and minimize the number of curb cuts in new developments. Curb cuts and multiple vehicle access points break up the sidewalk, reduce pedestrian safety, and detract from pedestrian-oriented retail and residential areas.

***Policy T-3.2.1: Parking Duration in Commercial Areas***

Using pricing, time limits, and curbside regulations, encourage motorists to use public curbside parking for short-term needs, and promote curbside turnover and use while pushing longer-term parking needs to private, off-street parking facilities.

*Action T-3.2.A: Short-Term Parking*

Continue to work with existing private parking facilities to encourage and provide incentives to convert a portion of the spaces now designated for all-day commuter parking to shorter-term parking to meet the demand for retail, entertainment, and mid-day parking.

*Action T-3.2.C: Curbside Management Techniques*

Revise curbside management and on-street parking policies to:

- Adjust parking pricing to reflect the demand for, and value of, curb space;
- Adjust the boundaries for residential parking zones;
- Establish parking policies that respond to the different parking needs of different types of areas;
- Expand the times and days for meter parking enforcement in commercial areas;
- Promote management of parking facilities that serve multiple uses (e.g., commuters, shoppers, recreation, entertainment, churches, special events);
- Improve the flexibility and management of parking through mid-block meters, provided that such meters are reasonably spaced and located to accommodate persons with disabilities;
- Preserve, manage, and increase alley space or similar off-street loading space;
- Increase enforcement of parking limits, double-parking, bike lane obstruction, and other curbside violations, including graduated fines for repeat offenses and towing for violations on key designated arterials; and
- Explore increasing curbside access for EV supply equipment.

*Action T-3.2.D: Unbundle Parking Cost*

Find ways to unbundle the cost of parking. For residential units, this means allowing those purchasing or renting property to opt out of buying or renting parking spaces. Unbundling should be required for District-owned or subsidized development and encouraged for other developments. Employers should provide a parking cash-out option, allowing employees who are offered subsidized

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parking the choice of taking the cash equivalent if they use other travel modes. Further measures to reduce housing costs associated with off-street parking requirements, including waived or reduced parking requirements in the vicinity of Metrorail stations and along major transit corridors, should be pursued. These efforts should be coupled with programs to better manage residential street parking in neighborhoods of high parking demand, including adjustments to the costs of residential parking permits.

*Action T-3.2.E: Manage Off-Street Parking Supply*

Continue to waive or reduce parking requirements in the vicinity of Metrorail stations and along major transit corridors, as implemented during the recent revision of the zoning regulations. Explore further reductions in requirements as the demand for parking is reduced through changes in market preferences, technological innovation, and the provision of alternatives to car ownership. Update the Mayor's Parking Taskforce Report with more recent parking data, and monitor parking supply on an ongoing basis.

*Action T-3.2.F: Encourage Shared-Use Parking*

Collaborate with private, off-street parking facilities to encourage shared-use parking arrangements with nearby adjacent uses to maximize the use of off-street parking facilities.

**II. District Department of Transportation: Consolidated Transportation Review (CTR) Guidelines**

**1.3.2 Appropriate Level of Vehicle Parking**

Since on-site vehicle parking is a permanent feature of a development that affects the trip generation characteristics of the site, it is critical that the Applicant not over-build parking. Availability of extra spaces has the potential to induce unanticipated vehicle trips on the transportation network. Additionally, overbuilding parking significantly increases the cost to construct a building, which is then passed onto the future tenants and is counter to the District's effort to make housing more affordable. If the Applicant provides more parking than calculated using the rates in Table 2 below, DDOT will require the parking supply be reduced or additional substantive TDM measures and non-auto network improvements be provided to offset future induced traffic. DDOT's Preferred Vehicle Parking Rates will be enforced during zoning review and at public space permitting for the site's curb cut.

These DDOT-preferred parking rates are set at levels that advance the MoveDC goal to increase the amount of District-wide home-work trips made by non-auto modes to 75%. Providing lower parking supplies, particularly in office and residential buildings, is an important strategy for supporting transit ridership and disincentivizing the use of a personal vehicle for home-work trips. In conjunction with a reduced supply of parking and a robust TDM program, vehicle parking will be unbundled from the cost to lease or purchase space in a building and priced appropriately (usually the average rate charged within ¼ mile of the site). Additional guidance on parking pricing is included within the standardized TDM Plans (Appendix C).

If a CTR or TIA is required, DDOT will require the assumed auto mode-share be adjusted upward to reflect the presence of a high on-site parking supply. Conversely, if a low parking ratio is provided, DDOT may permit the Applicant to reduce the expected automobile mode-share since the low

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parking provision acts as a natural constraint on the amount of vehicle trips that could be generated by the site. When determining the number of spaces to be provided on-site, the Applicant should also consider the complimentary nature of parking demand between uses, sharing parking facilities among land uses within the building, arrival and departure rates, and programs to minimize parking demand.

**Table 2 | DDOT-Preferred Vehicle Parking Rates**

Land Use		Less than ¼ Mile from Metrorail	¼ to ½ Mile from Metrorail OR Less than ¼ Mile from Priority Transit**	½ to 1 Mile from Metrorail	More than 1 Mile from Metrorail
<b>Residential</b> <i>(spaces/unit)</i>	<b>DDOT:</b> ZR16 Min-Max:	<b>0.30 or less</b> 0.17* - 0.67	<b>0.40 or less</b> 0.17* - 0.67	<b>0.50 or less</b> 0.33 - 0.67	<b>0.60 or less</b> 0.33 - 0.67
<b>Office</b> <i>(spaces/1,000 GSF)</i>	<b>DDOT:</b> ZR16 Min-Max:	<b>0.40 or less</b> 0.25* - 1.00	<b>0.50 or less</b> 0.25* - 1.00	<b>0.65 or less</b> 0.50 - 1.00	<b>0.85 or less</b> 0.50 - 1.00
<b>Hotel</b> <i>(spaces/1,000 GSF)</i>	<b>DDOT:</b> ZR16 Min-Max:	<b>0.40 or less</b> 0.25* - 1.00	<b>0.45 or less</b> 0.25* - 1.00	<b>0.60 or less</b> 0.50 - 1.00	<b>0.75 or less</b> 0.50 - 1.00
<b>Retail ***</b> <i>(spaces/1,000 GSF)</i>	<b>DDOT:</b> ZR16 Min-Max:	<b>1.00 or less</b> 0.67* - 2.66	<b>1.25 or less</b> 0.67* - 2.66	<b>1.60 or less</b> 1.33 - 2.66	<b>2.00 or less</b> 1.33 - 2.66
<b>Other Uses</b>	<b>DDOT:</b> ZR16 Min-Max:	<b>75% of \$ 701.5 or less</b> 50% - 200% of \$ 701.5*	<b>90% of \$ 701.5 or less</b> 50% - 200% of \$ 701.5*	<b>120% of \$ 701.5 or less</b> 100% - 200% of \$ 701.5	<b>150% of \$ 701.5 or less</b> 100% - 200% of \$ 701.5
<b>Notes:</b>					
* There is no vehicle parking requirement in Downtown "D" and several other zones. DDOT strongly encourages Applicants to provide no on-site vehicle parking where allowable by zoning.					
** Priority transit includes the H Street Streetcar, Streetcar Benning Road Extension, DC Circulator, and Priority Corridor Network Metrobus Routes defined by zoning in DCMR 11, Subtitle C § 702.1(c).					
*** Retail rates can be used for either standalone buildings or first floor users of mixed-use projects. The Retail category also includes a wide range of related uses such as fast casual restaurant, bank, drinking establishment, pet grooming, coffee shop, grocery, etc.					

DDOT developed and began using these parking rates in 2017 to evaluate the appropriateness of a project’s parking supply. They are now included in this edition so that an Applicant can right-size the amount of parking on-site prior to the initial scoping meeting with DDOT and prior to filing a land development application with the reviewing body.

DDOT’s preferred residential parking rates originated from the Park Right DC webtool which is based on parking demand data collected from 115 multi-family residential buildings around the District. The lowest and “best case” sites for each context of the District were selected to establish the residential parking rates. Office rates are based on 400 GSF per employee and non-auto mode-shares of 85%, 80%, 75%, and 65%, respectively, based on distance to transit. Hotel rates are based on 450 GSF per room and an assumption that the amount of parking per hotel room be roughly half of the per residential unit rate since visitors to hotels in the District typically do not arrive by personal vehicle (e.g., airplane, train, taxi, ridehailing). This equates to approximately 1 space per 6 hotel rooms within ¼ mile of Metrorail and 1 space per 3 hotel rooms more than 1 mile from a Metrorail station. Rates for retail and all other uses are set proportionally to the ZR16 minimums based on the residential, office, and hotel rates. For atypical land uses, the Applicant should consult the DDOT Case Manager and, as appropriate, refer to other industry resources, published research, market research, and similar land uses in comparable geographies within and outside of the District.



# Memorandum

**To:** David Valenstein; Beverley Swaim-Staley  
**CC:** David Handera; Daniel Sporik; Kevin Forma; Bradley Decker  
**From:** Gretchen Kostura  
**Date:** January 7, 2020  
**Re:** Amtrak Parking for the Washington Union Station Expansion Project

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Passenger parking is not essential to Amtrak's operation of intercity passenger rail at Washington Union Station and is regarded as an ancillary passenger amenity. Although existing conditions provide for rail passenger parking, a majority of Amtrak and commuter rail passengers access the Station via alternate transportation modes. Amtrak strongly encourages passengers to travel to the Station through modes other than private vehicle to park. This advocacy coupled with major planned rail infrastructure investments north and south of the Station and a shifting culture away from private automobile use leads Amtrak to anticipate passenger parking demand to continually decrease in the future.

Currently, based on our ridership and survey responses from passengers, Amtrak estimates 600-700 passengers are parking at the Station<sup>1</sup>. We do not assume that parking will increase proportionally as rail ridership increases. Additionally, there will likely be a considerable period where there is no parking available at the Station during construction and passengers will need to figure out an alternative means of accessing the Station. Therefore, Amtrak believes the current parking program targeted for Amtrak passengers in the Station Expansion Project is over planned and Amtrak supports refinement of the parking estimate in the future. Amtrak does not support any entity building a parking garage specifically to support Amtrak passengers.

In a public setting, Amtrak will continue to support Alternative A-C and will offer testimony to the elements directly related to the core business of operating intercity passenger rail. However, given the parking garage is located on federal property and overseen by Union Station Redevelopment Corporation, Amtrak will defer to the property owner and operator to determine the appropriate use for their property given market demand, land use analysis and transportation mode shifts as the planning progresses into design. The City should also be involved with determining the overall appropriate amount of parking for the Station as they are responsible for setting parking requirements for development projects in DC. Amtrak, FRA, USRC, and the City should commence a working group to refine the parking program.

*January 27, 2020*

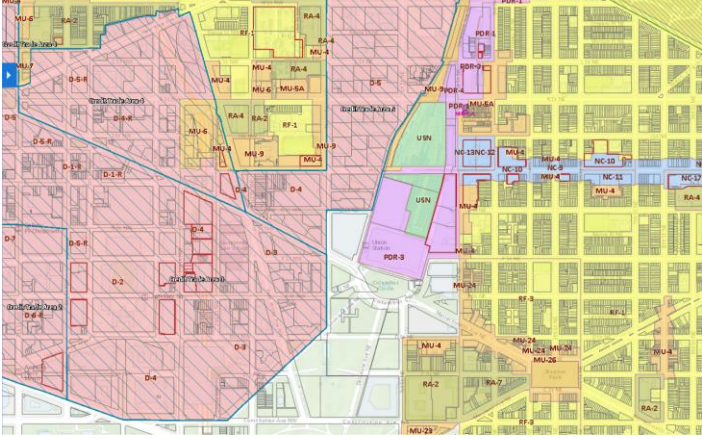

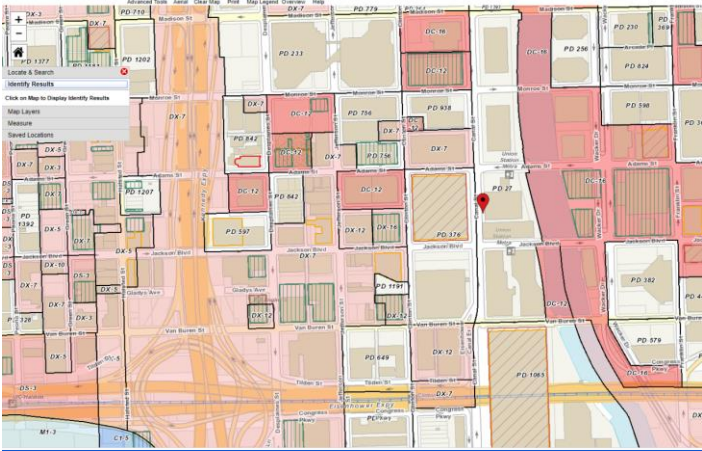

We do not believe the EIS process needs to be stalled or postponed as this refinement work can move in parallel to the current process with the current numbers serving as a stress test for the Project.

Finally, in the event the property owner and operator, in coordination with local and regional transportation officials and Amtrak, determines the parking program should be downsized, Amtrak encourages the reevaluation of locating the parking facility below the tracks and platforms.

<sup>1</sup> Daily Amtrak ridership is approximately 16,000. It can be assumed that Union Station is the origin station for half those riders and 8% of those riders are parking at the Station given our survey results from 2017. Note that the most recent survey of passengers in December 2019, only 4% of riders from Union Station drove and parked.

Attachment 5: Research on Comparative Stations (Working Document)

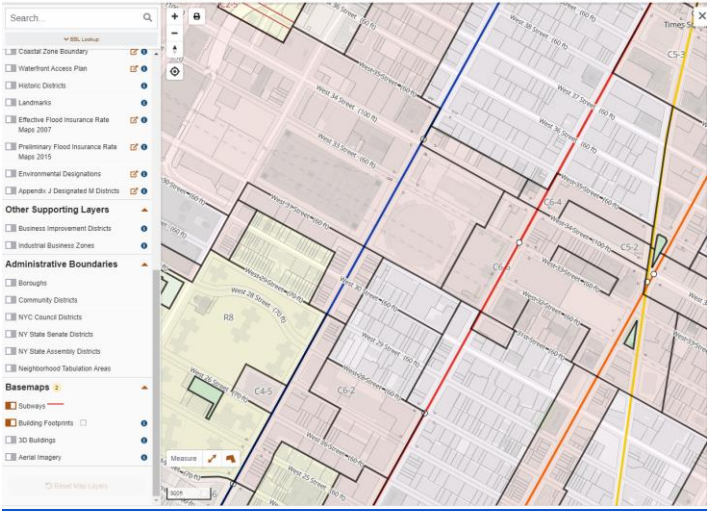
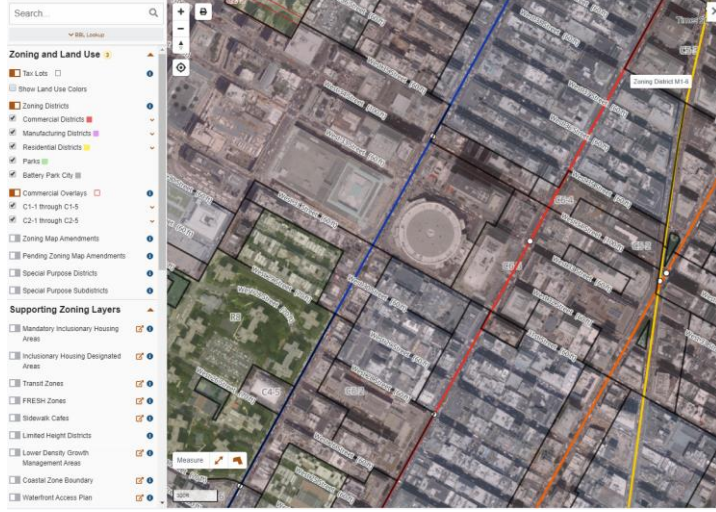

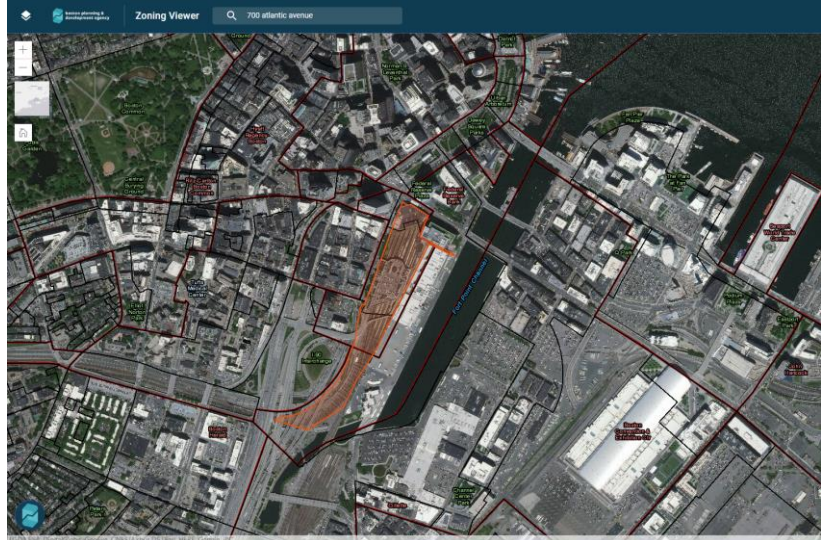
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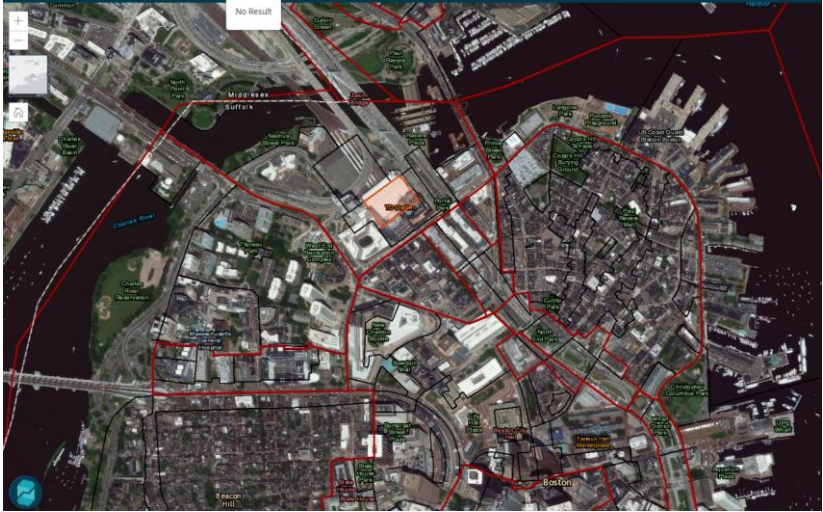
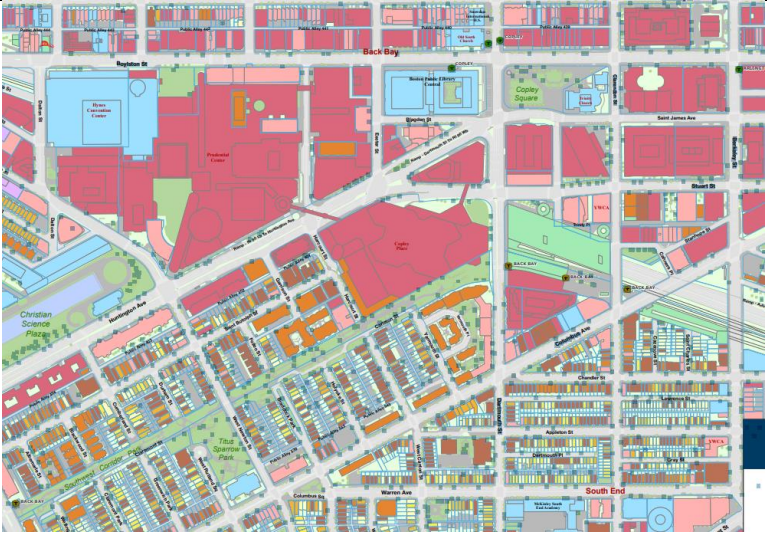

Location	Existing Station Associated Parking <sup>1</sup>	Development plans and associated parking	Relationship to the city	Amtrak Riders (Yearly FY18) <sup>2</sup>	Station's Zoning Context	Station's Built Form Context
Washington Union Station	2,275 Parking	Proposed: 1,575	Served by Amtrak, WMATA rail and bus, VRE, MARC, intercity bus, Streetcar, and Circulator.  Urban, relatively easy access to I-395.	5,197,237	 <a href="http://maps.dcoz.dc.gov/zr">http://maps.dcoz.dc.gov/zr</a>	 <a href="http://maps.dcoz.dc.gov/zr">http://maps.dcoz.dc.gov/zr</a>
Chicago Union Station	700 spot parking; closed on Sept 30, 2019  <a href="https://chicago.curbed.com/2019/9/23/20879942/union-station-bmo-tower-parking-garage-closed-construction">https://chicago.curbed.com/2019/9/23/20879942/union-station-bmo-tower-parking-garage-closed-construction</a>	Chicago Union Station Master Plan (2012): New development apts. would have 400 parking spaces; does not appear that those would be accessible to Amtrak users.  <a href="https://chicago.curbed.com/2018/9/12/17845744/union-station-development-hotel-apartments-office-tower">https://chicago.curbed.com/2018/9/12/17845744/union-station-development-hotel-apartments-office-tower</a>	Served by Amtrak, Metra commuter rail service, Chicago Transit Authority, Greyhound.  Urban, easy access to I-90, I-290.	3,388,307	 <a href="https://gisapps.chicago.gov/ZoningMapWeb/?liab=1&amp;config=zoning">https://gisapps.chicago.gov/ZoningMapWeb/?liab=1&amp;config=zoning</a>	 <a href="https://gisapps.chicago.gov/ZoningMapWeb/?liab=1&amp;config=zoning">https://gisapps.chicago.gov/ZoningMapWeb/?liab=1&amp;config=zoning</a>

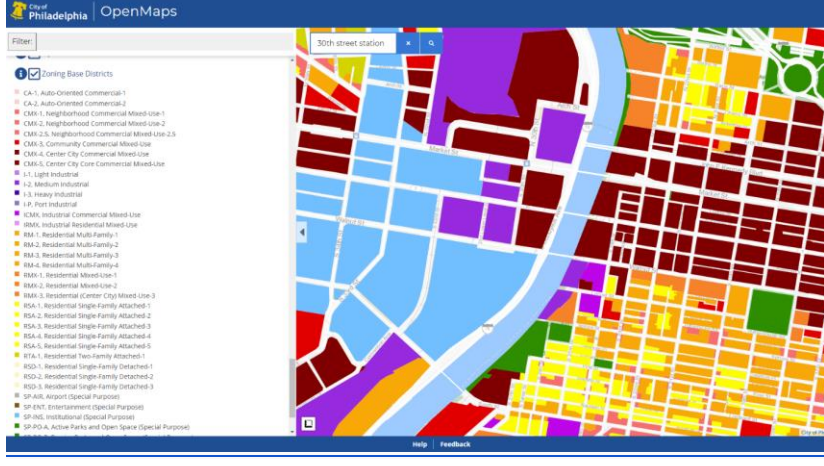
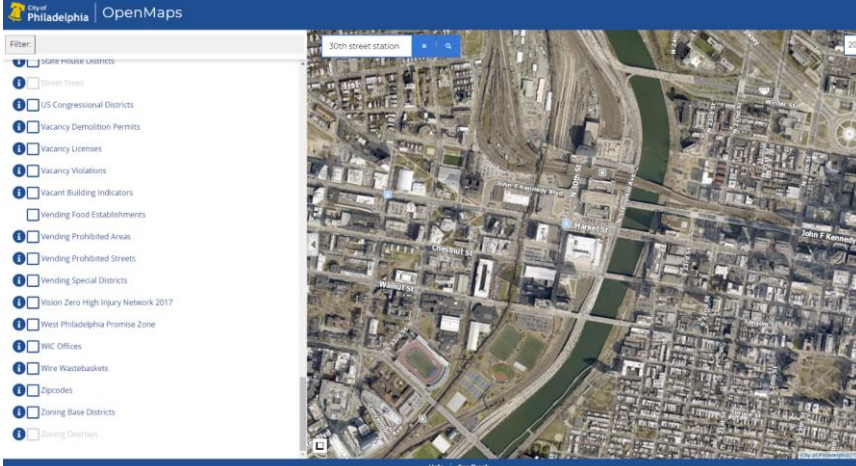
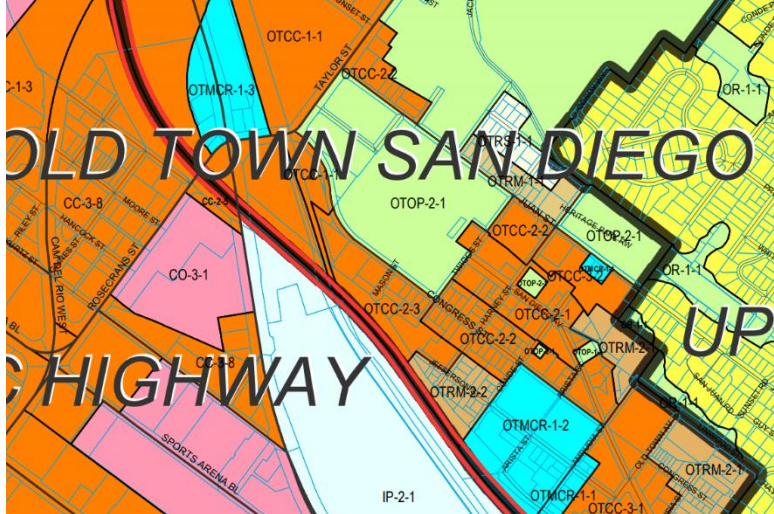
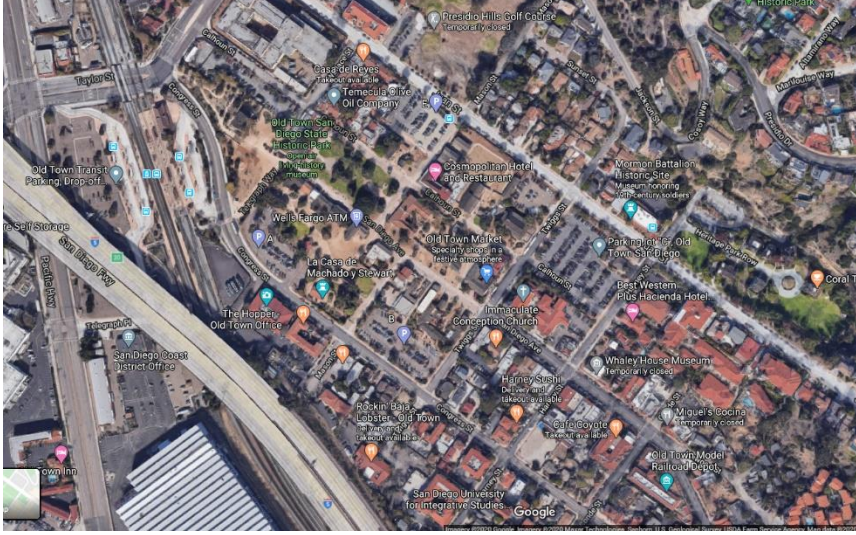
<sup>1</sup> Not all parking at and associated with these stations is dedicated to intercity travelers. Parking data was gathered between February and April of 2020.

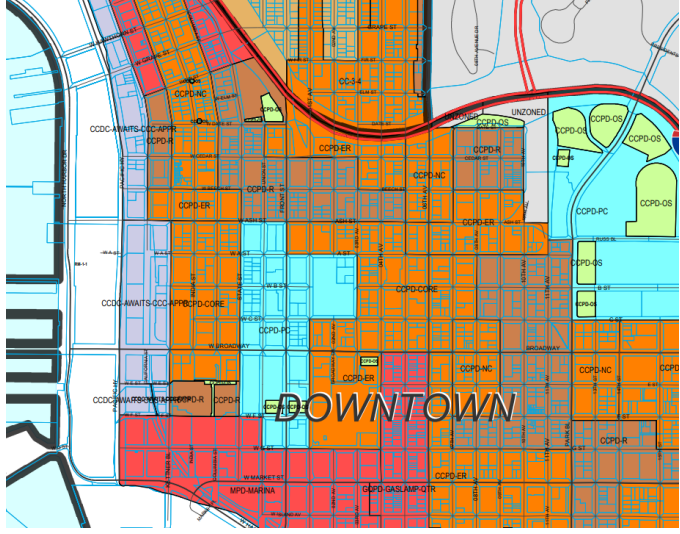
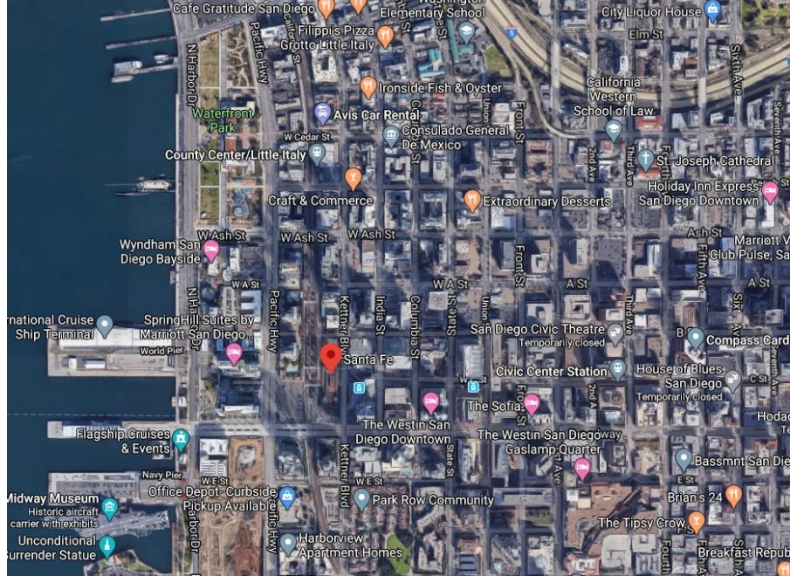

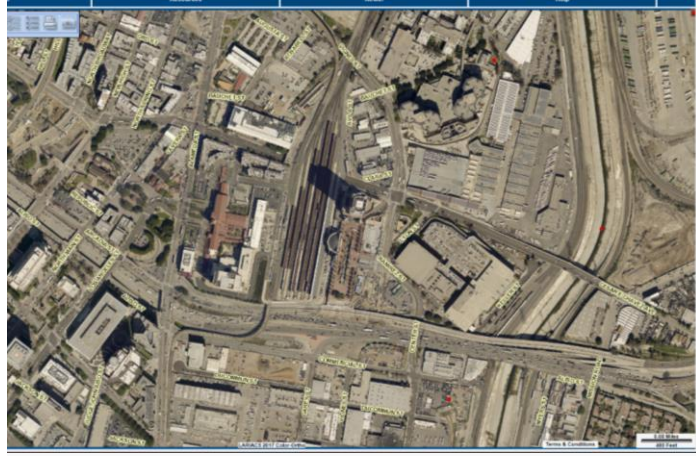
<sup>2</sup> <https://www.amtrak.com/state-fact-sheets>

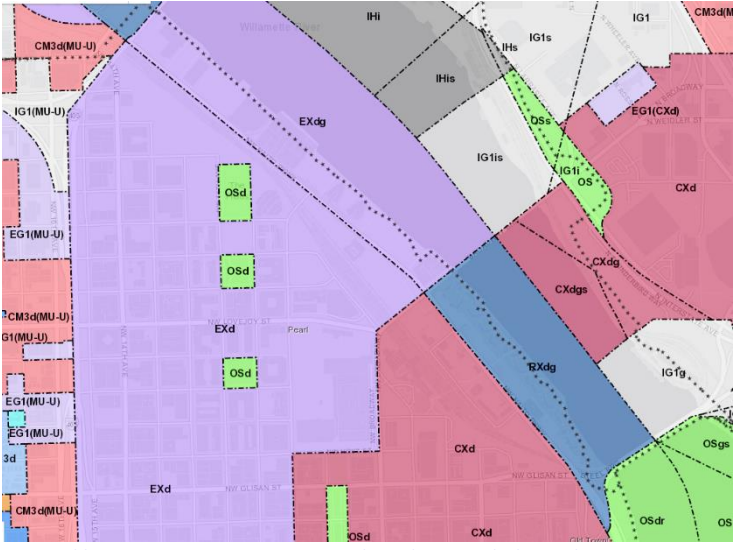
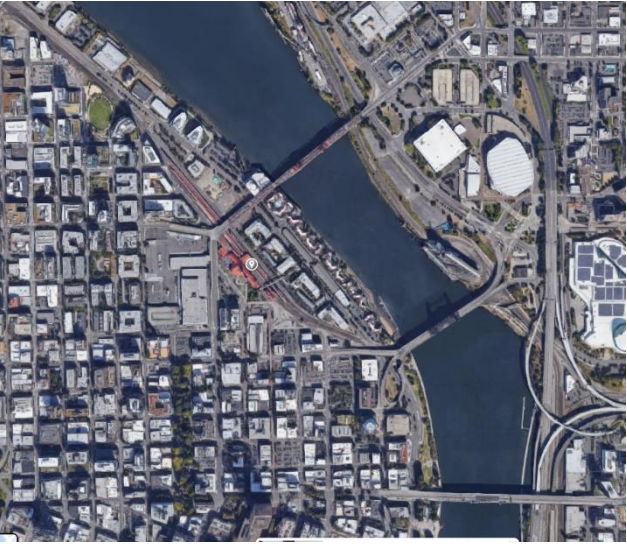
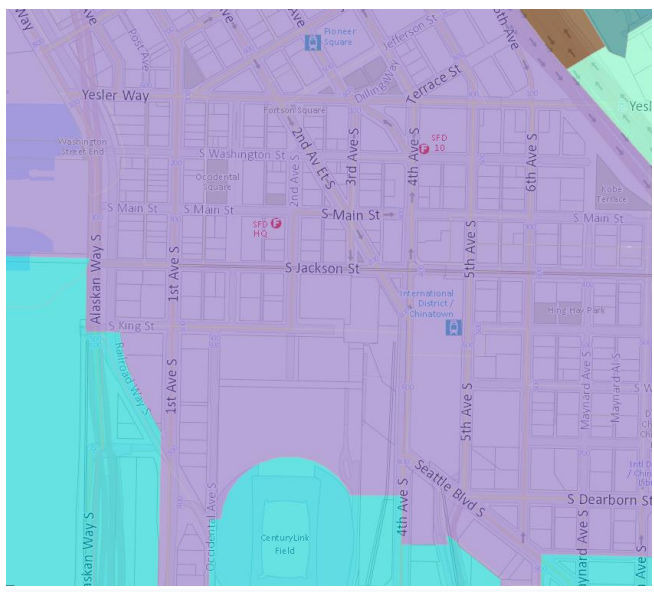
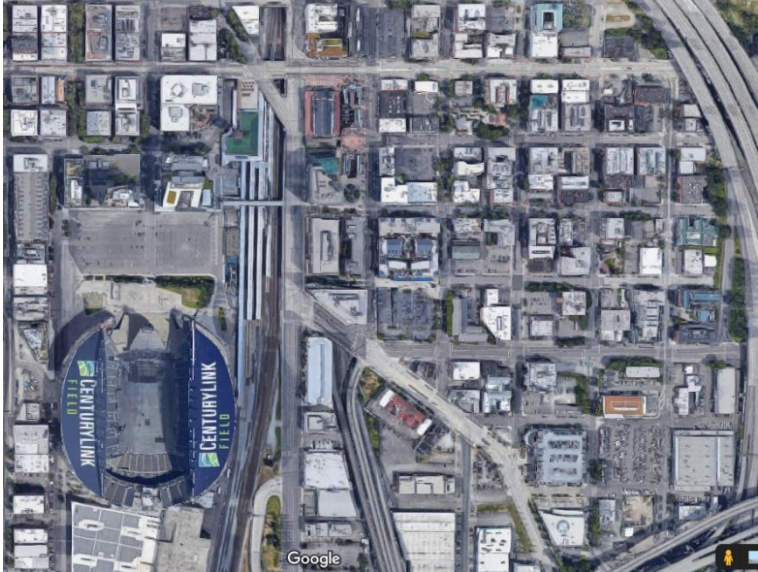


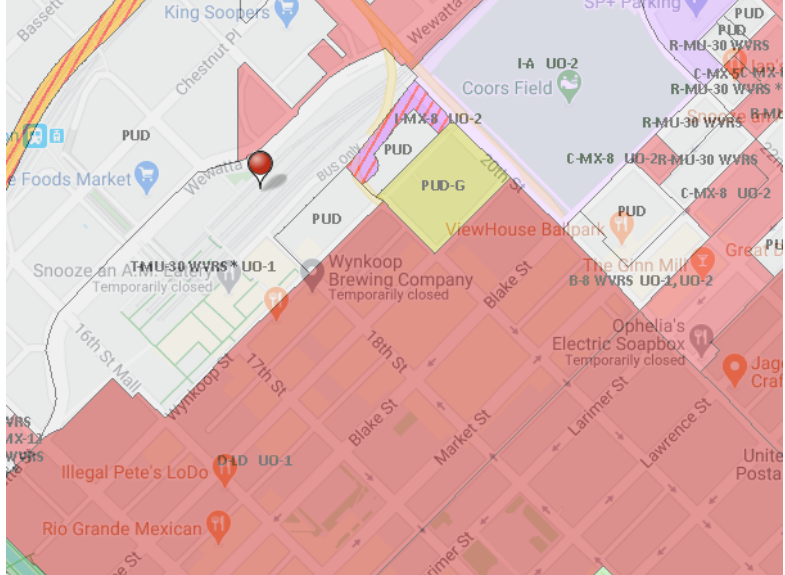
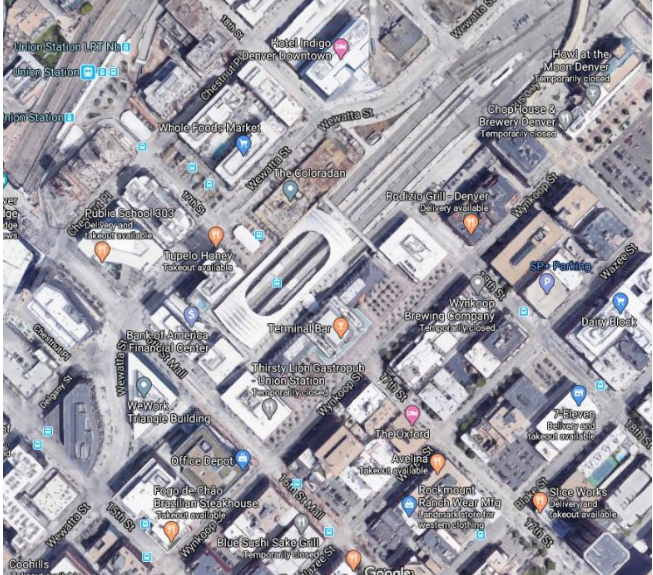
Location	Existing Station Associated Parking <sup>1</sup>	Development plans and associated parking	Relationship to the city	Amtrak Riders (Yearly FY18) <sup>2</sup>	Station's Zoning Context	Station's Built Form Context
New York Penn Station	Amtrak Website indicates: overnight parking is available for a fee at many private garages in the area.	New Train Hall: <a href="https://www.nytimes.com/2016/09/28/nyregion/penn-station-new-york-andrew-cuomo.html">https://www.nytimes.com/2016/09/28/nyregion/penn-station-new-york-andrew-cuomo.html</a>	Served by Amtrak, MTA rail, NJ Path, Long Island RR,  Very Urban, no easy access to highways.	10,132,025	 <p><a href="https://zola.planning.nyc.gov/about#9.72/40.7125/-73.733">https://zola.planning.nyc.gov/about#9.72/40.7125/-73.733</a></p>	 <p><a href="https://zola.planning.nyc.gov/about#9.72/40.7125/-73.733">https://zola.planning.nyc.gov/about#9.72/40.7125/-73.733</a></p>
Boston – South Station	943 parking spaces  <a href="http://www.bostonplans.org/getattachment/4a72af83-aa8d-4be1-a9ce-dbad321a65c5">http://www.bostonplans.org/getattachment/4a72af83-aa8d-4be1-a9ce-dbad321a65c5</a>  Lots of additional parking available around the station: <a href="#">here</a>	Boston South Station Expansion 895 total spaces.  <a href="http://www.bostonplans.org/getattachment/147f7f58-dd54-4702-8659-ce81707bfc35">http://www.bostonplans.org/getattachment/147f7f58-dd54-4702-8659-ce81707bfc35</a>	Served by Amtrak, MBTA rapid transit, and MBTA commuter rail; intercity bus.  Urban, quick access to I-93.	1,553,953	 <p><a href="http://www.bostonplans.org/3d-data-maps/gis-maps/neighborhood-maps">http://www.bostonplans.org/3d-data-maps/gis-maps/neighborhood-maps</a></p>	 <p><a href="http://maps.bostonredevelopmentauthority.org/zoningviewer/">http://maps.bostonredevelopmentauthority.org/zoningviewer/</a></p>

Location	Existing Station Associated Parking <sup>1</sup>	Development plans and associated parking	Relationship to the city	Amtrak Riders (Yearly FY18) <sup>2</sup>	Station's Zoning Context	Station's Built Form Context
Boston – North Station	1275 spaces; 38 accessible spaces <a href="https://www.mbta.com/stops/place-north">https://www.mbta.com/stops/place-north</a>  Limited additional parking available around the station: <a href="#">here</a>	North Station/ Boston Garden Development  800 parking spaces  <a href="http://www.bostonplans.org/getattachment/e5eb598c-bb01-49f6-9190-4d07641d7c6f">http://www.bostonplans.org/getattachment/e5eb598c-bb01-49f6-9190-4d07641d7c6f</a>	Served by Amtrak and MBTA Commuter Rail.  Urban, quick access to I-93.	464,988	 <a href="http://www.bostonplans.org/3d-data-maps/gis-maps/neighborhood-maps">http://www.bostonplans.org/3d-data-maps/gis-maps/neighborhood-maps</a>	 <a href="http://maps.bostonredevelopmentauthority.org/zoningviewer/">http://maps.bostonredevelopmentauthority.org/zoningviewer/</a>
Boston – Back Bay Station	No MBTA parking; adjacent private garage with 2000 spaces  <a href="https://en.wikipedia.org/wiki/Back_Bay_station">https://en.wikipedia.org/wiki/Back_Bay_station</a>	Back Bay/ South End Gateway <a href="http://www.bldup.com/projects/back-bay-station-redevelopment">http://www.bldup.com/projects/back-bay-station-redevelopment</a>  No net new parking is expected:  <a href="http://www.bostonplans.org/getattachment/ab73db76-3746-4e68-b57e-4a800abf1694">http://www.bostonplans.org/getattachment/ab73db76-3746-4e68-b57e-4a800abf1694</a>	Served by Amtrak; MBTA rapid transit; and MBTA commuter rail; intercity bus.  Urban, transitions to residential neighborhoods.	683,016	 <a href="http://www.bostonplans.org/3d-data-maps/gis-maps/neighborhood-maps">http://www.bostonplans.org/3d-data-maps/gis-maps/neighborhood-maps</a>	 <a href="http://maps.bostonredevelopmentauthority.org/zoningviewer/">http://maps.bostonredevelopmentauthority.org/zoningviewer/</a>

Location	Existing Station Associated Parking <sup>1</sup>	Development plans and associated parking	Relationship to the city	Amtrak Riders (Yearly FY18) <sup>2</sup>	Station's Zoning Context	Station's Built Form Context
Philadelphia 30 <sup>th</sup> St Station	2,100 parking spaces <a href="https://www.blta.com/portfolio/parking-intermodal/amtrak-30th-street-station-parking-garage-2/">https://www.blta.com/portfolio/parking-intermodal/amtrak-30th-street-station-parking-garage-2/</a>	30 <sup>th</sup> St Station District Plan (2016) <a href="http://www.phillydistrict30.com/">http://www.phillydistrict30.com/</a>  Doesn't explicitly mention expanded parking.	Served by Amtrak, buses, trolley, regional rail, intercity bus.  Urban, significant exposed rail yard, quick access to I-76.	4,471,992	 <a href="https://openmaps.phila.gov/">https://openmaps.phila.gov/</a>	 <a href="https://openmaps.phila.gov/">https://openmaps.phila.gov/</a>
San Diego – Old Town Transportati on Center	437 “park and ride” spaces and 350+ overflow spaces <a href="https://en.wikipedia.org/wiki/Old_Town_Transit_Center">https://en.wikipedia.org/wiki/Old_Town_Transit_Center</a>	No upcoming plans.	Served by Amtrak, Coaster commuter rail, San Diego Trolley, San Diego Metropolitan Transit System bus lines.  Surface Parking around. Easy Access to I-8 and I-5.	350,518	 <a href="https://www.sandiego.gov/development-services/zoning-maps">https://www.sandiego.gov/development-services/zoning-maps</a>	

Location	Existing Station Associated Parking <sup>1</sup>	Development plans and associated parking	Relationship to the city	Amtrak Riders (Yearly FY18) <sup>2</sup>	Station's Zoning Context	Station's Built Form Context
San Diego -- Santé Fe Depot	Station parking not available: <a href="https://www.amtrak.com/stations/san">https://www.amtrak.com/stations/san</a>  Parking is provided by ACE Public Parking, located a few blocks north of the station: <a href="https://www.pacificsurf.com/destinations/san-diego-santa-fe-depot/">https://www.pacificsurf.com/destinations/san-diego-santa-fe-depot/</a>	Station was sold to a private developer in 2017; development around the station <a href="https://www.sandiegouniontribune.com/business/growth-development/sd-fi-santafesold-20171011-story.html">https://www.sandiegouniontribune.com/business/growth-development/sd-fi-santafesold-20171011-story.html</a>	Served by Amtrak, Coaster commuter rail, light rail, and San Diego Metropolitan Transit System bus lines.  More urban; no Interstate access, minimal surface parking.	699,430	 <p><a href="https://www.sandiego.gov/development-services/zoning-maps">https://www.sandiego.gov/development-services/zoning-maps</a></p>	 <p><a href="https://maps.google.com">Maps.google.com</a></p>
Los Angeles -- Union Station	3,000 spaces <a href="https://en.wikipedia.org/wiki/Union_Station_(Los_Angeles)">https://en.wikipedia.org/wiki/Union_Station_(Los_Angeles)</a>	Transforming Los Angeles Union Station (2015): no new parking will be added  <a href="https://media.metro.net/projects_studies/union_station/images/LAUS_Design_Report-Final_10-9-15.pdf">https://media.metro.net/projects_studies/union_station/images/LAUS_Design_Report-Final_10-9-15.pdf</a>	Served by Amtrak, airport transfer buses, Intercity Bus, Metro regional bus and light rail, Metrolink rail service, car rentals.  Significant surface parking in the area, easy access to 101. Neighboring area appears industrial (to the south)	1,717,405	 <p><a href="http://zimas.lacity.org/">http://zimas.lacity.org/</a></p>	 <p><a href="http://zimas.lacity.org/">http://zimas.lacity.org/</a></p>

Location	Existing Station Associated Parking <sup>1</sup>	Development plans and associated parking	Relationship to the city	Amtrak Riders (Yearly FY18) <sup>2</sup>	Station's Zoning Context	Station's Built Form Context
Portland -- Union Station	400 spaces <a href="https://www.parkme.com/lot/52473/station-place-garage-portland-or">https://www.parkme.com/lot/52473/station-place-garage-portland-or</a>	Prosper Portland (2019): remove annex parking lot at Union Station  <a href="https://prosperportland.us/portfolio-items/portland-union-station/">https://prosperportland.us/portfolio-items/portland-union-station/</a>	Served by Amtrak. Portland Transit Mall is one block away and serves bus lines and light rail for the city and region.  Downtown, parking lots are proximate to the station. No Interstate access.	576,339	 <a href="https://www.portlandmaps.com/bps/zoning/#/map/">https://www.portlandmaps.com/bps/zoning/#/map/</a>	 <a href="https://www.google.com/maps/@45.518611,-122.676111,15z">Maps.google.com</a>
Seattle - King Street Station	no parking: <a href="https://www.amtrak.com/content/amtrak/en-us/stations/sea.html">https://www.amtrak.com/content/amtrak/en-us/stations/sea.html</a>  Nearby private parking: <a href="https://spothero.com/seattle/amtrak-king-street-station-parking">https://spothero.com/seattle/amtrak-king-street-station-parking</a>	No plans to add parking; plan to develop as a cultural center: <a href="https://www.seattle.gov/arts/programs/arts-at-king-street-station">https://www.seattle.gov/arts/programs/arts-at-king-street-station</a>	Served by Amtrak, Sounder commuter rail trains, Amtrak bus services. Nearby bus lines and light rail.  Proximate to downtown, near sports complex. Easy access to I-5.	686,426	 <a href="http://seattlecitygis.maps.arcgis.com/apps/webappviewer/index.html?id=f822b2c6498c4163b0cf908e2241e9c2">http://seattlecitygis.maps.arcgis.com/apps/webappviewer/index.html?id=f822b2c6498c4163b0cf908e2241e9c2</a>	 <a href="https://www.google.com/maps/@47.611389,-122.330556,15z">Maps.google.com</a>

Location	Existing Station Associated Parking <sup>1</sup>	Development plans and associated parking	Relationship to the city	Amtrak Riders (Yearly FY18) <sup>2</sup>	Station's Zoning Context	Station's Built Form Context
Denver -- Union Station	no parking: <a href="https://www.amtrak.com/stations/den">https://www.amtrak.com/stations/den</a>	No upcoming plans	Served by Amtrak, RTD Free Metroride and Mallride, and RTD Light Rail.  Urban, surface parking exists a few blocks away, proximate to I-25.	143,986	 <p><a href="https://denvergov.org/maps/map/zoning">https://denvergov.org/maps/map/zoning</a></p>	 <p><a href="https://maps.google.com">Maps.google.com</a></p>

Attachment 6: Amtrak Rider Survey

District of Columbia Report-Back to NCPC re: Appropriate Parking Numbers for the Washington Union Station Expansion Project, June 3, 2020

**Amtrak eCSI Access/Egress Questions by Station (Data Collected 12.12.19 through 3.26.20)**

E369. What primary form of transportation did you use to get from [INSERT DESTINATION STATION] where you got off the [INSERT ROUTE] train to your final destination? Please choose only one. (RANDOMIZE [KEEP 01-02, 03-05, 06-07, and 08/12 NEXT TO EACH OTHER]. ALLOW ONLY ONE RESPONSE.)

	Total Responses	Connecting Amtrak train	Connecting Amtrak bus	Drove and parked at station	Carpooled and parked at station	Dropped off by another auto driver	Local public transit	Private intercity bus	Taxi/limousine	Walk/bicycle	Rental car	Plane	Uber	Lyft	Other
WASHINGTON, DC	743	6%	0%	3%	0%	13%	29%	0%	22%	6%	1%	1%	12%	5%	2%

## District of Columbia Office of Planning



Office of the Director

April 30, 2020

David Valenstein, Senior Advisor  
Federal Railroad Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington DC 20590

RE: District of Columbia Comments on the Preferred Alternative for the Washington Union Station Expansion Project

Dear Mr. Valenstein:

The District of Columbia Office of Planning (OP) appreciates the opportunity to participate in the ongoing National Environmental Protection Act (NEPA) process for the Washington Union Station Expansion Project for which the Federal Railroad Administration (FRA) is the Lead Agency. This letter is to share with FRA our conclusions regarding parking, which we are providing to the National Capital Planning Commission (NCPC). At 1,575 spaces, the project would be overparked and sacrifices to parking valuable space that should instead be devoted to land uses that would enhance both the station and the surrounding area.

On January 9, 2020, NCPC, in its dual role as a consulting party to the NEPA process and as land use approval authority for the project, requested that:

[t]he applicant (FRA) substantially reduce the number of parking spaces (in the Union Station Expansion Project), and that the applicant, private development partner, and staff work with the District Office of Planning and the District Department of Transportation to evaluate and confirm the appropriate amount of parking given the mix of uses, traffic and urban design impacts, and transit-oriented nature of the project prior to the next stage of review.

We believe that it is possible to design the project in a manner that supports the best long-term land use, delivers world-class multi-modal transportation, and is financially viable for the Union Station Redevelopment Corporation (USRC) in its role as steward of Washington Union Station. We do not believe that such an important project can compromise on any of these vital



objectives. Unfortunately, because Preferred Alternative A-C makes significant compromises on land-use and parking – sacrificing far more valuable land uses to make room for parking – OP cannot support it.

Based on District policies, comparable U.S. facilities, and our analysis of parking demand, our report to NCPC recommends a total of 295 parking spaces for the subject project, although up to 375 might be appropriate if additional information demonstrated it was justified. Table 1 shows the District’s proposed parking for Union Station.

**Table 1: District Proposed Parking for Union Station**

<b>Program</b>	<b>Case</b>	<b>District Rec. Parking #</b>	<b>Min</b>	<b>Max</b>
Land Use	Retail	0	0	0
	Office	206	0	206
Long-Term Parking	Amtrak	0	0	0
	Bus	0	0	0
Short-Term Parking	Driver leaves car temporarily	40	40	120
ADA Parking		49	7	49
<b>Total Parking</b>		<b>295</b>	<b>47</b>	<b>375</b>

Source: District Office of Planning, District Department of Transportation<sup>1</sup>

Throughout this process, the District has emphasized the importance of:

- Prioritizing intermodal effectiveness and efficiency (including intercity bus, rideshare services, and bicycle connections);
- Providing continued and enhanced quality of life for people who live in, work in, and visit the Washington Union Station area;
- Affirming the civic identity rooted in the transportation infrastructure at Union Station;
- Retaining intercity bus service at Washington Union Station; and
- Promoting pedestrian mobility in the design.

As illustrated by our recommended parking numbers in Table 1, OP and DDOT agree with NCPC that the 1,575 parking spaces in Preferred Alternative A-C will undermine the ability of the project to achieve these goals and must be reduced. OP reached this conclusion through the Inter-Agency Parking Working Group, which was created to address NCPC’s request and included representatives of FRA, USRC, Amtrak, OP, and DDOT.

Union Station is a unique facility in a dense urban location. It hosts more visitors than the Las Vegas Strip and handles more passengers than any of the major airports in our region. Beyond its role as an intercity transit hub, Union Station is accessible by Metrorail, Streetcar, MARC, VRE, and Circulator and WMATA bus routes. Moreover, it is adjacent to the District’s highly

<sup>1</sup> The numbers recommended herein were developed in collaboration with the District Department of Transportation (DDOT) and represent the District’s recommended parking numbers for the Union Station Expansion Project.

walkable and bikeable downtown. In this setting and with such rich multimodal access, private vehicles will play a limited role in the future Union Station.

With this accessibility in mind, and as part of the Parking Working Group, the District analyzed policies, case studies, and rationales that could help address appropriate parking numbers at Union Station in the year 2040 (the horizon year for the subject Project and NEPA process), taking into account future retail and office uses as well as long-term, short-term, and ADA-related parking at Union Station.

OP drew policy guidance from proposed amendments to the District's Comprehensive Plan, made as part of the current Comprehensive Plan update process, and from DDOT's Guidance for Comprehensive Transportation Review. District policies and guidance from these and other planning documents emphasize reducing the use of single occupancy vehicles, reducing parking, reducing greenhouse gas emissions, and enhancing multimodal transportation.

Unfortunately, after three sessions of the Parking Working Group, in which the District shared information about the policies, data, and analysis supporting substantially reduced parking, FRA remained unwilling to propose any reduction in the 1,575 spaces presented to NCPC for Preferred Alternative A-C.

OP cannot see a viable path to success for such an overparked project. A NEPA Record of Decision that includes so much parking will likely require future modifications to reduce the amount parking and deliver a viable project. To avoid such a time-consuming process, FRA should modify the existing Preferred Alternative or develop a new Preferred Alternative that substantially reduces parking, substitutes the difference in parking with additional land use programming, and integrates pick-up and drop-off (PUDO) facilities and related details for capacity, location, and design. We recognize that reducing the parking will impact PUDO and are prepared to collaborate with FRA, DDOT, and surrounding communities and developments to ensure an appropriate facility or facilities are dedicated to PUDO activity.

OP fully appreciates the need to ensure the long-term financial viability of Washington Union Station and believes that a recalibrated approach to parking can support and achieve multiple project benefits for its stakeholders. OP believes that developing uses such as hotel, office, and retail instead of parking could provide robust revenue streams to support operations. Although the retail at Union Station serves patrons of the station and is not destination retail for which customers drive and park, we understand that parking may present a challenge in terms of an existing lease agreement between USRC and commercial tenants at the station. OP stands ready to work with the project team on questions relating to lease terms and to identify the land uses. But the terms of a lease should not dictate critical land use and transportation decisions that will be felt for a century or more.

I look forward to continued engagement in the Union Station Expansion Project and will submit comments consistent with those in this letter in response to the DEIS when you release it for public comment.

Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew Trueblood". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Andrew Trueblood

- cc: John Falcicchio, Deputy Mayor for Planning and Economic Development
- Jeffrey Marootian, Director, District Department of Transportation
- Beverley Swaim-Staley, President and CEO, Union Station Redevelopment Corporation
- Marcel Acosta, Executive Director, National Capital Planning Commission
- Gretchen Kostura, Senior Program Manager, Washington Union Station, Amtrak



September 28, 2020

David Valenstein  
 U.S. Department of Transportation  
 Federal Railroad Administration  
 Office of Railroad Policy and Development  
 1200 New Jersey Avenue, SE  
 Washington, DC 20590

RE: *Washington Union Station Expansion Project; Additional Comments on the Draft Assessment of Effects Report and Resolution of Adverse Effects*

Dear Mr. Valenstein:

Thank you for continuing to consult with the DC State Historic Preservation Office regarding the Washington Union Station Expansion Project and for hosting two additional consulting parties' meetings on September 2 and 22, 2020. The first meeting focused on the Draft Assessment of Effects (AOE) Report and the second on the resolution of adverse effects. This letter provides additional comments on each topic in accordance with Section 106 of the National Historic Preservation Act and other applicable laws.

#### ASSESSMENT OF EFFECTS:

As summarized in the table below, the AOE indicates that the Expansion Project Preferred Alternative A-C will adversely affect three historic properties within the Area of Potential Effect, specifically Washington Union Station, the Washington Union Station Historic Site and the Railway Express Agency (REA) Building. The Capitol Hill Historic District will also be potentially adversely affected. We generally concur with these determinations of effect with the following caveats.

Property	Type of Effect					Determination of Effect
	Physical	Visual	Noise	Vibration	Traffic	
Washington Union Station	✓	✓	✓	✓	✓	Adverse Effect
Washington Union Station Historic Site	✓	✓	✓	✓	✓	Adverse Effect
REA Building	✓	✓	✓	✓		Adverse Effect
Capitol Hill Historic District		✓	✓	✓	✓	Potential Adverse Effect

(Note: Adverse Effects are highlight in red)

#### Assessment of Effects on Washington Union Station

We agree that adverse visual effects will result due to the visibility of the Expansion Project (and the adjacent Private Air Rights development) from points south, but we also maintain that adverse visual effects will occur on views from the north. Although the northern aspect is not the station's primary

Mr. David Valenstein

*WUS Expansion Project; Additional Comments on the Draft Assessment of Effects Report & Resolution of Adverse Effects*

September 28, 2020

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vantage point, it provides an important orienting view of the station's iconic main vault and is a historically significant, well-designed and highly symmetrical elevation that will become more visible and prominent because the Expansion Project will demolish the existing parking garage and establish a major new entrance along the H Street Bridge. Like any new construction project adjacent to a historic building, new additions should be designed to be compatible with their historic contexts in accordance with *Secretary of the Interior's Standards*, including *Standards No. 2 and No. 9* by "not destroying spatial relationships that characterize the property" and in terms of "being compatible with the historic materials, features, size, scale and proportion and massing to protect the integrity of the property and its environment."

As currently proposed, the Preferred Alternative will diminish the integrity of the historic station's design and setting and result in an adverse visual effect from the north because it does not guarantee an adequately sized and centered civic space along the Delaware Avenue axis to protect and frame views to the station's prominent main barrel vault and because the inadequate design gestures that are proposed to address this concern (i.e. the Visual Access and Daylight Access Zones) are too narrow and largely defined by a six-story parking garage and a bus facility which do not provide the civic character essential to achieve compatibility with the historic setting or respond appropriately to the urban design context. When compared to existing conditions, the additional height that could be allowed under the Preferred Alternative is likely to exacerbate these adverse effects.

As stated in our letter of May 17, 2019, we acknowledge that train-related sounds are associated with Union Station, but construction-related noises are not. More than a decade of immediately adjacent construction-related noise is very likely to diminish Union Station's integrity of feeling and association. While such noises may be somewhat muted within the station itself, they will be more perceptible in the building's immediate setting so we believe they should be identified as an adverse effect and closely monitored.

Although traffic congestion at Union Station is already problematic, we contend that the significant increases in traffic that the Expansion Project is projected to generate, either directly or indirectly, combined with the resulting, ever-increasing gridlock meet the criteria of adverse effect by introducing and intensifying visual, atmospheric and audible elements that will further diminish the historic station's integrity of setting, feeling and association. Some of the traffic-related adverse effects may be exacerbated by perpetuating the existing traffic "loop" that currently encircles the historic station rather than sensitively redirecting vehicles onto or below the new deck on the north, and by failing to establish a designated Pick-Up and Drop-Off (PUDO) facility that could lessen traffic effects on Columbus Plaza and other areas of the site.

#### Assessment of Effects on Washington Union Station Historic Site

The Preferred Alternative would cause the same effects on the WUS Historic Site as on Union Station but we find that additional adverse effects on the historic site would result from other Action Alternatives which propose above-grade parking garages north of the H Street Bridge (i.e. Alternatives C-East, C-West and D) because these facilities will further diminish the integrity of the Terminal Rail Yard's design, setting, feeling and association and interrupt important, character-defining views between the tracks, Union Station and the REA Building.

Mr. David Valenstein

*WUS Expansion Project; Additional Comments on the Draft Assessment of Effects Report & Resolution of Adverse Effects*

September 28, 2020

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The additional noise caused by approximately eleven to fourteen years of new construction directly within the WUS Historic Site will also adversely affect the historic property. Noises from jackhammers, pile drivers, and related heavy construction equipment which are not associated with train operations will be audible to station users and rail commuters and will diminish the WUS Historic Site's integrity of feeling and association.

The Preferred Alternative A-C does not reflect the recommendations of multiple planning agencies and consulting parties that the planned number of parking spaces is excessive and does not reflect reasonable demand projections or sound transportation planning principles for a centrally located multimodal transit station. The bulk and location of the planned parking significantly exacerbates the potential for adverse effects on the station through an out-of-character parking garage looming as a backdrop for the historic architecture. It increases reliance on parking ramps fully exposed to view from the front of the station and expands vehicular intrusion into areas intended for pedestrians, even despite recent efforts to improve the amenity of the front plaza immediately adjacent to the Metro entrance.

Expanded reliance on these ramps perpetuates egregious damage to the architectural and historic integrity of the station caused by truncation of the historic train concourse and removal of its public entrances to the station forecourt. These building elements modulated the sculptural composition stepping down from the main vault, shielded utilitarian components of the complex from frontal view, defined pedestrian plazas, and promoted free-flowing customer access to the terminal through multiple entrances. Failure to pursue any amelioration of this disfiguring disruption undermines the purported support for restoring the architectural and historic character of the station. It also fails to recognize significant opportunities to improve station access from the east and enhance multi-modal facilities on the west, such as through expansion of the Metro station entrance and bicycle terminal facilities. In contrast, the claimed benefit of aligning new building elements along First Street as a kind of street wall is historically inappropriate and draws attention to the lack of a satisfactory resolution to this condition.

#### Assessment of Effects on REA Building

Construction-related noises also have potential to result in an adverse audible effect on the REA Building and should be monitored closely to determine whether they meet the criteria of adverse effect.

#### Assessment of Effects on Capitol Hill Historic District

The AOE states that the Expansion Project may result in a potential traffic-related adverse effect on the Capitol Hill Historic District. We understand FRA's assertion that insufficient data exists to make a final determination of effect at this point but the Capitol Hill Restoration Society and Advisory Neighborhood Commission 6C have strongly objected to the potential nature of this determination and asserted that the traffic study, which was the subject of discussion during a June 30, 2020 consulting parties meeting, provides sufficient information to determine that an adverse effect will occur. The likely decreases in levels of service on some neighborhood streets and intersections, the anticipated increased number of for-hire and ride share vehicles circulating in the area, and Preferred Alternative recommendations such as the "U-Turn" option from the East Ramp and the right-hand turn out of the bus facility, both of which direct traffic eastward towards the historic district, suggest that the adverse effect is much more probable than potential.

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Prior to addressing the resolution of adverse effects, we note that the comments above focus primarily on the Preferred Alternative and are based upon information that has been provided to date. Our determinations of effect may need to be revised as we learn more about what is proposed and review more detailed information relating to the manner in which the Expansion Project will be implemented.

## **RESOLUTION OF ADVERSE EFFECTS:**

Though not an exhaustive list, the following comments outline some of our primary recommendations for how the Preferred Alternative should be revised to avoid and/or significantly minimize as many adverse effects as possible. We are requesting FRA to incorporate these and other consulting party recommendations directly into a Revised Preferred Alternative in advance of, or as part of the Final Environmental Impact Statement, as appropriate, because we consider these revisions essential to respond appropriately to Union Station's significance. We also believe this approach will be more effective than relying upon a Programmatic Agreement if the current Preferred Alternative is adopted and options for meaningful revisions are precluded.

### Resolution of Adverse Effects on Washington Union Station and the WUS Historic Site

Avoiding and minimizing adverse effects associated with the proposed new construction are among our top priorities – especially the lack of assurances that a civic space will be provided to protect and frame views to the north side of the historic station. We consider such a civic feature an essential component of a successful design solution for the historic and urban context and for the major new entry that FRA proposes.

With the exception of a small section on the southern end, however, the currently proposed Visual Access Zone (VAZ), which the Preferred Alternative suggests may achieve this important goal, is located almost entirely within the Private Air-Rights Development Area and the responsibility to construct the civic space will rest fully on the private developer. By contrast, we understand that FRA plans to provide daylighting features for the lower concourse within the related Daylight Access Zone (DAZ) despite the fact that it falls entirely within Private Air-Rights. If FRA can ensure that daylighting will be provided within private property, it seems reasonable that FRA can also ensure that civic space will be provided within the whole of the VAZ. Not precluding a private developer from establishing this critically important civic feature does not equate to ensuring that it will be constructed. To avoid the adverse effect, FRA should revise the Preferred Alternative in whatever ways are necessary to guarantee civic space will be integrated into the design.



On a related note, the AOE states that the VAZ "...may be centered on the historic station building." (emphasis added). An off-centered VAZ would significantly diminish the integrity of the historic station's design and setting by skewing views to the main barrel vault. This would defeat the purpose, as would a VAZ that is too narrow to provide meaningful views. To avoid these adverse effects, the VAZ must be centered on the historic station and wide enough to allow users to view as much of the barrel vault as possible. The most effective way to accomplish this appears to be to expand the VAZ into the

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portion of the Federal Air Rights east of the currently proposed parking garage and bus facility so that it is centered on the historic station, includes the DAZ, and is wide enough to create the civic space that Union Station deserves.

Furthermore, the currently proposed VAZ/DAZ is going to be largely defined by a six-story parking garage that is not compatible with and does not contribute to the civic character which is so important for the new entrance. We once again request FRA to reduce the amount of parking and revise the Preferred Alternative to remove most or all parking from this area. Since a significantly reduced number of parking spaces could be more easily accommodated below grade than the excessive number FRA currently proposes, we also request FRA to include a below grade parking deck in the Preferred Alternative. While we appreciate that FRA hoped to minimize temporary, indirect adverse effects of a long construction period by eliminating underground parking from the Preferred Alternative, it is much more important to avoid the permanent, direct adverse effects that the above-grade parking garage would cause. In addition to improving civic character, removing parking from the main deck could provide many other benefits such as improving the pedestrian experience, reducing vehicular traffic in the civic space, providing more area for “people friendly” uses, introducing greater flexibility for improved urban design approaches and potentially reducing the height of new construction.

We support the proposed location of the bus facility, but buses do not contribute to civic character any more than parking garages and we remain concerned that the proposed forty bus slips exceed the twenty-five that FRA has identified as necessary. For this reason, we also requesting FRA to eliminate the unnecessary slips and promote better bus management practices to facilitate improved design options for the bus facility and its surroundings.

As referenced earlier, adverse effects on Union Station will also result from the visibility of the Expansion Project (and the adjacent Private Air Rights development) from points south. The intensity of these adverse effects will depend upon the height of new construction on either side of Union Station’s barrel vault and the extent to which incongruous asymmetry or a visually incompatible parking garage disrupts or competes with the historic character of the station. To minimize these adverse effects, we request FRA to work with appropriate entities to develop design guidelines that would apply to all new development, both public and private, north of Union Station. Such guidelines should also address approaches to avoid or minimize adverse interior effects that may result from interior circulation routes or building elements that are inconsistent with historic circulation patterns, predominant visual axes and other character-defining features.

The preferred alternative should also be revised to reflect parking facilities consistent with the recommendations of local and federal planning agencies. Below-grade parking options reflected in other Action Alternatives should be pursued, and the proposed vehicular circulation around the terminal should be revised to avoid and minimize the use of ramps and roads directly encircling the historic building. Alternative treatments of the historic train concourse should also be considered to restore its historic integrity, improve pedestrian access, and enhance intermodal transit facilities

#### Resolution of Adverse Effects on the Capitol Hill Historic District

We stress the importance of FRA committing to collecting traffic-related data and continuing to evaluate and implement alternative solutions that may avoid or substantially minimize traffic-related effects at both the station and the adjacent historic district.



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As previously noted, the list of avoidance and minimization measures listed above is not exhaustive. There are many other adverse effects, including cumulative adverse effects, that will need to be thoroughly addressed through the development of a Programmatic Agreement. However, the recommendations we have cited focus on the avoidance and minimization measures that we consider most urgent at this time, and those that we believe should be addressed through a Revised Preferred Alternative in advance of a Programmatic Agreement. We will provide additional recommendations for avoidance, minimization and mitigation measures as consultation on the Programmatic Agreement continues.

Section 4(f) Evaluation:

The comments provided in this letter relate primarily to the Section 106 and NEPA reviews of the Expansion Project but as the “Official with Jurisdiction” (OWJ) for purposes of the related Section 4(f) review, we clarify that the references to favorable comments in our letters of March 30, 2018 and December 18, 2019 which are cited on pages 6-24 and 6-25 of the DEIS Draft Section 4(f) evaluation should not be taken to indicate that we agree the Expansion Project includes all possible planning to minimize harm to historic properties.

We look forward to continuing our consultation with FRA and all consulting parties toward achieving FRA’s transportation needs while also enhancing the historic character of one of the nation’s most admired historic rail terminals. If you should have any questions or comments regarding any of these matters, please contact me at [andrew.lewis@dc.gov](mailto:andrew.lewis@dc.gov) or 202-442-8841. Thank you for providing this additional opportunity to comment.

Sincerely,



C. Andrew Lewis  
Senior Historic Preservation Specialist  
DC State Historic Preservation Office

cc: Consulting Parties  
16-0114

## Washington Union Station Expansion Project Administrative Review DEIS Cooperating Agency Comment Tracking

Date Comments Provided: 9/25/2020

Reviewers: DDOT

ID	Reviewer	Agency	Line #	Chapter	Section	Comment
1	Active Transportation	DDOT		3		Thank you for keeping bike lane on east side of 1st St NE; note that future DDOT plans include connections of bike infrastructure all the way to R St. and this east-side alignment is compatible with future DDOT plans.
2	David Koch	DDOT	1784	3	3.4.7.4 Bus Facility	For this and other Bus Facility/Bus Program sections, clarify that all bus slips are planned for intercity and charter bus use only. City buses (WMATA and DC Circulator) would serve WUS from curbside facilities and not the bus facility. Please see comments below for additional shelters for WMATA and Circulator buses.
3	Haley Peckett	DDOT		3	General	Please include private air rights development circulation assumptions for all build alternatives circulation
4	Haley Peckett	DDOT	191	3		Please provide a circulation diagram for No Action alternative.
5	Howard Chang	DDOT		3	3.1.8.8	It is very critical to maintain a pedestrian pathway physically during/after the Union Station improvement, which is currently located near the east edge of the Parking Garage, in order to connect the streetcar stop and WMATA bus stop on the top of H St Bridge with Union Station directly. This is the only way for both streetcar and WMATA bus riders to access Union Station. (This comment is not specific to any one page, it's general throughout the document)
6	Mike Goodno	DDOT		3	aves with underground	Can you please provide a drawing for what will happen on K St NE. The DEIS notes that a single access point will be on the south side due to the technical difficulties of installing separate access and egress points. Will we be widening one of the sidewalks for shared bike/ped access?
7	Victor Silva	DDOT		3	Figure 3-2	Figure 3-2 shows skylights. These would conflict with the layout for streetcar on the bridge and cannot be accommodated by the girder framing of the bridge. Please remove skylights from drawing or add a note that those skylights will be removed.
8	Victor Silva	DDOT	1245	3		There are no facilities on H Street to support bicycle use.
9	Victor Silva	DDOT		3	3.1.8.4	The last sentence of Section 3.1.8.4 states "As of March 2020, preparation of a Categorical Exclusion for this project was ongoing." – DDOT is now doing an Environmental Assessment, please update in the final.
10	Will Handsfield	DDOT		3	General	Ensuring that all loading bays are big enough and sized accordingly so loading doesn't happen in the cycle track; DDOT frequently sees K-71 (flex posts) run over by large trucks using the First St NE loading dock at Union Station.
11	Haley Peckett		828	3		DDOT disagrees with the characterization that DDOT and OP used policy goals rather than projections to support the parking numbers. Please refer to the full NCPC report that we submitted with substantial evidence as to why a reduced parking amount is appropriate.
12	Haley Peckett			3	Figure 3-22	The circulation diagram in this figure does not show the offset intersection configuration (although I believe FRA is still proposing that this intersection is offset). Please revise drawing to reflect offset intersection. (DDOT does not support an offset intersection; we are just requesting consistency across the DEIS.)
13	Ellen Jones	DDOT	1785	3	3.4.7.5	DDOT supports the concept of a below-ground parking and consolidated PUDO facility in the preferred alternative and requests additional study on the feasibility and safety of such a facility.

14	Haley Peckett	DDOT	606	4	4.5.4.5	Clarify that 860 parkers <i>per day</i> park for 1-5 hours
15	Haley Peckett	DDOT	601	4	4.5.4.5	Please cite the year of USPG parking data
16	Haley Peckett	DDOT	635	4	4.5.4.7	Suggest citing DDOT data "from September 2019"
17	Howard Chang	DDOT	108	4		List of documents of District Policies, Regulations, and Guidance: add DC Streetcar Design Criteria and Utility Manual
18	Howard Chang	DDOT	108	4	Page 4-6	Please insert both <i>DC Streetcar Design Criteria 2019</i> and <i>DC Streetcar Utilities Standard of Practice 2015</i> somewhere on Page 4-6 below Line 108.
19	DDOT TESD (YZ, MS)	DDOT	General -Traffic Operat	5	5.5.4	<ul style="list-style-type: none"> <li>The operational and safety impact on the proposed 5-leg East intersection should be analyzed and documented. The mitigations should be proposed to alleviate conflicts and increased delay for all different modes;</li> <li>All substandard locations listed in the Preferred Alternative should be mitigated. This may include major and minor strategies as well as overall trip reduction through TDM or other means;</li> <li>All the underground parking can only be accessed from the K St entrance/exit, which may cause safety and operational issues.</li> </ul>
20	DDOT TESD (YZ, MS)	DDOT	General - Curb cuts	5	5.5.4	<p>We want to re-emphasize our concerns on the proposed curb-cuts, and also recommend:</p> <ul style="list-style-type: none"> <li>Minimize and consolidate the curb-cuts, especially on the south side of the H St;</li> <li>The misaligned western intersection on the H St bridge would limit the capabilities to operate flexibly. DDOT supports alternatives that maximize flexibility to adjust future operations based on future conditions.</li> </ul>
21	DDOT TESD (YZ, MS)	DDOT	General - Circulation	5	5.5.4	DDOT recommends that FRA work with the Private Air Rights developer to determine the necessary movements along the H St bridge while maintaining an acceptable LOS and working within the approved curb cut locations on H Street Bridge. FRA's geometry provides options for the Private Air Rights developer but those options have not been vetted or approved by the Private Air Rights developer.
22	Haley Peckett	DDOT	General	5	5.5	DDOT has additional concerns about the following aspects of Alternative A-C circulation: a) four closely spaced signalized intersections (assuming the bus exit/entrance would need a separate signal from a private air-rights development central road); b) all buses can only make an EB right; and c) limited internal storage for queuing. Compared with Alt A-C, some of the build alternatives seem to provide higher flexibility for one-way movements and turn restrictions, ability for buses to move either east or west, fewer offset intersections, and greater internal storage capacity within the site roadways for the overflow vehicles. DDOT recognizes many of the details of circulation are not known at this time, and therefore DDOT encourages designs that would maximize flexibility in the future to reduce traffic impacts.
23	Haley Peckett	DDOT	837	5		DDOT is concerned that moving 1/3 of FHV trips to the deck level of H Street will continue to cause queuing onto H Street Bridge. While DDOT appreciates the design enhancements to increase capacity of the PUDO area on the deck, we have concerns about the performance in real world conditions. Based on the linear nature of the facility, there will be limited capacity for active passenger loading which may cause additional congestion/queuing and loading in unauthorized locations - <i>including queuing on H St. Bridge, which is a major concern for DDOT.</i>

24	Haley Peckett	DDOT	General	5	Table 5-63	Thank you for including the recommendation that proponents, District agencies, WMATA, and the private air rights developer work together to achieve an overall 20% reduction in total vehicle volume, across existing, no-action, and build alternatives. While DDOT has not modeled this reduction, it is our opinion that this <i>estimated</i> level of traffic reduction would be needed to achieve a sustainable level of traffic. This level of traffic reduction would require multiple strategies and stakeholder ownership, including from the District.
25	Howard Chang	DDOT		5	5.5	3. In 5.5, there are multiple places that DC Streetcar and DC Circulator are mentioned. Apparently, as you know, streetcar extension toward Georgetown (2040 MWCOG Modeling Year) was one of the basic assumptions of the DEIS analysis. According to the analysis, it has some significant impacts on DC Circulation bus route modification (elimination of Georgetown Route due to the streetcar western extension), intercity bus access to the garage, etc. DDOT acknowledges that although the project is not funded for design or construction in the next six years, we concur with it remaining one of the background assumptions in FRA's DEIS.
26	Transit Delivery Division / PSD	DDOT		5		While FRA has addressed some of DDOT's prior comments related to bus congestion and crowding, DDOT still recommends that transit buses have additional attention. 1. In general, note that buses are a significant form of transit for District residents with numerous core, high-frequency routes passing through Union Station. In 2019, approximately 50% of all transit passengers rode the bus (and 50% role Metrorail). Buses are both a means of access to the station and pass by the Stations as they traverse the District. 2. As FRA notes, buses will have an adverse impact due to traffic congestion. DDOT requests specific mitigations for buses to alleviate the impacts to travel time and reliability. 3. Given the desire to encourage mode shift to transit and the high number of buses serving WUS, DDOT would like to see overall greater visibility and vision for transit buses as part of the solution to passenger access to and from Union Station. 4. DDOT recommends that FRA provides (potentially as a mitigation) a new shelter for bus route(s) that serves the front of the station to provide a high visibility option for arriving passengers.
27	Victor Silva	DDOT	1056	5	5.5.4.2	States that pedestrian access to the station from the DC Streetcar Union Station stop will not be available for a period during construction. This seems a fairly significant impact that FRA addresses in mitigation with the following statement "Proponents to coordinate with DDOT on options for temporary access to WUS Streetcar station during construction and take steps with the District State Safety Office to address issues that may affect Streetcar certification." This seems to identify there is an issue, but not offer a mitigation.
28	Victor Silva	DDOT	403	5	5.5.3	Please revise the text relating to the H Street Bridge. What is the basis for the statements on delays and detours that will be experienced by traffic and busses using the bridge. What is the basis of the statement that DC Streetcar service will be suspended during construction? The H Street Bridge NEPA document is currently not approved and so these assumed impacts have no basis.
29	Haley Peckett	DDOT	1061	5.5		If temporary interruptions in access to DC Streetcar during construction were to trigger full system closure and SSO review and recertification, then the impacts would be more severe due to the lengthy and costly process to perform this closure/federal oversight review.

30	Haley Peckett	DDOT	561	5.5		DDOT believes that the WMATA operational impact should be minor or moderate, especially since the exceedance of the V/C ratio is so minor and limited to only a short duration and distance. Characterizing this as a major adverse impact is problematic because these impacts appear to be "equivalent" with traffic impacts. In reality, the traffic impacts are much more severe and the transportation network as a whole would be better served by moving travelers to transit.
31	Haley Peckett	DDOT	620	5.5		The TBD location for bus layover may have adverse impacts upon the traffic network, bus operations, and potentially surrounding land uses at the new layover location. While these impacts cannot be precisely measured at this time, it should be acknowledged the type of impacts that could occur, as well as the effective doubling of bus trips to the layover location. Further, the District expects that FRA (in coordination with the District) will locate and come to agreement upon the new layover location.
32	Haley Peckett	DDOT	652	5.5		We recommend that you provide hourly volumes for the new north loading dock on 2nd St. NE, as well as the size of trucks that will be using that dock. Ensure that the trucks using the dock can safely access the dock from all directions - or note if there are access restrictions due to clearance or otherwise. Also, please ensure that the loading docks on First St NE are adequately sized to prevent trucks from loading in the cycle track (which occurs in current conditions.)
33	Haley Peckett	DDOT	723	5.5		Thank you for moving the cycle track per DDOT's request. The conflict will now be between unloading passengers and cyclists, which is still an adverse impact above existing conditions. Bicyclists also stand to have an adverse safety impact related to increased vehicle congestion, as they operate on the same roadways. However, there could be potential mitigations, especially in the form of adding protected or dedicated bicycle infrastructure through and around the Station.
34	Haley Peckett	DDOT		5.5	Table 5-33	Why not use V/C ratio or other quantitative metric here, as done in rail? A mitigation could be offering more frequent bus service during peak periods to alleviate crowding, but unclear how severe overcrowding is. DDOT could also offer dedicated bus infrastructure where merited but it helps to have a sense of the demand.
35	Haley Peckett	DDOT	788	5.5		DDOT encourages reductions in parking as a means to encourage mode shift to non-auto modes; DDOT does not consider the reduction in parking to be an adverse impact due to the alternative modes available and the negative impact of increased parking on the District's transportation network.
36	Haley Peckett	DDOT		5.5	736	In the future, greater congestion around the station may mean that parking trips are concentrated in off-peak hours. (At least consider the possibility that they'd have different temporal distribution patterns than today.)
37	Haley Peckett		933-938	5.5		DDOT is strongly opposed to spillover onto the District's road network, as indicated may occur on Massachusetts and H St. Bridge. DDOT requests design changes or mitigations to avoid this condition.
38	Haley Peckett	DDOT	978	5.5		DDOT understands that the assumption of additional parking is for trip estimation purposes only. However, DDOT does not support the private air rights developer adding parking to this location.
39	Haley Peckett		1102	5.5		DDOT recognizes that identification of temporary loading, intercity bus, and taxi facilities (among other facilities) have not been determined yet. However, DDOT expects that FRA will lead the location and negotiation of these facilities. These uses are not appropriate to take place on the District's roadway network.
40	Haley Peckett	DDOT	1073	5.5		The temporary lack of an intercity bus facility is an adverse impact. DDOT does not support curbside operations of the intercity buses on DDOT's roads as the interim facility.

41	Haley Peckett	DDOT	1190	5.5		FHV queuing onto H St. Bridge during construction is not acceptable. FRA should identify alternative circulation and FHV locations.
42	Haley Peckett	DDOT	984	5.5		The duration of Phase 4 of construction is 3-5 years, depending on the alternative. DDOT does not have clear understanding about how transportation impacts will be distributed around the street network, if and how additional trips generated by the station will begin to phase in, routes and volumes of construction truck traffic, where alternative staging locations (for PUDO, taxi, parking, etc.) will occur, and other relevant details. It is unclear if all of these construction impacts will last for the full duration of Phase 4 or only a part. Additionally, many of the uses will "default" to District streets (including intercity bus use, PUDO, and short-term parking). Can they be phased within the phase to minimize impacts? This item merits further detail and discussion (understanding that detailed commitments may not be made now, but conceptually, we are concerned about the intensity and level of impact.)
43	Haley Peckett	DDOT	General	5.5		Assume all comments on Alternative A above also apply to other build alternatives, except where noted otherwise below.
44	Haley Peckett	DDOT	1422	5.5		DDOT supports the concept of a below-ground parking and consolidated PUDO facility and requests additional study on the feasibility and safety of such a facility. However, DDOT recognizes that all Build alternatives with underground parking assume access on K Street NE. For these Build alternatives, DDOT recommends that FRA explore the feasibility of reconstructing the K Street NE underpass to enhance safety, visibility, and multimodal operations, as well as to minimize conflicts with the planned multiuse path that will also be located on K Street NE.
45	Haley Peckett	DDOT	1423	5.5		Reiterating the point made in the above comment, DDOT has concerns about entries and exits from K St. NE underpass in its current configuration. Adding 20% of the for-hire pick-up trips to this location has benefits from a trip distribution perspective, but this would enhance the need to make safety and operational engineering improvements, including possible reconstruction.
46	Haley Peckett	DDOT	1461	5.5		It is notable that, although this option distributes the parking and some PUDO trips off of the H St. Bridge, the overall degradation in traffic as measured through the EIS is similar to Alternative A. DDOT believes most trips would not be able to reach Union Station due to congestion on the surrounding roadway network.
47	Haley Peckett	DDOT	1482	5.5	5.5-44	Thank you for acknowledging the employee ratio used for trip generation for offices uses, and noting that is conservative. Updated information sources like the CTR can make a good case for FRA to update assumptions for the FEIS related to overall trip generation reduction and mode shift. DDOT strongly recommends that, as part of the 20% vehicle trip reduction, FRA uses updated trip generation assumptions that align with our 2019 CTR.
48	Haley Peckett	DDOT	2253	5.5		The DEIS notes that the offset intersection for buses is the same as the No Action alternative (line 191). In both alternatives, DDOT does not support an offset intersection for safety and efficiency of operations. The impacts are exacerbated in A-C due to the increased traffic volume. In the case of the No Action alternative, the impetus would be on the private air rights developer to mitigate this condition.
49	Haley Peckett	DDOT	2394	5.5	Figure 5-21	Although the analysis does not show spillback, DDOT still has concerns that friction and share usage of the deck-level circulation may result in spillback. Some consideration of mitigation should take into account prevention of spillback onto H St.

50	Haley Peckett	DDOT	2339	5.5		DDOT supports the distribution of for-hire trips across four locations. However, as FRA notes, there is still the possibility (and even likelihood) that queuing onto DDOT's streets will occur despite distributed locations. DDOT supports a centralized PUDO facility and would recommend analysis on how such a centralized facility could work. DDOT recognizes that any centralized facility would have traffic impacts in channeling a large number of trips into one PUDO location and would like to see this analysis representing a "worst case scenario." Finally, DDOT still supports distributed PUDO and recommends a centralized facility as one of multiple PUDO locations around the station. 1959
51	Haley Peckett	DDOT	2368	5.5		DDOT is concerned about the level of traffic network impacts in all Build alternatives. In A-C, the impact is especially pronounced on the N. Capitol Street corridor, as well as entry points from the east (Mass Ave and 3rd/H NE). Overall, a reduction in the number of vehicular trips should be the focus of mitigation efforts.
52	Haley Peckett	DDOT		5.5	Table 5-61	Overall, the comments on this chart include: Streetcar may have minor to moderate operational adverse impacts related to offset intersections or other signal timing delays. Loading may have adverse impact due to traffic congestion or accessibility of the loading docks (due to street reconfiguration and congestion). For-hire and PUDO vehicles may have major adverse impact for traffic congestion and queueing.
53	Haley Peckett	DDOT		5.5	Table 5-63	Additional mitigations to include: For-Hire Vehicles should specifically mention performance based system for "minimum internal capture rate"
54	Haley Peckett, Bike Team	DDOT		5.5		The increased vehicular volumes throughout the project, the installation of a passenger loading zone adjacent to the First St. NE cycle track, and the increased safety risks between bicycle facilities and turning movements associated with the project, would be a negative impact to cyclists in the area. DDOT would further clarify that all build alternatives result in adverse impacts to cyclists, and that any build alternative with parking access on K Street NE would increase the level of impact to cyclists due to conflicts with turning vehicles in a constrained location.
55	DDOT TESD (YZ, MS)	DDOT	General	7	Page 7-6	DDOT notes that without a reduction in parking, the project proponents will need to provide much more significant improvements to impacted intersections, well above and beyond solutions from a "toolbox" as described in mitigation 29. Related to the above, the increase in vehicular demand is substantial and has a major impact on the vehicular transportation network. As such, as part of proposing a 20% trip reduction, the redevelopment should have an enhanced TDM program that could reasonably achieve such a trip reduction.
56	Haley Peckett	DDOT		7	7-4, No. 14	DDOT agrees that proponents should contribute to improvements in the Station Access and Capacity Study, as a baseline.
57	Haley Peckett	DDOT		7	7-4, No. 15	DDOT would like to see a coordinated effort between project proponents, WMATA, and the District government to increase capacity and reliability to serve Union Station's projected increased ridership. WMATA needs improved capacity both to serve the levels of ridership projected in this DEIS (and its associated impact), as well as additional ridership that would need to be achieved to shift some of the vehicle mode share to transit (see also comment 24)

58	Haley Peckett	DDOT		7	7, No. 22	DDOT is concerned that overreliance on enforcement (especially by District agencies) is not a sustainable strategy to manage queuing and congestion on District streets. DDOT will work with FRA on the details of a mitigation strategy that lead with policy and a performance-based management system in which USRC sets and helps to enforce a minimum internal capture rate. District agencies can be partners in this effort. DDOT would also like to see a regular monitoring program to ensure that queuing does not spill back into District streets
59	Haley Peckett	DDOT		7		DDOT believes that one-way circulation at the deck level will enhance safety and traffic throughput. DDOT encourages mitigations that would allow for one-way movements on the private road network.
60	Howard Chang	DDOT/TDD	P. 7-4	7	7, No. 29 Table 7-1	Insert "Proponents to coordinate with DDOT to obtain permission through TOPS program."
61	Howard Chang	DDOT/TDD	P. 7-4	7	Table 7-1	Insert "Construction contractors to coordinate with DDOT to receive safety training through DC Streetcar Track Allocation Program."
62	Transit Delivery Division / PSD	DDOT		7		Example mitigations can include: enhanced bus shelters and stop infrastructure, charging or supportive infrastructure for electric and alternative fuel buses, wayfinding and physical connections to incentivize transit bus use over for-hire vehicles (and facilitate intermodal transfers), and recommendations for bus lanes, TSP, and other bus priority treatments (DDOT recognizes that we control the latter infrastructure and are supportive of adding these treatments).
63	Victor Silva	DDOT	11	7	7.2	Please provide better descriptions of the permits required for the project including the specific names of the permits that would need to be acquired, and the purpose for the permit.
64	Victor Silva	DDOT	11	7	7.2	Item 10 lists DDOT right of way permit. Please provide further information if this is a short term occupancy or a property transfer.
65	DDOT TESD (YZ, MS)	DDOT	General	A6		The anticipated level of rental car parking/demand as well as high level of pick-up/drop-off activity remains the same as previous, indicating major adverse impacts on the surrounding vehicular network. No additional vehicular mitigation measures are proposed, nor additional or specific intersection mitigation measures are suggested or proposed to mitigate deficient vehicular operations. DDOT will expect to work with FRA to develop specific mitigations.
66	Haley Peckett	DDOT		Appendix A1	Drawing 035	This drawing shows a small PUDO facility located underground. Please clarify the size of the PUDO facility, the hourly volume, and what percentage of PUDO trips in peak hour that this facility is intended to accommodate. DDOT supports the concept of a below-ground parking and consolidated PUDO facility in the preferred alternative and requests additional study on the feasibility and safety of such a facility.
67	Haley Peckett	DDOT		Appendix A6	Part 1, 2.2.2	DDOT and OP submitted lengthy documentation of the District's position on parking. Please refer to the NCPC Report and FRA letter, dated April 30, 2020, and relevant attachments.
68	Haley Peckett	DDOT		Appendix A6	2.2.2.3	Please provide a citation from rental car companies on the claim that 45 percent of clients are intercity passengers. This was not provided during the working group meetings.
69	Haley Peckett	DDOT		Appendix A6	2.2.3.4	In addition to the reasons listed, the District does not support long-term parking at Union Station in alignment with its mode shift goals, documented in its Comprehensive Plan and moveDC.



70	Haley Peckett	DDOT		Appendix A6	P. 22 (top of page)	DDOT has operational and safety concerns with underground parking with a single entrance on K Street. DDOT recognizes that a reduced parking program will have fewer impacts overall. Our parking concerns are related to the resolution of number of parking spaces and potential future inclusion of a for-hire vehicle facility.
71	Haley Peckett	DDOT		Appendix A6	P. 22 (top of page)	FRA notes "The ability to accommodate some vehicular demand through use of parking facility" may help manage PUDO challenges. DDOT would support a PUDO facility adjacent to the parking garage - <i>but that our recommendation of a maximum of 295 parking spaces remains unchanged.</i> Further, DDOT would like to see analysis and circulation to show that a consolidated PUDO facility adjacent to parking would not have spillover queuing onto H St. Bridge. DDOT supports the concept of a below-ground parking and consolidated PUDO facility, which would need to be supported by additional study but would not risk queuing on the Bridge.
72	Haley Peckett	DDOT		Appendix A6	3.2.1	Would the additional height from a reduced aboveground parking facility be used for additional Federal air rights development? DDOT would encourage USRC to partner with regional stakeholders to enlist policies that would incentivize transit use over PUDO trips.
73	Haley Peckett	DDOT		Appendix A6	Footnote 35	DDOT believes that a greater percentage of parking trips could be converted to transit, walking, or other modes. Further, District and USRC-led policies related to PUDO and FHV at Union Station could increase the internal capture rate, increase vehicle occupancy (carpooling), and reduce the overall number of vehicle trips, especially at peak hour.
74	Haley Peckett	DDOT		Appendix A6	3.2.1	If possible, provide an estimate on the reduction in construction time. This could be a significant impact reduction for the District. (This is true for other Alternatives too)
75	Haley Peckett	DDOT		Appendix A6	3.1	For purposes of calculating impacts, what is the number of parking spaces you assume in your "significantly reduced" analysis?
76	Haley Peckett	DDOT		Appendix A6	Table 3.1	FRA notes adverse impacts related to energy, water, emissions, etc. due to the proposed greater footprint of office development in the federal air rights development. However, the District would prefer office uses over parking due to the greater impact on the District's roadway network from parking without the resulting business activation. Additionally, DC has legislation that controls for energy and water use from its buildings that should minimize or negate impacts in the future.
77	Haley Peckett	DDOT		ES	Table ES-7	The city bus impact should be equal to (or at least close to) the traffic level of impact since these modes are "stuck" in the same traffic congestion. However, DDOT would be happy to talk about ways that we could apply priority bus treatments to mitigate this impact. See comments in Ch. 5.
78	April Hall	DDOT		General	Right of Way	We would request design plans to review impacts to DDOT's right of way especially at the H Street bridge and the proposed intersection and ramp construction. A portion of the track bed spans over the former H Street underpass and is not structural adequate and is of concern as to the impact of the underpass. Right of Way suggest DDOT and Amtrak enter into an agreement for ongoing use of DDOT's right of way for parking and housing of an electrical substation and utility conduits. Staging and access on the west side of the H Street underpass would need to be coordinated with DDOT especially with the upcoming H Street bridge reconstruction.

79	Active Transportation	DDOT	1549	4.13.1 Regulatory Context and Guidan	Relevant Federal and District policies, regulations, and guidance should include DCMR Title 24: Public Space and Safety. The List should also include the NoMA Small Area Plan that has specific recommendations for the Metropolitan Bike Trail as well as Downtown East Re-Urbanization Strategy that has recommendations for connectivity and open space networks to the west of the station. The 2005 Met Branch Trail Concept Plan - <a href="http://metbranchtrail.com/wp-content/uploads/Complete-Draft-Plan-reduced.pdf">http://metbranchtrail.com/wp-content/uploads/Complete-Draft-Plan-reduced.pdf</a> - can be included but note that all recommendations have been implemented in this area already.
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**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
Department of Energy and Environment



September 28, 2020

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

RE: District of Columbia Department of Energy and Environment Comments on the Preferred Alternative for the Washington Union Station Expansion Project

Dear Mr. Valenstein,

The District of Columbia's Department of Energy and Environment (DOEE) appreciates the opportunity to participate in the National Environmental Policy Act (NEPA) process by providing comments on the Draft Environmental Impact Statement (DEIS) for the Union Station Redevelopment released on June 4, 2020, which is being led by the Federal Railroad Administration (FRA).

DOEE's comments address the FRA's preferred alternative design, Alternative A-C. The comments address issues raised in the DEIS that do not align with the District's environmental, energy, and sustainability plans or that could be enhanced to help the District achieve our environmental, energy, and sustainability goals, rather than on matters that will be more fully addressed through DOEE's normal regulatory review process. The comments are by no means comprehensive but summarize specific items related to the Union Station site project, including the level of commitment to sustainability, the project's design with regard to greenhouse gas emissions, and the ability of the project to meet stormwater management and air quality requirements, including any planned regulatory requirements expected to be in effect by the time this project begins design and development.

These comments are intended to assist FRA and their partners by suggesting early design changes to better align with city-wide goals and avoid possible delays in the future. DOEE is always interested in meeting with interested parties early in the development process to identify opportunities to address environmental and sustainability issues and to avoid future regulatory problems. Once a project team has been selected to implement the plans discussed in the DEIS, they are encouraged to contact DOEE for a pre-design review meeting to further discuss these comments and regulatory compliance issues.

The Sustainable DC (SDC) [2.0 Plan](#) establishes goals and targets to ensure that the District is the healthiest, greenest, most livable city for all District residents. Clean Energy DC is the District's energy and climate action plan. Climate Ready DC and Resilient DC are the District's strategies for making the District more resilient to climate change. This suite of plans defines what actions need to be taken between now and 2032 in our buildings, our energy infrastructure, and our transportation system to meet the District's ambitious GHG reduction targets. Given their scale, investments in large building and infrastructure projects, such as the \$5.8 billion investment in the Union Station Redevelopment, are once-in-a-lifetime opportunities to move the needle on these goals.

Given the unique character and importance of Union Station as a key transportation hub and nexus for the District and the surrounding neighborhood, DOEE feels strongly that any renovation and new development should showcase best-in-class sustainable and resilient design strategies, strive through its design and operation to reduce greenhouse gas emissions, and serve as the foundation for innovative net-positive energy and environmental impact development. The Union Station project should strive to harmonize the complex with the neighborhood, reduce traffic congestion, and improve transit connections. Our comments focus on several issues that should be more fully addressed in the Final EIS:

- Resilience;
- Energy efficiency and use of renewables;
- Reduction of GHG emissions;
- Transportation and air quality; and
- Stormwater and water quality management.

### **Resilience**

In 2016, Washington, DC was selected from more than 1,000 cities around the world to become part of the 100 Resilient Cities (100RC) network, along with cities like Paris, New York, Bangkok, and Buenos Aires. The Resilient DC strategy is the result of a nearly two-year process that developed a deeper understanding of some of the District's most important challenges and vulnerabilities. It is a forward-thinking roadmap that addresses longstanding and persistent challenges, such as flooding, crime, and inequality, while simultaneously preparing the District for emerging and future challenges, such as the impacts of technology and growth on DC's economy and neighborhoods. Regarding resiliency concerns, DOEE has the following comments:

- As the main transit hub for the District, the Union Station redevelopment is a piece of critical infrastructure and should be designed to remain operational in the event of power failure or other natural disasters. Ensuring new infrastructure is climate ready and resilient supports goals in SDC 2.0, Climate Ready DC, Clean Energy DC, and Resilient DC. Section 5.7.6.1 of the DEIS states consideration for "increasing power supply redundancy and backup generation." DOEE recommends maximizing installation of solar photovoltaic panels and pairing that with battery storage for backup generation. If additional backup generation is necessary, the project should look for alternatives to diesel-powered generators that have a deleterious effect on air quality and GHG emissions. In addition to solar plus battery systems, common alternatives include natural gas and fuel cell generators.
- Section 5.7.6.1 of the DEIS briefly mentions several strategies being considered to increase resilience through the project's design, including "Reducing dependency on centralized power by installing renewable energy systems at WUS." DOEE commends the project for considering onsite renewable energy generation. Per SDC 2.0 Action EN2.2, the District's goal is to "Build and support commercial and residential renewable energy projects sufficient to achieve at least 5% of citywide electricity from local generation sources." DOEE encourages the project to design for the maximum solar PV production possible using "solar ready" best practices and to commit to achieving a minimum of 5% of Union Station's energy use from onsite solar photovoltaic generation.

- Section 5.7.6.1 states that “monitoring and incorporating into the Project design and technology features to minimize buckled railroad tracks” will be considered. The District’s Climate Ready DC Plan projects that average summer high temperatures are expected to increase 10°F to 97°F by the 2080s. Given the timeline for design and construction, FRA is encouraged to incorporate anti-buckling strategies into the project’s base scope.

### **Energy Efficiency and Use of Renewables**

Some actions identified in the Clean Energy DC Plan and necessary to achieving the District’s greenhouse gas emission goals were codified in the Clean Energy DC Omnibus Amendment Act of 2018 (CEDC Act), which mandated that 100% of the District’s energy supply must be renewable by 2032, and that by 2041, at least 10% of that energy must come from solar generated within the District. The CEDC Act also established a Building Energy Performance Standards Program, which requires buildings in the District to meet energy efficiency standards that increase every 6 years. Regarding energy efficiency and use of renewables, the District has the following comments:

- Section 5.8.4.7 , Table 5-110 details anticipated Energy Use Intensities (EUIs) for buildings under Alternative A-C. Projected EUIs are very high and will need to be improved upon to meet the District’s current building code, let alone future codes that will be promulgated pursuant to SDC 2.0 Action BE4.1: “Require higher levels of energy efficiency, renewable energy requirements, net zero standards for new construction, and broader sustainability metrics for public projects.” In addition, per the Clean Energy DC Plan, the DC Energy Code is anticipated to require net-zero energy (NZE) by 2026 for all new construction and major renovations. Given the design and construction timelines for this project, planned buildings need to be designed to achieve greater energy efficiency levels, nearing net-zero energy use, to comply with current and future codes. This action would minimize operational costs, avoid permitting delays, and structure construction costs to maximize investment in energy efficiency.
- Section 5.8.6 mentions several “cost-effective energy efficiency technologies.” Given the District’s plan to require net-zero energy development for new construction and major renovation projects by 2026, all energy efficiency strategies should become part of the project’s base scope. Energy conservation measures including additional insulation, LED lighting and controls, high efficiency mechanical systems, and envelope commissioning and air sealing have a return on investment within five years. In addition, deep efficiency strategies such as ground source heat pumps, chilled beams, building energy management systems, and daylighting and natural ventilation strategies have a return on investment between five and fifteen years. Given market conditions and the District’s goal of continually improving building codes to meet higher efficiency targets with the ultimate goal of implementing a net-zero energy construction code by 2026, it is strongly encouraged that the applicant maximizes all strategies to increase energy efficiency and decrease tenant utility costs.
- Mentioned in Appendix A2 – Scoping Report, “several commenters requested that FRA consider electrification of rail operations at WUS.” Electrification is a vital component of meeting the District’s carbon neutrality goals and eliminating the use of fossil fuels. However, only the No-Action Alternative mentions previous actions to electrify some of the tracks to “enhance operational flexibility” (See Chapter 3, page 3-39). This minimal consideration does not allow for a ‘hard look’ at the relative consequences of not electrifying operations, and DOEE recommends FRA create a strategy and timeline for electrifying the train tracks and enabling upgrades to

electric tracks and switchers in the future that fully-considers their long-term benefits, including to the environment and in reducing the cost of operations.

### **GHG Emissions**

The District has committed to cutting its greenhouse gas emissions in half by 2032 and becoming carbon neutral by 2050. These plans address reducing emissions from transportation and from buildings, which account for seventy-five percent (75%) of the GHG emissions in the District. Regarding GHG emissions, DOEE has the following comment:

- The DEIS focuses on what it calls “operational impacts” as it pertains to greenhouse gas emissions. For all projects, but particularly a project of this size, the greenhouse gas emissions stemming from the creation and transportation of the materials used to construct the project represent a far greater amount of GHG emissions than regular operations. This is called “embodied carbon.” Addressing embodied carbon is still a growing practice and is currently outside of the District’s regulatory scope, but DOEE encourages this monumental project to explore opportunities to measure and reduce embodied carbon alternatives where appropriate. This can be particularly impactful as it pertains to the use of concrete and steel. Those materials are among those with the highest concentration of embodied carbon emissions. As the design progresses, DOEE encourages FRA to require a Life Cycle Assessment (LCA) of the embodied emissions from the project. With the District committed to carbon neutrality by 2050, embodied carbon emissions will likely be regulated in the coming future. DEIS Section 5.7.7 states that “there are no permits pertaining to GHG emissions or resilience.” While currently accurate, this is likely to change within this project’s development horizon and is quickly becoming best practice in the near term.

### **Transportation and Air Quality**

Reduction of personal vehicle car trips, minimization of congestion, and increasing public transit and multimodal transit options are key priorities in the District’s Sustainable DC Plan and are strategies utilized to reduce GHG emissions and improve air quality. Because of its position as the major transit hub for the District, the Union Station redevelopment represents a once-in-a-lifetime opportunity to make progress on these goals. DOEE encourages FRA to make design decisions that support these goals, including better integration with the DC Streetcar, development of a comprehensive bicycle support and parking plan, and supporting electric vehicle (EV) charging throughout the parking facility. With regard to transportation and air quality, DOEE has the following comments:

- DOEE supports a significant reduction in parking spaces in line with needs projected by the District’s Office of Planning, but notes that with the reduction in parking, there is also risk of an increase in localized air pollution hotspots due to the shift to private or for-hire pickup and drop-off, which could exacerbate localized air pollution. For this reason, DOEE recommends the following comments be incorporated into the expansion design for the above grade parking garage in Alternative A-C:
  1. Time of use rates for parking spaces similar to the Demand-Based Parking Pricing in Penn Quarter/Chinatown (see <https://ddot.dc.gov/page/demand-based-parking-pricing-penn-quarterchinatown>);
  2. Prioritization of areas in the parking garage for compact vehicle parking;

3. Install electric vehicle make-ready infrastructure to accommodate the future installation of electric vehicle charging stations for at least 50% of parking spaces. Offer electric vehicle charging stations in excess of expected demand in order to minimize the future cost of electric vehicle charging station increased capacity;
- The District's SDC 2.0 plan calls for a network of electric vehicle charging stations throughout the city to support 100% of Transportation Network Companies (TNCs) and 50% of taxis to be all electric by 2030. In addition, this week [California announced](#) that it will stop sales of gas-powered vehicles by 2035. EV charging spaces should be included in the project to anticipate these near-term market transitions. While the DEIS does not specifically mention electric vehicle (EV) charging, as the city's main transit hub and central location for for-hire and TNCs such as [Uber](#) and [Lyft](#), which have made all-electric fleet commitments, the Union Station redevelopment is among the best locations in the District for EV charging. DOEE encourages FRA to install Level 2 EV charging infrastructure for rental car and car share companies as well as DC fast charging infrastructure for taxis and TNCs within the multimodal surface transportation center.
  - The DEIS notes the possibility of significant spoils removal. DOEE supports spoil removal by work train where two 20-gondola work trains per day would haul the same amount of spoil as 120 trucks. This change would limit daily truck traffic to 10–20 delivery trips per day, reducing air pollution and associated GHG emissions while minimizing congestion. Although the work would need to be scheduled in a manner that does not interfere or conflict with Amtrak, VRE, or MARC operations, this strategy may also result in significant cost savings for the project.
  - There are numerous air quality regulatory requirements that will be applicable to the construction and redevelopment activities associated with this project. Although several of the applicable regulations are cited within the DEIS, DOEE noted several links to outdated versions of regulations. For the current version of air quality regulations, please reference Title 20, Chapters 1 through 15 of the [District of Columbia Municipal Regulations](#).

FRA should be especially aware of air quality permitting requirements pursuant to 20 DCMR § 200.<sup>1</sup> The applicant is encouraged to engage in early planning meetings with DOEE's Air Quality Division (AQD) to fully identify these requirements and plan for compliance.

- Given the scale of bus and for-hire vehicle parking, DOEE requests that FRA post signs, similar to those posted at the existing bus slips, to promote awareness about engine idling restrictions in the District pursuant to 20 DCMR § 900. More information on the District's anti-idling law is available at <https://doee.dc.gov/service/engine-anti-idling-law>.
- In addition to the bicycle parking proposed in Alternative A-C, DOEE recommends dedicating space in the form of spaces or corrals to support micromobility options including electric bicycles and scooters. According to DDOT, more than 5 million dockless bike and scooter trips were taken in 2019. DOEE supports DDOT installing bike and scooter corrals to support these micromobility options.

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<sup>1</sup> In particular, the DEIS describes a small concrete batch plant to be installed in the West Rail Yard to support the construction. This equipment will be subject to air quality permitting requirements.

## Stormwater and Water Quality Management

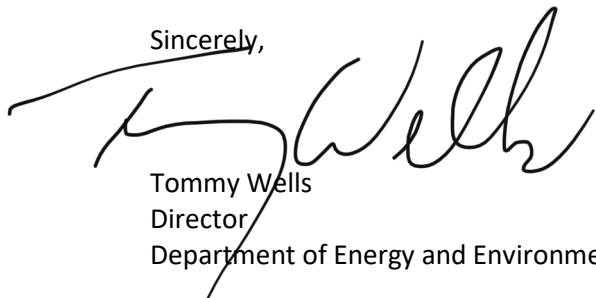
Stormwater management is critical for managing inland flooding and ensuring the District reaches its goal of having its waters fishable and swimmable. Efforts by individual development projects have a direct impact on the health and wellness of our waterways and the safety and resilience of our city. The District's Comprehensive Plan outlines policies to maximize permeable surfaces and use landscaping and green roofs to reduce runoff. Additional information on stormwater in the District, including governing regulations and permit information may be found [at https://doee.dc.gov/service/stormwater-management](https://doee.dc.gov/service/stormwater-management). With regard to stormwater and water quality management, DOEE has the following comments:

- Section 5.7.6.1 in the DEIS discusses resilience and proposes “Considering reflective roofs or green roofs to reduce heat island effect.” It is important to note that reflective roofing materials are required by the current building code, and green roofs are typically incorporated into projects as a required strategy for meeting the District's stormwater management regulations. DOEE encourages FRA to consider a broad resilience strategy that goes beyond minimum regulatory requirements with specific recommendations noted above. For stormwater management, this may include development of a holistic stormwater management plan for the full project site, integrating solar over green roofs, incorporating rain gardens and bioretention areas at grade, and maximizing stormwater management through rainwater harvesting and reuse. Refer to DOEE's [Stormwater Management Guidebook](#) for additional information.
- Section 7.1 Mitigation Measures and project Commitments, #3 in Table 7.1, states that groundwater will be discharged through the District's MS4 instead of through the combined sewer system to Blue Plans. This project area is serviced by the Combined Sewer System (CSS). Groundwater should be discharged into CSS upon receiving authorization from DC Water for a Temporary Discharge Authorization (TDA) Permit.

DOEE looks forward to working with the Federal Railroad Administration and their partners to ensure that the Washington Union Station redevelopment meets future market demands and is a sustainable and resilient asset for the District and the region, and for generations to come.

Please do not hesitate to contact me or our staff with questions.

Sincerely,



Tommy Wells  
Director  
Department of Energy and Environment

cc: John Falcicchio, Deputy Mayor for Planning and Economic Development  
Lucinda Babers, Deputy Mayor for Operation and Infrastructure  
Andrew Trueblood, Director, Office of Planning  
Jeffrey Marootian, Director, District Department of Transportation



Hello. My name is Rob Dooling and I am a member of the DC Multimodal Accessibility and Advisory Council. We are appointed by Mayor Bowser to advise governments on improving transportation and public space for people with disabilities in DC. As a representative of the disability community, I urge a plan for the future union station that includes zero parking spaces for personal vehicles. We want walkable public space focused on buses, trains, bikes, and pedestrians. Thank you.



## COMMONWEALTH of VIRGINIA

Jennifer L. Mitchell  
Director

DEPARTMENT OF RAIL AND PUBLIC TRANSPORTATION  
600 EAST MAIN STREET, SUITE 2102  
RICHMOND, VA 23219-2416

(804) 786-4440  
FAX (804) 225-3752  
Virginia Relay Center  
800-828-1120 (TDD)

September 28, 2020

Mr. David Valenstein  
Federal Railroad Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

RE: Union Station Draft Environmental Impact Statement Comments

Dear Mr. Valenstein:

On behalf of the Virginia Department of Rail and Public Transportation (DRPT), I wanted to provide comments on the Union Station Draft Environmental Impact Statement (DEIS) that was released this summer.

As you are aware, DRPT has taken steps to secure the future of passenger rail through its Transforming Rail in Virginia initiative, in which the Commonwealth will establish public ownership of infrastructure and the acquire private railroad right of way (ROW) from North Carolina to CP Virginia in the District. All right of way lines and operations lead to the 1<sup>st</sup> Street Tunnel. The ease and importance of the connection and use of Union Station and its train yards cannot be overstated, as the future of Virginia commuter operations are dependent on the passenger and rail infrastructure in, outside, and surrounding the station. The multitude of transportation options once rail and bus commuters arrive at Union Station will allow the rail and bus operations in Virginia to exist and grow as a desirable transportation option. Union Station continues to be an important transportation hub and destination for visitors and commuters to the District of Columbia, as the buses and trains that flow into and out of Union Station remove thousands of cars a year from the regional and national interstate systems. DRPT looks forward to the improvements outlined by the DEIS to offer a better transportation system to the region.

After reviewing the DEIS, DRPT offers the following general comments on the DEIS document.

- **Union Station – Adequate Train Capacity**

The Commonwealth plans to double Amtrak state-supported service and Virginia Railway Express (VRE) service by 75% over the next decade, which will afford the Commonwealth to create passenger operations that will include hourly service to and from Richmond and

weekend VRE service. The Commonwealth wants to ensure that sufficient capacity for the increase in Amtrak and VRE trains service is accommodated at Union Station. To manage the new operations, VRE is in need of permanent storage in the Union Station Yard. The near-term passenger rail plans to increase the Virginia-based train service to Union Station extends well beyond 2030, and will require Union Station to have flexible train operational and storage space to the station, and within the Union Station yard now and in the future.

- **Allow Flexibility for Commuter Train Operations**

Infrastructure that supports fluid movements through the Union Station train yard for both VRE and MARC trains is also important to the future of regional commuter run-through service. DRPT recommends that the future of VRE and MARC interoperability for all lines be acknowledged more strongly in the DEIS. We recognize that the VRE-MARC run-through service to the Penn Line is included in the document, but a stronger effort to resolve run-through service for all MARC and VRE lines should be considered by the document. The interoperability of passenger rail in the District, Maryland, and Virginia will continue to be a challenge for the next 20 years.

- **Improving VRE Passenger Facilities in Union Station**

VRE passengers should be perpetually provided signage and a space to access VRE trains, schedules, and all other services that pertain to the use of VRE trains within Union Station. All signage, waiting area locations, schedules, and ticketing opportunities should be visible and be easily understood by any passenger who seeks to use VRE services within all levels of Union Station.

- **Securing the future of Union Station Infrastructure**

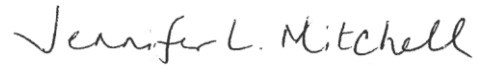
The Union Station tracks, tunnels, yards, signalization and all other related rail infrastructure are in need of a continuing maintenance, infrastructure operational plan, and a finance plan for the future of the station. The Commonwealth is interested in the future of the 1st Street Tunnel, as it is the only access point to and from Virginia and, at two tracks, will become a pinch-point between Union Station and the future four track build-out of CP Virginia.

- **Intercity and Commuter Bus Service**

DRPT asks for continued flexibility in allowing both commuter and intercity buses to use Union Station as a destination in the District of Columbia. DRPT sponsors six (6) Virginia Breeze intercity buses daily from southwest Virginia to and from Union Station with plans to further expand/increase service in the future. Union Station is an important destination and transportation hub for intercity buses and regional commuter buses because of the many points of access that the station provides to destinations in the District, in the region, and nationwide. Additionally, the Commonwealth is focused on flexibility for commuters and visitors when selecting a mode of transportation, and many are motivated to use bus services to Union Station to avoid driving themselves to the District. While the commuter buses in Northern Virginia do not currently use Union Station as a primary commuter destination in the District, it is likely that the operators of Northern Virginia regional bus services will continue to be drawn to the station as an ideal drop-off, pick-up location in the future.

Thank you for the opportunity to comment on the Union Station DEIS. If you have any questions, please feel free to contact Kate Youngbluth on my staff at [katherine.youngbluth@drpt.virginia.gov](mailto:katherine.youngbluth@drpt.virginia.gov).

Sincerely,

A handwritten signature in black ink that reads "Jennifer L. Mitchell". The signature is written in a cursive, flowing style.

Jennifer Mitchell  
Director



September 25, 2020

Mr. David Valenstein  
 Office of Railroad Policy and Development  
 USDOT Federal Railroad Administration (MS-20 RPD-10)  
 1200 New Jersey Avenue, SE  
 Washington, DC 20590

Dear Mr. Valenstein:

Thank you for the opportunity to comment on the Washington Union Station (WUS) Expansion Project's Draft Environmental Impact Statement (DEIS). On behalf of the Washington Metropolitan Area Transit Authority (WMATA or Metro), I am transmitting the Authority's comments on the document.

Metro and WUS are essential to the National Capital Region's transportation system. WUS is the region's busiest intermodal transportation hub and sees the highest number of boardings in the Metrorail System. It's also an important hub for several major Metrobus routes, the DC Streetcar and intercity buses. As such, WMATA enthusiastically supports the vision for a modernized and expanded WUS to provide the critically needed capacity boost for mainline rail travel for one of our region's historic treasures.

While WMATA supports the project, we have concerns about its impact on the local transit system's ability to absorb additional travel demand, resulting from an expanded WUS and increased mainline rail travel. These must be addressed proactively as part of future WUS work. I also want to highlight the importance and responsibility of WUS to coordinate early with WMATA on construction sequencing and WUS' impacts on WMATA facilities and operations. Finally, I want to note the importance of coordination on WMATA's current Blue, Orange, Silver Capacity and Reliability Study, which is exploring new potential Metrorail line alternatives that could potentially serve WUS. These issues are discussed in more detail below.

### **WUS Circulation Impacts to Metrorail Station and Proposed Mitigation**

The DEIS documented that "Relative to the No-Action Alternative, Alternative A-C [the preferred alternative] would have a moderate adverse direct operational impact on Metrorail operations because of increased demand that would aggravate train overcapacity and station circulation issues."

#### **Washington Metropolitan Area Transit Authority**

600 Fifth Street, NW  
 Washington, D.C. 20001  
 202/962-1234

*By Metrorail:  
 Judiciary Square-Red Line  
 Gallery Place-Chinatown  
 Red, Green and  
 Yellow Lines*

*A District of Columbia  
 Maryland and Virginia  
 Transit Partnership*

Mr. David Valenstein

Page 2

The DEIS further projects that although WMATA's First Street Concourse Project and Amtrak's Concourse Modernization Project included in the No Action and preferred alternatives will improve circulation between the Metrorail mezzanine and WUS rail platform, "vertical circulation between the WMATA platform and the WMATA mezzanine would... be a constraint on circulation in the No-Action Alternative and would remain one in [Alternative A-C, the preferred alternative]. It is likely that in [Alternative A-C], circulation conditions on the WMATA platform for passengers seeking to access the North Mezzanine would further degrade compared to the No-Action Alternative as a result of increased volumes."

FRA proposes mitigation for this impact is as follows: "Project Proponents to contribute to improvements identified in WMATA's Station Access and Capacity Study that have not been addressed by the Concourse Modernization Project or by WMATA by the time of implementation."

As the 2011 WMATA Station Access and Capacity Study is outdated, WMATA requests a change in the proposed mitigation as follows to better reflect the needs for WUS-Metrorail Station circulation and the many changes that have taken place in the last decade, as discussed below:

"Project Proponents to contribute to improvements identified in **a refreshed version of** WMATA's Station Access and Capacity Study that have not been addressed by the Concourse Modernization Project or by WMATA by the time of implementation. **A new study is required to reflect the latest planning assumptions.**"

Several issues should be updated or incorporated, including:

- revised Metrorail ridership forecasts and service assumptions;
- an extended horizon year (from 2030);
- Amtrak's Concourse Modernization Project including the potential for a new WMATA Center Mezzanine;
- WUS Expansion Project preferred alternative and Amtrak, MARC, and VRE rail demand and service assumptions;
- the latest land use assumptions for WUS air rights development including Akridge's Burnham Place;
- any long-term demand trends stemming from the COVID-19 pandemic;
- WMATA's Blue/Orange/Silver study status noted below;
- DC Streetcar Georgetown-Union Station Extension Project status (assumed to be built in the DEIS);<sup>1</sup> and
- MARC through-running status (assumed to be operational in the DEIS).<sup>2</sup>

### **WUS Capacity Impacts to Metrorail Red Line and Proposed Mitigation**

<sup>1</sup> The DC Streetcar Georgetown-Union Station Project is included in the TPB Constrained Long Range Plan (CLRP) but the project has been halted by DDOT due to lack of funding. If the project is not built, it will alter the DEIS transit assumptions and likely exacerbate Metrorail Red Line and Metrobus capacity issues.

<sup>2</sup> MARC through-running is included in MTA's MARC Cornerstone Plan but is not included in TPB's CLRP. MARC through-running would reduce demand for Metrorail access at WUS, as noted in the DEIS.

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As noted above, the DEIS projects a “moderate adverse direct operational impact on Metrorail operations,” reflecting a volume-to-capacity (V/C) ratio above 100%, meaning that demand would exceed the available capacity on Red Line trains to and from WUS. In the AM Peak, the DEIS projects V/C increasing from 86% to 103% (above the no-action alternative) in the Shady Grove direction. While in the PM peak, V/C is expected to increase from 107% to 115% in the Glenmont direction. The DEIS (chapter 7) summarizes the impact as follows: “Increase in passenger volumes and capacity issues on WMATA Red Line.”

FRA’s proposed mitigation suggests: “Proponents to coordinate WMATA about regional efforts to increase mainline capacity along the Red Line.”

WMATA proposes stronger language to reflect the importance of the Red Line in connecting passengers to and from WUS, particularly given the increased station footprint, mainline rail traffic and the question of whether the DC streetcar western extension will be built.<sup>1</sup> The following change would strengthen the proposed mitigation language:

**“Proponents to coordinate with WMATA *and highlight the importance of increased* mainline capacity along the Red Line, *potentially including a new Metrorail line, to the future success of Washington Union Station.*”**

#### **WUS Construction Impacts to Metrorail Red Line and Proposed Mitigation**

The DEIS documents “construction of [preferred] Alternative [A-C] would have major adverse impacts on WMATA Metrorail Red Line operations due to intermittent stoppages or single-tracking events.” These impacts would occur on the west side of the DEIS study area during proposed construction phase 4, which would include the First Street Concourse, new H Street Concourse and entrance, parking garage demolition and new Track 37 construction near the NoMa-Gallaudet Metrorail Station. The DEIS notes that “no extended shutdowns or periods of single-tracking are anticipated.”

The DEIS concludes these impacts result in the “need for schedule adjustments or temporary stoppage on the Red Line during Phase 4 of construction.”

To mitigate this impact, FRA proposes that “Proponents to coordinate with WMATA on construction approaches that would minimize delays or stoppages on the Red Line.”

WMATA concurs with this approach, but we want to highlight the importance of early WMATA pre-construction coordination to identify and mitigate any unforeseen project issues. Although the WUS Expansion Project is still in the early phases of engineering and environmental review, impacting WMATA facilities and operations is likely to result in several challenges and project risks that should be incorporated into the WUS Expansion Project planning. All construction actions within WMATA’s “zone of influence,” must be coordinated with WMATA’s Joint

Mr. David Valenstein

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Development and Adjacent Construction (JDAC) Office and approved by WMATA. The “zone of influence” is defined in Section 3.1 of WMATA’s JDAC Project Manual, which can be found on the JDAC website via the link below. Coordination can add significant time and cost to a major project, so please document the potential impact and coordinate with WMATA early and often to avoid or mitigate the impact. The JDAC website can be found here for review:  
<https://www.wmata.com/business/adjacent-construction/index.cfm>.

### **Blue/Orange/Silver (BOS) Study Metrorail alternatives serving WUS**

Since 2019, WMATA has advanced work on the BOS Study, a local alternatives analysis to identify the best and most cost-effective solutions to address future ridership, service, and reliability needs on these Metrorail lines. All four potential Metrorail build alternatives would serve WUS. Two would connect near Massachusetts Ave NW/NE, at the front of WUS, while two are assumed to connect near H Street NW/NE, at the rear of WUS.

WMATA has preliminarily assessed the interface between each potential Metrorail build alternative and the WUS preferred alternative for potential future constructability issues. A potential future Massachusetts Ave NW/NE Metrorail alignment appears to be unaffected by the proposed WUS preferred alternative, while an H Street NW/NE alignment is discussed in more detail below.

While a potential future Metrorail Station beneath H Street could be constructed just west or east of the WUS development, it appears that two twin Metrorail tunnels approximately 20-foot diameter and approximately 40 feet on center can pass through the proposed WUS and H Street Bridge column grid. One tunnel could be placed in the center of the H Street alignment (between the H Street Bridge columns) with one to the north between the north H Street Bridge columns and the first set of WUS development columns north of the bridge. The column grid in the north-south direction allows space for this to happen. The H Street Bridge columns are 62’-8” on center and the Master Plan and North Bridge columns are separated by 44’-4”. With these dimensions the south tunnel can be kept at a distance of approximately 22’ from the bridge columns and the north tunnel kept approximately 12’ from the bridge and master plan columns. See the attachment for details.

If the northern station site beneath H Street is chosen, the Proponents need to maintain space to allow two twin 20-foot diameter tunnels to pass through the substructure at approximately 70 feet below the H Street Concourse. All efforts should be made to preserve a Metrorail right-of-way in this area for the tunnels. If the Burnham Place air rights development is built first, engineering studies need to verify that these bored tunnels can pass through the column grid without any disturbances. If Metrorail is built first, Akridge’s extensive experience with joint development built adjacent to tunnels should not present a constructability issue.




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As the BOS Study progresses, I ask that FRA and the Project Proponents work with WMATA to ensure that the WUS preferred alternative and FEIS consider the BOS Study's results and do not preclude WMATA's preferred BOS Locally Preferred Alternative, expected in 2021.

I appreciate your collaborative efforts and the opportunity to comment on the DEIS. I look forward to continuing to work with the FRA on this critical infrastructure project. If you have any questions regarding these comments, please contact Jonathan Parker at [jhparker@wmata.com](mailto:jhparker@wmata.com).

Sincerely,



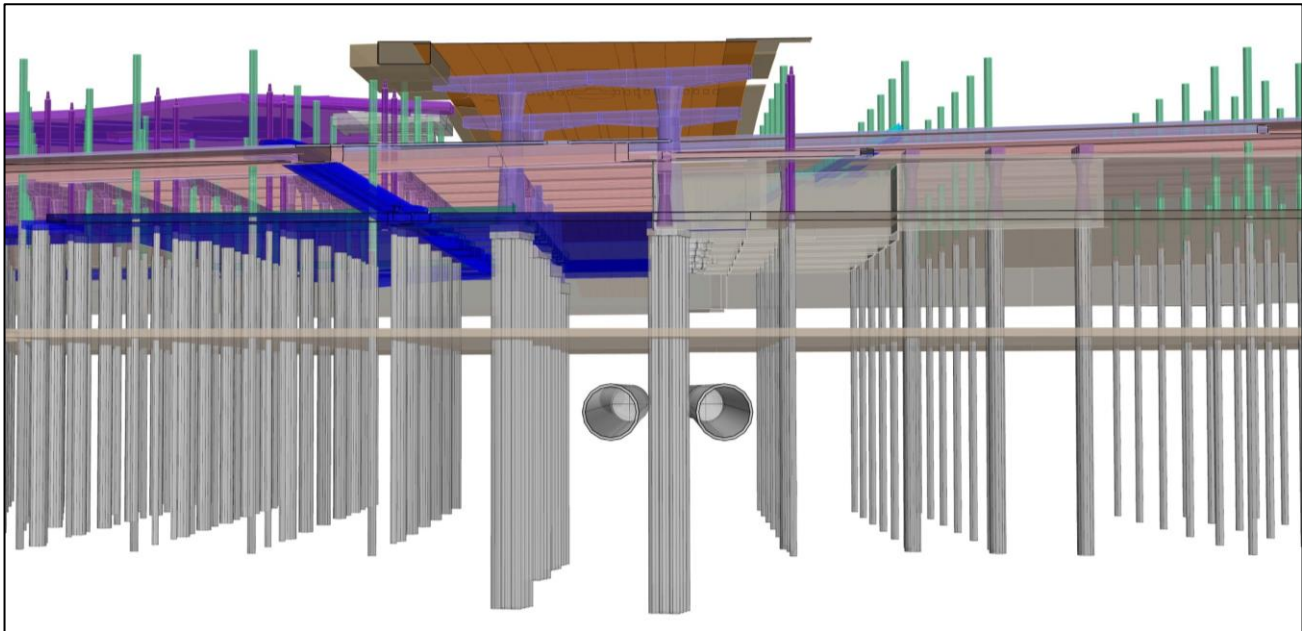
Shyam Kannan  
Vice President  
Office of Planning

Cc:

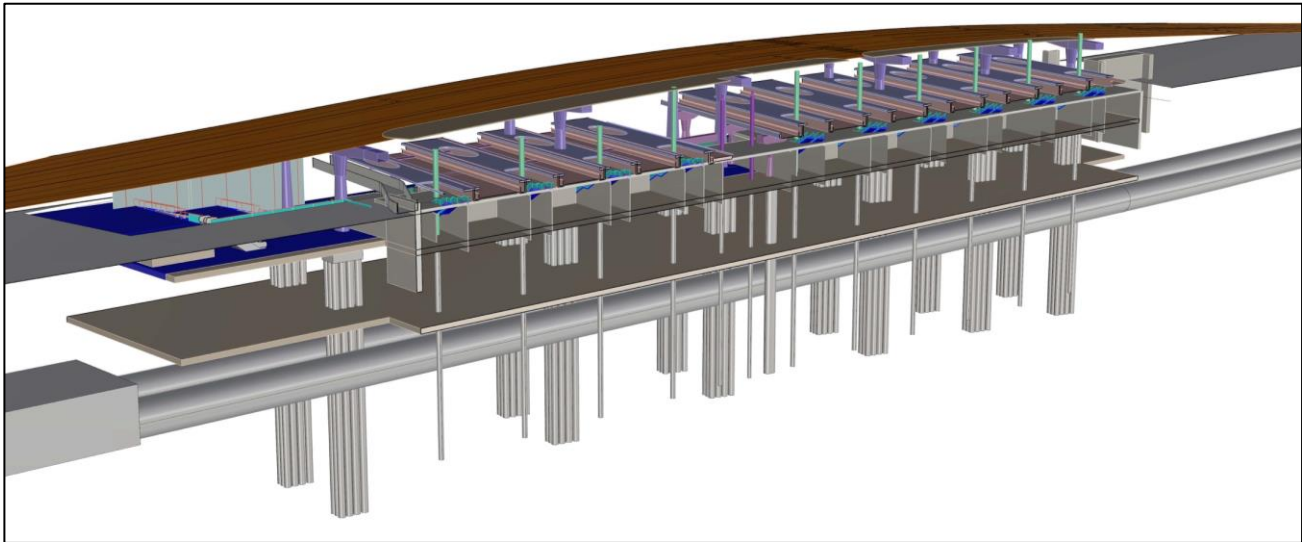
Nick Gardner, WMATA  
Thomas Robinson, WMATA  
Nina Albert, WMATA,  
Allison Davis, WMATA  
Seth Garland, WMATA  
John Magarelli, WMATA  
Jonathan Parker, WMATA  
James Ashe, WMATA  
Jeff Winstel, WMATA  
Ann Chisolm, WMATA  
Kate Roetzer, WMATA  
Kevin Forma, USRC  
Gretchen Kostura, Amtrak  
Ellen Jones, DDOT  
Amanda Stout, DDOT

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Page 6

**Attachment**



*Section through H Street looking west – showing Metro Twin Tunnels between the H Street Bridge columns and the North H Street Bridge Column and the 1st WUS development column to the north*



*Axes of Metrorail tunnels passing through columns of the H Street Bridge and the WUS development columns*



Adams Morgan Partnership BID ★ Capitol Hill BID ★ Capitol Riverfront BID ★ Coalition for Smarter Growth  
 Destination DC ★ Downtown DC BID ★ Dupont Circle BID ★ Events DC ★ Federal City Council ★ Georgetown BID  
 Golden Triangle BID ★ Greater Greater Washington ★ Greater Washington Partnership ★ Mt. Vernon Triangle CID  
 NoMa BID ★ Rosslyn BID ★ Sierra Club DC Chapter ★ Southwest BID ★ Washington Area Bicyclist Association  
 1440 G Street NW ★ Washington, DC 20005 ★ 202-681-0509 ★ info@dcstcoalition.org

September 28, 2020

Mr. David Valenstein  
 Office of Railroad Policy and Development  
 USDOT Federal Railroad Administration (MS-20 RPD-10)  
 1200 New Jersey Avenue, SE  
 Washington, DC 20590

Re: Public Comment to the Washington Union Station Draft Environmental Impact Statement

Dear Mr. Valenstein:

The expansion of Union Station represents the single greatest economic development and transportation opportunity for the District of Columbia and the region as a whole. An opportunity of this magnitude requires a bold vision, modern and innovative thinking, and dedication to the highest and best standards of planning and design. Finally, and importantly, projects of this scope need the full support of key stakeholders in order to garner the political and financial underpinning required to make the project a reality.

This project does not currently have that support. The National Capital Planning Commission (NCPC) NCPC, an approving body for this project, has indicated that the project outlined in the DEIS would not be approved and that significant changes are needed in order for the project to move successfully forward. To ensure that all key stakeholders are actively supporting this project, and to ensure its ultimate success, we strongly encourage that the Final EIS address the following issues:

- **Revise the parking program to align with recommendations from the DC Office of Planning and NCPC**

There appears to be no project proponent or project stakeholder other than FRA that supports the number of parking spaces included in the Draft EIS. We encourage FRA to lower the number of parking spaces included in the Final EIS so that it falls in line with the 295-space maximum recommended by the DC Office of Planning and National Capital Planning Commission (NCPC).

- **Provide space for dedicated, centralized Pick-Up Drop-Off (PUDO) Facilities, and locate parking and PUDO facilities below-grade**

Pick-up and drop-off demand at Washington Union Station already represents an operational challenge, and is likely to increase in the coming years.

We appreciate that the FRA has attempted to address the popularity and impact of PUDO demand at Union Station. However, the approach proposed by FRA does not provide a workable solution. Even at current demand, the proposed solution would increase congestion around the station, cause traffic spillover into adjacent neighborhoods, and increase conflicts at key access points like intercity bus ramps and bike lanes.

To fully acknowledge and manage the impacts of the fast and growing popularity of Transportation Network Companies (TNCs) trips to and from Union Station, DC Sustainable Transportation encourages the FRA to allow for a centralized, below-grade facility. This kind of modern PUDO solution, similar to those that have been implemented at airports and transportation centers throughout the country, will enhance traveler experience and address the critical issues of congestion and conflicts with other modes accessing the station that are not adequately addressed in the DEIS.

A centralized PUDO area will maximize the efficiency of TNCs by reducing idling and VMT, creating new access points to the station, and enhancing the customer experience by creating greater platform access and reduced distance to PUDO areas. Importantly, the creation of below-grade PUDO facilities located close to the rail concourse will enhance the passenger experience and unlock key urban design opportunities – creating more civic space, and allowing for the realization of a vibrant and efficient station setting.

- **Create a more efficient bus facility that treats intercity bus riders with dignity and realizes the opportunity for enhanced multimodal service**

The Draft EIS proposes 40 slips for intercity and bus facility, which far exceeds the amount FRA concluded in the DEIS would be adequate to meet future demand. As proposed, the oversized facility is an inefficient and potentially harmful recommendation

for the future of both the intercity bus rider experience, and the urban design and multimodal opportunities the project presents. Similar to PUDO, we encourage FRA to embrace modern best practices in establishing operating efficiencies to ensure thoughtful utilization of facilities.

Right-sizing the bus facility and adopting a design that optimizes operations will ensure the success of intercity bus travel, an essential component of Union Station's multimodal transportation service. We encourage FRA to reduce the size of the bus facility in the Final EIS and mitigate adverse impacts to the surrounding community by allowing options for exiting the station via western access points.

A right-sized facility will provide substantially enhanced multimodal, civic, and economic opportunity for Union Station and the District—and also a significantly better experience for the 3 million intercity bus riders who are projected to travel through Union Station annually by 2040.

- **Improve bicyclist and pedestrian safety, and promote multimodal access to Union Station**

The Draft EIS indicates that “multimodal operations and access” to the station should be improved. However, bicycle access, bicycle and bike share parking and programming are not a readily recognizable component of the Draft EIS, which is a missed opportunity. As stated above, the currently proposed parking, PUDO, and bus facility plans present conflicts and safety concerns for bike lanes and pedestrian zones.

We encourage the Final EIS to include a more detailed bicycle access, parking, and operational strategy that provides access and parking to the station from all sides. This strategy should achieve the District of Columbia's MOVE DC goal of *Enhancing the Multimodal System* and Sustainable DC's goal to *Expand provision of safe, secure infrastructure for cyclists and pedestrians* and the related target to *Increase biking and walking to 25% of all commuter trips*. Such a strategy would be in line with other planning action being taken by the FRA at this time and in this region. In particular, [the Final EIS for the Long Bridge project](#), in which there was strong consideration and weight given to multimodal improvements.

We encourage the FRA to incorporate and focus on the quality of multimodal connectivity, and the future Station's urban design and surroundings.

- **Plan for a vibrant urban place and create an opportunity for mixed-use development on federally owned land**

The draft EIS inadequately discusses how the Preferred Alternative affects the economic development and the urban environment surrounding the Station. In fact, DC Office of Planning states the “Land use planning is poorly developed reflecting outmoded suburban condition rather than an immensely vibrant, urban context in the heart of our Nation’s Capital....it is clear that the current approach would make high-quality urban design impossible to achieve.” A project of this magnitude needs to be configured to achieve world class urban design and place making. The existing DEIS does not take on this important task and we strongly recommend that the final EIS deliver upon the promise of this project for the region, the District of Columbia and neighboring communities.

We also encourage FRA to recognize the value of the real estate it owns next to the station and create opportunities for mixed-use development in lieu of the large federal garage as currently envisioned. Dedicating this federal real estate to an above grade parking structure destroys valuable economic potential for the federal government, for the District, and the greater Washington region. By changing the approach, the federal government can create developable space and above the tracks for a much more productive use. This real estate offers the potential for public and private spaces that can fill important needs relative to parks, public spaces, and connections to the surrounding community, reinforcing the importance and prominence of the station in its broader neighborhood context.

The Washington Union Station Expansion Project is of critical and significant importance to the region, and DC Sustainable Transportation is dedicated to ensuring the success of this project. To this end, it is imperative that FRA addresses these comments. Once this is done, we will move forward, as one region in concert with the federal government, to realize the opportunity of a greatly improved Washington Union Station.

Thank you,

*Caitlin Rogger*

Caitlin Rogger  
Policy Manager  
DC Sustainable Transportation

Cc: The Honorable Eleanor Holmes Norton  
Mayor Muriel Bowser  
Chairman Phil Mendelson  
Councilmember Charles Allen

Andrew Trueblood, OP

Jeff Marootian, DDOT

C. Andrew Lewis, SHPO

Johnette Davies, Amtrak

Marcel Acosta, NCPC

Beverley Swaim-Staley, USRC



202.223.4560  
1310 L Street, NW Suite 325  
Washington, DC 20005  
[www.federalcitycouncil.org](http://www.federalcitycouncil.org)

September 28, 2020

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: Public Comment to the Washington Union Station Draft Environmental Impact Statement

Dear Mr. Valenstein:

The expansion of Union Station represents the single greatest economic development and transportation opportunity for the District of Columbia and the region as a whole. Not only will the expansion double the station's capacity for Amtrak and commuter rail service, it will deliver fiscal benefits, job opportunities, and enhanced mobility through transportation capacity and facility improvements. By enhancing the station's role as a high-capacity multimodal transit center, the station expansion project will have a significant influence in allowing the region to achieve goals related to growth, efficiency, and competitiveness, as well as critical climate-related goals. The station expansion also will have a major influence on the successful development of privately-held air-rights over the Union Station railyard which will deliver substantial economic, housing, open space, and connectivity benefits to an area of the city that has historically served as a major barrier. An opportunity of this magnitude requires a bold vision, modern and innovative thinking, and dedication to the highest and best standards of planning and design. Finally, and importantly, projects of this scope need the full support of key stakeholders in order to garner the political and financial underpinning required to make the project a reality.

This project does not currently have that support. The National Capital Planning Commission (NCPC), an approving body for this project, has indicated that the project outlined in the Draft Environmental Impact Statement (DEIS) would not be approved and that significant changes are needed in order for the project to move successfully forward. Further, and importantly, the Preferred Alternative has not been endorsed by the board of directors of the Union Station Redevelopment Corporation (USRC), a Proponent of this project. As an organization that holds a board seat on USRC, the Federal City Council is committed to our role in this project and to ensuring its success, however we cannot and will not support the progression of this project without significant changes to the DEIS.

To ensure that all key stakeholders are actively supporting this project, and to ensure its ultimate success, we strongly encourage that the Final Environmental Impact Statement (Final EIS) address the following issues:

- **Revise the parking program to align with recommendations from the DC Office of Planning and NCPC**

There appears to be no project proponent or project stakeholder other than the Federal Rail Administration (FRA) that supports the number of parking spaces included in the



Draft EIS. We encourage FRA to lower the number of parking spaces included in the Final EIS so that it falls in line with the 295-space maximum recommended by the DC Office of Planning and NCPC.

- **Provide space for dedicated, centralized Pick-Up Drop-Off (PUDO) Facilities, and locate parking and PUDO facilities below-grade**

PUDO demand at Washington Union Station already represents an operational challenge, and is likely to increase in the coming years.

We appreciate that the FRA has attempted to address the popularity and impact of PUDO demand at Union Station. However, the approach proposed by FRA in the DEIS does not provide a workable solution. Even at current demand, the proposed solution would increase congestion around the station, cause traffic spillover into adjacent neighborhoods, and increase conflicts at key access points like intercity bus ramps and bike lanes.

To fully acknowledge and manage the impacts of the fast and growing popularity of Transportation Network Companies (TNCs) trips to and from Union Station, the Federal City Council encourages the FRA to allow for a centralized, below-grade facility. This kind of modern PUDO solution, similar to those that have been implemented at airports and transportation centers throughout the country, will enhance traveler experience and address the critical issues of congestion and conflicts with other modes accessing the station that are not adequately addressed in the DEIS.

A centralized PUDO area will maximize the efficiency of TNCs by reducing idling and VMT, creating new access points to the station to reduce congestion in and around Columbus Circle, and increasing access to station platforms from PUDO areas for customers. Importantly, the creation of below-grade PUDO facilities located close to the rail concourse will enhance the passenger experience and unlock key urban design opportunities – creating more civic space, and allowing for the realization of a vibrant and efficient station setting.

- **Create a more efficient bus facility that treats intercity bus riders with dignity and realizes the opportunity for enhanced multimodal service**

The DEIS proposes 40 slips for intercity and bus facility, which far exceeds the amount FRA concluded in the DEIS would be adequate to meet future demand. As proposed, the oversized facility is an inefficient and potentially harmful recommendation for the future of both the intercity bus rider experience, and the urban design and multimodal opportunities the project presents. Similar to PUDO, we encourage FRA to embrace modern best practices in establishing operating efficiencies to ensure thoughtful utilization of facilities.

Right-sizing the bus facility and adopting a design that optimizes operations will ensure the success of intercity bus travel, an essential component of Union Station’s multimodal transportation service. We encourage the FRA to reduce the size of the bus facility in the Final EIS and mitigate adverse impacts to the surrounding community by allowing options for exiting the station via western access points.

A right-sized facility will provide substantially enhanced multimodal, civic, and economic opportunity for Union Station and the District—and also a significantly better experience for the 3 million intercity bus riders who are projected to travel through Union Station annually by 2040. By placing the emphasis on people over parking facilities, an efficient bus facility can support the FRA and USRC’s goals to create an intercity bus experience that treats bus riders with dignity.

- **Plan for a vibrant urban place and create an opportunity for mixed-use development on federally owned land**

The DEIS inadequately discusses how the Preferred Alternative affects the economic development and the urban environment surrounding the Station. In fact, DC Office of Planning states the “Land use planning is poorly developed reflecting outmoded suburban condition rather than an immensely vibrant, urban context in the heart of our Nation’s Capital....it is clear that the current approach would make high-quality urban design impossible to achieve.” A project of this magnitude needs to be configured to achieve world class urban design and place making. The existing DEIS does not take on this important task and we strongly recommend that the final EIS deliver upon the promise of this project for the region, the District of Columbia and neighboring communities.

We also encourage FRA to recognize the value of the real estate it owns next to the station and create opportunities for mixed-use development in lieu of the large federal garage as currently envisioned. Dedicating this federal real estate to an above grade parking structure destroys valuable economic potential for the federal government, for the District, and the greater Washington region. By changing the approach, the federal government can create developable space and above the tracks for a much more productive use. This real estate offers the potential for public and private spaces that can fill important needs relative to parks, public spaces, and connections to the surrounding community, reinforcing the importance and prominence of the station in its broader neighborhood context.

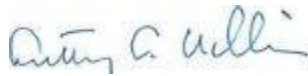
- **Improve bicyclist and pedestrian safety, and promote multimodal access to Union Station**

The DEIS indicates that “multimodal operations and access” to the station should be improved. However, bicycle access, bicycle and bike share parking and programming are not a readily recognizable component of the Draft EIS, which is a missed opportunity. As stated above, the currently proposed parking, PUDDO, and bus facility plans present conflicts and safety concerns for bike lanes and pedestrian zones.

We encourage the Final EIS to include a more detailed bicycle access, parking, and operational strategy that provides access and parking to the station from all sides. This strategy should achieve the District of Columbia's MOVE DC goal of *Enhancing the Multimodal System* and Sustainable DC's goal to *Expand provision of safe, secure infrastructure for cyclists and pedestrians* and the related target to *Increase biking and walking to 25% of all commuter trips*. Such a strategy would be in line with other planning action being taken by the FRA at this time and in this region. In particular, [the Final EIS for the Long Bridge project](#), in which there was strong consideration and weight given to multimodal improvements. We encourage the FRA to incorporate and focus on the quality of multimodal connectivity, and the future Station's urban design and surroundings.

The Washington Union Station Expansion Project is of critical and significant importance to the region, and the Federal City Council is dedicated to ensuring the success of this project. To this end, it is imperative that the FRA address these comments. Once this is done, we will move forward, as one region in concert with the federal government, to realize the opportunity of a greatly improved Washington Union Station.

Sincerely,



Anthony A. Williams  
CEO and Executive Director  
Federal City Council

Cc: The Honorable Eleanor Holmes Norton  
Mayor Muriel Bowser  
Chairman Phil Mendelson  
Councilmember Charles Allen  
Andrew Trueblood, OP  
Jeff Marootian, DDOT  
C. Andrew Lewis, SHPO  
Johnette Davies, Amtrak  
Marcel Acosta, NCPC  
Beverley Swaim-Staley, USRC



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September 28, 2020

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: Public Comment to the Washington Union Station Draft Environmental Impact Statement

Dear Mr. Valenstein:

The expansion of Union Station represents one of the single greatest economic development and transportation opportunities for the Capital Region. An opportunity of this magnitude requires a bold vision, modern and innovative thinking, and dedication to the highest and best standards of planning and design. And, importantly, projects of this scope need the full support of key stakeholders to garner the political and financial underpinning required to make the project a reality.

This project does not currently have that support. To ensure that all key stakeholders are actively supporting this project, and to ensure its ultimate success, we strongly encourage that the Final EIS address the following issues:

- **Revise the parking program to align with recommendations from DC Office of Planning and NCPC**

There appears to be no project proponent or project stakeholder other than FRA that supports the number of parking spaces included in the Draft EIS. We encourage FRA to lower the number of parking spaces included in the Final EIS so that it falls in line with the 300-space maximum recommended by the DC Office of Planning and the District Department of Transportation.

- **Provide space for dedicated, centralized Pick-Up Drop-Off (PUDO) Facilities**

Pick-up and drop-off demand at Washington Union Station already represents an operational challenge and is likely to increase in the coming years.

We appreciate that the FRA has attempted to address the popularity and impact of PUDO demand at Union Station. However, the approach proposed by FRA does not provide a workable solution. Even at current demand, the proposed solution would increase congestion around the station, cause traffic spillover into adjacent neighborhoods, and increase conflicts at key access points like intercity bus ramps and bike lanes.

To fully acknowledge and manage the impacts of the fast and growing popularity of Transportation Network Companies (TNCs) trips to and from Union Station, we encourage the FRA to allow for a centralized facility. This kind of modern PUDO solution, similar to those that have been implemented at

airports and transportation centers throughout the country, will enhance traveler experience and address the critical issues of congestion and conflicts with other modes accessing the station that are not adequately addressed in the DEIS.

A centralized PUDO area will maximize the efficiency of TNCs by reducing idling and VMT, creating new access points to the station, and enhancing the customer experience by creating greater platform access and reduced distance to PUDO areas. Importantly, the creation of PUDO facilities located close to the rail concourse will enhance the passenger experience.

- **Create a more efficient bus facility that treats intercity bus riders with dignity and realizes the opportunity for enhanced multimodal service**

The Draft EIS proposes 40 slips for intercity and bus facility, nearly double the amount FRA concluded in the DEIS would be adequate to meet future demand. As proposed, the oversized facility is an inefficient recommendation for the future of both the intercity bus rider experience, and the urban design and multimodal opportunities the project presents. Like PUDO, we encourage FRA to embrace modern best-practices in establishing operating efficiencies to ensure thoughtful utilization of facilities.

Right sizing the bus facility and adopting a design that optimizes operations will ensure the success of intercity bus travel, an essential component of Union Station’s multimodal transportation service. We encourage FRA to reduce the size of the bus facility in the Final EIS and mitigate potential adverse impacts to the surrounding community by allowing options for exiting the station via western, northern, and southern access points.

A right-sized facility will provide substantially enhanced multimodal, civic, and economic opportunity for Union Station and the District—and also a significantly better experience for the 3 million intercity bus riders who are projected to travel through Union Station annually by 2040.

- **Improve bicyclist and pedestrian safety, and promote multimodal access to Union Station**

The Draft EIS indicates that “multimodal operations and access” to the station should be improved. However, bicycle access, bicycle and bike share parking and programming are not a readily recognizable component of the Draft EIS, which is a missed opportunity. As stated above, the currently proposed parking, PUDO, and bus facility plans present conflicts and safety concerns for bike lanes and pedestrian zones.

We encourage the Final EIS to include a more detailed bicycle access, parking and operation strategy that provides safe access and parking to the station from all sides. This strategy should achieve the District of Columbia’s MOVE DC goal of *Enhancing the Multimodal System* and Sustainable DC’s goal to *Expand provision of safe, secure infrastructure for cyclists and pedestrians* and the related target to *Increase biking and walking to 25% of all commuter trips*.



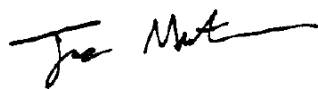
- **Plan for a vibrant urban place and create an opportunity for mixed-use development on federally owned land**

The draft EIS inadequately discusses how the Preferred Alternative impacts the economic development and the urban environment surrounding the Station. In fact, DC Office of Planning states the “Land use planning is poorly developed reflecting outmoded suburban condition rather than an immensely vibrant, urban context in the heart of our Nation’s Capital....it is clear that the current approach would make high-quality urban design impossible to achieve.” A project of this magnitude needs to be configured to best meet the competing goals of enhancing economic potential and mitigating displacement surrounding the Station while creating world class urban design and place making. The existing draft EIS does not take on this important task and we strongly recommend that the final EIS redouble efforts to deliver upon the promise of this mega-project for the region, the District of Columbia, and neighboring communities.

We encourage the FRA to analyze the cost, project schedule and revenue projections for above and below grade configurations for parking, PUDO and bus operations. A proper cost-benefit analysis is expected to show that in lieu of a large above ground parking structure directly adjacent to the existing station, as currently envisioned, developing the real estate for mixed-use development could provide the greatest economic and social benefit. This is because dedicating this federal real estate to an above grade parking structure reduces valuable economic potential for the federal government, for the District, and the region. By changing the approach, the federal government could create developable space and above the tracks for a much more productive use. This real estate option offers the greatest ability to decrease conflict for bicyclists and pedestrians, while creating the potential for public and private spaces that can fill important needs relative to parks, public spaces, and connections to the surrounding community, reinforcing the importance and prominence of the station in its broader neighborhood context.

The Washington Union Station Expansion Project is of critical and significant importance to the region, and the Greater Washington Partnership is dedicated to ensuring the success of this project. To this end, we encourage the FRA to address these comments. Once this is done, we will move forward, as one region in concert with the federal government, to realize the opportunity of a greatly improved Washington Union Station.

Sincerely,



Joe McAndrew  
Managing Director for Transportation  
Greater Washington Partnership

**From:** Stephanie Piperno  
**To:** [Union Station Expansion](#); [David.Valenstein@dot.gov](mailto:David.Valenstein@dot.gov)  
**Cc:** [mariel.bowser@dc.gov](mailto:mariel.bowser@dc.gov); [PMENDELSON@dccouncil.us](mailto:PMENDELSON@dccouncil.us); [callen@dccouncil.us](mailto:callen@dccouncil.us); [Andrew.Trueblood@dc.gov](mailto:Andrew.Trueblood@dc.gov); [jeff.marootian@dc.gov](mailto:jeff.marootian@dc.gov); [marcel.acosta@ncpc.gov](mailto:marcel.acosta@ncpc.gov); [bswaimstaley@usrcdc.com](mailto:bswaimstaley@usrcdc.com); [andrew.lewis@dc.gov](mailto:andrew.lewis@dc.gov); [johnette.davies@amtrak.com](mailto:johnette.davies@amtrak.com)  
**Subject:** Union Station Expansion Project Comments  
**Date:** Monday, September 28, 2020 10:50:33 AM  
**Attachments:** [Capital Trails Coalition Union Station Expansion Project Comments.pdf](#)

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Dear Mr. Valenstein,

The Capital Trails Coalition's comments on the Draft EIS for the Union Station Expansion Project are attached.

The Washington Union Station Expansion Project is of critical and significant importance to the region, and The Capital Trails Coalition is dedicated to ensuring the project includes bicycle and pedestrian access that is in line with the District of Columbia's MOVE DC goal of enhancing the multimodal system and Sustainable DC's goal to expand the provision of safe, secure infrastructure for cyclists and pedestrians. To this end, it is imperative that FRA addresses these comments.

Thank you for your consideration.

Sincerely,  
Stephanie

--

**Stephanie Piperno | Trails Coalition Manager**

**Washington Area Bicyclist Association**  
2599 Ontario Rd. NW, Washington, DC 20009

Cell: 860-605-6685

Email: [stephanie.piperno@waba.org](mailto:stephanie.piperno@waba.org)



September 28, 2020

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, S  
Washington, DC 20590

Re: Public Comment to the Washington Union Station Draft Environmental Impact Statement (DEIS)

Dear Mr. Valenstein:

The expansion of Union Station represents the single greatest transportation and economic development opportunity for the District of Columbia and the region as a whole. For people who bike and walk, the Washington Union Station Expansion Project (Project) presents a critical opportunity to enhance not just connectivity to and around the station, but to the region as a whole. An opportunity of this magnitude requires a bold vision, modern and innovative thinking, and dedication to the highest and best standards of planning and design. And importantly, projects of this scope need the full support of key stakeholders in order to garner the political and financial underpinning required to make the project a reality.

This project does not currently have that support. National Capital Planning Commission (NCPC), an approving body for this project, has indicated that the project outlined in the DEIS would not be approved and that changes are needed in order for the project to move successfully forward. A more detailed strategy for bicycle access that is in line with the District of Columbia's MOVE DC goal of *enhancing the multimodal system* and Sustainable DC's goal to *expand provision of safe, secure infrastructure for cyclists and pedestrians* is needed.

The Capital Trails Coalition is a collaboration of over 60 public and private organizations, agencies, and citizen volunteers, across six jurisdictions, working to complete a nearly 900-mile interconnected network of multi-use trails in the National Capital Region. The Coalition includes Rails-to-Trails Conservancy, Washington Area Bicyclist Association (WABA), Federal City Council, and several advisory members, including the National Park Service and the District Department of Transportation.

The Capital Trails Coalition is aligned with key stakeholders actively supporting efforts to reduce conflicts with vehicles in and around the station, minimize the number of people driving to and from and parking at the station, and create an exceptional multimodal experience that truly enhances and promotes access for all. This Project is of particular interest as the connection along the Metropolitan Branch to Louisiana Ave to the National Mall is all a part of the East Coast Greenway from Maine to Florida.





In order to achieve the District’s stated goals for mode shift to non-automobile trips and sustainability, and to ensure the ultimate success of the Union Station Expansion project we strongly encourage that the Final EIS address the following issues:

- **Improve bicyclist and pedestrian safety, and promote multimodal access to Union Station**

The Draft EIS indicates that “multimodal operations and access” to the station should be improved. However, bicycle access, bicycle and bike share parking, and programming are not a readily recognizable component of the Draft EIS, which is a missed opportunity. We encourage the FRA to increase the bike parking and bikeshare facilities in more locations, and to increase the supply of both bike racks for secure bike parking and bikeshare/micromobility. There are examples of transit hubs from around the world with easy, accessible, ample, and high-quality bike parking that this Project should seek to meet.

The Project presents a once in a lifetime chance to create high quality connection to and around Union Station. East-west connections in the entire project have for so long represented such a divisive fracture in our transportation network because of the railyard and track and the access should be significantly improved. As stated below, the currently proposed parking, pick-up/drop-off (PUDO) zones, and bus facility plans present conflicts with the construction of the Greenway, the protected connection to the Metropolitan Branch Trail, and do not resolve conflicts and safety concerns for bike lanes and pedestrian zones. Additionally, the DEIS does not adequately address the detour for the First Street NE two-way protected bike lanes and safe accommodations for those facilities for the duration of the construction period.

We encourage the Final EIS to include a more detailed strategy for bicycle access that is in line with the District of Columbia’s MOVE DC goal of *Enhancing the Multimodal System* and Sustainable DC’s goal to *Expand provision of safe, secure infrastructure for cyclists and pedestrians* and the related target to *Increase biking and walking to 25% of all commuter trips*. Additionally, we encourage the FRA to consider connectivity to critical access points like H Street NE, Columbus Circle NE, and Louisiana Avenue NE in its final plans.

Such a strategy would be in line with other planning action being taken by the FRA at this time and in this region, including [the Final EIS for the Long Bridge project](#), in which there was strong consideration and weight given to multimodal improvements, [decisions which were strongly supported by the District and key regional stakeholders](#). We encourage the FRA to incorporate and focus on the quality of multimodal connectivity, and the future Station’s urban design and surroundings.

- **Revise the automobile parking program to align with recommendations from the DC Office of Planning and NCPC**

Overbuilding automobile parking facilities will have an adverse impact on the experience of bicyclists and pedestrians at Union Station by increasing the number of car traffic around the station and impeding the



development of the greenway and important civic space. Additionally, there appears to be no project proponent or project stakeholder other than FRA that supports the number of parking spaces included in the Draft EIS. We encourage FRA to lower the number of parking spaces included in the Final EIS so that it falls in line with the 295-space maximum recommended by the DC Office of Planning and the District Department of Transportation.

- **Dedicate space for dedicated, centralized Pick-Up Drop-Off (PUDO) Facilities, and allow for parking and PUDO facilities below-grade**

Pick-up and drop-off (PUDO) demand at Washington Union Station already represents an operational challenge, and is likely to increase in the coming years. Already, the externalities of PUDO traffic—congestion, double-parking, and distracted driving—represent some of the most significant threats to bicyclist and pedestrian safety at Union Station. It is critical that this is addressed in the Station Expansion Project.

To fully acknowledge and manage the impact of Transportation Network Companies (TNCs) trips to and from Union Station, The Capital Trails Coalition supports the FRA creating a centralized, below-grade PUDO facility. This kind of modern PUDO solution, similar to those that have been implemented at airports and transportation centers throughout the country, will enhance traveler experience and addresses the critical issues of PUDOs in the immediate and long-term that are not adequately addressed in the DEIS.

A centralized PUDO area would maximize the efficiency of TNC operators by reducing idling and VMT, create new Western access points to the station, and enhance customer experience by creating greater platform access and reducing distance to PUDO areas. Importantly, the creation of below-grade PUDO facilities will unlock key urban design opportunities – the construction of the Greenway, more civic space, and allowing for the full realization of the project vision.

- **Create a more efficient bus facility that treats intercity bus riders with dignity and realizes the opportunity for enhanced multimodal service**

The Draft EIS proposes 40 bus slips for the intercity bus facility, which far exceeds the amount FRA concluded would be adequate to meet future demand. As proposed, the oversized facility is an inefficient and harmful recommendation for the future of both the intercity bus rider experience, and the urban design and multimodal opportunities the project presents. Most importantly, as currently proposed, the facility would make it impossible to build the Greenway. Similar to PUDO, we encourage FRA to embrace modern best-practices in establishing operating efficiencies to ensure thoughtful utilization of facilities.

The Washington Union Station Expansion Project is of critical and significant importance to the region, and The Capital Trails Coalition is dedicated to ensuring the success of this project. To this end, it is imperative that FRA addresses these comments. Once this is done, we will move forward, as one region in concert with the federal government, to realize the opportunity of a greatly improved Washington Union Station.



Sincerely,

*Liz Thorstensen*

Elizabeth Thorstensen  
Vice President of Trail Development, Rails-to-Trails Conservancy  
Chair, Capital Trails Coalition

Cc: The Honorable Eleanor Holmes Norton

Mayor Muriel Bowser

Chairman Phil Mendelson

Councilmember Charles Allen

Andrew Trueblood, OP

Jeff Marootian, DDOT

C. Andrew Lewis, SHPO

Johnette Davies, Amtrak

Marcel Acosta, NCPC

Beverley Swaim-Staley, USRC



September 28, 2020

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: Public Comment to the Washington Union Station Draft Environmental Impact Statement (DEIS)

Dear Mr. Valenstein:

The expansion of Union Station represents the single greatest transportation and economic development opportunity for the District of Columbia and the region as a whole. For people who bike and walk, the Washington Union Station Expansion Project (Project) presents a critical opportunity to enhance not just connectivity to and around the station, but to the region as a whole. Unless the facilities that support multimodal movement around Union Station are exceptional, these facilities will only be for a few, dedicated users. An opportunity of this magnitude requires a bold vision, modern and innovative thinking, and dedication to the highest and best standards of planning and design. And importantly, projects of this scope need the full support of key stakeholders in order to garner the political and financial underpinning required to make the project a reality.

This project does not currently have that support. National Capital Planning Commission (NCPC), an approving body for this project, has indicated that the project outlined in the DEIS would not be approved and that changes are needed in order for the project to move successfully forward.

The Washington Area Bicyclist Association (WABA), the region's leading bicycle advocacy organization with over 5,000 members across DC, Maryland, and Virginia, is aligned with key stakeholders actively supporting efforts to reduce conflicts with vehicles in and around the station, minimize the number of people driving to and from and parking at the station, and create an exceptional multimodal experience that truly enhances and promotes access for all. In order to achieve the District's stated goals for mode shift to non-automobile trips and sustainability, and to

ensure the ultimate success of the Union Station Expansion project we strongly encourage that the Final EIS address the following issues:

- **Improve bicyclist and pedestrian safety, and promote multimodal access to Union Station**

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The Project presents a once in a lifetime chance to create high quality connection to and around Union Station. East-west connections in the entire project have for so long represented such a divisive fracture in our transportation network because of the railyard and track and the access should be significantly improved. As stated below, the currently proposed parking, pick-up/drop-off (PUDO) zones, and bus facility plans present conflicts with the construction of the Greenway, the protected connection to the Metropolitan Branch Trail, and do not resolve conflicts and safety concerns for bike lanes and pedestrian zones. Additionally, the DEIS does not adequately address the detour for the First Street NE two-way protected bike lanes and safe accommodations for those facilities for the duration of the construction period.

We encourage the Final EIS to include a more detailed strategy for bicycle access that is in line with the District of Columbia’s MOVE DC goal of *Enhancing the Multimodal System* and Sustainable DC’s goal to *Expand provision of safe, secure infrastructure for cyclists and pedestrians* and the related target to *Increase biking and walking to 25% of all commuter trips*. Additionally, we encourage the FRA to consider connectivity to critical access points like H Street NE, Columbus Circle NE, and Louisiana Avenue NE in its final plans.

Such a strategy would be in line with other planning action being taken by the FRA at this time and in this region, including [the Final EIS for the Long Bridge project](#), in which there was strong consideration and weight given to multimodal improvements, [decisions which were strongly supported by the District and key regional stakeholders](#). We encourage the FRA to incorporate and focus on the quality of multimodal connectivity, and the future Station’s urban design and surroundings.

- **Revise the automobile parking program to align with recommendations from the DC Office of Planning and NCPC**

Overbuilding automobile parking facilities will have an adverse impact on the experience of bicyclists and pedestrians at Union Station by increasing the number of car traffic around the station and impeding the development of the greenway and important civic

space. Additionally, there appears to be no project proponent or project stakeholder other than FRA that supports the number of parking spaces included in the Draft EIS. We encourage FRA to lower the number of parking spaces included in the Final EIS so that it falls in line with the 295-space maximum recommended by the DC Office of Planning and the District Department of Transportation.

- **Dedicate space for dedicated, centralized Pick-Up Drop-Off (PUDO) Facilities, and allow for parking and PUDO facilities below-grade**

Pick-up and drop-off (PUDO) demand at Washington Union Station already represents an operational challenge, and is likely to increase in the coming years. Already, the externalities of PUDO traffic—congestion, double-parking, and distracted driving—represent some of the most significant threats to bicyclist and pedestrian safety at Union Station. It is critical that this is addressed in the Station Expansion Project.

We appreciate the FRA attempting to address the popularity and impact of PUDO demand at Union Station. However, the approach proposed by the FRA does not provide a workable solution. Even at current demand, the proposed solution would increase congestion due to on-street queueing, increase conflict with key access points like intercity bus ramps and bike lanes, and have other adverse impacts on the surrounding communities.

To fully acknowledge and manage the impact of Transportation Network Companies (TNCs) trips to and from Union Station, WABA supports the FRA creating a centralized, below-grade PUDO facility. This kind of modern PUDO solution, similar to those that have been implemented at airports and transportation centers throughout the country, will enhance traveler experience and addresses the critical issues of PUDOs in the immediate and long-term that are not adequately addressed in the DEIS.

A centralized PUDO area would maximize the efficiency of TNC operators by reducing idling and VMT, create new Western access points to the station, and enhance customer experience by creating greater platform access and reducing distance to PUDO areas. Importantly, the creation of below-grade PUDO facilities will unlock key urban design opportunities – the construction of the Greenway, more civic space, and allowing for the full realization of the project vision.

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impossible to build the Greenway. Similar to PUDO, we encourage FRA to embrace modern best-practices in establishing operating efficiencies to ensure thoughtful utilization of facilities. Right-sizing the bus facility and adopting a design that optimizes operations will ensure the success of intercity bus travel, an essential component of Union Station's multimodal transportation service. We encourage FRA to reduce the size of the bus facility in the Final EIS and mitigate adverse impacts to the surrounding community by allowing options for exiting the station via northern access points.

The Washington Union Station Expansion Project is of critical and significant importance to the region, and WABA is dedicated to ensuring the success of this project. To this end, it is imperative that FRA addresses these comments. Once this is done, we will move forward, as one region in concert with the federal government, to realize the opportunity of a greatly improved Washington Union Station.

Sincerely,



Greg Billing  
Executive Director  
The Washington Area Bicyclist Association

Cc: The Honorable Eleanor Holmes Norton

Mayor Muriel Bowser

Chairman Phil Mendelson

Councilmember Charles Allen

Andrew Trueblood, OP

Jeff Marootian, DDOT

C. Andrew Lewis, SHPO

Johnette Davies, Amtrak

Marcel Acosta, NCPC

Beverley Swaim-Staley, USRC



September 25, 2020

David Valenstein

Office of Railroad Policy and Development 1

USDOT Federal Railroad Administration (MS-20 RPD-10)

1200 New Jersey Avenue, SE

Washington, DC 20590

**Re: Comments on the Washington Union Station Expansion Project Draft  
Environmental Impact Statement**

Dear Mr. Valenstein,

DC Trails is a family owned private company servicing the District of Columbia, Virginia and Maryland for over twenty years. DC Trails provides transportation to a diverse group of clients including schools, universities, professional groups, tourists and intercity travelers coming to and traveling from Washington DC. Hereby we are submitting our comments to the Suggested Union Station Expansion Project Draft Environmental Impact Statement.

DC Trails is happy to be part of the community of businesses operating out of Union Station Bus Terminal and we look forward to operating out the reconfigured and





improved facility. In our view, the proposed facility expansion should locate the Intercity Bus Deck directly adjacent to the main terminal building and its area should be increased.

The future facility expansion would best benefit the travelers and bus operators, through designing the Intercity Bus Deck as a multipurpose component within Union Station's intermodal terminal, the only of its kind in the area. It is imperative to keep in mind that while the Intercity Bus Deck serves a diverse community of riders, it also provides a full range of transport operations and related activities, and does not focus solely on loading and unloading passengers.

We found conclusions of the analysis at the basis of the slip reduction proposal to be inaccurate, since at its core, the proposal assumes an overall reduction in ridership. We have seen intercity bus volume grow year over year and become more than ever the preferred way of commuting between cities and the proposed 34% - 72% reduction in capacity goes against our observations.

Over the recent years the motorcoach and intercity bus industry has been showing steady growth, with routes and schedules expanding. The industry as a whole has become easily accessible through technological advances, such as online booking and marketing, which has positively translated into ticket sales and increase in ridership. In our view, the Proposed Station Expansion Project is a great opportunity to address the growing needs of the commuters and the projected growth in traveler volume, and expand the Intercity Bus Deck.



The bus not only continues to be the most affordable and flexible travel option, but has also asserted itself as a preferred way for intercity travel with the latest technological features available. Most coach buses providing long distance travel today are equipped with power outlets, WiFi, electronic logs, fuel efficiency and abide by the latest emission regulations, which make bus travel attractive to a wide variety of people. The average bus passenger today chooses bus travel not solely based on affordability factors, but also as one of the most convenient, energy efficient and comfortable ways to travel. Bus operators are now able to bring the highest level of comfort to intercity travel with the newly available business class coaches. Our own fleet has added a number of business class buses and received positive feedback from our client base.

Our passengers include tourists who may use our buses for a single round trip and regular customers who commute between DC and New York on a nearly weekly basis. Our clients are students, government workers, and people from a variety of backgrounds and income levels who all rely on our services for both affordability and comfort. While the train can serve as a comparable travel alternative to some, it still often remains financially inaccessible for many. We have the urge to advocate for all of our customers, regardless of their income level. We strongly feel that reducing Union Station Bus Deck capacity will disproportionately hurt those without the option to buy a more expensive train ticket or those who do not own a private car for long distance travel.

We have seen a steady increase in ridership year over year, for 2018 and 2019, there were 29,130 passengers and 60,623 passengers respectively. We have more than doubled our ridership from and to Union Station. One of our largest client groups are



students and education professionals. In 2019 alone we have seen an increase of 1600 reservations made by students using their EDU e-mails to book the trip over the previous year (in reality that number is significantly higher as many students use their private e-mail address and not the EDU email). If the capacity of the bus deck is reduced, Union Station would no longer operate as a true intermodal terminal we know and love today, and as designated by The Union Station redevelopment act of 1981 which directs the use of Union Station primarily as a multiple use transportation area.

In addition to the intercity operation DC trails and other bus providers are relying on Union Station for charter tours that bring thousands of visitors that come to the nation's capital including "worldstride educational student travel", visiting groups from all over the US and the world, participants in different marches, inaugural events and more. Having a single destination for staging, loading and unloading passengers and doing driver relief provides a level of convenience for bus operators and travelers. Having a designated structure for bus operations also relieves the surrounding area and the district in general from dealing with issues arising from curbside pick-up, such as roadway and sidewalk congestion and being exposed to the elements.

Bringing the intercity bus operation into Union Station took a lot of effort and coordination on the part of bus operators and district officials and has proved to be a success. The proposed expansion program, as currently laid out, will hurt the intercity bus operation within Union Station and take away from its function as an intermodal facility, setting us backwards. Moreover, taking into account DDOT's future plan to eliminate curbside pickups in the district, having a bus facility for the intercity buses is now more important than ever.



The proposal to bring more efficiency through technology and dynamic management approach does not seem aligned with the current number of intercity bus companies, peak schedules and traveler volume. The dynamic management approach may not best account for our passengers with disabilities requiring special accommodations, or help bus operators navigate through unpredictable events, such as erratic traffic patterns and bus breakdowns. The reduction in slips will not only negatively impact the traveler's experience of using the terminal, but pose additional complications for the surrounding area and the already congested roadways.

It is worth emphasizing that all bus operators, including the intercity bus carriers and the tour buses rely on the facility not only for loading and unloading of passengers, but also for staging and parking. The facility allows the drivers some rest between trips and provides short term parking for the buses, resulting in less crowded streets and curbside. According to our projections, not only that a reduction is not feasible for the current intercity and tour bus operations currently servicing Washington DC, but increasing the number of bus slips and expanding the staging and parking spaces for buses is needed to support the growing demand.

Keeping all that in mind, the suggestion to reduce the number of bus slips would be extremely detrimental to a smooth day-to-day operation of the bus terminal, as it is currently operating at near capacity at peak times during peak seasons such as weekends, holidays and the variety of the special events that draw people to DC, from Cherry blossom festival to marches. Alternative A-C is our preferred alternative as baseline however it is important to either maintain the current operational slips at the



station or expand to allow the increase in intercity travel as well as tours and long distance travel needs.

Thank you for the opportunity to share our comments with you and we look forward to continuing operations out of the renewed and improved Union Station once the project is complete. We hope that you consider our suggestions regarding the project and expansion to the existing Intercity Bus Deck can be incorporated to better service the community.

Best Regards,

A handwritten signature in blue ink, appearing to read "William Torres Jr.", is written over a horizontal line.

William Torres Jr.

DC Trails President



August 26, 2020

David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**Re: Comments of Greyhound Lines, Inc. on the Washington Union Station Expansion Project Draft Environmental Impact Statement**

Dear Mr. Valenstein:

My name is Dave Leach and I am President/CEO of Greyhound Lines, Inc. I have worked for Greyhound for 34 years and have been President/CEO for the last 13 years. I am personally submitting these comments on behalf of Greyhound because I consider the Washington Union Station Expansion Project (“the Project”) to be of utmost importance to Greyhound and because of my personal familiarity with the history of Greyhound’s presence at Washington Union Station.

Greyhound is proud to be an integral part of Washington Union Station and looks forward to continuing that role in the expanded facility. Greyhound’s basic position on the Expansion Project is that the intercity bus deck must continue to be located immediately adjacent to the main terminal building with passenger loading and unloading and bus staging areas sufficient to accommodate current passenger demand and likely future growth.

After careful review, Greyhound believes the Draft Environmental Impact Statement is fundamentally flawed in its analysis and conclusions regarding the Union Station intercity bus deck, specifically its determination that by reducing intercity bus deck capacity by 34% to 72% (depending on action alternative), the Project will not only preserve, but actually enhance, intercity bus deck capacity. Because of this flawed analysis, the DEIS does not comply with Executive Order 12898 in that it does not address Environmental Justice for minority and low-income populations.<sup>1</sup>

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<sup>1</sup> The flawed analysis also raises a serious question concerning a potential violation of Title VI of the Civil Rights Act of 1964 (42 USC 2000d et seq.), which prohibits discrimination by federally assisted activities against persons based on race, color or national origin. Since these comments are responding to the DEIS, they will focus primarily on the failure to comply with Executive Order 12898; however, these arguments also apply to a potential Title VI violation.



Greyhound agrees with the DEIS conclusion that of the action alternatives listed, Alternative A-C is the preferred alternative in that it only reduces bus deck capacity by 34%, but it is not Greyhound's preferred alternative. Greyhound would prefer that the Project be reimagined in a manner that maintains or expands the current bus deck capacity. If that preference is rejected, Greyhound would like to work with FRA and the Project Proponents<sup>2</sup> to modify Alternative A-C so it will meet current and likely future demand from intercity bus passengers and thus be in compliance with Executive Order 12898.

Before addressing the specifics of the DEIS, I would like to briefly describe the history of the intercity bus deck; what it has meant to intercity bus passengers and to Washington Union Station; and why it is essential to continue its current location and scope.

The federal statute authorizing the redevelopment of Union Station, the Union Station Redevelopment Act of 1981 (Public Law 97-125), directed the Secretary of Transportation to "provide for the rehabilitation and redevelopment of the Union Station complex primarily as a multiple-use transportation terminal serving the Nation's Capital and secondarily as a commercial complex..." (emphasis added). Despite this clear statutory language, Union Station remained without an intercity bus terminal in the complex for more than 30 years.

Meanwhile, Washington's only intercity bus terminal, operated by Greyhound, was located by the railroad tracks several blocks behind Union Station. Increasingly, intercity bus service was provided by "curbside operators" operating off street corners throughout the city. After a struggle that lasted nearly fifteen years, and with the leadership of Congresswoman Eleanor Holmes Norton, former Deputy Secretary of Transportation John Porcari, and then-Chairman of the House Transportation and Infrastructure Committee John Mica, the current Washington Union Station intercity bus deck was opened in 2012.

The intercity bus deck has proven to be a great success. It achieved the statutory directive to make Union Station a true intermodal facility; it provided immediate access to the main terminal building and Metro for intercity bus passengers; it provided a new revenue stream for Union Station merchants and USRC; and it got the buses off the street and into one centrally located, convenient transportation hub.

Now, as the Washington Union Station Expansion Project moves forward, it is very important that the achievements of Congresswoman Norton and others not be undone. Specifically, Greyhound believes that the Project must include an intercity bus deck, which retains its location immediately adjacent to the main terminal building and which has bus loading, unloading, and staging areas that are adequate to meet current and likely future demand.

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<sup>2</sup> The DEIS defines the Project Proponents as USRC and Amtrak. DEIS Executive Summary at page ES-3.



According to the DEIS, the bus deck has 61 bus loading and unloading spaces (commonly known as “bus slips”).<sup>3</sup> This is sufficient to serve the daily intercity bus arrivals and departures operated by seven intercity bus companies with sufficient capacity for peak periods. In addition, those slips also accommodate charter, tour and sightseeing buses, DC Circulator buses, and vehicles used for miscellaneous purposes.

Greyhound’s preference would be to retain or increase the existing number of bus slips on the bus deck in the final Expansion Project plan. That would enable the current bus usage (intercity, charter/tour/sightseeing, DC Circulator and miscellaneous) to continue and would provide sufficient flexibility to accommodate future growth in intercity bus traffic, which the DEIS projects at 19% by 2040 (DEIS Table ES-2, Page 28).

Even though the DEIS does not contain an alternative that would retain or increase the existing number of bus slips (except for the no action alternative), I urge FRA and the Project proponents to redesign the Project to retain, and possibly add to, the full complement of existing bus slips on the bus deck. Intercity buses are the most energy efficient mode of passenger transportation; they are the most affordable transportation mode; they carry a high percentage of minority passengers; and they are the only transportation mode that connects Washington and other cities to thousands of rural communities.

The Project is titled the Washington Union Station Expansion Project, yet intercity rail capacity is being expanded to accommodate 148% growth in intercity rail traffic and 163% and 187% increase in commuter rail traffic while all of the action alternatives in the DEIS recommend a reduction in intercity bus capacity. Greyhound believes that this is a fundamental flaw in the DEIS and urges FRA to correct it by developing an alternative, which retains or adds to the intercity bus deck’s existing capacity.

If FRA rejects that recommendation and focuses its analysis on the six action alternatives listed in the DEIS, then Greyhound agrees with FRA that Alternative A-C is the preferred alternative. The other five action alternatives propose between 17 and 27 bus slips on the intercity bus deck. In other words, these five alternatives propose reducing the bus capacity at Union Station between 56% and 72% while increasing rail capacity between 148% and 187%.

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<sup>3</sup> DEIS Appendix A3h – Final Concept Development and Evaluation Report Appendix H: Bus Terminal Capacity Technical Memorandum at page 2. Although this 2016 Technical Memorandum listed 61 bus slips at that time, it appears that there are more than that now. An Operations Summary prepared in August, 2020 by USPG, LLC, the bus deck managing agent, lists 69 bus slips. Whatever the exact number, there are more than 60 bus slips, which would be substantially reduced under any of the DEIS action alternatives.





Any one of those five alternatives would be disastrous for intercity bus service and intercity bus passengers. Even with the most efficient possible slip utilization, there is simply no way that 27 bus slips could handle existing passenger demand at peak periods, or even at normally busy periods. Intercity bus providers, including Greyhound, would have no choice but to cut back or eliminate their service at Union Station while seeking other service locations around the city. In other words, buses would be right back where they were before the opening of the bus deck with multiple inferior service locations scattered throughout Washington.

In Greyhound's view, this is an unacceptable result for several reasons. First, it would defeat the purpose of those who worked so hard to create the bus deck, which was to provide a central intermodal transportation hub for intercity buses while removing them from congested city streets. Second, it would be inconsistent with the congressional mandate to redevelop the Union Station complex "primarily as a multiple-use transportation terminal serving the Nation's Capital". And third, and most important, it would discriminate against intercity bus passengers in direct violation of Executive Order 12898, Environmental Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.

EO 12898 requires federal agencies to make achieving environmental justice part of their mission. They must do so by identifying and addressing disproportionately high and adverse impacts of their actions on minority and low-income populations in order to achieve an equitable distribution of benefits and burdens. The DEIS attempt to meet this mandate is fatally flawed.

The DEIS does properly recognize that "minorities and low-income persons rely on the bus for intercity travel much more than other demographics." (DEIS at page 5-535). That is certainly the case with Greyhound, which is a majority minority bus service provider. Greyhound's 2019 survey of its passengers found that 56% were minorities (35% Black, 14% Hispanic, 7% Asian). The survey also found that 43% of Greyhound passengers had annual household income of less than \$35,000 and 57% had annual household income of less than \$50,000.

But the DEIS then concludes that the No Action Alternative (preserving the existing 61 bus slips) "would result in a major adverse operational impact on bus passenger facilities' ability to accommodate projected increases in users at WUS" (page 5-535) while the alternatives reducing the bus deck capacity by 56% to 72% would only "have a moderate adverse direct operational impact on intercity bus operations..." (page 5-538).

This makes no sense, and in fact, is contradicted by the information contained in the DEIS itself. There is a paucity of data or statistical analysis in the DEIS with regard to the intercity bus deck, but what does exist is contained primarily in Appendix A3h Final Concept Development and Evaluation Report Appendix H: Bus Terminal Capacity Technical Memorandum, July 13, 2016.



(the “Technical Memorandum”) and secondarily in Appendix A5e Action Alternatives Refinement Report, Alternative Bus Program Memorandum, February 2017, updated May 2020 (the “Supplemental Memorandum”).

The Technical Memorandum concludes that by 2040, there will be a need for 47 “active spaces” for intercity bus, charter and tour bus, and DC Circulator on the bus deck. Page 8, Table 1. This includes 2 spaces for “operational flexibility” but does not appear to include the twelve 2016 “layover spaces”.

Although I believe the 47 spaces are understated, that number is far above the 17-27 gates proposed in the action alternatives other than Alternative A-C, and indeed is substantially above the 40 gates proposed in A-C. It shows that rather than causing a “moderate” adverse impact on intercity bus operations, alternatives reducing total spaces to 17-27 slips would effectively eliminate most, if not all, intercity bus service from Union Station.

I have several reasons for believing that the 47 spaces are understated and that, in fact, the “current” 61 gates (as listed in the 2016 Technical Memorandum) may not be sufficient in the future. First, Alternative A-C’s 47 space proposal assumes that in the 2015-2016 period, there were 19 “active spaces” assigned to intercity bus companies. It appears that those numbers included only Greyhound/BoltBus and Megabus. As of August 4, 2020, the correct number of bus spaces assigned to intercity bus operators is 29.<sup>4</sup>

Second, the peak period calculations used to determine capacity needs are based on time-of-day “average” peak periods. They do not take into account day-of-the-year peaks. Those days (Christmas, Thanksgiving, Easter, Cherry Blossom Festival, all Federal holidays, summer weekends, etc.), when multiple extra buses are operated on many schedules, are the true peaks that make intercity bus service viable.

For example, on November 27, 2019, the day before Thanksgiving, Greyhound had 104 scheduled arrivals and departures at Washington Union Station, but operated an additional 37 extra buses (also known as extra sections). This was an increase of 36 percent above the regular number of buses operated by Greyhound at Washington Union Station. It is days like these when maximum capacity is needed, and there is no recognition of that need in the Technical Memorandum.

Third, the Technical Memorandum projects a need for 47 active bus slips in 2040 (25 intercity, 18 charter, tour and sightseeing, and 4 DC Circulator), but it ignores the multiple other buses that

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<sup>4</sup> USPG, LLC Operations Summary, August 4, 2020. Spaces are assigned as follows: Megabus 11, Greyhound/Bolt 11, Best Bus 2, Peter Pan 2, OurBus 2, Washington Deluxe 1.



utilize the bus deck. According to the USPG, LLC Operations Summary, those buses (with the number of slips utilized) include:

- UCIS (Government Contract): 1
  - Gallaudet (School): 1
  - Children's Hospital (Healthcare): 1
  - Medstar Mobile Units (Healthcare): 2
  - Virginia Breeze (Connector): 1
  - CNN: 4
  - DMW Industries: 1
  - Bike and Roll: 2
  - Old Towne Trolley: 2
  - Dedicated slips to allow bus pickup and drop off only (15 minute maximum) 2
- Total bus slips dedicated to miscellaneous usage 17**

Fourth, the Technical Memorandum does not take into account the numerous special events, both scheduled and unscheduled, that cause overflow conditions on the bus deck. A few examples of scheduled special events include the March for Life, Women's March, Capital Pride, Police Unity Tour, and Inaugurations. In addition, when Amtrak has service disruptions, it uses the bus deck for alternative bus service.

Since the DEIS does not address this miscellaneous usage, we do not know if the proposal is intended to eliminate all of it. At the very least, the DEIS should address these functions and make an informed and logical decision on whether or not to include them in the projected bus deck. If FRA and the Project Proponents intend that these buses used for educational, healthcare, governmental, communications, special events and emergency purposes are to be eliminated from Union Station, the DEIS should clearly state that fact, explain where FRA and the Proponents plan for these buses to go, and assess the environmental impact of those planned moves. If these buses are to continue to be located on the bus deck, the final number of bus slips must be expanded to include them.

And fifth, it is my understanding that the District Department of Transportation's policy going forward is to develop Washington Union Station as the primary access and parking hub for the District while reducing the availability of curbside motorcoach parking and services on DC streets. Specifically, I believe that DDOT intends to reduce daytime motorcoach curbside parking and to eliminate overnight motorcoach curbside parking while shifting a substantial portion of that parking to Union Station, and requiring all new bus operators to serve Union Station. The DEIS must take into consideration DDOT's Union Station bus deck usage



expansion plans when determining the final number of bus slips to include in its preferred alternative.

In its conclusion, the Technical Memorandum notes that the “terminal could adopt a dynamic management approach”, which could affect the bus slip projections. This approach would utilize technology to allocate buses to available spaces based on current demand. The Memorandum concedes that “there are no bus terminals managed dynamically in the United States”, but suggests that examples in the UK and New Zealand might apply. Technical Memorandum at page 9.

As we have in many other intermodal terminals, Greyhound stands ready to work with terminal management to improve efficiency, but we suggest that there are reasons why dynamic management has not gained traction in the United States. Those reasons include costs, complexity of operations, and multiplicity of operators. Although we are willing to cooperate in any effort to improve efficiency, we see no evidence that dynamic management could significantly reduce the number of bus slips required at Union Station.

The Supplemental Memorandum is an update of the Technical Memorandum, which essentially reaffirms the findings of the Technical Memorandum. It looks at a 25-bus slip alternative with 30 minute turnarounds, but concludes that “given the complications of a strict active management approach and physical constraints, larger bus programs are recommended”. Supplemental Memorandum at page 1.

One significant point about the Supplemental Memorandum is its admission that its analysis of daily peak demand “is based on regular Spring/Summer service and avoids peaks-of-the-peak like the Cherry Blossom Festival”. Supplemental Memorandum at page 2, footnote 5. This confirms my point that intercity bus service is a peak period business, as is the charter and tour business, and the DEIS simply ignores those peaks.

In that regard, Greyhound received a notice from USRC today (August 25, 2020) asking all bus deck occupants “to help us circulate, stage and park 167 buses” for the August 28 Civil Rights March event. Even with 69 bus slips this will be a tall order, but it would be impossible with the number of bus slips contemplated in any of the DEIS action alternatives. The DEIS’ failure to address the need for peak period bus slip availability is a fatal flaw.

Given our real-life experience, Greyhound believes that all of the alternatives (other than the no action alternative and possibly alternative A-C, if properly modified) are totally inadequate to meet present and future intercity bus capacity needs. They would all lead to effective eviction of most, if not all, intercity bus passengers from Union Station.



Even Alternative A-C is highly problematic. It is difficult to see how a 34% reduction in bus deck capacity will sustain existing intercity bus, charter/tour bus, DC Circulator service, and miscellaneous bus usage, much less accommodate the projected increases. Greyhound would much prefer to maintain the existing bus deck capacity or increase that capacity to reflect DDOT's plans for increased bus usage and the DEIS increased usage projections, but we are willing to work with USRC management to enhance bus deck efficiency to try to move closer to the 40 bus limit contained in Alternative A-C.

For Alternative A-C to work, there must be an adequate bus staging area in, or very close to, Union Station.<sup>5</sup> Even the DEIS recognizes the need for a bus staging area, but concludes that "these locations have not been determined." (Page 5-95). For Greyhound to support a bus slip reduction along the lines of Alternative A-C, these locations must be determined and included in the Project. I would emphasize that having the staging area in the complex is highly preferable; otherwise, buses shuttling to and from an off-site staging area will contribute to traffic congestion around the complex.

The DEIS ignores the issue of bus staging (other than the above reference), yet this is an important environmental issue. Today, all bus staging is contained on the bus deck and has no impact on surrounding street traffic. But if bus staging is required to occur outside of the building, even if the staging area is only a short distance away, it will have a significant impact on traffic surrounding the building.

In New York City, Greyhound stages its buses at a lot that is one-tenth of a mile from the Port Authority Bus Terminal. Even with this very short distance, moving buses from the staging area to the terminal has a significant impact on surrounding street traffic. In New York, there is no choice because the terminal's bus loading and unloading capacity has been reached, if not exceeded. But Washington Union Station does have a choice and that choice should be to design the bus deck with adequate capacity for bus loading, unloading and staging. We urge that the DEIS be modified to address this issue and to recommend an action alternative that provides for adequate bus staging in the terminal, along with sufficient bus loading and unloading areas.

I am pleased to note that the Supplemental Memorandum concludes by stating that the "size and operation of the bus facility may continue to be refined by FRA and Proponents during the preparation of the FEIS and during the design phase of the Project". Supplemental Memorandum at page 6. This will give FRA and the Project Proponents an opportunity to develop a bus deck plan which meets the present and future needs of bus passengers at

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<sup>5</sup> Bus "staging" refers to the short-term, multiple hour parking of a bus next to, or very close by, the bus slip where it will load passengers on the next schedule it will serve. "Staging" is sometimes used interchangeably with "layover". Bus staging generally does not involve bus servicing, which in Greyhound's case, is done at a remote location several miles away.



Washington Union Station. Greyhound looks forward to helping FRA and the Proponents design an adequate bus deck.

I would also like to address the issue of the appropriate level of car parking in the future Union Station. It appears that the car parking plans have generated, by far, the most controversy. I want to make clear that the appropriate level of car parking and the adequacy of the intercity bus deck are entirely separate issues. One has to do with what parking is needed to support the primary functions of Union Station; the other concerns what must be done to provide adequate facilities for one of those primary functions, that is, the provision of intercity bus service.

I will leave it to the experts to determine the right amount of overall car parking. In terms of car parking related to intercity bus service, Greyhound, passengers, like Amtrak passengers, have little need for long term parking. But, also like Amtrak passengers, Greyhound passengers do have a need for some short-term parking for those passengers (e.g., senior citizens, people with special needs), who feel the need to have a companion with them for the loading or unloading process. The final number of parking spaces should include adequate short-term parking for intercity bus passengers.

Most of the public comment with regard to parking has focused on reducing the proposed number of parking spaces. If the number of parking spaces is reduced, the resulting vacant space would be ideal for the bus staging area, which will be needed to make Alternative A-C viable and to mitigate the Environmental Justice problem created by the reduction in bus slips. I urge FRA to utilize any such vacant space for the bus staging area. Certainly, intercity bus staging in that space should take priority over any non-transportation use.

It appears from the record that the primary proponent for reducing the size of the intercity bus deck is the Akridge Company, the developer of the adjacent commercial project. I am sure that commercial enterprise will be a positive addition to the Project, but it is important that the primary transportation functions of Union Station, including intercity bus service, not be sacrificed for non-transportation commercial interests.

The commercial project is to be built on air rights owned by the developer and should focus on commercial development. But the intercity bus deck is part of the federally-owned air rights at Union Station, and thus, by law, should be part of “the rehabilitation and redevelopment of the Union Station complex primarily as a multiple-use transportation terminal serving the Nation’s Capital...” (Public Law 97-125) (emphasis added).

In its January 2, 2020 comments to the National Capital Planning Commission, Akridge proposed that the bus deck be “right sized” to 10-12 bus slips. Its justification was that this would bring it in line with usage at comparable terminals. Yet, the chart that it presented to



support its claims (Attachment B, page B-23) does not contain real life numbers for any U.S. terminal. The only reference to a U.S. terminal is a plan for future bus lanes in 2040 at a proposed Philadelphia intermodal facility.

That plan provides no basis for its bus slip recommendations, and in fact, appears extraordinarily uninformed about intercity bus service. It states that “Intercity bus service is relatively new to Philadelphia beginning in 2008 as a curbside boarding operation”. 30<sup>th</sup> Street Station District Plan Report at page 78. The plan authors were apparently unaware that most intercity bus service in Philadelphia is operated from the downtown Greyhound terminal, which has been in business for decades.

Akridge also makes the extraordinary suggestion that the FRA plan be modified to eliminate the nine charter and tour bus slips proposed in Alternative A-C (out of the 40 total slips) and to have those buses load and unload in front of the station or on the surrounding side streets. Charter and tour buses need a safe and convenient location to load and unload their groups. They have that on the bus deck. Can you imagine hundreds of schoolkids milling about in front of Union Station or on its side streets while dozens of buses jockey for position in front of the Station and on the roads leading to it? The environmental issues concerning congestion and safety would be greatly increased.

I would also like to address the comments of ANC 6C, which argued that buses do not need to be at Union Station because they compete with trains. That completely misses the fundamental purpose of intermodal transportation centers such as Washington Union Station, which is to provide travelers with transportation alternatives conveniently located in one transportation hub. Moreover, although there is some competitive overlap between buses and trains, Amtrak and Greyhound also cooperate with each other through a ticket honoring agreement to provide alternative transportation in emergency situations such as weather-related cancellations. That cooperation could not exist without the two companies being co-located at Union Station.

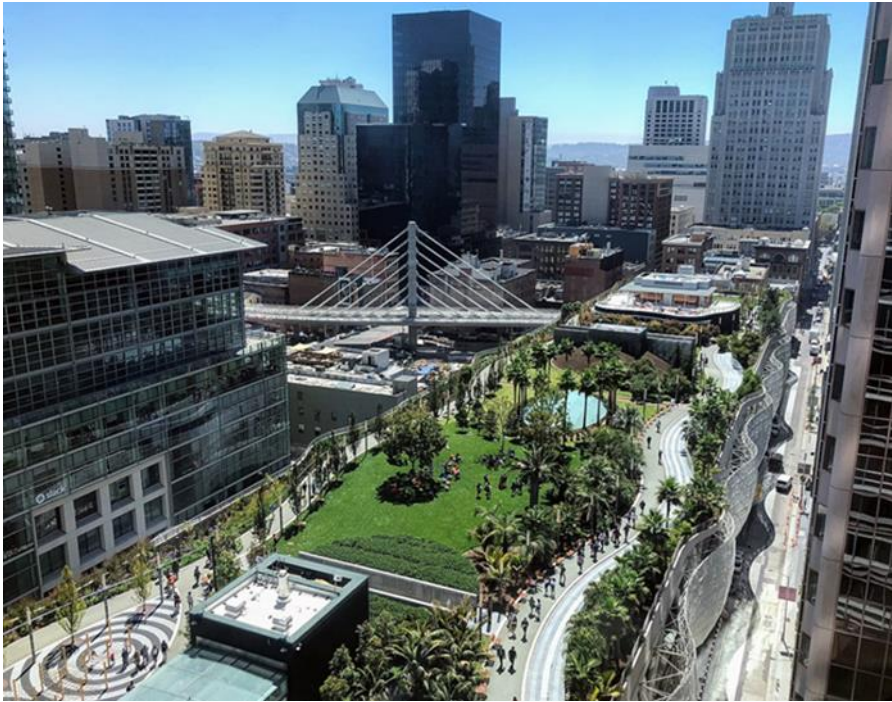
Finally, a number of commentators have criticized the placement and perceived appearance of the bus deck and parking structure as part of the urban design. It should be noted that there are many examples around the world where architecture has been used successfully to conceal the more functional elements of a development and we expect that the designer of this project in the Nation’s Capital to be of the highest caliber and perfectly capable of addressing this from an urban design perspective in a historic setting.

This would be consistent with how other modern intermodal facilities, including the intercity bus portions of those facilities, are being designed. Greyhound has recently occupied a great example of enlightened urban design, the Transbay multi model facility in San Francisco (shown below). Transbay, which opened in 2019, offers world class amenities and is a



considered a destination for users and visitors to the Bay area. I am confident that the Project designer will be equally creative here.

Transbay has many creative and important design features, but one worth particular mention is the cable-stayed bridge, which carries buses directly from the terminal to the San Francisco-Oakland Bay Bridge. That bridge, which is clearly visible in the lower picture below, is not only an attractive landmark, it also serves an important environmental purpose by removing bus traffic from city streets.







Thank you for the opportunity to file these comments. Greyhound is excited about the Expansion Project and looks forward to working with FRA and the Project Proponents to ensure that the Union Station intercity bus deck is designed to fully integrate current and future bus passengers into the new Station.

Sincerely yours,

A handwritten signature in black ink, appearing to read "D. Leach".

Dave Leach  
President/CEO  
Greyhound Lines, Inc.

cc: The Honorable Elaine Chao, Secretary of Transportation  
Members of the Union Station Redevelopment Corporation Board of Directors  
Marcel Acosta, Executive Director, National Capital Planning Commission  
Beverley K. Swaim-Staley, President and CEO, Union Station Redevelopment Corporation



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September 28, 2020

**VIA EMAIL**

David Valenstein  
Office of Railroad Policy and Development (MS-20 RPD-10)  
USDOT Federal Railroad Administration  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590  
info@WUSstationexpansion.com

RE: Comments on the Draft Environmental Impact Statement (“DEIS”) for the Washington Union Station Expansion Project

Dear Mr. Valenstein:

On behalf of megabus.com (“Megabus”) and its parent company, Coach USA, Inc. (“Coach USA”), we appreciate the opportunity to provide our comments to the DEIS for the Washington Union Station Expansion Project (“Project”). It is an exciting period to revitalize and enhance Washington Union Station (“WUS”) and we are proud to be one of multiple motorcoach operating carriers that service this historical station.

For background, Coach USA is one of the largest transportation operators in North America. We operate more than 2,400 buses and coaches and employ more than 4,500 people. We provide critical local and inter-city transport services for communities throughout the US and Canada. Coach USA owns more than 25 bus carriers in North America that operate scheduled bus routes, motorcoach tours, airport shuttles, charters, and/or city sightseeing tours. Since its launch in April 2006, Megabus is one of the leading intercity motorcoach services with a central focus on the Northeast offering daily express service for as low as \$1. Megabus has served more than 50 million customers throughout more than 100 cities across North America. Megabus’ relationship with the Washington Union Station is vital to this service and to our passengers that rely on an economical and efficient transport to the D.C. Metropolitan area.

We want to make clear from the start that we value and support the needs to evolve while preserve the historical Washington Union Station. We are very much part of the community that comprises

all that is offered at WUS and look forward to our future together. Upon our full review of the DEIS, we submit our comments in response to the DEIS's striking disconnect between the alternatives provided and the motorcoach traveler needs. To displace and/or significantly reduce the bus capacity of Megabus and its companion carriers would rupture the very specific intent of what the WUS set out to achieve in the Union Station Redevelopment Act of 1981 ("USRA"); specifically, it empowers the Secretary of Transportation to "provide for the rehabilitation and redevelopment of the Union Station complex *primarily* as a multiple use transportation terminal service for the Nation's Capital, and *secondarily* as a commercial complex" (*emphasis added*).<sup>1</sup>

Additionally, as part of the overall analysis, there must be a review to the alternatives presented by the DEIS to ensure the necessary compliance with Title VI of the Rehabilitation Act and the Economic Injustice Executive Order 12898. The alternatives that are proffered by the DEIS does not address the potential of discrimination and/or inequity to individuals and populations in similar economic and social situations by the significant reduction of its bus facility, and this should be further explored to achieve a positive result.

### Primary Purpose of Washington Union Station

As stated herein, the primary purpose of the WUS is to provide a "multiple use transportation terminal service". Although the USRA was enacted in 1981, a bus deck was not offered to the masses at WUS until 2012. The popularity of this option exponentially increased over the years, which now provides Megabus and other common carriers to utilize at least 61 bus slips for the loading and unloading of passengers for motorcoach services. These slips not only afford an area for the intercity bus services offered by Megabus, but a variety of other tour, transit and charter services. In its No Action Alternative, the DEIS provides in Table 3.6 that intercity bus service is projected to increase from 2.5 million passengers annually to 3.175 million passengers annually or a 27% increase from the current daily stats.<sup>2</sup> The DEIS also notes an increase in the rail service to grow 24%. The increase for rail service is similar to the bus service with a notably slightly less increase.

The increases for both rail and bus are necessary to point out for this analysis insofar as they are not only projecting a similar rate of increase, but also reflects the need to provide multiple use options for travelers. The DEIS provides a variety of alternatives, but in every instance, there is a reduction to the bus facility area and a significant increase to the rail tracks and platforms. Our concern lies with the ability to meet the same increased demand and still continue to have a home in WUS that is satisfactorily equipped to achieve this purpose. A severe reduction of bus slips would create a disparity of choice for the traveler. This disparity does not serve USRA's purpose, but rather falls back to a time where there was no multiple use terminal. The data as provided in the DEIS shows that there is a clear need for a less costly, efficient and fluid transportation option.

Our goal is to engage in a dialogue and conversation that would allow us the opportunity to serve that public need for bus transportation services. The service ranges from long distance travel, rural to urban communities, intercity services and the daily commute. Bus transportation provides this myriad of opportunities that will only increase over time. To stifle and protract those opportunities would be a disservice to the public and those we serve. Our preference would be to preserve the current number of 61 bus slips. We are ready, willing and able to have these discussions on

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<sup>1</sup> Title VI of the Civil Rights Act of 1964 (42 USC 2000d et seq.)

<sup>2</sup> DEIS for Washington Union Station Expansion Project – Chapter 3 - Alternatives at page 38.

redesigning on how the bus facility can be inclusive within the project and the evolution of the WUS project.

Given the alternatives as outlined in the DEIS, the only alternative that creates some equity is the Preferred Alternative, Alternative A-C. This still provided motorcoach operating carriers with a 40 bus slip capacity and a 19% increase. This is still a further reduction from the July 7, 2016 memorandum (“2016 Memo”), which originally provided an allowance of 47 bus slips.<sup>3</sup> In fact, the 2016 Memo states that “the estimated current demand for intercity bus services [alone] is 19 spaces.” This was based on data from 2013 to 2015. Between 2016 and 2019, Megabus already increased its trips to WUS by 22%. The 2016 Memo was further revised in the February 2017, Updated May 2020 memorandum (“Updated 2020 Memo”) to support the Alternative A-C approach.<sup>4</sup> It proceeds to note that any of the other alternatives that reduces the bus slips at a range from 17 to 27 would not be conducive for either the bus passenger, operating carrier or the surrounding area of the WUS.

Much of the reliance in the DEIS is an overly optimistic management program that would provide a theoretical process for buses to enter and exit the facility if the bus slips were reduced significantly in alternatives A through E and even Alternative A-C. There would be a need to have a robust staging area to handle the complexities of the daily travel; and that is only managing the daily travel. There are also special events that bring an increased population to the D.C. area such as the Cherry Blossom Festival, which is noted in the Updated 2020 Memo, the DC JazzFest, Capital Pride, inaugurations and scheduled marches. An increased volume of buses also accommodate the influx of visitors to the D.C. area during the holidays. For Thanksgiving in 2019, Megabus added 40 extra buses to ensure we met the demand for WUS as a final destination. 17 or even 40 bus slips could not handle seasonal holiday travel in any practical or efficient manner. The alternatives simply do not address or acknowledge how a much reduced bus facility would accommodate the influx of bus travelers for these events.

The alternatives will only create congestion in the surrounding area of WUS, displace already weary travelers into areas inconvenient or isolated and force motorcoach operating carriers to find other areas to unload/load passengers. This would create a chaotic and unsafe atmosphere, which the FRA should give serious consideration. Even if a staging area could be integrated, buses moving back and forth to move constantly during the day with multiple carriers will undoubtedly create an already heavy traffic area and an increase of environmental issues. In 2016, there were 72K bus movements at WUS. Based on 2019 volumes, we would estimate upwards of 90k additional bus movements per year if buses were required to layover outside of the bus deck.<sup>5</sup> It is not only an environmental issue or congestion issue, but certainly a safety issue. As in one example, Flixbus unloaded/loaded it passengers in the front of WUS in February, 2020, which was short lived. It certainly increased a level of unnecessary danger to its passengers by either waiting or disembarking on an already congested area of private or for hire cars.

We would like to make one brief but important note in terms of car parking. It is understood that there is a need for parking, whether it is related for support of WUS, travelers or customers. We want to ensure that there is a level of parking that will ultimately support the bus traveler in terms of

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<sup>3</sup> DEIS Appendix A3h – Final Concept Development and Evaluation Report Appendix H: Bus Terminal Capacity Technical Memorandum at page 1.

<sup>4</sup> DEIS Appendix A5e – Action Alternatives Refinement Report Appendix D: Reference Memoranda at Page 5.

<sup>5</sup> Estimate based on 2019 departure and arrival volume of major carriers operating to/from Union Station. Bus movement defined as any bus moving between the bus deck and a separate staging area.

short term parking at the station. This would be a common element necessary not just for bus, but for rail as well. Such parking should be within reasonable short access to the bus or rail traveler. It is especially critical to the daily commuter or special event spectator who rely on ease of access to meet his or her own schedule.

There is a need to preserve and retain a sufficient number of bus slips to accommodate the increasing volume and provide a satisfactory alternative to the rail.<sup>6</sup> The Updated 2020 Memo even concedes that “[t]he size and operation of the bus facility may continue to be refined by FRA and Proponents during the preparation of the FEIS and during the design phase of the Project.” We consider ourselves part of the mosaic of WUS and are truly optimistic and enthusiastic to help bring the Project to fruition. But we urge the FRA to require further diligence that gives the bus facility the space that reflects the true intent of WUS.

### Equity in the Transit Planning Process

Title VI grants federal agencies providing financial assistance the oversight authority to "effectuate [the law's] provisions . . . by issuing rules, regulations, or orders of general applicability," ([42 U.S.C. § 2000d-1](#)) and also provides for enforcement actions and remedies in individual cases. that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. The FRA is one of the federal agencies charged with such oversight authority and incorporates the language of Title VI to take prompt measures “to ensure no person is denied participation in, or the benefits of, its programs due to race, color, or national origin, and works to ensure nondiscriminatory transportation in support of our mission to enhance the social and economic quality of life for all Americans.”<sup>7</sup> This can reasonably be read as creating a buffer zone of protection to ensure that the potential for discrimination is identified and averted before it becomes actual.

The Economic Justice Executive Order, issued by President Bill Clinton in 1994, requires federal executive agencies and entities receiving federal funds to "identify[] and address[], as appropriate, disproportionately high and adverse human health or environmental effects of [their] programs, policies, and activities on minority populations and low-income populations . . . ."<sup>8</sup> The Order also prohibits the exclusion of persons (or populations) from participating in, reaping the benefits of, or being discriminated against under such programs, policies, and activities, because of their race, color, or national origin.

It is notable that this prohibition explicitly applies to "populations" in addition to individuals. By using the word "populations" rather than "communities," the Order extends not only to the residents of specific geography but also to "populations" who are similarly-situated with respect to the

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<sup>6</sup> As cited in the Updated May 2020 Memo, “In her February 28, 2020 letter to the National Capital Planning Commission (NCPC), Congresswoman Holmes Norton called for WUS to “retain a sufficient number of bus slips to support the continuation of a thriving intercity bus business, accommodate the needs of both bus companies and travelers, and ensure that travelers retain a wide range of options that will meet their needs in terms of destination, departure times, frequency and price.”

<sup>7</sup>

<sup>8</sup> Exec. Order No. 12898, [59 Fed. Reg. 7629](#) (Feb. 11, 1994)

benefits or burdens of a plan or project, but may live far apart.<sup>9</sup> The EJ Executive Order overlaps with, but is distinct from, Title VI. The EJ Executive Order extends its protections to "low-income populations" not otherwise protected under federal civil rights law.<sup>10</sup> This is relevant to the view that travelers of a particular segment of the transportation multi use network, such as buses, and who are "similarly affected" by a plan or policy, may comprise a protected population.

It is important to address both Title VI and EJ Executive Order since a reduction of the bus facility may result in an impact that is both unjust and disparate. It may create an inequity of accessibility for the low-income versus the high income traveler and potentially isolate specific races from the opportunity to travel to WUS. In a recent Megabus demographic survey, 28% of our ridership comprised of financially insecure households and the highest percent of African Americans and Hispanics.<sup>11</sup> With the ability of bus transportation to provide outreach to communities that are typically unreachable with the rail system and provide a low cost alternative, it is a favored option for the low income family and areas where minority races are dominant.

We visualize an equitable solution to maintain the access to groups that may have little or no option. The alternatives outlined in the DEIS do not address this specific issue. In every instance, it reduces bus capacity to a level which only allows it to grow by 19% (from its original 27%)<sup>12</sup>, and yet increases the rail system to achieve a 148% increase (from its original 24%). But at what cost to the segment of travelers who require and depend on bus transportation as its only option? At the very least, what will be the demographic shift to increase the rail system and decrease the bus facility and/or move it off site? What is the message it will send to the populations that rely on bus transportation? One of the most complementary aesthetics to a city is its diversity and the ability to create opportunity. We ask to have this dialogue as part of the planning in line with the FRA's oversight authority so that such planning and processes are meaningful and deliberate.

To review or collect demographic data, such as riders' race, English proficiency, frequency of transit usage, and opinion on quality of service - and conduct an equity analysis, provides protected populations with a form of access that we can inform ourselves about the needs and circumstances of these groups.<sup>13</sup> Megabus conducts multiple surveys to understand our customer, who participates in our services and how we can improve the quality and accessibility of the service. It would be amiss to not do the same for the Project. There should be, at the very least, an understanding as to why a traveler may elect to travel by bus as opposed to rail. A collection of this data from participating carriers can provide the right information to understand the impact of a reduced bus facility. It can also stress the need to preserve the quantity of bus services currently available at WUS.

There is no doubt that the Project will see a rebirth to the historical station and preserve its undeniable beauty while expanding its value. But we must not forget its primary purpose – a multiply use transportation terminal service. There is also a need to preserve accessible options of

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<sup>9</sup> COLLOQUIUM GETTING THERE FROM HERE: AN EXPLORATION OF REGIONALISM AND TRANSPORTATION IN THE UNITED STATES: ARTICLE: CONFRONTING INEQUALITY IN METROPOLITAN REGIONS: REALIZING THE PROMISE OF CIVIL RIGHTS AND ENVIRONMENTAL JUSTICE IN METROPOLITAN TRANSPORTATION PLANNING, 44 Fordham Urb. L.J. 1017

<sup>10</sup> See Footnote 8.

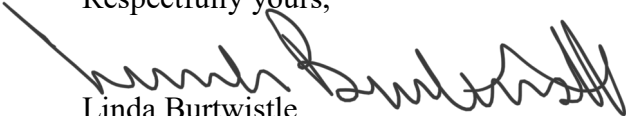
<sup>11</sup> megabus.com Demographic Segmentation, Marketing Analytics, May 2018.

<sup>12</sup> To reiterate, Megabus ridership trips increased already by 22% from 206 though 2019.

<sup>13</sup> See Footnote 8.

transportation. Both the bus and rail should grow based on the demands of the people who participate in it. We look forward to continuing this dialogue with the FRA and Project proponents and provide the necessary input to refine the bus facility and its design to accommodate this preservation.

Respectfully yours,



Linda Burtwistle  
Chief Executive Officer  
Coach USA, Inc.



September 28, 2020

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: Amtrak Comments on Washington Union Station Expansion Project Draft Environmental Impact Statement

Dear Mr. Valenstein:

Amtrak is in receipt of the Washington Union Station Expansion Project (SEP) Draft Environmental Impact Statement (DEIS) and commends the Federal Railroad Administration (FRA) for the tremendous amount of work and effort that has been put into reaching this milestone deliverable. Amtrak recognizes the importance of this document as the first step to realizing an expanded and modernized Union Station complex in order to facilitate the growth and expansion that is planned throughout the region and along the Northeast Corridor (NEC). Collectively with Union Station Redevelopment Corporation (USRC), District of Columbia (DC), other local and federal agencies and transportation providers, and the private air rights owner Akridge, Amtrak believes there is an opportunity to produce a transformative, state-of-the-art rail station that integrates transportation infrastructure, economic development, and urban placemaking.

From a rail planning perspective, Amtrak strongly supports the rail infrastructure plans that are common to all the alternatives proposed in the DEIS. The rail infrastructure plan accommodates the large growth that is planned along the NEC and to Virginia in the upcoming decades, maximizes the constrained footprint at Union Station to accommodate this planned service growth, and provides a modern and first-class passenger experience for Amtrak and our commuter partners at Union Station. Amtrak is also in favor of an enlarged passenger concourse (where the Claytor Concourse is today) that would span all tracks and platforms complemented by a central spine, west concourse and H Street concourse to allow for passengers and station users to flow through and access the station in a more efficient manner than today.

For the SEP to be successful broad support is needed to fund and advance this project. The current preferred alternative A-C identified in the DEIS falls short of achieving this goal. Amtrak believes that the Final Environmental Impact Statement (FEIS) should incorporate several key modifications to the preferred alternative A-C in order to attain this broad support including an updated parking program that reduces the number of spaces and reconsiders the location of the parking facility and continued refinement of the passenger pickup and drop-off program all in an effort to ensure that the final alternative is one that meets future needs while creating the transformative, activated neighborhood that has been a cornerstone of this project since the beginning.





The DEIS assumes about 1,000 parking spaces for Amtrak passengers whereas Amtrak has previously stated in our memo addressed to FRA and USRC on January 7, 2020 that we do not require any future long-term parking at Union Station. Amtrak encourages our passengers to access our stations, especially in urban areas, via alternate modes than single occupancy private vehicles. Union Station is ideally situated in the middle of DC with multiple means of access that are going to be enhanced as part of the SEP. Virginia, in partnership with Amtrak and others, is investing more than \$3B in rail infrastructure over the next decade or so and has recently introduced congestion pricing on the highways in Northern Virginia, all in an effort to curtail use of the private automobile within the region. Maryland has continued to explore the ability for future increases in both capacity and regularity of service for commuter rail services. Additionally, DC is on the record as not supporting this level of parking as it is not in line with their current policies and technical analysis. All of this supports a parking reduction in the FEIS.

Amtrak does acknowledge a need for short term, kiss-and-ride type parking which can be accommodated in a smaller facility. Alternative C planned for about 900 parking spaces below grade. The DEIS noted concerns with a K Street entrance and constructability of the facility below the track level. In terms of constructability, it is feasible to build below the track level. Construction would take a year or so longer but is achievable and could be worth it to have better lasting results for the entire complex. If the facility were reduced below 900 spaces, closer to the 300 spaces proposed by DC Office of Planning (DC OP), it would be worth re-examining K Street or alternate means of access and egress to that facility. Given the shift of our passengers to transit and ride-share/taxi to access Union Station, Amtrak encourages a continued discussion and refinement of the passenger pick up and drop off plan to a more consolidated location. A reliance on the front of the historic Union Station, with the increased passenger volumes, will likely result in continued overwhelming of Columbus Circle and the surrounding streets, as will a plan with multiple locations for pick up and drop off.

Amtrak recognizes the parking and bus structure in Alternative A-C is on the federal land and therefore would provide revenue back to Union Station to support operations. However, Alternative C notes that more than 900,000 square feet of office or another use could be built in that location if the bus and parking facility were located elsewhere. This has the potential to be better integrated with the urban fabric and to establish a more consistent revenue stream for maintenance and operation of the historic portions of Union Station. Additionally, as part of delivery of this project, there is an opportunity to re-evaluate overall how the station is funded and maintained. While maximizing value is important, creating a vibrant, mixed-use community has also long been an Amtrak priority for Union Station redevelopment from the beginning of the planning process in 2010. These two priorities need not be in conflict.

Finally, the DEIS has a significant amount of mitigation measures that are attributed to USRC and Amtrak, as well as other stakeholders. Amtrak suggests that FRA begin to engage with all identified stakeholders for mitigation measures prior to the FEIS to ensure these are items the agency can and wishes to achieve.

Amtrak is aware of the objections to portions of the preferred alternative A-C from valued stakeholders such as National Capital Planning Commission (NCPC), DC government, the local Advisory Neighborhood Commission (ANC), and others. This provides FRA the opportunity to produce a final preferred alternative that speaks to Amtrak's as well as others' concerns and to put forth a final plan that delivers on enhanced rail and transportation services, facilities, and access while also fostering an activated urban realm above and north of Union Station. As a project proponent, Amtrak stands ready to



continue our work and partnership with FRA and others to ensure the future success of this important and exciting project.

Regards,

A handwritten signature in blue ink, appearing to read "D. Handera", written in a cursive style.

Dr. David Handera  
VP Stations, Facilities, Properties and Accessibility

Brandon:

Yes, I guess I had some comments and concerns about some of the projections related to the bus deck for the increases in ridership between now and 2035, I guess, roughly 15 years from now. I know that given the current COVID-19 reality, it's obviously going to change some things and it may change things permanently, but typically the bus industry and the intercity bus industry, which is kind of characterized in some cases, if I scheduled service, although we do also have a lot of charter uppers that utilize Union Station platforms for lunches and shopping and things like that. But typically the increase in ridership is on the seven to 10% annually, yet for this project, it seems to only be looked at as a 20% increase. Hence, the footprint seems to have been significantly reduced. Is there any opportunity to reevaluate those projections, which then might help reevaluate the footprint?



September 28, 2020

The Honorable Ronald Batory  
Administrator  
Federal Railroad Administration  
1200 New Jersey Ave, SE  
Washington, DC 20590

Dear Administrator Batory,

I am writing to you on behalf of the American Bus Association and our 850 bus and motorcoach company member companies who represent over sixty percent of all motorcoaches on the road in the U.S. and in Canada. The ABA is encouraged by the U.S. Department of Transportation and Federal Railroad Administration's ongoing efforts to promote the use of, and expanded access to, intermodal passenger facilities in order to create a seamless transportation experience for the traveling public. Specifically, we support your work to make Washington, D.C.'s Union Station the premier intermodal facility in the United States with access points for private charter buses, intercity buses, commuter buses, transit buses, Amtrak, commuter trains, intracity rail transit (metro), streetcars, bike share, taxis, personal vehicles and pedestrians.

In response to the announcement soliciting public comment, we offer the following comments to the environmental impact statement (EIS) for the Union Station Expansion Project. We also testified during the public hearing on July 14, 2020 and have frequently participated at every possible opportunity. As the Project proceeds through the next phase of development, we wish to emphasize the importance of the motorcoach access for charter, intercity and sightseeing bus operations at Union Station. It is critical these components be taken into proper consideration during Project development and execution. Private motorcoach operations at Union Station are a vital driver of not only efficient transportation for the traveling public, but also in supporting both the environment and the economy of Washington, D.C. Project developers must ensure Union Station remains a truly intermodal facility, providing critical connections to the larger integrated transportation network.

The American Bus Association (ABA) is the leading private bus and motorcoach industry trade association in North America. The ABA has been in existence for over 90 years and is home to over 3,800 member companies and organizations. ABA's motorcoach operator members operate nearly 65% of the equipment on the road. ABA's members provide all manner of transportation services including: scheduled service, charter and tour, commuter operations and airport shuttle service. In addition, there are ABA members that provide all manner of services to bus companies and there are several bus manufacturer members of ABA.

In addition to having motorcoach operators, ABA members include many tour, travel companies, convention and visitors' bureaus (CVBs) destinations and attractions including many based in the

District of Columbia. From this standpoint, ABA plays a vital role in promoting tourism throughout North America and for the District, in addition to intermodal transportation and multi-modal transportation planning. In this context, Union Station (specifically as a destination) and other intermodal transportation hubs are crucial cogs in our tourism infrastructure and drivers of economic development in addition to multimodal mobility. We believe that there is a unique synergy between transportation and tourism. In fact, is a member of ABA and annually attends our major convention, ABA Marketplace, to promote motorcoach parking and shopping opportunities at Union Station to hundreds of motorcoach operators nationwide.

In fact, ABA's President & CEO Peter Pantuso has served for the past 2 years as a member of the U.S. Department of Transportation's National Advisory Committee on Travel and Tourism Infrastructure (NACTTI). One of the NACTTI's key tasks is to identify critical transportation facilities and corridors that facilitate and support the interstate and interregional transportation of passengers for tourism, commercial, and recreational activities as well as identify strategies to improve intermodal connectivity for travelers and tourists. We believe that Union Station and this Expansion Project can serve as a model for future intermodal facilities.

We view motorcoach and bus tourism as a vital piece of the puzzle of pairing transportation with development as we bring people to destinations. In previous changes to the configuration of Union Station, buses haven't always been embraced to their fullest potential. Prior to the remodel of the current intercity and charter bus deck in 2012 there were over 90 spaces for mostly charter buses to park or pick up and drop off passengers. Those were spaces were reduced under the redesign and integration to about 60 spaces. There had been previous discussions of the development (and completion) of an off-site satellite parking lot near New York Ave., NE, with a first-rate driver's lounge to incentivize continued bus patronage at Union Station before the reduction of tour bus parking spaces. Within the proposed Union Station Expansion Project alternatives, those spaces will be further reduced to roughly 40 (or less) and parking will be additionally constrained, not only at Union Station, but for the entire downtown core of Washington DC.

We would welcome the opportunity to share our expertise to help ensure the expansion project fulfills its goal of sustainable and realistic expansion while minimizing the impact on the residential neighborhoods and the surrounding community.

As the project moves forward, we join our partners in the tourism community with three major recommendations:

- 1) motor coach parking should be maintained at its current level and not reduced
- 2) a satellite parking facility should not be considered
- 3) any parking or dwell time restrictions (30-minutes is mentioned in the proposal) should be only for intercity or tenants and not for paid charter bus parking.

We have already provided some additional advisor's to the Union Station Redevelopment Corporation, heavy users of Union Station who are not only intercity transportation providers and represent over 2 million annual trips to DC. Visitors arriving in DC by motorcoach are major users of the Union Station and the consultants who provided the design alternatives do not seem to have a clear understanding of how the tourism industry operates. Out-of-town visitors to the District are frequently part of large tour groups that travel by motor coach, often in multi-bus caravans. In many cases our passengers ride motorcoaches from their point of origination into the city or even to a

suburban metro station. If a group arrives by plane, a motorcoach picks up the group at the airport. In each scenario that motorcoach is their primary travel mode throughout their time in DC. At some point in the trip it's highly probable that the group – will go to Union Station or a tour of somewhere nearby and the driver will need someplace to park and rest.

We believe this proposal could be better informed with some consideration of their data sources, better evaluation of the economic impacts of motorcoach travel, and consideration for the benefits of motorcoach travel on congestion and the environment. It did seem odd that environmental impact of motorcoaches was represented in a very limited fashion throughout the EIS document.

### **Bad Data**

A lot of the data used in creating the projections for 2040 is outdated or just incorrect. As we stated during our public hearing testimony, intercity bus ridership has increased on the order of 7-10% annually for each of the past 10 years per an annual report based on ridership and stop location volume published by DePaul University. At Union Station alone, over the past 3 years, 3 new intercity bus providers have added Union Station as a stop location and there is potential for many more carriers to be added if the process was more transparent and easily accessed. The data included with the EIS suggests almost no growth in the intercity segment over the next 20 years! Similarly, while charter bus traffic may ebb and flow depending on customer preferences, itineraries and special events, the data completely ignores the % change in DC tourism and a large majority of those travelers (particularly foreign tourists) come to the District via motorcoach transportation. The tourism data from Destination DC should be factored into the growth plans, and additionally prior to 2016 Union Station did not generally advertise its motorcoach parking opportunities. With so many factors changing over the past 5 years, the growth projections need to be aggressively revisited. Finally, in terms of projecting growth, the market share and inventory of Washington, DC's available motorcoach parking was not considered. Union Station at present has almost 60% of the available motorcoach parking spots currently. Without additional development elsewhere, there is potential for Union Station to almost have a monopoly on motorcoach parking, which could result in a significant increase in parking demand. Market forces are a factor that should have also been considered in the growth scenarios.

### **Economic Benefits**

Motorcoaches love Washington, DC! Among ABA's bus operator members, more than 33% list Washington, DC as one of their top 5 destinations. Motorcoaches and the groups that they bring also have a significant positive impact on the local economy. Motorcoaches bring as much as \$5,000 - \$10,000 per night during an overnight visit to a destination such as Washington, DC. The Union Station Redevelopment Corporation estimates that its retailers realize more than \$33 million in revenues from bus passengers on an annual basis. For FY 2015, Amtrak realized its second highest passenger ridership in its national system at Union Station with 4.9 million passengers, trailing only New York. Nearly 4 million bus passengers also passed through Union Station in 2015. This does not include bus passengers who were dropped off in other locations such as the National Mall and matriculated their way through Union Station by other modes. Bus passengers represent a significant demographic in the continued economic success of Union Station. In addition, the economic growth

### **Congestion Mitigation and Environmental Benefits**

George Mason University<sup>1</sup> and the Metropolitan Washington Council of Governments<sup>2</sup> have recently concluded studies that demonstrate that more than 1,000 private buses pass through the District of Columbia on a daily basis, a number which increases to over 2,000 buses per day during the peak tourism season, February through June. The District maintains a motorcoach parking inventory of roughly 800 spaces throughout the city<sup>3</sup>. Less than half of the motorcoach parking inventory is close, convenient or easily accessible (10 minutes travel time or less) to the downtown core or the National Mall. With parking at an extreme premium, locations like Union Station are essential to ensuring that buses continue to visit. Washington needs safe places to park and give drivers with limited allowable driving hours a place to rest. Union Station is perfectly positioned to fill that void.

Still, beyond the obvious economic benefits, one of the most underappreciated benefits of motorcoach travel are the environmental benefits that they bring. In traveling by motorcoach, on average 35 to 40 cars are displaced from our roadways with each load of 55 passengers who decide to ride the bus rather than drive. With double-decker motorcoaches capable of carrying up to 81 passengers, additional congestion reduction benefits are realized.

An environmental impact statement not only needs to assess the impact of the buses serving Union Station, but it will also need to estimate and weigh the impact of the congestion and pollution that they will prevent and remove from the local community. Motorcoaches are the greenest and most efficient form of surface transportation<sup>4</sup>. Motorcoaches realize 239.8 passenger miles per gallon, as compared to 85.2 passenger miles per gallon for Amtrak and 27.9 passenger miles per gallon for cars. Motorcoaches also release only 43 grams of CO<sub>2</sub> per passenger mile, as compared to 147 grams for Amtrak and 368 grams for cars. And that is just today! Motorcoach emissions and fuel economy are going to continue to get even better, particularly under the Environmental Protection Agency's (EPA) recently released Greenhouse Gas Phase 2 regulations. These regulations will impact new engines beginning in 2021 and will be heavy users of the expanded Union Station. Those vehicles will see a 24% or greater reduction in their already low CO<sub>2</sub> emissions. These calculations and environmental benefits will need to be incorporated into the EIS.

As mentioned, motorcoaches emit the lowest average amount of grams of CO<sub>2</sub> per passenger mile of any mode including Amtrak, transit buses and single passenger vehicles. When motorcoaches are left without viable parking options and forced to circulate the city streets in "creep mode" (roaming around the city streets at low speed) rather than parking, this activity has a negative impact on traffic congestion as well as the environment. Buses operating in creep mode use more fuel (generally double) and emit at least 50% more nitrogen oxides (NO<sub>x</sub>) when driving at low speed in urban traffic than when idling. This adds more than 375 gallons more fuel burned and emissions of more than 22

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<sup>1</sup> Margaret Daniels, P. G. (2015). *National Mall and Memorial Parks Tour Bus Study*. Washington, DC: National Park Service.

<sup>2</sup> Cambridge Systematics. (2015). *Regional Bus Staging, Layover, and Parking Location Study*. Washington, DC: Metropolitan Washington Council of Governments.

<sup>3</sup> DC Department of Transportation. (2011). *DC Motorcoach Action Plan*. Washington, DC: DC Department of Transportation.

<sup>4</sup> Union of Concerned Scientists. (2008). *Getting There Greener: The Guide to Your Lower-Carbon Vacation*. Cambridge, MA: Union of Concerned Scientists.

pounds of excess NO<sub>x</sub> annually, for only one hour/day of circulating<sup>5</sup>. The District has a strict 3 minute idling law, and thanks to the success of annual outreach efforts by ABA, the DC Department of Transportation, Union Station and Destinations DC, the motorcoach industry is very familiar with the law and rarely found to be out of compliance. Parking eliminates idling for motorcoaches. We would suspect that the same cannot be said for Amtrak or transit bus operations. Motorcoaches would gain a significant environmental benefit by being afforded increased parking locations.

The net impact of reducing congestion and increasing the parking capacity for cars through the turnover generated by limited time parking also purports to have an environmental benefit. However, every motorcoach visiting Union Station is also contributing to this goal of improving the environment. In addition to the mass transportation benefits offered by motorcoaches, they also offer a significant reduction in terms of emissions over every other surface transportation vehicle.

Motorcoach drivers also operate in compliance with the U.S. Department of Transportation's hours of service regulations, which mandate a maximum of 10 hours of driving time. For companies visiting Washington, DC on day-trips, and for companies located more than 4 hours away, drivers need a place to rest and relax while waiting for their group to return. Eliminating parking locations such as Union Station will negatively impact their trips. Forcing drivers to waste time searching for a distant parking location, or creating a situation where they use up valuable service hours creeping through the streets and making the driver less rested and threatening the safety of the trip. We hope that you will consider this need and the needs of the more than 50,000 tourists who visit Washington, DC by motorcoach daily during the busy tour season and add realized safety benefits as a factor in the EIS.

In summary, motorcoaches bring significant economic and environmental benefits to Union Station and the District of Columbia. As you begin the process of redesigning and transitioning to its next phase of Union Station's operations, we would like to stress that it is critical that motorcoach parking and the intercity bus aspects of the bus deck's operational footprint within the Union Station Expansion Project must be maintained or enhanced, not reduced. As fewer and fewer millennials seek to get driver's licenses or own cars, the demand for intercity motorcoach travel will continue to increase.

Again, thank you for your past support for intermodal passengers. The bus industry appreciates your interest in continuing to provide intermodal opportunities for the entire passenger transportation industry, but we hope that you won't forget the charter and tour bus segment in the intermodal redevelopment plan.

Sincerely,



Brandon Buchanan  
Director of Regulatory Affairs

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<sup>5</sup> Lowell, D. (2008). *Updated Comparison of Energy Use and Emissions From Different Transportation Modes*. Concord, MA: MJ Bradley & Associates.





## Adventure Cycling Association

September 28, 2020

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, S  
Washington, DC 20590

Re: Washington Union Station Draft Environmental Impact Statement (DEIS)

Dear Mr. Valenstein:

I am writing on behalf of Adventure Cycling Association and our 50,000 members in support of expanding biking and walking facilities, accessibility, and safety in the Washington Union Station Expansion Project. Adventure Cycling is a national nonprofit that inspires, empowers, and connects people to bicycle travel. We are a member of the Capital Trails Coalition, which is working to advance completion of an interconnected network of multi-use trails for metropolitan Washington, DC.

This project provides a critical opportunity to increase biking connectivity to and around the station, as well as the region as a whole. Washington DC is an international destination for bicycle touring and the hub for more cross country and regional bicycle routes and trails than any other city in the nation, including:

- The 3,500-mile U.S. Bicycle Route 50, which will connect to San Francisco when complete;
- The 3,700-mile Great American Rail Trail which will connect to Washington State;
- The 2,643-mile Atlantic Coast route, which connects Bar Harbor, Maine to Key West, Florida;
- The 3,000-mile East Coast Greenway, which connects Maine to Florida;
- The 377-mile Tidewater Potomac Route, a regional loop;
- The 335-mile C&O Canal Towpath and Great Allegheny Passage trails connecting to Pittsburg;
- The 45-mile W&OD Trail, connecting to Purcellville, VA;
- Hundreds of miles of trails in the Capital Trails Network, a growing regional trails network.

Why consider cross-country bicycle trails with the expansion of DC's Union Station? Because Union Station is also a major hub for Amtrak's continually expanding bicycle services. Since 2015, Amtrak has added bicycle service on all of its long-distance routes and the majority of its state supported routes, carrying over 54,000 bicycles in 2018. Just in September 2020, Amtrak announced new bike service additions to several routes including the Northeast Regional. The MARC train has also added and expanded its bike services in the past five years. Bicycle and train use for both commuting and recreation has grown significantly in a short time, and now is the opportunity to ensure that Union Station will serve the needs of these visitors as demand continues to increase, whether for first/last mile commuter bike connections or the cross-country bike traveler.

### Adventure Cycling Association

*A member-supported nonprofit organization, inspiring and empowering people to travel by bicycle.*

(800) 755-2453 • (406) 721-1776 • [info@adventurecycling.org](mailto:info@adventurecycling.org)  
[www.adventurecycling.org](http://www.adventurecycling.org) • 150 E. Pine Street, Missoula, Montana 59802

To meet the needs of passengers with bicycles, we urge the FRA to include:

1. Safe access to Union Station with protected bicycle lanes or separated bike path.
2. Secure and covered bicycle parking – More rail and transit stations and airports are providing secure bike parking stations.
3. Secure lockers for storing valuables – This is important for travelers who may be doing a bike trip as part of a longer trip and need somewhere to store their additional valuables that they can't pack on their bicycle.
4. Stairs with a ramp for bicycles – To allow bicyclists to roll rather than carry their bicycle to another level of the station.
5. Incorporate bike share – increase bike share stations at Union Station to facilitate more convenient multimodal connections.
6. Focus on multimodal connections rather than dedicating the majority of space to motor vehicles, which will only increase congestion and costs to this project.

As a member of the Capital Trails Coalition, we also endorse their recommendations to: 1) improve bicyclist and pedestrian safety and promote multimodal access to Union Station; 2) revise the automobile parking program to align with recommendations from the DC Office of Planning and NCPC; 3) dedicate space for dedicated, centralized Pick-Up Drop-Off (PUDO) Facilities, and allow for parking and PUDO facilities below-grade; and 4) create a more efficient bus facility that treats intercity bus riders with dignity and realizes the opportunity for enhanced multimodal service. These recommendations would reduce conflicts with vehicles in and around the station, minimize the number of people driving to and from and parking at the station, and create an exceptional multimodal experience that truly enhances and promotes access for all.

The District of Columbia has stated goals for mode shift to biking and walking, including the MOVE DC goal of *enhancing the multimodal system* and Sustainable DC's goal to *expand provision of safe, secure infrastructure for cyclists and pedestrians*. Union Station is a critical transportation hub for cyclists and it is important that the FRA's expansion of Union Station are in line with these goals, and the needs of all of Union Stations' users. That means investing in biking and walking facilities, accessibility, and safety and working with the Capital Trails Coalition to ensure that the needs of those without a motor vehicle are met.

Thank you for your consideration of these comments, and please contact me with any questions.

Sincerely,



Saara Snow  
Advocacy Manager  
[ssnow@adventurecycling.org](mailto:ssnow@adventurecycling.org)

Cc: The Honorable Eleanor Holmes Norton

Mayor Muriel Bowser

Chairman Phil Mendelson

Councilmember Charles Allen

Andrew Trueblood, OP

Jeff Marootian, DDOT

C. Andrew Lewis, SHPO

Johnette Davies, Amtrak

Marcel Acosta, NCPC

Beverley Swaim-Staley, USRC

Marquis Edwards Committee of 100 on the Federal City. My comment is that this is a rail station and it should first and foremost operate as a rail station. Unfortunately, the way the DEIS is designed, it provides no high-speed rails service South of Union Station, the high-speed rail station ends in the sub-tracks on the upper level. The second problem is the fact that the operating system South of the station is assumed to be under continued ownership and dispatch by the freight railroads.

It fails to take into account what happened last year when VRE and Virginia announced they had acquired over a 100 miles of CSX tracks in Virginia, that they would pay for, own and operate the new passenger rail bridge at Long Bridge and therefore provide passenger and commuter rail efficiencies that could greatly increase the number of trains. As a matter as an example, New York under the Hudson River, you have the North River Tunnel that supplies Penn Station, it accommodates up to 24 trains per hour. It is a two tunnel system with one track in each direction. The same as our first street tunnel situation. It shows the efficiency of operating a rail system for commuter and rail operations, as opposed to having to accommodate the inefficiencies of freight running simultaneously on the same rails, [the Union Station DEIS needs to be updated to take into account the Virginia] The DEIS needs to be updated to take into account the operating system of what would happen under the Virginia VRE plan to operate the track South of Union Station for passenger and commuter rail, and to take into account high-speed rail. Thank you.



**Comments Concerning the  
Union Station  
Draft Environmental Impact Statement  
(Released June 12, 2020)**

September 28, 2020

The Union Station Draft Environmental Impact Statement (DEIS) proposes an expansion plan that will cost between 5.8 and 7.5 billion dollars<sup>1</sup> and require 11 to 14 years to build<sup>2</sup>. The plan focuses on bus and automobile parking, station concourses, platforms and retail. But the plan does not adequately address Union Station’s role as a train station. The expansion plan needs to be substantially revised to address that deficiency.

Union Station is first and foremost a train station—a critical piece of the nation’s transportation infrastructure and an indispensable asset to help our region solve our transportation challenges: *vehicle congestion and parking caused by automobile commuters*. Two-thirds of the daily trips to and from the District are by car, leading to congestion and costly travel delays, compromised air quality and increased carbon emissions.

Commuter and passenger rail are essential in providing pragmatic alternatives to automobile commuting. 213 passenger trains pass through, depart, or arrive in the District on a typical weekday<sup>3</sup>, resulting in many economic and social benefits for the District.

- In FY 2015, Amtrak’s headquarters at Union Station employed 235 DC residents with wages totaling over \$18.5 million. Amtrak also spent \$24.2 million on goods and services in DC during that same year.
- VRE and MARC carry commuters who add a combined \$1.64 billion to the District economy each year.<sup>4</sup>

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<sup>1</sup> DEIS, Executive Summary, page ES-34.

<sup>2</sup> *Id.*, page ES-1.

<sup>3</sup> *DC Rail Plan*, page 3-34

[https://ddot.dc.gov/sites/default/files/dc/sites/ddot/page\\_content/attachments/DC%20SRP%20FinalReport.pdf](https://ddot.dc.gov/sites/default/files/dc/sites/ddot/page_content/attachments/DC%20SRP%20FinalReport.pdf).

<sup>4</sup> *Id.*, pages 3-70 thru 3-71.

### **Summary Recommendations**

Because of outdated assumptions and projections, the Preferred Alternative fails to provide adequate trackage and adjustments to trackage to meet known needs even within the Draft Environmental Impact Statement timeframe. The DEIS falls short of meeting the needs of rail passengers and the project stakeholders. The Committee of 100 on the Federal City has repeatedly emphasized that rail transportation must be prioritized in any plan for the proposed Union Station Expansion Project. Major changes are needed in the DEIS to accomplish this. As explained in these comments, the Preferred Alternative and DEIS need to be revised to:

- Take into account the increased number of trains that will operate south of Union Station within the planning horizon of this expansion project due to separation of passenger and freight rail operations south of Union Station and the ability to electrify the passenger tracks south of Union Station.
- Update the trackage required to accommodate a much larger number of trains than the projections in this DEIS.
- Take into account the need for high-speed rail south of Union Station.
- Take into account VRE thru-running to Maryland and MARC thru-running to Virginia.
- Revise the trackage configuration to accommodate high-speed rail south of Union Station and electrification of the tracks south of Union Station.
- Reduce the size of the proposed parking garage to accommodate only the needs of Union Station.
- Address the need for an income stream for USRC during the proposed construction timeframe when the parking garage will not provide that income.

### **Erroneous Assumptions and Projections**

The rail network that uses Union Station is operationally and physically fragmented among several service providers and owners. Likewise, the planning is fragmented, with three different plans for the rail system south of Union Station that will affect Union Station operations in the years encompassed by this DEIS:<sup>5</sup>

1. The plan that resulted from the December 2019 Agreement between CSX and the Commonwealth of Virginia that the Virginia Department of Rail and Public Transportation (DRPT) would build, own and operate the new two-track Long Bridge river-crossing as well as substantial CSX trackage in Virginia.<sup>6</sup>

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<sup>5</sup> These plans or projects do not address the need for a fourth rail track between 3rd and 2nd Streets, SW, the entrance to the First Street rail tunnel. Apparently this was not accomplished as a part of the Virginia Avenue Tunnel project and has been overlooked in the L'Enfant Station Expansion plans. Four tracks are essential from the Long Bridge to the First Street Tunnel to separate freight and passenger operational controls by providing two tracks for freight and two tracks for passenger rail.

<sup>6</sup> The Long Bridge EIS ROD states at page 2-1: "It is anticipated that the Project will become the responsibility of the new Virginia Passenger Rail Authority, which formed on July 1, 2020, once

2. The Long Bridge FEIS plan to add a fourth track between the Long Bridge and 12<sup>th</sup> Street SW (FEIS issued September 2, 2020) that designates DRPT as Project Sponsor, responsible for designing and constructing the Project as presented in the Long Bridge FEIS.

3. The L’Enfant Station Expansion Plan will add a fourth track between 12<sup>th</sup> Street and 3<sup>rd</sup> Street, SW. It is projected to be completed in 2029<sup>7</sup>.

These three plans will result in separation of passenger and freight rail operation south of Union Station. This momentous change in rail operation will transform our rail system into a more modern, efficient and inclusive rail network that will better serve the DC region and the East Coast rail network. But this dramatic change in rail operations is completely ignored in the Union Station DEIS. In fact the DEIS clearly states the contrary – that passenger and commuter rail operations south of Union Station will continue to be controlled by CSX (Appendix B, page 23):

*The 2040 simulation retains operating variability for trains arriving from the south, given assumed continued ownership and dispatch by freight railroads in the future. [emphasis added]*

**This assumption is wrong and the planning projections that result from it grossly understate the number of trains that will operate south of Union Station.** The Virginia/DRPT and Long Bridge expansion projects are projected to be completed in five years (FEIS, page 1-7) and the VRE L’Enfant Station expansion by 2029. All three projects will be in service before the 11-14 years required for the Union Station expansion and must be taken into account in plans for the Union Station Expansion.

### **The Benefits of Separating Passenger and Freight Rail**

The plans and projects now in progress to separate passenger from freight rail operations south of Union Station will allow a very large increase in the number and frequency of passenger trains because they can operate faster and be spaced more closely if passenger and freight operations are not intermixed and controlled by CSX as is now the case on these SW tracks.

New York City’s Penn Station illustrates the benefits of separating passenger from freight operations. The track arrangement for Penn Station is similar to our rail operations south of Union Stations, and like our First Street rail tunnels, is served by two tunnels (the North River Tunnels) under the Hudson River. In both cases, there are two tunnels with one rail track in each tunnel. The contrast is clear: DC’s 1<sup>st</sup> Street tunnels carry a total of

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that body has the staff capable of administering the Project. Should there be a change in Project sponsorship, the new Project Sponsor will assume DRPT’s responsibilities.”

<sup>7</sup> The L’Enfant Station Expansion was originally planned for completion in 2023 (Long Bridge DEIS, page 3-16), but the completion date has been extended to 2029.

about 6 trains per peak hour under the control and scheduling of CSX<sup>8</sup>, whereas NYC's North River Tunnels accommodate up to 24 trains per hour in each direction, a total of 48 trains in a peak hour, requiring very precise scheduling and control. Achieving this configuration south of Union Station would allow a substantial increase in passenger and commuter rail traffic south of Union Station.

### **Passenger Rail Projections Are Not Credible**

A foundational element of the Union Station DEIS is anticipating and responding to predicted growth in passenger and commuter rail traffic over the next 20 years. Forecasting accurately that increase is critical. The estimates of number of trains found on pages 24-25, Appendix A3 [*Final Concept Development and Evaluation Report*] are broken out among Service Providers (Amtrak, MARC, VRE) and further between Peak Hours and Full Day Totals. These projections are critical—underlying most every future physical and service decision covered by this important document. These numbers must be credible and based on documentable data. Such appears not the case in the DEIS. 1) Some are thinly sourced, if at all. 2) Those estimates provided are derived from varying projection dates—Amtrak's numbers are derived from *Operating Plans for 2030+* (which purports to project to 2039); MARC projections are based on data applicable only through 2029; and **no** documentable projections for VRE are cited whatsoever. 3) Projections cited in Table 7-1 of Appendix B [*Terminal Infrastructure Report*] are apparently based on the estimates presented in Appendix A3. However, the DEIS does not explain how they were arrived at. Is there an algorithm that is not disclosed in the DEIS? The Table 7-1 projections appear low. There is no logical progression from the projections in Appendix A3 to the projections in Table 7-1 of Appendix B. It is widely understood that MARC, VRE, and Amtrak each plan for significant increases in the number of trains at Washington Union Station over the next 20 years. The DEIS's numbers must be credible, well sourced, and within the same time frame. They are not.

### **The DEIS Proposes Too Few Rail Tracks**

Because of the significant under projections based on outdated assumptions and information, the DEIS' Preferred Alternative proposes too few tracks.

Union Station originally had a total of 33 revenue tracks:<sup>9</sup>

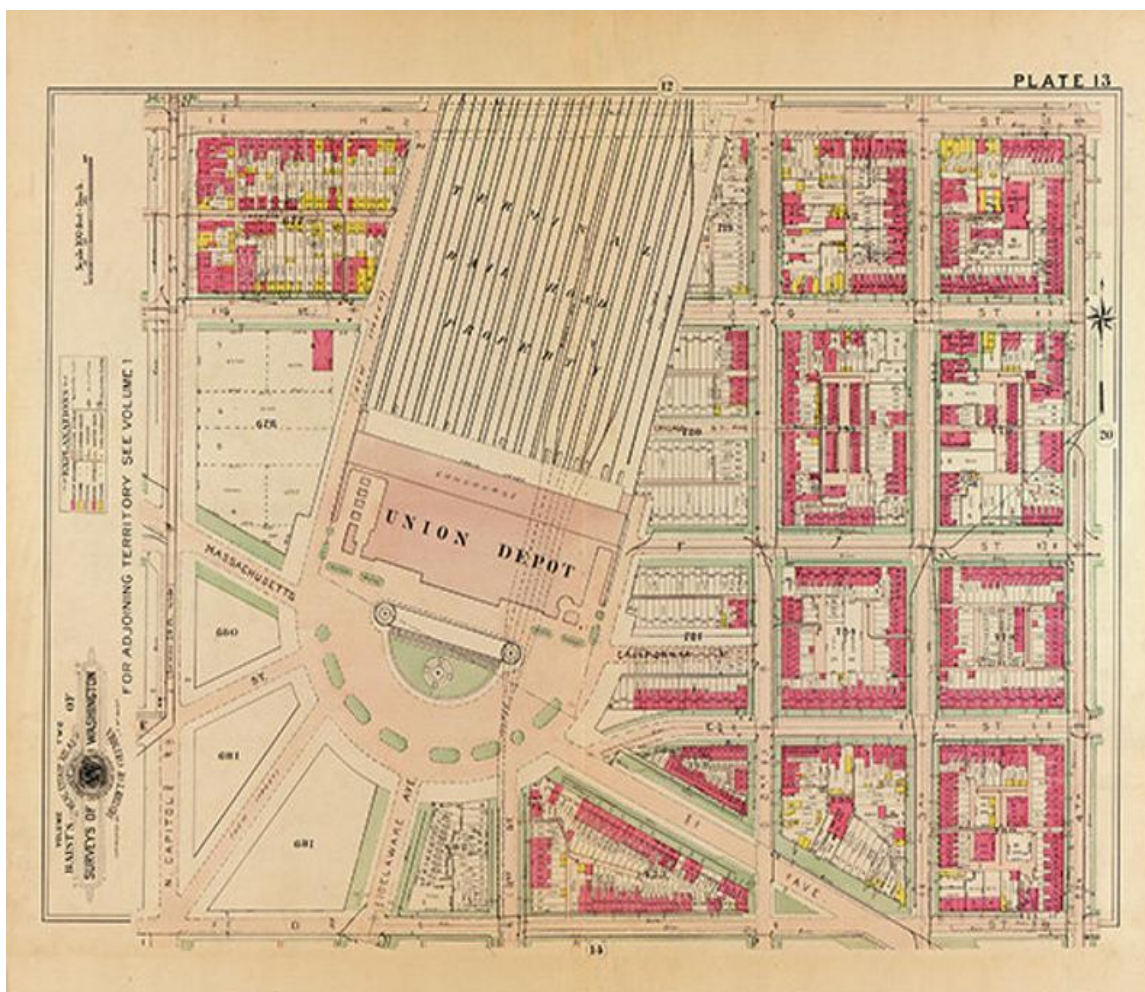
- 24 stub-end tracks ran north of Union Station on the upper level;
- 9 run-through tracks on the lower level; and
- 2 non-revenue tracks that terminate on the lower level that are labeled “mail tracks.”<sup>10</sup>

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<sup>8</sup> As of 2016, during morning and afternoon peaks 6 passenger trains per hour depart or arrive at Union Station for points south. *DC Rail Plan*, page 3-35.

<sup>9</sup> *Union Station Historic Preservation Application*, page 8, dated 2012, jointly sponsored by C100 and DC Preservation League.





Today, Union Station has 23 tracks, 20 of which are revenue producing:

- 14 stub-end tracks, located on the upper level;
- 6 run-through tracks on the lower level; and
- 3 other tracks exist, but they are used for storage and “pooling”.<sup>11</sup>

<sup>10</sup> DEIS page 2-5, Section, 2.2.3. But, according to Appendix A-3, page 23: “The Lower Level has nine (9) tracks, of which only six (6) are currently used for revenue service. ... Tracks 22 and 29 are through tracks without usable platform faces used by trains to travel through the station without loading/unloading passengers; Tracks 23 to 28 are used in revenue service to load and unload passengers, and Track 30 is a Stub End storage track used for midday storage and to switch locomotives.”

<sup>11</sup> DEIS page 2-5, Section, 2.2.3. But, according to Appendix A-3, page 23: “The Lower Level has nine (9) tracks, of which only six (6) are currently used for revenue service. ... Tracks 22 and 29 are through tracks without usable platform faces used by trains to travel through the station without loading/unloading passengers; Tracks 23 to 28 are used in revenue service to load and unload passengers, and Track 30 is a Stub End storage track used for midday storage and to switch locomotives.”

The DEIS proposes to provide only 19 revenue tracks:

- 12 stub-end tracks serving rail operations north of Union Station; and
- 7 run-through tracks.<sup>12</sup>

The reduced number of tracks is, in large measure, determined by the much wider platforms that are proposed. All of the current platforms are less than 20-feet wide, and many have columns supporting the parking garage or the H Street Bridge. Widening the platforms to accommodate capacity growth and safety standards requires realigning and re-spacing the station tracks that reduces the number of revenue tracks<sup>13</sup> A key unaddressed issue in the plans: *Must the platforms be as wide as 30 to 35'6"?*<sup>14</sup>

Even Amtrak's July 25, 2012 *Union Station Master Plan* issued eight years ago called for more tracks and estimated that by 2030 those tracks would be at capacity. The plan called for:

- 12 west-side stub tracks (page 13);
- 8 east-side run-through tracks under the 1<sup>st</sup> Street tunnel to points south would have to be reconstructed;
- 2 new run-through tracks (p. 4 and 10) that by 2030 were estimated to be at capacity; and
- 6 - 9 new additional below grade tracks after 2030 to serve new rail operations north of Union Station.<sup>15</sup>

The DEIS eliminated all the below grade options: the 2 new run-thru tracks and the 6-9 additional tracks proposed to accommodate new rail service.<sup>16</sup>

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<sup>12</sup> DEIS, page 3-3, section 3.1.1.2.

<sup>13</sup> 2012 *Union Station Expansion Plan*, page 3.

<sup>14</sup> DEIS, Appendix A-3a, pages 128-189.

<sup>15</sup> 2012 *Union Station Master Plan*, page 13: "Demand for rail services will rise to the level where the practical capacity of these facilities is reached. This could happen as early as 2030, depending on the pace of growth and investment in overall rail system capacity. To provide for this future capacity the Master Plan allows for the development of a new lower level of tracks and platforms in a zone beneath the west side stub tracks that can be excavated to create six additional station tracks (or up to nine if needed for additional capacity)."

\* \* \*

The lower track level would be connected to the Northeast Corridor main line by means of a bored tunnel from Union Station northeast to the vicinity of the Anacostia River."

<sup>16</sup> DEIS, page ES-9: "The nine eliminated preliminary concepts included below-grade tracks [the 2012 Union Station Master Plan proposed these below-grade tracks would be located in the area below the west-side stub tracks] that Amtrak determined it did not need to meet its operational requirements."

Amtrak's *Union Station Master Plan* was issued in 2012. But now, eight years later, Amtrak, VRE and MARC have developed expansion plans that would greatly increase the number of trains and the number of rail passengers using Union Station, including plans for high speed rail south of Union Station.<sup>17</sup> The state of Virginia and VRE have approved funding to acquire over 100 miles of CSX track, pay for, own and control the new Long Bridge Potomac River rail crossing, and thru-run its trains through Union Station into Maryland. In addition, MARC plans to run its trains into Virginia.<sup>18</sup>

The DEIS references the source documents it relied on in several sections.<sup>19</sup> But those source documents were prepared as early as 2013 and last accessed by FRA in 2017. Perhaps that is the reason that the DEIS reaches its outdated planning conclusions.

### **High Speed Rail, but Only North of Union Station**

The upper-level stub-end tracks (Tracks 7-20) are used by MARC and by Amtrak's Acela Express, Northeast Regional, Vermonter, and Capitol Limited trains (DEIS, Chapter 2, page 2-5). The DEIS states that at least four (4) tracks must have 1200' platforms for future Acela HSR service for future growth.<sup>20</sup>

The 2012 *Union Station Master Plan* (page 13) "provides that future tracks from the lower level of Union Station could be extended to the south, enabling extension of high-

<sup>17</sup> The Record of Decision for *Southeast High Speed Rail Washington, DC to Richmond Virginia*, issued September 5, 2019. Note that while the DC to Richmond High Speed rail plan included Washington, DC in its title, it in fact ended at the south end of the Long Bridge and did not address the Long Bridge or how to get to Union Station. ([http://dc2rvarail.com/files/3115/6803/2848/DC2RVA\\_ROD\\_05Sept2019.pdf](http://dc2rvarail.com/files/3115/6803/2848/DC2RVA_ROD_05Sept2019.pdf)).

The Long Bridge FEIS resolves that discontinuity. On the Virginia side, the new two-track bridge would "tie into the four tracks at RO Interlocking proposed by the concurrent DC to Richmond Southeast High Speed Rail (DC2RVA) project." (ROD at page 2-7). This high-speed rail plan for Virginia is connected to the SW tracks that serve Union Station, but high-speed rail south of Union Station is assumed to not exist in the Union Station DEIS.

<sup>18</sup> High speed rail south of Union Station will be further enhanced by the recent announcement to extend high speed rail from Richmond to Raleigh. <https://www.usnews.com/news/best-states/virginia/articles/2020-09-21/grant-to-help-north-carolina-buy-rail-for-high-speed-service>.

<sup>19</sup> Federal Railroad Administration. 2017. *NEC FUTURE Tier I Final Environmental Impact Statement*. [http://www.necfuture.com/tier1\\_eis/feis/](http://www.necfuture.com/tier1_eis/feis/). Accessed June 6, 2017.

Virginia Railway Express. 2014. *System Plan 2040*.

<http://www.vre.org/vre/assets/File/2040%20Sys%20Plan%20VRE%20finaltech%20memo%20combined.pdf>. Accessed June 6, 2017.

Maryland Transit Administration. 2013. *MARC Growth and Improvement Plan Update: 2013 to 2050*. [https://mta.maryland.gov/sites/default/files/mgip\\_update\\_2013-09-13.pdf](https://mta.maryland.gov/sites/default/files/mgip_update_2013-09-13.pdf). Accessed June 6, 2017.

<sup>20</sup> Appendix A-3, page 24.

performance high-speed rail service to Virginia, North Carolina, and the Southeastern United States.” High speed rail south of Union Station is not discussed or even acknowledged in the DEIS nor does it address efficiencies and greatly increased numbers of passenger and commuter trains that will result from separating passenger and freight operations south of Union Station, but it takes into account operational efficiencies and more frequent train service for passenger and commuter trains arriving from the north on the Northeast corridor.<sup>21</sup> The DEIS recognizes the efficiencies of controlling the rail tracks north of Union station for passenger operations (rather than inter-mixed passenger/freight operations) but does not for tracks south of Union Station.

### **Thru-running of MARC and VRE**

For a number of years, MARC and VRE discussed the benefits of thru-running VRE trains to Maryland and MARC trains to Virginia.<sup>22</sup> The Metropolitan Washington Council of Governments Transportation Planning Board (TPB) recently issued a report prepared by Foursquare<sup>23</sup> stating that run-through rail service would have a positive impact on the labor pool by expanding access both for businesses and employees<sup>24</sup> and could alleviate capacity issues on Metrorail as well as issues with crowding and congestion on platforms at Union Station and other busy transfer points.<sup>25</sup> The Foursquare Report further concluded that a substantial number of people travel each day in each direction between the MARC and VRE service areas, and in the future, the potential for run-thru trips will increase considerably.<sup>26</sup>

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<sup>21</sup> DEIS Appendix B, page 23: “The 2040 simulation retains operating variability for trains arriving from the south, given assumed continued ownership and dispatch by freight railroads in the future. In contrast, the 2040 simulation assumes much more reliable operation for trains arriving from the north, given the significant NEC reliability investments represented by NEC FUTURE.” [emphasis added].

<sup>22</sup> In May 2014 MARC and VRE announced they are planning a true regional rail partnership to thru-run MARC to L’Enfant Station and on to Virginia and to extend VRE from Union Station into Maryland. <http://www.nbcwashington.com/news/local/MARC-VRE-Discuss-Regional-Rail-Partnership-259457971.html>.

<sup>23</sup> *Market Assessment and Technical Considerations for VRE-MARC Run-Through Service in the National Capital Region*, Foursquare Integrated Transportation Planning, June 2020.

<sup>24</sup> Nearly three-quarters of the District’s workforce commutes from outside the District while one-third of the District’s residents reverse commute to jobs outside the District (DC State Rail Plan, page 4-2).

<sup>25</sup> Foursquare Report, page 13.

<sup>26</sup> *Id.*, page 42.

The DEIS pays little attention to thru-running that will greatly increase the number of trains going through Union Station and reduce the need for MARC and VRE to find mid-day parking for their trains until they are needed for the evening rush-hour. It assumes that no VRE trains will thru-run when, in fact, VRE trains currently thru-run through Union Station to reach the Ivy City train yard where they are parked during mid-day, until their return to service for the afternoon/evening commute back to Virginia. VRE awaits only an agreement with Amtrak and MARC to thru-run to Maryland, and once that is accomplished, the VRE ridership using Union Station will increase substantially.

The DEIS assumes that only 8 of the MARC’s 57 daily Penn line trains will thru-run to Virginia,<sup>27</sup> but no trains from MARC’s Brunswick or Camden line will thru-run. The reason for not including trains from the Brunswick and Camden Lines is apparently because the FEIS does not propose any modification of the Brunswick and Camden line tracks coming into Union Station. Only the Penn Line has direct access to the 1st Street tunnel where the connecting thru-running tracks are practically inaccessible to MARC’s Brunswick Line and to a lesser extent, the MARC Camden Line. For Brunswick and Camden Line trains to access the 1<sup>st</sup> Street tunnel, trains must traverse the entirety of Union Station’s “throat” from east to west over multiple interlockings:



<sup>27</sup> Eight MARC trains is the same number used for the early Long Bridge expansion studies that FRA adopts for this Union Station FEIS with no discussion or analysis.

**The Committee of 100 recommends that the DEIS be expanded to evaluate how to reconfigure the Brunswick and Camden tracks so they can access the First Street Tunnel. This not only affects the ability of Brunswick and Camden trains to thru-run to Virginia, but also affects VRE’s ability to thru-run to a substantial part of Maryland.**

### **The Benefits of Electrification**

Currently, CSX requires that trains traveling south of Union Station and using the Long Bridge use diesel locomotives because the overhead wires for electric locomotives would interfere with tall freight loads. This is the reason for the long lay-over at Union Station of Amtrak thru-trains—the required change of locomotives.<sup>28</sup> But with the addition of the fourth track in SW, and the fact that CSX will have their own dedicated tracks, this is no longer an issue and the tracks south of Union Station can be electrified.<sup>29</sup>

As the Long Bridge FEIS explains at page 1-10:

*[The addition of a fourth track] provides sufficient capacity for freight trains to pass through the Corridor unimpeded by passenger trains during peak passenger train hours.*

This will mean that the time-consuming change of locomotives will no longer be required. Thus, thru-running MARC and VRE trains, as well as Amtrak regional trains, can move through Union Station much more quickly.

### **DEIS Parking Garage Plans are not Supported**

The DEIS is proposing 1,575 parking spaces (Alternative A-C, Preferred Alternative, Appendix A6, page 3), consisting of 6 levels of parking in a 10-story building, at a height of 130 feet above the H Street Bridge, at approximately the same location as the existing garage. This would be a huge structure, towering over Union Station<sup>30</sup> and contrary to the

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<sup>28</sup> FEIS, Appendix B, page 26: “Trains operating immediately south of the WUS utilize diesel-powered locomotives. Electric locomotives entering WUS whose route continues southbound must be switched from an electric to a diesel locomotive power at WUS, and vice-versa.”

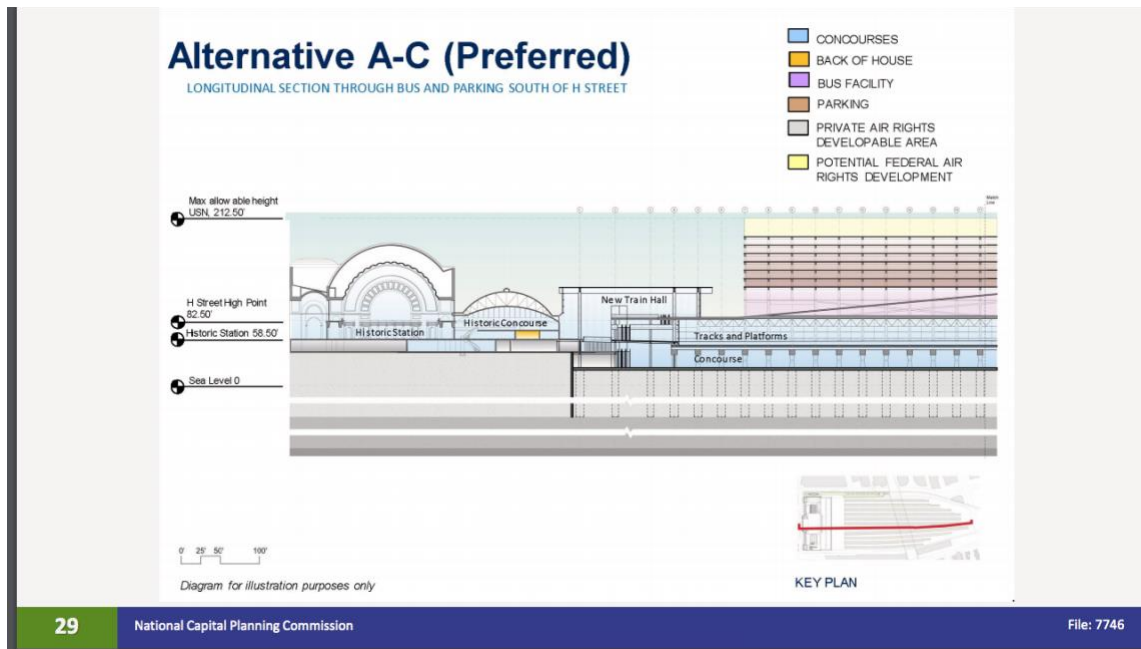
<sup>29</sup> The Long Bridge FEIS explains that:

“The existing railroad right-of-way is owned by CSXT. Action Alternative A [the preferred alternative] would require CSXT to commit a significant portion of its right-of-way to new tracks and ancillary structures, which would be used primarily for passenger operation.” (page 1-21). “The Long Bridge Project has been designed so as not to preclude electrification. Any future electrification in this location would use the lowest profile equipment available at the time. Based on industry trends, it is expected that the required clearance would be lower than required for current equipment.” (Appendix D4, pp. 14-15).

<sup>30</sup> NCPC expressed concerns about height and massing similar to DC’s concerns when the DC Zoning Commission approved the air rights development. At page 4 of its January 9, 2020 Commission Action, NCPC:

Requests the applicant prepare elevations and renderings to show how the height and mass of the alternatives will look from key viewsheds, including from the U.S. Capitol building, the

DEIS assumption that it would be subject to USN Zoning. In the first place, this is federal property, not subject to DC Zoning— zoning would be determined by the National Capitol Planning Commission (NCPC), and even if NCPC were to apply DC’s USN Zoning<sup>31</sup>, the proposed 130-foot garage height would be in violation of the 90-foot height limitation for air-rights structures adjacent to the Union Station historic building.<sup>32</sup>



The Commission on Fine Arts (CFA),<sup>33</sup> the National Capital Planning Commission,<sup>34</sup> Amtrak,<sup>35</sup> the DC Office of Planning and DDOT<sup>36</sup> have challenged the DEIS parking proposal as excessive.

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National Mall, Delaware Avenue, and 1st Street, NE. The renderings should also include the massing of any private development permitted in the USN zone.

<sup>31</sup> Page 2 of the July 9, 2020 NCPC Information Presentation explained:

NCPC reviews projects on federal land in the District of Columbia in-lieu of local zoning approval. In this instance, the historic Union Station and existing parking garage and bus facilities are located on federal land. Absent a zoning code, the Commission looks to the Comprehensive Plan to guide its decision making.

<sup>32</sup> DC Municipal Code §11-305.1(c) and (d).

<sup>33</sup> On November 21, 2019, FRA and the Proponents presented the Preferred Alternative to CFA at an informational meeting. In a letter dated November 27, 2019, CFA expressed concern about the planning assumptions underlying the parking element and the volume represented by the combined bus and parking facilities. Therefore, CFA requested that FRA and the Proponents reconsider the above-ground parking element of the Project in order to develop a more “appropriately sized and sympathetically configured massing.”

<sup>34</sup> FRA submitted the Preferred Alternative to NCPC for conceptual review at the Commission’s January 9, 2020 hearing. The commissioners expressed concerns about the massing of an above-

The present parking garage consists of 2,200 parking spaces, located on four levels. Existing contracts established in the 1980s with the station’s retail operator call for 1,575 spaces—the exact number the DEIS proposes in the Preferred Alternative. These contracts will require renegotiation to address removal of the current garage that will be the initial step in reconfiguring the tracks and building the new deck. The FRA and USRC should employ modern parking parameters where each land use is assessed for parking demands in a new agreement with the station retail operator. **The C100 recommends that the EIS adopt the parking space estimating criteria the DC Office of Planning and DDOT have employed that reflects modern urban design and parking parameters.**

To justify the excessive 2040 parking requirement that FRA is projecting, the DEIS employed two inappropriate approaches:

1. Observed Demand-Based.

Cars that were in the garage more than 24 hours were assumed to be using Amtrak or intercity bus service. This number of 1,178 cars was then adjusted to 2040 based on the Amtrak growth factor of 95%, then reduced by 10% for people switching from cars to public transportation. The result was a parking requirement of 2,687 parking spaces for 2040.

2. Survey-Based.

This was based on an April 2015 - March 2016 Amtrak customer satisfaction survey that was interpreted to mean that 8%<sup>37</sup> of the passengers arriving or departing from Union Station accessed the Station by private vehicles, requiring 656 parking spaces. But because on average, they stayed 1.87 days, the DEIS uses a figure of 1,226 spaces-per-day, again adjusted to 2040 based on the Amtrak growth factor of 95%,

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ground parking facility. The Commissioners approved the following language regarding the parking program:

“The Commission... requests the applicant substantially reduce the number of parking spaces, and that the applicant, private development partner, and staff work with the District Office of Planning and the District Department of Transportation to evaluate and confirm the appropriate amount of parking given the mix of uses, traffic and urban design impacts, and transit-oriented nature of the project prior to the next stage of review.”

<sup>35</sup> On January 7, 2020, Amtrak explained that parking for its passenger operations at WUS “is not essential to Amtrak’s operation of intercity passenger rail” and that “Amtrak does not support any entity building a parking garage specifically to support Amtrak passengers.”

<sup>36</sup> In an April 30, 2020 letter to FRA, DC Office of Planning and DDOT presented the District’s policy preferences for parking at WUS and a proposed 295 parking spaces.

<sup>37</sup> In its January 7, 2020 memorandum to FRA, Amtrak stated that the proportion of Amtrak passengers driving and parking at WUS had declined from 8 percent in 2015/2016 to 4 percent in December 2019 and that it did not support any parking for Amtrak passengers.



then reduced by 10% for people switching from cars to public transportation. The result was a parking requirement of 2,512 parking spaces for 2040.

The bases for those projections are deeply flawed. The starting point was the customer satisfaction survey in which only about 0.2% of the passengers responded to the survey.<sup>38</sup> In addition to the statistical significance of using only a 0.2% sample for the projection, there is no basis for the 8% figure for the Amtrak passengers that purportedly use the parking garage. Amtrak's January 7, 2020 memorandum to FRA explained that the percentage of Amtrak passengers driving and parking at WUS had declined from 8 percent in 2015/2016 to 4 percent in December 2019 and that Amtrak did not support any parking for Amtrak passengers.

Apparently recognizing the inadequacies of its "statistical" computations, the DEIS seeks to compare Union Station's parking need to the needs of shopping centers. Page 6 of Appendix A6 states:

*WUS competes with urban retail centers throughout the region such as Chinatown, Georgetown, and Fashion Centre at Pentagon City, suggesting that its peers are urban hubs that have parking available and that the retail at WUS relies in part on the parking capacity.*

But that comparison ignores Union Station's primary role of providing rail service and multimodal transportation connectivity for the National Capital Region. Nonetheless, the DEIS concludes at page 11:

*Using 2040 projections for Amtrak ridership growth and the average Amtrak drive and park demand of 8 percent... the projection signals a demand for approximately 2,700 parking spaces.*

\* \* \*

*FRA and USRC therefore considered statutory direction, legal agreements, and possible shifts in demand over time, and identified 1,600 spaces as the planning number for spaces at WUS, which is the amount reasonably required under USRC lease terms with some additional spaces added for flexibility.*

But the 8 percent has no meaning when making a projection for 2040, since Amtrak has explained it needs no parking for 2040.<sup>39</sup> The statistical significance of the survey and practical basis for the adjustments are both questionable, but the most significant factor is what is ignored in coming up with the projection of 1,575 required parking spaces. Footnote 1, page 7, Appendix A6 states:

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<sup>38</sup> Page 8, table 1.4 shows that 4,654 responded from the 2,462,747 passengers boarding, representing 0.18%. Page 9, table 1.5 shows that 5,448 responded from the 2,474,601 passengers arriving, representing 0.22%.

<sup>39</sup> See fn 38, above: Amtrak's January 7 memorandum to FRA stating it needs no parking at Union Station.

*Cars in the garage for more than five hours, but less than one day, were assumed to be monthly parkers or other daily parkers associated with a 9-to-5-office use pattern and were not incorporated in the estimate. [emphasis added]*

Although ignored in the DEIS, monthly parkers are currently the major users of the parking garage. The Capitol Hill neighborhood will be harmed by adverse traffic congestion on the local roadways near Union Station with an oversized parking garage for the use of monthly parkers from near-by office buildings, whose peak entry and exit times would be during rush hour, the same time rail commuters are arriving and leaving. The community already anticipates having to contend with the increased traffic from the Akridge air-rights development that plans to provide 1,320 parking spaces as a part of its development (DEIS Chapter 3 –Alternatives, page 3-43).

### **Union Station Needs an Alternative to Parking Income**

Monthly parkers provide the majority of the income for the operations, maintenance and historic preservation of Union Station. Parking revenue sustains the Station's economic viability and supports USRC's continued preservation and use of the historic building (Appendix A6, pages 2-3):

*Parking at WUS provides more than 70 percent of USRC's operating revenue. It supports station retail, office, and event uses, which facilitate the operation of the station as part of the retail lease agreement and contribute to WUS's civic role as a vibrant public space and visitor destination.*

*Parking revenue is used for the preservation and rehabilitation of the historic station building. As a major reliable source of revenue, parking is needed for the continuation of station preservation and operation activities.*

The NCPC July 9, 2020 information presentation states on page 8:

*[T]he number of monthly parkers has been growing over time. In 2017, the facility provided space for 536 monthly parkers on Level 3. These parkers were not included in the assessment of the long-term parkers. As of December 2019, FRA and USRC indicated there were a total of 1,390 monthly parkers in the garage.*

The 2014 Audit Report concerning Union Station, prepared by DOT's Office of Inspector General explained that (page 2):

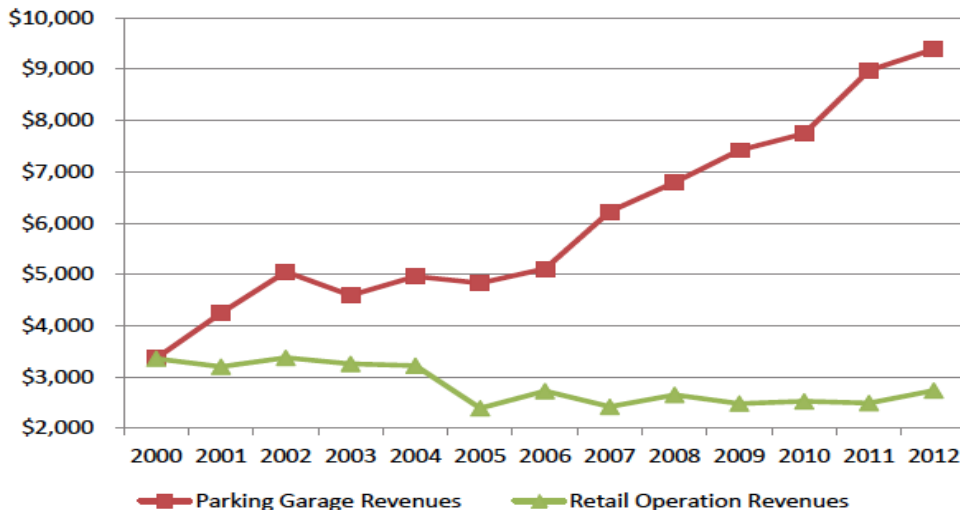
*DOT and FRA have relied on USRC to effectively manage Union Station. However, USRC has not adequately planned for Union Station's future.*

And the principal reason for this inadequacy is the fact that USRC has relied primarily on revenue from the parking garage to support its operation (Audit Report, page 10):

*While revenues from garage operations have increased, revenues from commercial operations have decreased over the past few years. Specifically, between fiscal years*

2000 and 2012, parking revenues increased from \$3.4 million to \$9.4 million, while commercial operations revenues decreased from \$3.4 million to \$2.7 million (see Figure 1).

**Figure 1. Parking and Retail Revenues for Fiscal Years 2000 Through 2012, in thousands of dollars**



Currently, approximately 210,000 square feet of leased retail space provides a source of revenue for USRC to fund Union Station operations, maintenance and preservation activities (DEIS Chapter C -*Purpose and Need*, page 2-14). “Current retail rents in WUS range from approximately \$75 to \$125 per square foot” (Appendix C – *Supporting Retail Information for Concept Development*, page C-3). This would indicate retail rental income of over \$20 million, but only something less than \$3 million has been made available to USRC.

The economics of this arrangement raise important questions:

- Why does USRC receive so little from its lease to Ashkenazy Acquisition Corporation, the company that manages the retail leases?
- Why do we now have benches in the East Hall and no restaurant in the Presidential Waiting Room?
- Why is the revenue from retail operations received by USRC so low?

**The C100 appreciates the need for USRC to have a reliable source of income for its operations, maintenance and historic preservation activities, but building a parking garage whose primary purpose is to provide that income is not reasonable.** In the near term, no parking revenue will be available once the parking garage is demolished and for several years thereafter during the period of track realignment and deck construction. For the 11-14 year construction period, the budget for the expansion project should contain a specific payment to USRC to compensate for the lost parking revenue.

A plan is needed for how to provide an alternative to parking revenue after the expansion of Union Station is complete. It may be time to investigate:

- Charging train operators for use of the station as airports charge airlines.
- A charge added to train tickets as a passenger ticket “tax”.

In the future, parking revenue will be reduced once a smaller garage is built, but there will be about 80,000 square feet of new retail space that is estimated to produce \$8.2 - 10.1 million annually (Appendix C – *Supporting Retail Information for Concept Development*, page C-10). Will USRC be able to use that for its operation, maintenance and historic preservation or will it be necessary to negotiate a new master lease with Ashkenazy Acquisition Corporation?

### **Conclusion**

The rail projects now in progress south of Union Station are projected to be completed well within the 2040 time horizon of this project. Those projects, together with thru-running of commuter trains, electrification of the tracks south of Union Station and providing for high-speed rail south of Union Station will greatly increase the number of trains that will need to access Union Station.

**Substantial revisions to the Preferred Alternative and the DEIS are required to adequately provide for these increases in future rail operation.**

#####

## **Comments Concerning the Impacts to Historic Properties Under Section 106**

On behalf of the Committee of 100 on the Federal City, thank you for the opportunity to comment upon the Draft Environmental Impact Statement (DEIS) for the proposed expansion project for Union Station. The comments below are focused upon the impacts to the historic station itself, and are meant to inform the Section 106 consultation process. As an iconic and significant work of architecture by Daniel Burnham, as a prominent feature in view of the United States Capitol building, and as one of the busiest transit points in the United States, we are keenly aware of the challenges that must be addressed and the priorities that must be balanced in planning for Union Station's expansion. From a historic preservation perspective, we believe there are four general principles which must be considered:

- The classical and symmetrical Beaux-Arts design of Union Station calls for a design that respects and complements these significant features
- Users should be able to still experience the historic station as a train station
- The impacts of any expansion on the surrounding historic neighborhood should be minimized
- The impacts to the historic station itself should be minimized

### **The classical and symmetrical Beaux-Arts design of Union Station calls for a design that respects and complements these significant features**

The substantial parking and bus-staging structure proposed in preferred alternative A-C results in an asymmetrical view of the Northern façade of the historic station, and the height creates an intrusion in the primary front elevation of the station. It also inappropriately uses what will be pedestrian-level frontage for parking. The current parking program proposal of 1,600 spaces, which many have criticized as oversized, and a lack of a designated Pick-Up-Drop-Off (PUDO) space have put unreasonable design constraints upon the project that adversely affect the historic station. A reduced parking program, preferably one underground, would enable a reconfiguration of space to permit better civic and pedestrian use and experience at ground level.

By reducing the pressure on the parking program the massing of that structure could be reduced and the asymmetry between the proposed federal and the private development projects balanced. This would improve the view of the north side of the historic station between the two campaigns, and improve the adverse effect (we disagree with a no adverse effect determination on the north side) to the historic station that the development presents. A reduced height will also minimize effects visible from the front of the station. Given the highly ordered and symmetrical architecture of the historic station, given the expectation that the north end will be a new primary approach to the station, it is essential that FRA's expansion project and the private air rights development achieve a harmonious and similarly symmetrical design. To help achieve this, we would like to see a partnership between FRA and Akridge to establish some basic cohesive design guidelines and principles.

### **Users should be able to still experience the historic station as a train station**

While the east/west alignment of the proposed new train hall makes good sense, it is very unclear how this addition will integrate with the historic station, or what functions will take place there. Given its great size, the new entrance to the North, and a new concourse proposed for H Street, we are concerned that the historic station itself runs the risk of functioning as nothing more than a shopping mall or a grand foyer to a completely new station. The proposed H Street concourse itself is a terrible substitute – a subterranean space below the railyard and far removed from the station is more akin to New York Penn Station. As a space considered to be universally a complete design failure, this should not be a goal.

**The impacts of any expansion on the surrounding historic neighborhood should be minimized**

We disagree with FRA's determination that increased traffic only has the *potential* to cause adverse effects to the neighboring Capitol Hill Historic District. The preferred alternative will clearly force increased traffic into the historic Capitol Hill neighborhood by, for example, sending all buses east on H Street NE directly into the neighborhood – instead of giving them an opportunity to travel west towards North Capitol Street. The impact on the setting, feeling and association of the historic district will be clearly adversely affected. As such, more study needs to be given to the impact of the increase in heavy traffic in the historic district, and strategies to avoid or mitigate should be employed. The only thing offered in the DEIS is a signage program, when the problem actually lies with the design itself.

**The impacts to the historic station itself should be minimized**

At this stage, with only functional massing to consider, it is extremely difficult to consider overall what effects the project will have on the historic station. We are very concerned that decisions made now will lead to both foreseen and unforeseen effects. As a Programmatic Agreement is negotiated as a part of this process to establish a process for evaluating effects to the historic station as design elements proceed, ongoing consultation with stakeholders must be robust and a set of design principles agreed to. Again, we encourage the development of design principles in conjunction with Akridge to assure both the expansion project and the private development work in harmony with each other as well as with the historic station itself.

Thank you for the opportunity or submit these comments on the DEIS.

Sincerely,



Kirby Vining, Chair, Committee of 100 on the Federal City

Hi, this is Drury Tallant. I've been a participating member of the consulting parties on behalf of the Capitol Hill Restoration Society. I'm very concerned that a fundamental project element such as the parking is so much under question at this late stage of the DEIS. That issue should have been resolved far earlier in this process and is, I believe, indicative of a failure to listen to the area's stakeholders early in this process. The possibility of much reduced parking, as it seems where we may be headed, promises very different design opportunities. In particular, I believe the parking should be underground, not in prime urban real estate, and simply changing the proposed multi-story parking structure to some other function does not address the poor urban planning that has plagued this project.

FRA has placed people in a subterranean area below the railroad tracks with cars and parking up in the sunlight. FRA never took seriously suggestions to use the H Street tunnel or the underutilized streets around Union Station for vehicular circulation, as well as pedestrian circulation. I believe that FRA has failed throughout this process to conceive of the transformation of this area, inclusive of the H Street Bridge, the station expansion, and the air rights project as a single entity. The decision very early on to look at only the federal portion, with very scant attention to the other portions of this project, have led to an urban design problem that needs a complete review in order to achieve the promise of this project. Thank you. Bye-bye.



September 25, 2020

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: Washington Union Station Expansion Project:  
Draft Environmental Impact Statement

Dear Mr. Valenstein,

The Capitol Hill Restoration Society (CHRS) appreciates this opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Washington Union Station Expansion dated June 12, 2020. Since early 2016, CHRS's representatives have attended the Consulting Party meetings for this very important project. The massive DEIS document contains a large amount of very useful information and required considerable time to review.

CHRS's primary concerns are the potential effects of the Washington Union Station Expansion on the Capitol Hill Historic District (CHHD). However, we will also comment on compatibility with the historic Union Station and the implications for closely related developments inclusive of Burnham Place, H Street Bridge replacement, and potential federal air rights development. We will refer to the federal Washington Union Station Expansion as WUS, and to the entire project (Washington Union Station Expansion + Burnham Place + federal air rights + H Street Bridge/Tunnel) as the Washington Union Station Projects (WUSPs).

### **Comments on Urban Plan**

CHRS's criticism throughout the WUS EIS process has been the restricted focus on the federal portion rather than the entirety of the WUSPs. We have not altered our position that it is impractical to evaluate the federal portion independent of the other integrated projects. This piecemeal approach fails to convey the potential transformation for this site.



Preferred Alternative A-C is the product of questionable early decisions by FRA. All alternatives considered within the EIS share common elements. Among those common elements are: 1) new passenger concourses below the rail yard; 2) use of the H Street tunnel exclusively for pedestrian access; and, 3) in kind replacement of the H Street Bridge. With those decisions in place, FRA's analysis became a process of moving the federal "project elements" around the site. There is no evidence that FRA seriously questioned these assumptions or considered the implications to the urban design for all the WUSPs.

### **Below Grade Concourses**

Preferred Alternative A-C creates new passenger concourses below the track level and creates a maze of vehicular circulation at the upper deck. Light wells more than 60 feet above and surrounded by buildings as much as an additional 130 feet or more in height purport to illuminate the concourses and retail spaces below the rail yard. The DEIS contains several very attractive illustrations of the below track spaces. They present the design in the best possible light, but also in a way that almost certainly cannot be achieved. The report warns "this compressed, linear space would resemble the concourse's spatial quality of New York Penn Station. Therefore, the proposed concourse datum is lowered to +22', to provide approximately a 13' height clearance under the Run-Through tracks and 20' under the Stub End tracks." (Appendix A-3, P 86). An excavation of this depth could provide two levels of parking below the rail yard, and squanders an opportunity to enliven the passenger concourses with views of the train and platform activities from concourses located above the rail yard.

### **H Street Bridge**

The existing H Street Bridge crests at elevation 82.47'. The DEIS assumes a starting height for Burnham Place nearly 4 feet higher, and with several large openings intended to bring sunlight beyond the rail yard to the H Street Concourse levels below. The District Department of Transportation website (DDOT) does not indicate any provision for the proposed light wells, nor do the graphic representations of the H Street Concourse depict the large piers required to support a new H Street Bridge (See for example Figure 97, Appendix A3, Page 82). It is critically important to fully incorporate the H Street bridge design into the WUSPs and to properly represent it within the Union Station DEIS.

Early in the EIS process FRA apparently gave some thought to integrating the H Street Bridge with the transfer deck required for Burnham Place (Appendix A3b, Page B-77). Unfortunately this concept was rejected, but warrants much further study. The opportunity to utilize the transfer deck above the rail yard - some 16 feet or more in depth - for concourse circulation, parking, and transportation functions promises attractive opportunities to design far more interesting solutions than Preferred Alternative A-C. This possibility is hinted at in renderings depicting an inhabited mezzanine structure (See for example Appendix A3, Figure 63, Page 67).

The urban design as well as pedestrian access to the upper deck would be greatly improved if the H Street Bridge were lowered rather than raised. Similarly, every effort should be made to lower the rail yard and design a transfer deck of sufficient depth to allow new passenger concourses and waiting areas above the rail yard enabling views of the trains and related activities.

### **Vehicular Circulation**

The vehicular circulation pattern is fairly consistent for all of the project alternatives including Preferred Alternative A-C. The deck level circulation (Chapter 3, Page 3-84) does not include the additional roadways for Burnham Place or even a designated pick-up/drop off (PUDO) location. Significant PUDO activity should be anticipated in this area for rail passengers, as well as bus passengers, Burnham Place, and federal air rights development. The proposed circulation degrades significant areas of the sunlit deck and curtails opportunities for activated urban spaces. An “escape” from the snarl of traffic on the East Ramp introduces a very tight U-turn onto F Street and purposefully diverts traffic into the Capitol Hill Historic District. Busses exiting the station must turn east, with no provision for west-bound busses. Automobiles leaving the parking structure and PUDO activity follow a circuitous route if they wish to head west on H Street. In short, the proposed vehicular circulation is unworkable and creates new problems for the local road network that FRA does not attempt to mitigate. Interpretation and analysis of the report’s vehicular traffic conclusions is exceedingly difficult in part because the information is so scattered throughout the report and lacks actual numbers.

Excavation below the rail yard for concourses, retail space, and large waiting areas either side of the proposed H Street concourse is questioned. Spaces below-the-tracks would be far better utilized for vehicular functions (parking, taxi, PUDO) and with an east-west connection between 1st and 2nd St, NE utilizing the H Street tunnel area to facilitate both vehicular and pedestrian access. Greater reliance on the lightly used streets immediately west of Union Station (1st St., and the unit blocks of G St and G Place, NE) could reduce demand and improve vehicular circulation at other areas. Eliminating the proposed parking structure above the deck level opens the possibility for far better uses than a parking structure.

### **Integration with Historic Union Station**

Preferred Alternative A-C proposes an east-west train hall (Concourse A, upper and lower) to replace the existing Claytor Concourse as the connector to the historic station. The DEIS is restrained on how Preferred Alternative A-C integrates into the historic station and areas now occupied by retail activities. Removal of the non-historic Claytor concourse and waiting area is appropriate. The proposed space (See Appendix A3, Figures 61- 68, pages 67-69) seems too vast and detached with little purpose, although the suggested possibility of an inhabited mezzanine structure could help. The proposed H Street Concourse comprises the main waiting areas and is linked to Concourse A by the 1st Street and Central Concourses. These areas are reminiscent of a similar concept at Penn Station in New York. The distance between H Street and Concourse A is about 700 feet (approximately two city blocks) and from the front doors of

the historic station the distance is about 1200 feet (three city blocks). The H Street Concourse waiting areas are a soulless space below a rail yard with no view to absorb the attention of waiting passengers; are 1000 feet+/- from the retail and architecturally interesting areas of the historic station; and are separated by the enormous, disengaged circulation spaces of the train hall. New waiting areas should be closer to the historic station, and incorporate views of rail and passenger activity.

Federal air rights development similar in scale to Burnham Place is not within the scope of the DEIS. Nevertheless, such development is anticipated and conceptual building masses are depicted. However, the appropriate height of both Burnham Place and any federal air rights should not be considered a settled matter. The Union Station North zone - the only place in the District that allows measurement from an artificial structure - opens the possibility for buildings significantly higher than any of the surrounding structures. This height threatens to diminish the District's iconic horizontal skyline. The impact of buildings rising above the skyline need to be understood not only in relation to Union Station, but also in a far broad urban context and image of the city.

#### **Section 4(f) Comments**

Chapter 6, Section 6.6.3 acknowledges that “the Capitol Hill Historic District may potentially experience an adverse effect under all Action Alternatives from an increase in peak-time traffic along 2nd Street NE and F Street NE as well as along some residential streets if congestion on H Street NE or Massachusetts Avenue prompts drivers to seek alternative routes to WUS through the neighborhood.” This section further concludes that any resulting traffic is not a “substantial impairment” and therefore “The Capitol Hill Historic District is not discussed further in this Draft Section 4(f) Evaluation.” (Page 6-16, Line 342-343) The Executive Summary discussion of Section 4(f) (Pages ES 62-63) does not even mention the potential adverse effect to the CHHD. Thus, the 4(f) evaluation conveniently concludes that an adverse effect is likely, but recommends no mitigation and evades addressing mitigation measures.

CHRS disagrees with this conclusion and notes that Preferred Alternative A-C directs traffic into the historic district by the proposed East Ramp U turn onto F Street, NE. This stands in direct contradiction to the statement that increased traffic in the historic district is the result of other drivers seeking “alternative routes” due to congestion. The Section 4(f) conclusion also fails to recognize the significant additional burden placed on Third St. to carry Union Station traffic from the new F Street U-turn to H Street and the H Street Bridge.

Missing from the 4(f) analysis is vehicular movement between the various pick-up and drop-off (PUDO) locations. In order to drop off a patron at one location and pick up a new patron at a different location, circulation around Union Station will be generated. Much of that circulation will be through the CHHD. This too stands in direct contradiction to the conclusion that increased traffic in the CHHD is not a direct result of Preferred Alternative A-C. While Section 4(f) ignores traffic diverted into the CHHD, the traffic analysis concludes that the intersection of

3rd and H St., NE (among others) will sink to level of service F because of the station expansion. Missing from both the Section 4(f) and traffic analysis, are actual traffic counts.

Table ES-2 "Passenger and Train Volumes by Service, All Action Alternatives" envisions total daily passengers on Amtrak, MARC, VRE and Intercity bus to more than double with any of the Action Alternatives (Executive Summary, Page ES-21). Additional traffic will also be generated by Burnham Place and any federal air rights development. Even at current passenger levels, the queue for taxis backs up onto nearby streets at both the front and rear of Union Station. Taxis as well as Uber and Lyft services routinely pick-up or drop off passengers near Union Station and return for additional passengers using either Third Street or North Capitol to circle between the front and rear of Union Station. This pattern of vehicular circulation will be multiplied by the increase in passenger volumes, the diversion of traffic onto F Street, NE, and movement between the various PUDO locations. This is a direct adverse impact to the Capitol Hill Historic District.

### **Conclusions**

The report contains a staggering amount of information and is an ominous predictor of the problems ahead. Any recommendation arising from the WUS EIS must provide a compelling argument that the project warrants funding and is an worthwhile improvement. We do not believe the Preferred Alternative meets that requirement. The EIS and Section 106 Review have not focused on achieving the best possible outcome for all the WUSPs. The Union Station expansion projects - inclusive of Burnham Place, H Street Bridge and federal air rights development - must be understood in their entirety. We caution that a Programmatic Agreement resulting from a flawed EIS will result in diminished opportunities for problem solving, create a vehicular fiasco, and limit urban design objectives for federal and private air rights development.

Thank you,



Beth Purcell, President  
Capitol Hill Restoration Society

cc: (via email)

Mayor Muriel Bowser, District of Columbia

Councilmember Charles Allen, Ward 6

Andrew Trueblood, Director, DC Office of Planning

David Maloney, State Historic Preservation Officer, DC Office of Planning

C. Andrew Lewis, DC Historic Preservation Specialist

Karen Wirt, Chair, ANC6C

Fredrick Lindstrom, Commission of Fine Arts

National Capital Planning Commission  
Rob Nieweg, National Trust for Historic Preservation  
Erik Hein, Exec. Director, NCSPO  
Beverly Swaim-Staley, USRC  
Kirby Vining, Chair, Committee of 100  
David Tuchman, Akridge Development  
Rebecca Miller, DC Preservation League



September 29, 2020

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10) 1200 New Jersey Avenue, S  
Washington, DC 20590

Re: Comment on the Washington Union Station Draft Environmental Impact Statement (DEIS)

Dear Mr. Valenstein:

The expansion and redesign of Union Station represents one of the most important land use and transportation decision in the DC region in recent memory and is a 100-year decision that we must get right. Our shared vision must be bold, it must put non-auto transportation first and foremost, and it should turn Union Station into a truly transit-oriented development center at the heart of our city. **For this reason, we cannot support the expansion plan as proposed in the Federal Railroad Administration's preferred alternative A-C, and are recommending that key flaws in the Draft Environmental Impact Statement (DEIS) be corrected.**

As you know, Union Station sees more annual visitors than each of our three regional airports. It serves as our direct connection to the heart of our fellow urban centers up and down the East Coast from Boston, New York and Philadelphia, to Richmond and Raleigh. It is also a hub and transfer point for the DC region's growing commuter rail service linking centers of walkable urbanism at suburban stations. It is also the transit-oriented hub for government, private-sector, and non-profit offices in a ½ mile to 1-mile arc around the station and could support millions more square feet of air rights development.

The Coalition for Smarter Growth is the leading organization in the DC region advocating for walkable, bikeable, inclusive, and transit-oriented communities as the most sustainable and equitable way for the Washington, DC region to grow and provide opportunities for all. In our 23 years we have reviewed and endorsed well over 125 plans and projects representing hundreds of millions of square feet of development and tens of thousands of housing units. We have nearly 24,000 people on our supporter list in the DC region. In 2017, the Council of Governments recognized us with their Regional Partnership Award and we've been recognized three times by the Washington Business Journal as a member of their Power 100 most influential business organizations in the DC region.

On a personal note, I have been a three day a week commuter on the Amtrak Northeast Corridor for a number of years and have become intimately familiar with Amtrak and VRE operations and the operations of Union Station. Our office has been located for the past nine years just a ten-minute walk from the station.

In the preparation of our comments we have reviewed the DEIS, met with stakeholders including Beverley Swaim-Staley, Director of the Union Station Revitalization Corporation, Akridge, the Federal City Council, and DC government planning officials. What follows are our top concerns about the findings in the DEIS and the flaws that we urge you to correct:



- 1) The proposed parking supply should be reduced to 295 spaces

We have spent extensive time analyzing the parking numbers, and the responses by Akridge and the DC Office of Planning (DCOP). We concur that the proposal for 1600 spaces is far beyond the need. Amtrak has indicated that it does not need parking and it appears that intercity bus riders do not require parking either. USRC has indicated that the parking is not tied to the retail center. In fact, cities have found that the source of their retail growth has been pedestrians and cyclists. The large amount of parking is at odds with DC's goals and the shared regional goals to reduce vehicle trips, vehicle miles traveled, air pollution and greenhouse gas emissions. It is also at odds with DC's goal to significantly increase bicycle, walking, and transit mode share. DCOP has concluded that no more than 295 spaces are needed and we concur.

- 2) The proposed above ground parking structure should be removed from the plan and the 295-space facility should be placed underground along with a pickup and dropoff facility

The current parking structure has been a blight on the historic station for too long. The new proposed structure would similarly detract from the aesthetics of the historic station in addition to being unnecessary. We concur with proposals to place both the parking and the pick-up and drop off in an underground location. Similarly, while we are not experts in intercity bus service, we believe measures can be taken to reduce the scale of the bus facility using modern gate management techniques. The bus station should certainly remain an integral and more welcoming part of this multimodal hub. All of these measures will allow for the space that would have been occupied by a new above ground parking garage to be occupied by air rights development. Doing so would also allow for much better public spaces and experience both in and around Columbus Circle, on H Street and in a future central plaza extending from H Street toward the main station.

- 3) The pick-up, drop-off plan and the overall circulation is very poor, undermines pedestrian and bicycle access to the station, negatively impacts the surrounding community, and should be changed

We share the extensive concerns of ANC-6C and the city about the proposed pick-up, drop-off plan and overall circulation to and from the station. The current proposal would further degrade conditions in front of the station and along H Street. It would make H Street more dangerous and undermine its role as a main street for the community, and would obscure the access to the train hall by non-auto means. Therefore, we concur with the alternative proposal being offered for underground taxi and pick-up and drop-off facility, as well as the recommendations for alternative approaches to circulation that would provide multiple entrances and exits to the underground facility to disperse traffic.

- 4) The bicycle facilities are inadequate and should be expanded with state-of-the-art facilities and improved connections to all surrounding existing and planned bicycle connections

The proposal fails to acknowledge and factor in the dynamic growth in cycling in DC and the presence of three major city bicycling routes – Metropolitan Branch Trail, 1<sup>st</sup> Street NE cycle track, and planned K Street crosstown bike link. It also lacks adequate bikeshare stations, outdoor bike racks, and a major indoor bike station. The bike station at Wiehle Metro has been a huge success and European rail stations



have major bike stations for parking. Connections between the station and the surrounding facilities should be improved.

In addition to this letter, CSG has signed onto the letter submitted by the Greater Washington Partnership, and also endorses the comments of the Federal City Council, the Capital Trails Coalition, and by the local community represented by ANC-6C.

**We recommend that the Federal Railroad Administration's Preferred Alternative A-C be rejected and that the alternative solutions recommended by our organization and the others referenced here be adopted.** As we plan for Union Station's next 100 years in the era of climate change we must slash the reliance on automobiles by favoring transit, bicycle and pedestrian access to the station, shrinking the parking, and creating a great place easily accessible by people walking and bicycling from all directions. We need to reclaim Columbus Circle for people, and create a great place at and connecting to H Street.

Thank you,

Stewart Schwartz  
Executive Director

Cc: The Honorable Eleanor Holmes Norton Mayor Muriel Bowser

Chairman Phil Mendelson, Councilmember Charles Allen, Andrew Trueblood, DCOP,  
Jeff Marootian, DDOT, Beverley Swaim-Staley, USRC C. Andrew Lewis, SHPO Johnette Davies,  
Amtrak Marcel Acosta, NCPC



Hi, my name is Anthony Williams and I am the CEO of the Federal City Council, and on behalf of the Federal City Council, I want to thank the Federal Rail Administration for this opportunity to submit public comment on the draft Environmental Impact Statement for study for the Washington Union Station Expansion Project, which looks to expand future rail capacity at the station. And I also want to thank FRA for extending the public comment period to September 28. This extension will ensure adequate time for comments that are critical for the successful future for Union Station.

The expansion of Union Station represents the single greatest economic development and transportation opportunity for the District and the region as a whole in a long time. An opportunity of this magnitude requires a bold vision, modern and innovative thinking, and the dedication to the highest and best standards of planning and design. And importantly, projects of this scope need the full support of key stakeholders in order to garner the political and financial support required to make the project a reality.

That is why I'm here today, to stress to FRA the importance of addressing critical issues with proposed alternative A-C. The Federal City Council was aware of four key concerns about this alternative. Those components are vehicle parking, vehicular circulation to include pickup/drop-off zones, the bus facility, and issues preventing high-quality urban design. Numerous other local stakeholders have weighed in on these issues, and at this time, there is a strong chorus of opposition for FRA's proposed alternative. Thankfully, many of the same local stakeholders, such as DDOT and the Office of Planning, are going beyond just voicing their concerns. They are doing significant work to identify solutions. These four issues, and the way in which they're addressed going forward, would determine whether or not this project comes to fruition. Now is the time for FRA to address the concerns that have been made.

Now is the time for FRA to address the concerns that have been raised and to amend the alternative so that the project can move successfully forward. I'm confident that by taking these comments into consideration, we can produce a project that has the impact we all want and of which we can be proud. I want to thank FRA for the opportunity to comment on this important project. Thank you.

September 28, 2020

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: Public Comment to the Washington Union Station Draft EIS

Dear Mr. Valenstein:

The expansion of Washington Union Station (WUS) represents a project of national significance, and a project of great importance for the Capital Region of DC, Maryland, and Virginia. For this reason, the undersigned organizations strongly support the modernization and redevelopment of Washington Union Station—Amtrak's second busiest train station in the U.S., WMATA's busiest Metrorail station, and the busiest transportation hub in the region, serving more residents and tourists than the region's three airports combined. The existing train station achieves this even though it does not provide a consistent positive train or retail experience for its more than 37 million annual visitors, and its track configuration and platform capacity are unable to meet expected growth of the unified and integrated rail network our region is currently planning.

An opportunity of the magnitude presented by the WUS Expansion Project requires a bold vision, modern and innovative thinking, and shared expectations and commitment from numerous parties over many years to make the promise of the project a reality. As important, projects of this scope need the full support of key stakeholders to garner the political and financial underpinning required to make the project a reality. While the WUS Draft Environmental Impact Statement (DEIS) plans for a greatly enhanced regional rail network, it falls short of enabling a regionally integrated rail network and does not present a development and construction strategy for the project's invested stakeholders.

To ensure that all key stakeholders are actively supporting the project's Final EIS, and its construction, we strongly encourage that the Final EIS address the following issues:

**Plan for through running trains for all MARC and VRE lines, not just the MARC Penn Line**

The DEIS does not fully plan for an integrated regional rail network, which must be addressed before the Final EIS. The proposed operating plan in the DEIS only plans for future run-through of MARC's Penn Line service into Northern Virginia and excludes consideration of similar through run trains for MARC Brunswick and Camden services, as well as through runs of VRE's service beyond Union Station into Maryland. The proposed Draft EIS runs counter to recent planning and advocacy activities<sup>1,2</sup>, and counter to recent Final EIS decisions made by FRA for other mega-projects on the Northeast Corridor<sup>3</sup>. The Final EIS should actively plan for cross-regional rail movements for all currently operating MARC and VRE commuter rail lines. This approach will maximize the benefits of a modernized and expanded rail network, better serve the super-region's private and public employers, and create good jobs for our region.

**Identify development and construction options**

A project of this magnitude will require sustained, accountable, collaborative, and invested leadership from numerous key stakeholders over the next two decades to fully realize the vision set

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<sup>1</sup> [What's the market potential for MARC-VRE run-through service?](#), MWCOG, May 26, 2020.

<sup>2</sup> [Capital Region Rail Vision Announcement](#), Greater Washington Partnership, September 14, 2020.

<sup>3</sup> [Capital Region Rail Vision Announcement](#), Greater Washington Partnership, September 14, 2020.

out in the Final EIS and Record of Decision, including the executives in DC, Maryland and Virginia, USDOT, USRC, Amtrak, MDOT and MTA, DDOT, Virginia DRPT, VRE, MARC, WMATA, intercity and charter bus operators, and the private air rights developer, Akridge, among others. We encourage the Final EIS to present various funding strategies and viable approaches to complete the construction of this project, from broadening USRC's responsibility managing this station and its expansion to a redevelopment compact with all project investors. This information will help the region's stakeholders focus attention on the potential roles and responsibilities for each agency to best support the construction of this important project.

As presented by NCPC, the DC Office of Planning, and others, the Draft EIS does not properly plan for intermodal connectivity and integration into DC's urban fabric, and we encourage the Final EIS to include revisions to the parking and bus programs, decreasing their overall footprint, and greatly enhance the pick-up and drop-off demand manage program to limit impacts on neighboring communities. Additionally, the plan must vastly improve safe connections, access, and parking for bicyclists.

The Washington Union Station project is a national and regional priority. It will allow for a more integrated and unified rail connection for the Northeast and the Southeast rail corridors, enable a more unified commuter rail landscape in the Capital Region, and unlock immense economic and housing development, and job creation for the region. In order for this project to successfully move forward, it is imperative that FRA addresses the important comments that have been offered to ensure we move forward, as one region in concert with the federal government, to realize the opportunity of a greatly improved Washington Union Station.

Sincerely,

Kate Bates  
President & CEO  
Arlington Chamber  
of Commerce

Julie Coons  
President & CEO  
Northern Virginia Chamber  
of Commerce

Jay Corbalis  
Vice President, Public Affairs  
JBG SMITH

Stephen W. Courtien  
President  
Baltimore-DC Metro  
Building Trades

Michael Friedberg  
Executive Director  
Coalition for the Northeast  
Corridor

Georgette Godwin  
President & CEO  
Montgomery County Chamber  
of Commerce

Lisa Guthrie  
Executive Director  
Virginia Transit Association

JB Holston  
CEO  
Greater Washington Partnership

Jim Mathews  
President & CEO  
Rail Passengers Association

Danny Plaugher  
Executive Director  
Virginians for High Speed Rail

Trip Pollard  
Land & Community Program  
Leader  
Southern Environmental Law  
Center

Stewart Schwartz  
Executive Director  
Coalition for Smarter Growth

James Smith  
Chairman  
Rail Passengers Maryland

Gina Stewart  
Executive Director  
The BWI Business Partnership,  
Inc.

Michele L. Whelley  
President & CEO  
Economic Alliance of Greater  
Baltimore

Robin-Eve:

Okay. Well, on behalf of the NoMa BID, I wanted to express our concern about the impact of the preferred alternative on the neighborhood generally. Particularly, we're concerned about the impact on transportation connectivity, open space opportunities, pedestrian opportunities, and bicycle traffic. For decades, we've worked to turn NoMa from a postindustrial area with decreasing employment opportunities for residents into the thriving mixed use community that it is today. Much of that work has centered around assuring that we have vibrant streets, great pedestrian and bicycle connectivity, and places where people feel comfortable just spending time in the neighborhood.

We've undertaken, at considerable expense, many studies and actions to see those items implemented. Items like improvements in Metropolitan Branch Trail, which is a bicycle pedestrian trail that runs through the neighborhood; improvements to streetscape design, which we have implemented in two trenches; the creation of a NoMa public realm design plan; and then actual, physical interventions to break up superblocks in the neighborhoods like the ones that were created through the historical industrial use that pervaded post the development of Union Station. So some of those interventions have been the NoMa Meander [crosstalk 00:23:49]. So we just are asking that FRA and the other proponents take a hard look in light of the impact of this plan on those concerns.



1200 First St. NE, Suite 310  
Washington, DC 20002  
202.289.0111  
[NOMABID.ORG](http://NOMABID.ORG)

September 28, 2020

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590  
[info@WUSstationexpansion.com](mailto:info@WUSstationexpansion.com)

RE: NoMa Business Improvement District Comments on Washington Union Station Draft  
Environmental Impact Statement

Dear Mr. Valenstein,

The Washington Union Station Draft Environmental Impact Statement (DEIS) fails to sufficiently justify several crucial features of the Preferred Alternative (A-C). The impacts of these decisions would counteract NoMa's transformation from a collection of underutilized post-industrial properties to a robust neighborhood featuring strong multimodal connectivity and attractive public spaces. The NoMa Business Improvement District (BID) strongly believes that the volume of proposed on-site parking, lack of consideration of other transportation impacts, and insufficient mitigation of construction impacts will be a detriment to NoMa and other surrounding neighborhoods.

### **A Threat to Neighborhood Progress**

For decades, the area now known as NoMa was a post-industrial neighborhood with decreasing employment opportunities and residents due to several factors including the rise in prominence of the automobile and a corresponding decrease in economic reliance on rail. By the time the District of Columbia (DC) had encountered significant financial struggles in the mid-1990s, the neighborhood largely comprised a collection of undeveloped or run-down properties, bisected by an imposing railyard and railway. But federal, regional, and local leaders, as well as a collection of hyperlocal property owners, envisioned the area as an opportunity to build a dense, mixed-use neighborhood, centered around investments in public transit and policies and incentives conducive to transit-oriented development. In 2004, the NoMa-Gallaudet Metro station (then called New York / Florida Ave Metro station) was built and, in 2007, the DC Council, in partnership with NoMa property owners, established the NoMa BID, in part, to facilitate this growth and development.

Other major public investments have included: the Metropolitan Branch Trail (MBT), an eight-mile bicycle / pedestrian trail that runs from Union Station to Silver Spring; and the NoMa Parks Foundation, funded by a \$50 million grant to ensure that this budding neighborhood could provide sufficient public open spaces for its quickly growing residential and office population. The DC Office of Planning (DCOP) further prioritized investments in public space and multimodal transportation options with the creation of the NoMa Streetscape Guidelines, which continues to shape the area's sidewalks and other public spaces.

These investments and principles have successfully created a dense and mixed-use neighborhood with a diverse set of accessible and convenient transportation options. Today, NoMa has over 12,000 residents and 65,000 workers and about 84% of NoMa residents commute by means other than driving. NoMa is an appealing live-work environment that has attracted a bountiful and well-educated workforce to serve DC's many federal employers including those that occupy about half of the office square footage in the neighborhood.

The Preferred Alternative identified in the DEIS by the Federal Railroad Administration (FRA), with its disregard for impacts on the neighborhood progress described above, threatens the community and federal property interests in NoMa by including an imposing above-ground parking structure that jeopardizes NoMa's multimodal connectivity and accumulation of public open space which has driven the neighborhood's recent successes. The proposed parking volume ignores the consequences of induced demand for vehicle travel: unnecessarily high parking volumes would induce higher volumes of car traffic and encourage additional infrastructure and development oriented around car use, stifling NoMa, the commercially vibrant H Street corridor, and beyond. Furthermore, the sizeable above-ground garage would undermine the inclusion of desperately needed open space opportunities at the Burnham Place mixed-use development proposed for the private air lots above the railyard and eradicate opportunities for neighborhood pedestrian connectivity.

### **Adverse Local Transportation Impacts**

The applicant fails to sufficiently justify the proposed 1,600 parking spaces or fully evaluate the impacts of the Preferred Alternative on local transportation conditions.

The applicant derives its parking volumes from several faulty assumptions about the number of parking spaces that will be required by the primary users of Union Station. For example, the applicant uses the District's zoning regulations to calculate a minimum need of 357 spaces for retail and office uses. This ignores provisions that allow for the inclusion of zero parking for retail uses in close proximity to other modes of transportation, which are plentiful in this area (Metro rail and bus, for-hire vehicles, etc.). In fact, the District Department of Transportation (DDOT) and DCOP agree that these modes of transportation are sufficient to justify zero parking for retail. Further, the high volumes of foot traffic naturally generated by other Union Station activity should further reduce any reliance on parking to attract customers. Additionally, the applicant proposes 900 flexible long-term spaces primarily for multi-day use by Amtrak customers. However, Amtrak has stated that it "does not support any entity building a parking garage specifically to support Amtrak passengers," describing parking for their passengers as "not essential." Flawed estimates like these inflate the proposed parking volume, which would generate additional vehicle trips to the station, placing additional burdens on surrounding neighborhoods via increased traffic. A high parking volume also reduces the available square footage to dedicate to more productive and higher-revenue-generating uses such as office and retail.

To determine and evaluate traffic impacts of the redevelopment project, the applicant should produce a thorough Transportation Demand Management (TDM) plan that is comprehensive of each of the seven alternatives under consideration. This type of analysis is critical to understanding the long-term impacts to surrounding neighborhoods. This TDM plan should include an assessment of strategies to induce station users to use more sustainable modes such as mass transit rather than single occupant vehicles.

Pick-Up-and-Drop-Off (PUDO) facilities must be strategically placed and designed throughout the Union Station project area, in order to limit the impacts of the high demand for for-hire vehicles on traffic congestion. DDOT data has previously indicated that Union Station generates the highest demand for for-hire vehicle usage in DC, and increased capacity for bus and rail passengers will only increase said

demand. This necessitates high-capacity PUDOs located within the project area that eliminate the need for drivers to queue on public roadways and create traffic congestion. Effective high-capacity PUDOs could also reduce long-term parking needs.

Lastly, while some minor details about bicycle and pedestrian access were advanced in the DEIS, and more granular urban design decisions are yet to come from the applicant, it should be stressed that the Final Environmental Impact Statement (FEIS) must commit to exceptional bicycle and pedestrian connections to the surrounding bicycle and pedestrian infrastructure within the station itself (between entrances, the train hall, transit options etc.). In particular, the redevelopments that interface with H Street NE must utilize pedestrian-scale design wherever possible to strengthen the connection between the lively H Street corridor, Union Station, and the rest of the District. Failing to do so would impose a physical division between the surrounding neighborhoods and stifle the vibrancy of the area.

### **Long-Term Construction Impacts**

The DEIS lacks consideration of the impacts of this lengthy construction process on the surrounding community. The proposed project will involve more than 11 years of construction activities within the context of the rapidly growing NoMa neighborhood which is already projected to experience a high volume of private and public development activity over the next five years, including the reconfiguration of a major intersection about one half of a mile from Union Station. The applicant states that First Street, 2<sup>nd</sup> Street, and H Street NE would all serve as critical access roadways for construction activities, further disrupting inter-neighborhood transportation options. The FEIS must include strategies to minimize or mitigate these disruptions for all modes of transportation along each of these roadways. The DEIS also lists for-hire vehicles, buses, and parking as Union Station services that would experience regular disruptions during this 11-year period. The applicant must commit to finding temporary off-site locations to continue these services that minimize added congestion to surrounding roadways and prolonged closure of bicycle and pedestrian pathways.

The NoMa BID implores the applicant to place greater stress on these issues during the development of the FEIS. Consensus on the challenges presented by Preferred Alternative A-C among many key stakeholders, including DDOT, DCOP, and the National Capital Planning Commission (NCPC) is sure to create significant delays for this project should the applicant fail to sufficiently respond to these concerns.

Sincerely,



Robin-Eve Jasper, President  
NoMa Business Improvement District

**From:** Jim Lilly  
**To:** [Union Station Expansion](#)  
**Subject:** Commentary on Washington Union Station Expansion Project  
**Date:** Sunday, July 26, 2020 12:55:15 PM

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Hello,

Commentary on the Project is provided below.

I am frustrated that prior comments do not appear to have been specifically addressed in accordance with law, at least not in a meaningful way I can find.

Our organization has been originating trips from the station since the 1950s. Since the 1980s we have been operating private cars from Washington, D.C. This plan as identified in the preferred alternative aims to put our organization out of business.

As with all buildings, they need to evolve over time. Fundamentally, one can accept the premise that the station needs to expand to accommodate future growth and maintain viability, as long as key elements and operational features of the station are maintained/preserved. The project, to include the preferred alternative, fails to meaningfully and substantively consider in a significant way the preservation of key elements and services of the station that date to its construction and are still relevant.

1) Platform Covers/Canopies - The existing lower level platform covers date to the original construction of the station. The Roman Character of the Columns is an architectural extension of the station itself. Some of these must be preserved and used in some meaningful, related way.

2) K TOWER - K Tower is a historic structure dating to the construction of the station and controls the movements of all trains in and out of the station. It is a unique structure not designed to be hidden under ground or under a building. Many railroad towers have been moved and repurposed. K Tower must be preserved.

3) Private Railroad Car Parking - Since its opening, the station has provided parking for private railroad cars, to include Presidents, the well to do, and ordinary Americans. The current plan does not provide for any of this and by reducing the number of tracks in the station, the excuse that there is no more room for private cars will likely, but inaccurately, follow. Private railroad cars bring visitors to our Nations Capital. Since construction private rail cars have provided a safe, secure, and discreet means for transporting dignitaries, Congressmen, and Presidents, in and out of the facility. Simply eliminating private cars from the station is not adequate means of addressing the issue. Private car parking in Washington, D.C. must be preserved.



All three of these elements could be incorporated into a new facility just North of the Amtrak Ivy City shops. This facility has already been identified in the DC Rail Plan as a museum and a place for parking private railroad cars. The Tower could be moved there and preserved. One or more sections of the lower level platform canopies could be incorporated as a platform cover. A joint public-not-for-profit partnership, in conjunction with Amtrak, could build and operate the facility with construction costs that are in the noise for this project (\$2 - \$5M). This could be a variation on the "Garden" in Los Angeles. As a museum such a facility could bring additional visitors to the Capital and into the Ivy City Area. Moving private car parking to a facility switched by Amtrak maintains this service while relieving pressure on use of the station tracks as cars could be switched directly to and from trains without ever being "parked" on a station track. Routine servicing could be performed at the facility (water, sewage dumps, inspections). This facility must be built and incorporated into the plan to fully address the Section 106 requirements for federal funding and to provide a true multi-modal facility that incorporates all elements of travel present at the station today.

Finally, building a new station with LESS private automobile parking than currently exists today is a disservice to the traveling public.

**James W. (Jim) Lilly,**

National Railway Historical Society, Washington, D.C. Chapter, Inc.  
(DCNRHS)

a not-for-profit 501(c)(3) organization founded in 1944

Visit us on the Internet at <http://www.dcnrhs.org>, or our legendary Pullman Dover Harbor at [www.doverharbor.com](http://www.doverharbor.com) or our railroad library at [www.railroadlibrary.org](http://www.railroadlibrary.org)

[info@dcnrhs.org](mailto:info@dcnrhs.org)



VIA E-MAIL

September 28, 2020

David Valenstein  
Office of Railroad Policy and Development  
Federal Railroad Administration  
1200 New Jersey Ave. SE  
Washington, DC 20590

**Re: Comments on Draft Environmental Impact Statement and Draft  
Assessment of Effects for Washington Union Station Expansion Project**

Dear Mr. Valenstein,

These comments are submitted by the National Trust for Historic Preservation<sup>1</sup> in response to the Draft Environmental Impact Statement (DEIS) and Draft Section 106 Assessment of Effects (AOE) Report, issued by the Federal Railroad Administration (FRA) for the Washington Union Station Expansion Project. The National Trust has been actively engaged for more than eight years in collaborative consultation and advocacy to protect Washington Union Station, one of our National Treasures, as the planning process for its redevelopment and expansion has unfolded and evolved.

In response to the DEIS and the AOE, we strongly agree with the comments and objections that are being submitted by the other consulting parties, including the State Historic Preservation Office (SHPO), the Capitol Hill Restoration Society, the Committee of 100 on the Federal City, and others. We especially take issue with the "Potential" Adverse Effect determination for the Capitol Hill Historic District, because these adverse effects are reasonably foreseeable under the current proposal, and they need to be addressed now through modifications to the project, not deferred and denied.

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<sup>1</sup> The National Trust is a private nonprofit organization chartered by Congress in 1949 to "facilitate public participation" in the preservation of our nation's heritage, and to further the historic preservation policy of the United States. *See* 54 U.S.C. § 312102(a). With more than one million members and supporters around the country, the National Trust works to protect significant historic sites and to advocate for historic preservation as a fundamental value in programs and policies at all levels of government. In addition, the National Trust has been designated by Congress as a member of the Advisory Council on Historic Preservation, which is responsible for working with federal agencies to implement compliance with Section 106 of the National Historic Preservation Act. *Id.* §§ 304101(8), 304108(a). The National Trust also has a strong record of enforcing compliance with Section 4(f) of the Department of Transportation Act, 49 U.S.C. § 303(c).

Rather than repeating these issues, which we have discussed during the Section 106 consultation process, we would like to focus our comments on the substantive requirements of Section 4(f) of the Department of Transportation Act, 49 U.S.C. § 303(c), and the failure of the Preferred Alternative A-C to comply with those requirements.

**The Preferred Alternative Fails to Comply with Section 4(f), By Failing to Include “All Possible Planning to Minimize Harm” to Historic Properties.**

As you know, Section 4(f) prohibits the “use” of historic properties (and certain other protected resources) for transportation projects, unless (1) “there is no prudent and feasible alternative” to the use of the protected property; and (2) the program or project includes “all possible planning to minimize harm” to the property. 49 U.S.C. § 303(c). And unlike the National Environmental Policy Act (NEPA) or Section 106 of the National Historic Preservation Act, whose mandates are ultimately procedural, the requirements of Section 4(f) impose substantive constraints on the exercise of agency discretion. The language of Section 4(f) shows that Congress intended the protection of historic properties (and other resources protected by the statute) to be given “paramount importance” in the planning of federal transportation projects. *Citizens to Preserve Overton Park, Inc. v. Volpe*, 401 U.S. 402, 412-13 (1971).

In this case, there is no dispute that the project will “use” the historic properties of Union Station, the Union Station Historic Site, and the REA Building (DEIS at 6-15 to 6-21), and there is no alternative that would avoid that use altogether (DEIS at 6-22). Accordingly, the issue here is whether the project includes “all possible planning to minimize harm” to those historic properties. It fails to satisfy that requirement.

“[T]he duty to minimize harm has two components. First, harm minimization requires FHWA to consider alternatives that result in less or less-drastic use of a Section 4(f) resource.” *Merritt Parkway Conservancy v. Mineta*, 424 F. Supp. 2d 396, 417 (D. Conn. 2006) (citing *Druid Hills Civic Ass’n v. FHWA*, 772 F.2d 700, 716 (11th Cir. 1985)). Second, “whatever harm cannot be avoided by choosing between construction alternatives should be mitigated by design choices within the chosen construction option.” *Merritt Parkway Conservancy v. Mineta*, 424 F. Supp. 2d at 417.

If an alternative, or a modification to the design, would be less harmful to the historic properties and other resources protected by Section 4(f), the agency *must adopt* that less harmful alternative, unless it can demonstrate that “there were truly unusual factors present,” or “unique problems,” or “the cost or community disruption” resulting from the alternative designs would reach “extraordinary magnitudes.” *Citizens to Preserve Overton Park v. Volpe*, 401 U.S. at 413.

In this case, the FRA’s Section 4(f) analysis fails to satisfy this legal standard. The agencies and other parties participating in the Section 106 consultation process have identified numerous ways in which Alternative A-C should be modified in order to substantially reduce its adverse impacts on Union Station and other historic properties. But the FRA has failed to provide a legally sufficient rationale for declining to adopt and incorporate those modifications. The proposed modifications include, for example:

- The number of parking spaces needs to be dramatically reduced, from the current proposal (to build more than 1,500 parking spaces in an enormous structure that would tower over Union Station) down to approximately 250 spaces;
- Some of the functions need to be shifted underground, especially parking and pick-up/drop-off (PUDO) circulation, in order to reduce the visual impact of the above-ground construction and reduce the adverse traffic impacts; and
- The Visual Access Zone needs to be expanded and shifted, to ensure that it is wide enough to maximize visual access to the historic Union Station building, and centered on the historic barrel vault.

One of the truly extraordinary things about this planning process is the broad consensus that has been achieved by virtually every party other than the FRA that these measures to reduce the adverse impacts are important and these and other modifications to the proposed project need to be made. Rarely do we have the preservation advocates, the city, the federal planning and design and preservation agencies, and the private developer, all in agreement on these issues.

The FRA has attempted to justify its desire to avoid these less harmful modifications partly based on cost. The agency has chosen the cheapest alternative (DEIS at 6-26), but the cost differential between the alternatives is not really very substantial, given the multi-billion-dollar budget and the lengthy construction schedule. Even the *most* expensive alternative is only 29 percent more in its estimated cost than the \$5.8 billion preferred alternative, and over the course of more than a decade, that differential is likely to be exceeded by cost increases and contingencies.

The FRA has also placed a high priority on attempting to reduce the duration of construction, and has cited this as a rationale for rejecting underground construction, along with other measures to reduce the adverse impacts. Again, however, the difference between the alternatives is probably less than the margin of error, given the lengthy duration of construction, with the longest alternative (at 14 years) just 27 percent longer than the preferred alternative (at 11 years). (DEIS at 6-25.) The FRA's disproportionate emphasis on minimizing the duration of construction may have the benefit of slightly reducing short-term impacts, but at the cost of substantially increasing the permanent adverse effects.

Ultimately, the FRA has simply not made the case that the proposed modifications to minimize harm, including those described above, would involve additional costs or community disruption of "extraordinary magnitudes."<sup>2</sup>

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<sup>2</sup> The Section 4(f) evaluation also attempts to cite correspondence from the SHPO as supporting the conclusion that Alternative A-C, as proposed, includes "all possible planning to minimize harm," and satisfies the requirements of Section 4(f). (DEIS at 6-23 to 6-25.) This assumption cannot be sustained, especially in light of the SHPO's more recent comments.

**Conclusion**

Thank you for considering the comments of the National Trust. We plan to continue participating as a consulting party in the Section 106 review in an effort to resolve the adverse effects of the project. We urge the FRA to make substantial modifications to its preferred alternative, in response to the strong and unified recommendations by the consulting parties, in order to satisfy the substantive legal requirements of Section 4(f) to incorporate “all possible planning to minimize harm” to the historic properties, as well as the requirements of Section 106 to “develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize or mitigate adverse effects on historic properties,” 36 C.F.R. § 800.6(a). Without these modifications, the project remains vulnerable.

Sincerely,



Elizabeth S. Merritt  
Deputy General Counsel

cc: Sarah Stokely, Jaime Loichinger, and Reid Nelson,  
Advisory Council on Historic Preservation  
Katherine Zeringue, Federal Preservation Officer, Federal Railroad Administration  
Andrew Lewis and David Maloney, DC Office of Historic Preservation  
Drury Talent and Beth Purcell, Capitol Hill Restoration Society  
Kirby Vining and Erik Hein, Committee of 100 on the Federal City  
Rebecca Miller, DC Preservation League  
David Tuchmann, Akridge Development



## The Guild of Professional Tour Guides of Washington, DC

August 3, 2020

Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Mr. David Valenstein and Expansion Project Committee Members,

The Guild of Professional Tour Guides of Washington, DC, an association of nearly 600 members, thanks you for the opportunity to provide comment on the Union Station DC Expansion Proposal and the June 2020 Draft Environmental Impact Statement (DEIS). Of concern is that the six alternatives presented in the DEIS (Appendix A) appear to run counter to the goal of sustainably expanding Union Station. Each alternative slashes the number of motor coach parking slots, minimizes passenger access pathway considerations, and limits the amount of time coaches can park. Union Station is a major **regional transportation hub**, as such accommodation of large group travel and motor coach access should be paramount to any expansion project. As professional DC tour guides, we are particularly familiar with how tour groups travel to and through Union Station. We are concerned that none of the plans appear to take into account the realities of current tour group use of Union Station nor forecasts for increased usage. We would welcome the opportunity to share our expertise to help ensure the expansion project fulfills its goal of sustainable and realistic expansion while minimizing the impact on the Capitol Hill neighborhoods.

As the project moves forward, the Guild's three recommendations are that the:

- motor coach parking includes, at a minimum, the current number of 61 slots
- parking facility be contained within the station complex as presently located
- facility NOT limit coaches to a 30-minute park time

Visitors arriving by motor coach are major users of the station. Out-of-town visitors to the District are frequently part of large tour groups that travel by motor coach, often in multi-bus caravans. In many cases our clients ride coaches from their point of origination into the city.

If a group arrives by plane, a motor coach picks up the group at the airport. In each scenario that motor coach is their primary travel mode throughout their time in DC. At some point in the trip it's highly probable that the group – one or more busses of 50+ visitors each - will go to Union Station. In some instances, the group will go to the station more than once during their trip to

Washington, DC. Annually, motor coaches bring thousands of individuals to the station, which is why it is imperative to maintain, or better yet improve, motor coach facilities.

Of serious concern is how a 30-minute time limit for parking is characterized as a “moderate adverse” impact (see Table 5-62, page 189). As professionals in the tourism industry, we know that reducing coach parking times by half will have a major adverse impact. This is a detrimental option, negatively affecting many including coach drivers who need a physical and mental break, consumer spending at the station and, perhaps most, importantly the community which will be bombarded by a steady flow of motor coaches forced from the station and onto neighborhood streets. This “active management” approach must be eliminated from all options.

Our concerns relating to coach parking times, pedestrian safety, retail viability, traffic congestion and the utility of the station, and air and noise quality are outlined in more detail below.

**Pedestrian Safety** - Access to, and parking at, the station must be an integral element of a transportation design. In previous comments to the planners, the Guild noted that a tour guide’s paramount concern is the safety of the guests. To help ensure public safety, the plan must include explicit design as how the footpath will be marked with appropriate signage. At Union Station a first step towards safe travel means ensuring that the motor coach on which they are traveling can secure an onsite parking space. Safety and accessibility to the station needs to include auxiliary areas where large groups can gather safely and walk to and from a parking spot that is located within the station complex. Groups should not be walking through tunnels, under bridges, or have to take long pathways to reach retail establishments. In addition, guests arriving by motor coach are often school groups that must remain together and elderly travelers who have mobility challenges. While there is mention that alternatives would have a drop-off and pick-up location, we know that unexpected access to the coach is needed by guests. Therefore, we ask that a new/improved bus facility be located in approximately the same location as the currently facility in the station.

**Retail Viability and Consumer Spending** - Large-group tours that come to Union Station generate much needed revenue to food and retail establishments. In fact, the sustainability of many businesses relies on these tourists’ dollars. Even if fifty people from the coach spend just ten dollars each on a meal those passengers generate \$500 and it’s likely the amount of dollars spent while in Union Station will be more. While in the station these tourists purchase meals at the food establishments and shop among the variety of vendors. In fact, the income generated by large-group tourism is substantial to the retailers in Union Station and to the city budget, which is derived in half by tourism spending. Without adequate parking, or time to spend at the station, tour groups may forego shopping at Union Station altogether which could have a devastating impact on the vendors who rent space in the station. Without tourist dollars these merchants may have to close shop creating a loss of revenue to the station in both tourist and rental dollars. With adequate facilities for tour busses, however, the traffic impact on the neighborhood could be minimized while maintaining this important revenue stream.

**Traffic Congestion** – The Guild found no informative distinction made between traffic concerns related to motor coach stops at Union Station and the inevitable increase in traffic that will

accompany planned residential complexes. There are some instance in the report, such as Chapter 5, Transportation, that references potential development of federal and private air rights. Yet, we found the report lacking clarity, and too often the report seemed to minimize the impacts of new residential and retail development in the area. The higher density of neighborhood dwellers will bring more vehicle traffic despite claims that occupants will be using mass transit. To fully inform the public, future plans should address in more detail the increased parking and traffic congestion expectations associated with planned residential development. Examining and having a clear understanding of all anticipated traffic growth is important if the public is to give a fair assessment of anticipated vehicle density and travel patterns.

A big question related to increased neighborhood traffic is that due to new vehicle and trolley traffic patterns some alternatives direct busses to exit east onto H Street, NE. A right-hand, eastbound, turn from the bus station ensures that busses will be entering into local neighborhoods, whereas a left-hand, westbound, turn directs coach traffic to the larger thoroughfares of North Capitol Street or Massachusetts Avenue, which for tour busses is the most logical route to return to the areas like the National Mall and the monumental core of the city. The report notes that this would be a slight detour to reaching the downtown area or monuments, however, the reality is that once the coaches enter into the neighborhood area the group can lose 20-30 minutes moving through narrow neighborhood streets getting to a main route.

**Air and Noise Quality** - A July 14th virtual town hall was held as part of the public comment process. At that time, some individuals, several representing community groups, argued for limited vehicle access to the station and an expansion design with fewer parking spaces than the 61 slots that currently exist and fewer than the 40 slots recommended in Preferred Alternative A-C. The reasoning is that a design should lend to a more neighborhood-friendly transit facility. Most DC tour guides are locals, and many guides reside in Capitol Hill and nearby neighborhoods. The Guild and its member guides support measures to create a more walkable city and channel vehicle traffic away from neighborhood streets. However, the reality is that limiting tour bus access to the station will only undermine the goal of improving the quality of life in the area and instead add to traffic congestion, smog and commotion.

More specifically, the Guild contends that limiting parking times as noted in Appendix A5e-Action Alternatives Refinement Report, Appendix D- Reference Memoranda will have a detrimental effect on the neighboring community. Pages one and two of the memo state that due to public comments in favor of reducing coach slots, a new approach will mean **busses must exit the facility in 30 minutes**. The “active management” approach also referred to as “dynamic management” is also used to justify slashing parking slots. While in the short-term these proposals may squelch public discontent over the number of parking spaces in the design, they are not based on the reality of usage or impact. In the long term, if implemented, these plans will more likely yield a thunderous public outcry from locals who experience an increased number of busses roaming their neighborhood streets to burn up another 30 minutes time till they pick up tourists who are at the station to eat and shop. Tour group schedules are highly regimented, and drivers must be very conscientious about keeping to the schedule. No motorcoach parking is



available near enough to Union Station for drivers to wait while their groups finish their meals and shopping in order to pick them up on time. If drivers are forced to leave the parking garage after thirty minutes, they will not drive to a location further away, but will drive around the streets of Union Station so that they can meet their passengers at the appointed time. Drivers do not risk driving across town, particularly during peak commuter times, but will drive around the streets to be near their clients.

Forcing coaches out into the streets every 30 minutes means

- More traffic congestion
- Heightened pedestrian safety concerns
- Increased pollutants into the air, harming air quality
- Additional street noise

In closing, the Guild contends that when expanding a major transportation facility that motor coach travel be respected and accommodated as a major transportation resource for thousands of individuals. The current number of 61 parking spaces must be retained and the “active management” parking time limit of 30 minutes must be dropped. To help make that case, we note the *Final Concept Development and Evaluation Report Appendix H: Bus Terminal Capacity Technical Memorandum* dated July 7, 2016. This study identifies 61 coach slots at Union Station. Thirty slots are permanently reserved, four are designated drop-off/pick-up spots, and 18 are available for hourly or daily rental. According to the assessment completed, only 47 active (active is defined as a vehicle spending two hours or fewer at the facility) bus slots will be needed to meet the demands of charter/tour, intercity, and circulator coaches in 2040. Yet in that same report, the conclusion section reads that “Future growth is expected in both intercity and the tour/charter markets”. In particular, we note the report’s projections that tour/charter/sightseeing demand will grow by 51 percent by 2040. A conclusion of the study is that “Therefore, the future terminal should have a similar capacity to today’s terminal.”

Thank you for your consideration of these comments,

Jackie Frend

President, Guild of Professional Tour Guides of Washington, DC

[Jackiefrend@gmail.com](mailto:Jackiefrend@gmail.com)

Maribeth Oakes

Co-chair, Government and Tourism Committee

Guild of Professional Tour Guides of Washington, DC

[Mbo6@verizon.net](mailto:Mbo6@verizon.net)

Cc:

Representative Eleanor Holmes Norton

National Capitol Planning Commission

Andrew Trueblood, Director, DC Office of Planning

Jeff Marootian, DC Department of Transportation

Phil Mendelsohn, Chairman of the Council, District of Columbia

**From:** Lauten, Peter (Contractor)  
**To:** [Union Station Expansion](#)  
**Cc:** [Volunteer](#); [Shelia Dashiell](#); [Kathleen Baldwin](#); [ringoldw@aol.com](mailto:ringoldw@aol.com)  
**Subject:** Comments Re: DEIS "Washington Union Station Project"  
**Date:** Monday, June 29, 2020 5:37:26 PM  
**Attachments:** [image002.png](#)

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To Whom It May Concern,

Travelers Aid International is a non-profit organization based in Washington DC. I would like to enter into the record this brief and summary history of the presence of Travelers Aid volunteers at Washington's Union Station:

Founded in 1913 by the YWCA, the Travelers Aid Society of Washington first went into service at the relatively new Union Station. Old editions of the *Washington Post* note that Travelers Aid volunteers were there in Union Station in March 1913 to assist travelers in the city for the first inauguration of Woodrow Wilson.

For a time, Travelers Aid shifted its operations away from Union Station when the terminal fell into disrepair and many operations were shuttered. Travelers Aid returned after a \$160 million renovation restored the building to its former grandeur. Union Station is now a multi-faceted transportation hub for Amtrak, local rail transportation and many bus lines, including Greyhound.

Travelers Aid Society of Washington closed in 1997 due to financial challenges. At that point, Travelers Aid International took over the direct operations at Union Station along with the contracts at Washington Reagan National Airport and Washington Dulles International Airport.

The Union Station operations are funded with a grant from the District of Columbia and private donations.

Source: <https://www.travelersaid.org/union/about-us/history/>

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Comments by Peter Lauten, Program Manager for Travelers Aid International at Washington Dulles International Airport:

As the program manager for TA Dulles (IAD), a sister program of Travelers Aid - Union Station (Zwu), I am submitting comments in support of the Travelers Aid program at Union Station.

Any historical preservation work of Union Station must take into account the essential work that

Travelers Aid volunteers have been performing at Union Station for more than 100 years. The legacy of volunteerism and assisting travelers at Union Station is currently under strain due to the following conditions:

For a variety of reasons and over the course of time, the presence of Travelers Aid volunteers at ZWU has been minimized and limited to what is currently a small and difficult to find “pod” which is an unsafe location to perform social work by any standard, let alone during the COVID pandemic.

In order to return the volunteers to full performance at Union Station, (which is urgently needed) and in order to provide help to those in need while maintaining a safe environment for clients/customers/staff, the TA location at Union Station must be made to be **more prominent and easily identifiable**. Furthermore, the location must be large enough to provide social distancing measures - **to ensure safety for all**.

I strongly encourage those engaged in the planning process of the expansion to consider implementing **a solution that would respect the history and importance of Travelers Aid volunteers in Union Station by providing a safe venue for them to work from, in a suitable prominent location**.

Thank you for your consideration,

### **Peter Lauten**

Program Manager

Travelers Aid - IAD

[Peter.Lauten@MWAA.com](mailto:Peter.Lauten@MWAA.com)

O: 703-572-7350

C: 703-785-0577





David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

July 13, 2020

Dear Mr. Valenstein,

We are providing Uber's commentary in advance of the Tuesday, July 14 public hearing regarding the Washington Union Station Expansion Project Draft Environmental Impact Statement (DEIS).

We would like to thank our partners at Union Station, DDOT, and DFHV for their initial dialogue in March on this project. Union Station is a vital transportation hub for Washington's riders, drivers, and the city as a whole, and we believe enhancing the ridesharing experience for our shared customers is a vital objective for all parties.

After reviewing the DEIS, we believe further dialogue is necessary to ensure we arrive at the most optimal experience for our shared customers. We note that the DEIS includes reference to a potential move for for-hire and private vehicle traffic. To the extent that includes rideshare, we want to be sure that we are closely involved in the development of a proposal that will enhance operations. Uber has extensive experience designing world-class operations, having successfully partnered with numerous cities across the country to address pickup and dropoff experiences, and we can share industry best practices and data-driven insights.

We share your concerns regarding growth impacts on the efficiency of future operations at Union Station. As ridesharing continues to grow as riders' preferred ground transportation mode, we want to be sure that any proposals will deliver the experience that our shared customers expect.

We look forward to continuing the dialogue with our partners on this important project.

Regards,

Stephanie Smith  
Senior Public Policy Manager  
Uber Technologies, Inc

**CC:** Kevin Forma, Union Station Redevelopment Corporation

September 28, 2020

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10) 1200 New Jersey Avenue, S  
Washington, DC 20590

Via email

Dear Mr. Valenstein:

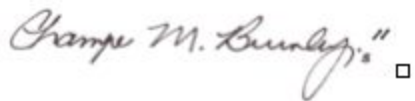
We encourage that all efforts to improve multi-modal access to Union Station be made a key priority of the station renovation project, though it seemingly is not in the current EIS. Doing so will promote train ridership, reduce traffic congestion and reduce pollution in the immediate vicinity of the station and in the District.

As a founding member of the Amtrak Bike Taskforce, we have seen over fifty-thousand passengers take their bikes on Amtrak trains. Many cyclists in the DC Metro area are taking their bikes on the Capital Limited as well as carrying bikes on MARC trains originating at Union Station. It is imperative for riders and pedestrians to have safe access to the station as well as secure bike parking and storage so that they can leave their bikes in confidence just as those who choose to park their car at the station.

Providing secure bike parking at Union Station makes financial sense. At the Wiehle Station on the Purple Line (Reston), secure bike parking is provided for 200 bikes. The facility was fully subscribed to *in the first month it opened*, paying completely for the buildout of the bike facility. It is now a profit center for Metro. I believe we would see the same happen at Union if secure bike parking were offered.

As is obvious in the District, many people choose to forgo car ownership and we believe this is not a passing fad. I would contend that many of these citizens are also prime candidates to ride the train for intercity travel. Make it easy for these users to walk or use bikes for first mile/ last mile access and Amtrak sells more tickets.

Sincerely,

Handwritten signature of Champe M. Burnley in cursive, followed by a small square symbol.

Champe Burnley,  
President



**From:** Louise Brodnitz  
**To:** [Union Station Expansion](#)  
**Subject:** Far Too Much Parking  
**Date:** Sunday, June 7, 2020 5:41:59 PM

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Gentlepeople,

The positioning of over a thousand parking spaces above ground in such close proximity to multiple regional transportation options is an unconscionable waste of an opportunity to reduce emissions and traffic congestion in the District of Columbia. The FRA is trying to create a suburban-style shopping mall in the midst of a city. The number of shoppers that might be drawn by that logic is capped by the number of spaces and limited by the lack of imagination. Instead FRA should be creating a destination that people want to visit precisely because it is urban, exciting, and vibrant, and they will get there by rail, metro, bus, cab, carshare, bike, walk, scooter, streetcar, and any other means that maximizes access for people over storage for cars.

Please eliminate most of the parking and make the H Street side of the station as vibrant as possible!

Louise D. Brodnitz, AIA AICP

**From:** Rami Turayhi  
**To:** [Union Station Expansion](#)  
**Cc:** [Muriel Bowser](#); [Allen, Charles \(Council\)](#)  
**Subject:** Washington Union Station Expansion Project - Comment to Draft Environmental Impact Statement: REMOVE PARKING GARAGE FROM DESIGN  
**Date:** Tuesday, June 16, 2020 1:56:35 PM

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FRA staff,

As a longtime resident of DC, a neighbor of Union Station, and a regular user of Amtrak and Union Station's retail and amenities, I implore the staff to remove the parking garage structure from its proposed expansion and redevelopment plans, reduce parking to zero (or something close to zero), and proceed with an updated design that permits all stakeholders to develop the area in and around Union Station as a world-class, pedestrian-focused destination. The current proposed design does the opposite, and relies on outdated notions of how humans utilize space in the core of cities, and travel to and from transit hubs.

Please, please: redesign the Union Station expansion WITHOUT any parking garage, and work in good faith with DC and Akridge to thoughtfully design and construct a world-class transit hub and neighborhood (i.e., Burnham Place) that will be a source of pride for generations of Washingtonians and Americans to come. We've already decimated some of our best transit hubs during the 20th century (see, for example, historic Penn Station), let's not do the same here, as we have a once-in-a-generation opportunity to turn Union Station and its environs into an example of a world-class, pedestrian-focused transit hub for DC, with thousands of residents and commuters enlivening an area that currently consists of unused air above railroad tracks.

Signed,  
Rami Turayhi

DC resident; H Street NE corridor

**From:** Wright Bryan  
**To:** [Union Station Expansion](#)  
**Subject:** Washington Union Station Expansion Project Comment  
**Date:** Friday, June 26, 2020 4:54:12 PM

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### **My comment on the Washington Union Station Expansion Project:**

I'm glad this is moving along. It's important. I'm all for upgrading the station and adding to it. I live down the street and I would like to see it improved.

On parking, I strongly disagree with the current vision. This is a transit station, not a parking lot. Parking should be reduced again to 750 spaces or fewer. Parking should be built underground. It is a waste and an eyesore to take up above-ground space for parking.

I am also concerned that too much attention is paid to getting cars in and out of the station. Pedestrians and bicyclists should be at the forefront of your planning.

From what I can see, you are only looking at adding 200 additional bike spaces. The plan should consider bike parking and storage on multiple approaches to this large development. Each set of entrances needs substantial bike parking. Overall bike parking should be able to handle 2,000 to 3,000 bicycles. How many bikes can you get in the space used to park one car? Probably 6-8.

Your planning for train improvements is forward-looking. Your planning for pedestrians, bikes and cars is backward looking.

My final comment is that the project should be done in half the time! Six to seven years is plenty to get this done. Stop dragging your feet.

**William Wright Bryan III**

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**From:** Stewart Kerr  
**To:** [Union Station Expansion](#)  
**Subject:** Agree with the DC Office of Planning -- Too much parking  
**Date:** Saturday, June 27, 2020 4:47:48 PM

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My name is Stewart Kerr - I live and work in DC around Union Station at 100 F Street. I appreciate everyone's efforts to plan and implement improvements to Union Station and I'm excited for the project to commence.

I am in agreement with Andrew Trueblood's April 30th letter suggesting a reduced number of parking spots for Union Station. The future development of WUS should encourage the use of transportation other than private or rental cars which are less environmentally sustainable and economically equitable than buses, metro, and bikes.

Thank you for giving the public an opportunity to provide comments and for your consideration of these comments.

Sincerely,  
Stewart Kerr

**From:** Andrew DeFrank  
**To:** [Union Station Expansion](#)  
**Cc:** [Charles Allen](#)  
**Subject:** Public Comment on Union Station Expansion  
**Date:** Tuesday, June 30, 2020 6:31:57 PM

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Hello,

My name is Andrew DeFrank. I'm a lifelong Washingtonian and native of Capitol Hill. My first memories of Union Station are from my early childhood, when I would take the train with my mom back and forth from New York to DC, when she and my dad lived in different cities.

I am strongly opposed to any expansion of parking facilities at Union Station. I believe the current parking garage structures should be demolished and not replaced. Union Station and the H Street NE corridor have the opportunity to be a dynamic urban hub in the heart of Washington, DC. That's a goal we should strive for. The cultural, economic, and environmental benefits of building blocks worth of densely-packed residences and businesses Any dedication of space to parking that could otherwise go to retail, residential, or other active uses (where car parking is a passive use) would make goal harder.

1,500 parking spaces is way too many. Washington, DC is a large and growing city, and Union Station is a major railway hub in the middle of dense, walkable communities. We should look to other American cities like Boston, Philadelphia, and New York, and include no more than 400 parking spaces in the Union Station Expansion.

Please, reconsider these alternatives and come up with a plan that doesn't kneecap the future of Capitol Hill, Near Northeast, H Street NE, and Noma for years to come.

Thank you,  
Andrew DeFrank

**From:** jrzb8910 .  
**To:** [Union Station Expansion](#)  
**Subject:** Washington Union Station Expansion  
**Date:** Wednesday, July 1, 2020 11:09:05 PM

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Good evening,

My name is Taquann McKinney. I have lived in the DC area for 5 years due to my career in the military. I have been all around the world in my 19 years of serving. I am an avid fan of high speed trains as well as train stations. There are train stations around the world that, when compared to the United States, make us look like a third world country. I am excited to see this project come together.

I like to compare Union Station to St. Pancras in London. St. Pancras was an eyesore of a railway station. After it was renovated and reopened in 2007, it has become a destination in itself. It's wide open spaces, modern rail platforms, inviting restaurants, have made it one of my absolute favorite railway stations in the world. I envy the citizens of London with how much pride they take in their railway stations. I believe the United States needs to do the same thing.

To that end, I believe DC needs to be a leader in pushing the narrative of climate change affecting our daily lives. Building a 10-story car garage on air rights that could be used for something more useful seems more like a fool's errand than anything else. I believe we should be encouraging people to get out of their cars, not creating incentives for them to drive a lot more. I believe Alternative A of the plan would be the most effective way to use the space and to make Union Station a fantastic destination within DC. I hope you will reconsider your plan to build that garage. If Amtrak is telling us they don't need it, I believe we should listen. Thank you for considering my point of view.

V/r,

Taquann McKinney

This is James Schulman, Registered Architect in Washington, D.C. I've just begun to review the proposals, but I want to look back in history.

In 1900, the proportion of automobiles to horse-driven vehicles was 99 to one, certainly on the East coast of the United States, and within nine years, by 1909, the proportion was flipped. There were 99 automobiles for every one horse-drawn vehicle. And experts have predicted the same thing will happen in terms of a conversion from private internal combustion engine vehicles to public fleets of battery-powered, electrified vehicles, autonomously driven. So the ownership of vehicles is about to flip, and within perhaps even less than the nine years that it took to go from horse-drawn to fuel vehicles.

And so I really, really caution the FRA in their assessments of what the parking needs of this facility are. They need to look at the future and not the status quo. I reserve the right to submit more comments as I've had a greater chance to review the plans. And thank you for this opportunity.

Hello, everyone. My name is Noah Gillespie. I'm a homeowner near Union Station. I'm speaking today in my individual capacity and I'll follow up with written testimony as well. I and many of my neighbors have been following along with great interest since the master plan for Union Station came out in 2012. This was creating a vision for 2040, still 20 years in the future, to double the number of passengers and triple the number of people that visit Union Station, which would be more than a hundred million people every year. It had sweeping visions of a 50-foot wide, 100-foot high central corridor bringing in people from all throughout the neighborhood under waving roots [inaudible 00:26:01] of greenery and glass. And this was also making Union Station the easiest place to switch between different modes of transit in the District, and to serve as the crown jewel in a long-distance, high-speed train network from Boston to Atlanta and beyond.

The proposed alternative, announced in November, and that is the basis for the DEIS, falls far short of the vision. Traffic around the station is already a disaster that turns many people away. Triple the number of people is going to make this even more of a challenge unless we design to discourage. It seems that a primary motivation for encouraging parking and more cars to visit the station is a fear that the business of Union Station and the revenue to sustain this historic element will not be available unless people can drive to the station. Clearly, the number of people who are going to visit by intermodal transit are going to be enough to sustain the station, and traffic jams even today keep people away. So what we need is foot traffic instead.

We know, as many commenters have already addressed, that excessive parking at the station is unnecessary. Many D.C. Agencies cannot envision a use for more than 300 spaces. And I and many of my neighbors would encourage far less. We know that Amtrak and buses do not need this parking, metro does not need this parking, and we do not need to provide federally subsidized private vehicle storage when instead we should be inviting people in. There's also been expressed [inaudible 00:27:33] that we may have to have parking in order to provide accessibility. And this assumes that accessibility can be provided by putting people with accessibility needs to the side. We need to bring everyone into the main access point so everyone can enjoy the station. Here, we have an opportunity to correct and remove the barriers that prevent access to the station today by putting pickup and drop off out of the way of pedestrians and bicyclists and ensuring that, in 2040 and beyond, everyone can enjoy this national treasure. Thank you very much.

Hello, this is Brent Huggins, and I am a homeowner and resident in Northeast DC, just a stone's throw away from Union Station. And I'm calling because I really support the expansion of train travel throughout the Northeast Corridor. I'm very excited for this project, the doubling of rail capacity, because I see that really as our future from an environmental standpoint, from a transportation standpoint, just the ability to move people so quickly. I'm really excited that we have essentially the fourth airport in our neighborhood.

However, I am very dismayed and upset and disagree with the proposal to rebuild a massive parking structure in our neighborhood that is not being used by our neighbors, isn't being used by folks that shop and go to Union Station, isn't being used by people that take the train. Amtrak, DDOT, the mayor's office, Eleanor Holmes Norton, our ANCs and neighborhoods have really opposed this parking structure because... all this parking. So I would ask that the Federal Railroad Administration reconsider this grave mistake. That we want to make it safer for pedestrians and bicyclists, for multimodal transportation. I agree that we should continue to have some long range process to go between cities, but that we don't need parking and that we shouldn't be building a massive parking structure really to support some commuters that aren't really helping make our [crosstalk 01:50:12] vibrant.

I believe that we should build for the future. And that I would really ask that the FRA reconsider all of the stakeholders that have expressed opposition to this parking. Even the DDOT or some other group of the DC government has said we need maximum 300 parking spaces. While I think that we can really think that you can use even less as we've become less reliant upon cars, there's no need to build an 1,800, 2,000 parking space garage. Please really reconsider that. When I've been to the community meetings, parking is seen as one of the number one priorities, according to FRA, and I don't understand where they're getting that. And I think that we really need to move away from auto transportation-

Thank you so much for taking public comment. My name is [inaudible 00:42:20] and I'm calling to support pedestrian prioritization in the Union Station redevelopment and to limit to the number of parking spaces. We have examples like Penn Station in New York where there are no parking stations, excuse me, no parking spots, and I think that that's a good example for us to follow. We know that we need more train capacity. I would love to see more high speed rail as well as more buses coming through Union Station.

The area around Union Station, the circle in front, is currently named Columbus Circle, and I would also suggest that we rename Columbus Circle as part of decolonizing Union Station and consider the removal of the parking garage and not rebuilding it also part of bringing the neighborhood back to a place where people can access it and there's safety. Right now it is very dangerous to cross the street on both sides of Union Station, on the H Street side as well as on the side that faces the Capitol building, and safety for pedestrians should be the number one priority in the redevelopment, in addition to prioritizing building additional housing and affordable housing and making sure that it is a public space for the community to enjoy. Thank you very much.

Andrew:

My comment is that I do not want any parking at union station. I want to prioritize pedestrians. I want to make it safe for pedestrians to move around union station. I cross union station every day on my way to work and I want to be able to do so safely.



Yes. Good evening. Thank you. My name is Alex Lopez. I'm a resident of Washington, DC and my comment, I wanted a... The union station design needs to prioritize pedestrians and bicyclists and other non-car modes of transportation, and we need limits on the amount of parking in that development. Those are my comments.

My name is Andrew Turner. I'm a resident of Washington DC. I wanted to make a comment requesting that the FRA consider that Union Station prioritize pedestrians and bicycle and reduced parking. As a resident who takes his children to the public school nearby Union Station thing, I think it's of utmost important to maintain the safety of all commuters who go by Union Station, including school children who are there all day long, both drop off and pick up as well as go outside on field trips walking around Union Station. I also think is important as someone who uses the train station that I want to prioritize the safety of getting into and out of the train station, whether I'm using the sidewalks, whether I'm using the buses or a bicycle or even for a car, but I want to reduce the amount of space that the parking takes or the actual driveways take in order to prioritize those alternative means of transit via for pedestrians and bicycles. Thank you.

Good evening. My name is Marina. I am a resident in Trinidad and I use the Union Station facilities all the time. I am calling to advocate for multimodal transit, high speed trains and improved bicycle facilities, as well as to advocate for reduced parking. This Union Station is a transit hub and we do not need thousands of people driving to a transit hub. Thank you.

Hi there. My name is Randy Downs. I'm a neighborhood commissioner in the DuPont circle area. In addition to being a neighborhood commissioner, I also work nearby at Union Station at 50 S street. I commute often through metro to Union Station or either by bike from DuPont to my office. I'm very excited about the expansion of the Union Station train station. And I think the project should definitely prioritize pedestrians, multimodal transportation, trains, expanded train networks buses, and the metro system. There is no room for additional private car storage. Additional cars in the area are a safety concern, environmental concern, and quality of life concern. So please again, prioritize people, pedestrians, bikes, buses, trains, and metro, not private car storage. Thank you so much.

**From:** Hannah Follweiler  
**To:** [Union Station Expansion](#)  
**Subject:** Feedback on the Union Station Expansion  
**Date:** Friday, July 24, 2020 8:27:12 PM

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Hello staff,

Thank you for putting in the time and effort to undergo this massive project, both in size and importance. I look forward to the day I travel in and out of Union Station with these improvements that will make rail travel in par with the rest of Europe and Asia.

The one down side to the current project is the amount of parking. Please heavily reduce the amount of parking. Most people get to Union Station today without a car, and even then car travel to the station is mostly just Ubers or Taxi Cabs. I also don't anticipate a growing demand for cars. Most of Gen Z does not want the hassle of car ownership and Millennials also like to go car free when they can.

Parking adds time and money to the project. Think of the cost savings if the amount of parking was slashed by 50%. While parking garages are not as time consuming as some of the other construction for this project, it surely would save Construction time to have less parking on the site.

Rail investment and other multimodal forms of transportation will put us on par with the rest of the developed world. Don't miss out on this opportunity to change the status quo in American infrastructure instead on basing it around the assumption that everyone owns a car and drives it all the time.

Thank you for your time,  
Hannah Follweiler  
Sent from my iPhone

**From:** Mike Aiello  
**To:** [Union Station Expansion](#)  
**Subject:** No Above Ground Parking  
**Date:** Monday, July 27, 2020 2:02:45 PM

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FRA,  
People can not live or work underground. Cars can.

Please, just put as much parking as you want underground. Not only is less parking needed than you think but less will be required in the future. We should not duplicate the eyesore of a parking garage that already exists.

-Michael Aiello  
DC Resident, User of Union Station for local and regional trips.

**From:** Karthik Balasubramanian  
**To:** [Union Station Expansion](#)  
**Subject:** Too much parking  
**Date:** Tuesday, July 28, 2020 6:51:21 AM

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The FRA needs to drastically reduce parking at union station. I live in the neighborhood and will be inhaling the fumes of the cars. I actually care about the environment too, unlike certain orange people and cronies

August 26, 2020

David Valenstein, Senior Advisor  
Federal Railroad Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue  
SE Washington DC 20590

RE: Comments on the Preferred Alternative for the Washington Union Station Expansion Project

Dear Mr. Valenstein,

I am writing to urge the FRA to reconsider certain aspects of the Washington Union Station Expansion Project. If left as proposed I believe these aspects will cause long-term harm to the environment, to the neighborhood, and to the city as a whole.

**There is too much parking.**

It is well-known that people choose the transportation method that maximizes convenience and cost, yet the cost is fairly elastic: people are willing to pay a great deal for convenience. The long-term environmental effects of choosing to drive are rarely if ever part of that decision. Yet these 'externalities' (adverse effects which are external to the decision) are detrimental anywhere, and particularly bad in the middle of a city where congestion can quickly cripple the roadways making it impossible for essential vehicles to get through, and cause pollution at street level that harms the health of pedestrians and residents. It is impossible to see that large an amount of parking as anything but an attempt to maximize income to FRA on the backs, health and efficient travel of DC's residents. Long-term parking must be the very last resort for those heading to the station. There are so many alternative options now that did not exist when such excessive parking made cities into paved heat islands. As a person who lives and works in DC, please don't induce people to drive to the station.



Furthermore, the dependence on private vehicles has a dampening effect on the ability of more efficient means of travel. Those alternatives are not only good for the environment, but they also help the local economy. They also help FRA: You will have more people using the shops along the way to the cabs, buses and metro making the station a more lively and fun place.

Don't make DC residents bear the heavy costs from congestion and pollution from this poor use of precious land and fragile air quality.

Yours sincerely,

Louise D. Brodnitz, AIA

**From:** Josh Boxerman  
**To:** [Union Station Expansion](#)  
**Subject:** Comment on Union Station EIS  
**Date:** Thursday, September 24, 2020 5:30:05 PM

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Good evening,

My name is Josh Boxerman. I am a lifelong area resident and current District resident. I'm writing to comment on the Union Station redevelopment project. I support alternatives that have as little parking as possible in order to create space for people and prioritize other modes of transportation.

I support the vision embodied in the Akridge proposal, as summarized here: <https://ggwash.org/view/79068/a-new-revamped-union-station-vision>

We should be building a 21st century station and not base it in 20th century thinking about cars and parking. Thank you for your consideration of my views.

Best,

Josh Boxerman

**From:** Troy Michalak  
**To:** [Union Station Expansion](#)  
**Subject:** Washington Union Station Project  
**Date:** Friday, September 25, 2020 1:53:32 PM

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Good afternoon,

I am writing to you today regarding the Washington Union Station Expansion Project. As it stands currently, the project appears to be a fantastic continuation of the current station and I can't wait to see it. However, one area of concern I have is the large number (approximately 1,600) of proposed parking spaces planned for the new space. The future of transportation has to be multimodal and curb our overreliance on cars as being the primary and often, the only way to move about. I know I'm not alone in this, as the the D.C. Office of Planning, D.C. Department of Transportation, Congresswoman Eleanor Holmes Norton, the D.C. Council, the District Advisory Neighborhood Commission (ANC) 6C, the Federal City Council, and the National Capital Planning Commission (NCPC) have all called for reducing the number of allotted parking spots, often suggesting going as low as 295 spaces. I hope you take this idea into consideration while the process moves forward.

Thank you,  
Troy Michalak (Ward 6 Resident)

**From:** Barton Lynch  
**To:** [Union Station Expansion](#)  
**Subject:** Comment  
**Date:** Saturday, September 26, 2020 8:08:27 AM

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Hello,

I would like the plan to include less space for cars and more space for people. The last thing we need to be doing is a permanent investment in an unsustainable, dangerous, space-hogging machines. Please change your plan.

Barton Lynch

**From:** Jeff Johnson  
**To:** [Union Station Expansion](#)  
**Subject:** public comments on Union Station Expansion  
**Date:** Monday, September 28, 2020 7:26:43 PM

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Dear Friends:

The plan provides far more parking allowances that will be needed now or in the future and this will just encourage more driving to the station. There current is too little adequate allowances for bicycle access and no protected bike parking. This must change and more bike and pedestrian access must be provided. I live in Northeast DC and use Union Station both daily for the subway and frequently for the trains. You planners need a better vision for the future use of the station. Thank you, Jeff Johnson

September 28, 2020

**Reference: Comments on Union Station Master Plan DEIS:**

**Overall**

1. A lot of work has been done on this project – congratulations. The rail and platforms all look well worked out and much more functional.

**Concourse areas**

2. The four concourse areas work well and the new entrances on 1<sup>st</sup> and 2<sup>nd</sup> Streets will give much needed relief for egress and access. The lower concourse seems in direct conflict with the 1<sup>st</sup> Street loading dock? And access into Metro?? I don't see anything that explains how all that might work – since they are all at the same level?
3. The concourse areas need daylight. It is not obvious how this might happen. The last thing this station needs is lot of dark underground 'hallways' with no light. The roof of the main concourse should be all open to the sky. The central concourse also needs to be all open to the sky for daylight. Light can be brought in from the west for the west concourse – even though under a building. H Street has it's sky domes?

**Surface area**

4. There is logic in traffic changes around the building – there needs to be a way that people can walk out any door of the building and find a cab – like any urban transit center, maybe there's a cue on the south, but cabs need to be allowed and encouraged at every entrance – think Penn Station NYC. Provide taxi pickup at all entrances – 1<sup>st</sup> 2<sup>nd</sup> streets, (all entrance areas) H Street. Traffic going north on 1<sup>st</sup> Street will put people out into the bike lane – or is that planned to move to the west side of the street? DO NOT put the taxi's in the basement – what a terrible place for someone coming to Washington to be greeted.
5. There is no need to bring a lot of traffic through the site – the roads in the plaza should be minimal – not major source of drop-off pickup. Access to the station area is all along H Street – not in the middle of the plaza – there is not an entrance into the station in the plaza area – this needs to have a pedestrian focus.
6. **Parking should be all but eliminated.** This an urban transit hub – not a shopping mall. Maximum number of cars should be 200 for the entire site. No one wants more except USRC and the developer – let them find another source of funding or let them go away.
7. Buses do not need to need be front and center. Even their position in Alt A is questionable – and certainly not over the main pedestrian concourse as in C and D. Many buses can stop along the streets like in other cities.



Bill Gallagher, FAIA

**From:** Matthew  
**To:** [Union Station Expansion](#)  
**Subject:** Comment on the Washington Union Station DEIS  
**Date:** Thursday, October 1, 2020 1:03:29 AM

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Hello,

I feel the number of parking spots needs to be drastically cut. Union Station is in the middle of a vibrant city and designers need to prioritize pedestrians and place making over parking garages.

We need to send a message that the union station neighborhood is itself a destination to live and visit, not to drive to and from.

Thank you

Matthew Keitelman

Public Comment  
on the  
Federal Railroad Administration  
Draft Environmental Impact Statement  
for the  
Washington Union Station Expansion Project

August 7, 2020

We are neighbors of Union Station. We live in the surrounding neighborhoods including Hill East, Near Northeast, NoMA, Gallaudet University, H Street, and Trinidad. We will inherit the community treasure—or failure—of this project, and we will bear the growing pains of its transformation. We are proud of our neighborhoods and the District and we write with the profound and solemn obligation to raise high the hopes and needs of the children twenty years from being born who will live in the halls we can only sketch whispers of today.

**This is a moment of great opportunity.** The last renovations to Union Station were completed before most of us were born. The primary purpose of this project is to make Union Station the easiest place in the District to transfer from one mode of transit to another, with the resilience to welcome twice as many passengers—and three times as many people—as it carries today. The project ambitiously aims to create a beautiful, world-class “destination unto itself” that people plan to visit just as much as they choose to stay a while when they happen to be passing through.

The importance of the project only underscores the responsibility of doing it right. None of us can afford \$7 billion and 11 years of construction to build a monument to bad judgment.

While much of the DEIS<sup>1</sup> presents exactly what we need the proposal includes major blunders:

1. On-site parking must be limited to Union Station needs, with a primary focus on ADA accessibility, not convenience.
2. Pick-up/drop-off points must be arranged to limit the overall volume of private vehicles approaching the station and direct them to distributed locations that put foot traffic first.
3. USRC must get creative about how to generate the revenue it needs, including renegotiating leases. Rebuilding unnecessary parking is waste and contrary to law.

**Doubling is an enormous number of people.** Union Station is sometimes called the “fourth airport” of the region because it serves so many passengers. In fact, it ranks first. Union Station transports more passengers today than Dulles, Reagan, or BWI.<sup>2</sup> Besides that, it is the third most-visited tourist destination in the world,<sup>3</sup> welcoming 100,000 people every day.<sup>4</sup>

<sup>1</sup> U.S. Dep’t of Transportation Federal Railroad Administration (“FRA”), *Draft Environmental Impact Statement and Draft 4(f) Evaluation for Washington Union Station Expansion Project* (June 4, 2020) (“DEIS”). Citations to the DEIS in this letter will cite the PDF pages of each section of the report as provided to the public on the FRA’s website. For example, the page marked “ES-1” would be cited as “DEIS Executive Summary at 8.”

<sup>2</sup> Union Station welcomes 42 million people per year. Letter to the House Appropriations Committee (Apr. 22, 2020), <https://norton.house.gov/media-center/press-releases/norton-requests-26-million-for-union-station-in-the->



The Union Station of 2040 will carry twice the number of people by train.<sup>5</sup> Twice the number of people boarding and disembarking on its platforms. Twice the number of people looking for a place to rest a minute in its waiting areas. Twice the number of people trying to come and go through each doorway. Twice the number of people moseying through its shops, grabbing a seat at a table to eat, enjoying a coffee under its historic gilded ceiling, stopping to look up at the sky through the skylight windows peering into the light and air of a brand new neighborhood overhead named after the station's original designer, Daniel H. Burnham.

But doubling only takes into account the increased ridership the station itself creates. Amtrak plans to *triple* the number of people who pass through Union Station, to more than 100 million people per year.<sup>6</sup> The 50-foot-wide, 100-foot-high Central Concourse heals the gap the station cut into the city plan, restoring Delaware Avenue as a foot traffic boulevard.<sup>7</sup> The new train hall alone will offer 280,000 square feet of retail space open to thousands of daily customers.<sup>8</sup> On top of this, the new Burnham Place neighborhood will house thousands of residents, in addition to all the people who will work in offices and shops above the tracks.<sup>9</sup> Many people will enter from above, through a new northern entrance at the H Street Bridge level "crowning" the station.<sup>10</sup> The new H Street Concourse below the tracks will connect the neighborhoods east and west of Union Station, welcoming them to come in to gather, shop, dine, explore, and imagine.<sup>11</sup> Likewise, a concourse below K Street will enable access to all platforms from the north and allow direct Metro access.<sup>12</sup> The 2012 Vision also planned a long "greenway" connecting NoMa and the Metropolitan Branch Trail down to the southwest corner of the station property using beautiful, green walking and biking trails rivaling New York City's High Line.<sup>13</sup>

This confluence of transit, fun, and relaxation will not be found anywhere else in the region.

Expanding Union Station's capacity to welcome all these people is the purpose and need for this project. How to create that welcome is the \$7 billion question.

The FRA's answer is to bring more cars. That is no answer at all.

next-coronavirus. In 2019, all three airports combined saw 48.76 million people, Dulles receiving 25 million. MWAA, *Air Traffic Statistics* (Dec. 2019), [https://www.mwaa.com/sites/default/files/12-19\\_at\\_2.10.20.pdf](https://www.mwaa.com/sites/default/files/12-19_at_2.10.20.pdf).

<sup>3</sup> Amtrak, *2nd Century Plan*, <https://nec.amtrak.com/project/washington-union-stations-2nd-century/>.

<sup>4</sup> Amtrak, *Union Station Master Plan*, at 1 (July 25, 2012), <https://nec.amtrak.com/wp-content/uploads/2017/08/Washington-Union-Station-Master-Plan-201207.pdf>.

<sup>5</sup> DEIS Executive Summary at 28 (Amtrak will be up 95%, MARC up 151%, VRE up 249%).

<sup>6</sup> Amtrak, *2nd Century Plan*; *Union Station Master Plan* at 23 ("There will be room for comfortably triple the number of passengers and double the number of trains within the same Union Station footprint.").

<sup>7</sup> *Union Station Master Plan* at 21.

<sup>8</sup> DEIS Executive Summary at 36. This is 80,000 square feet more than today. DEIS Appendix A6 at 7, 18.

<sup>9</sup> Burnham Place, *Project Summary*, <http://www.burnhamplace.com/projectoverview.html> (projecting 1,300 residential units and 1,500,000 square feet of office space); *Union Station Master Plan* at 23 (estimating 7,000 full-time employees of Washington Union Terminal and Burnham Place).

<sup>10</sup> *Union Station Master Plan* at 3; *id.* at 7 (showing a rendering of the new H Street entrance); *id.* at 20 (showing a wide view of the new station and Burnham Place along the future H Street Bridge).

<sup>11</sup> DEIS Executive Summary at 24; *Union Station Master Plan* at 8.

<sup>12</sup> *Union Station Master Plan* at 9-10.

<sup>13</sup> *Union Station Master Plan* at 3, 21; *id.* at 18 (showing a rendering of the greenway). The MBT stretches from Silver Spring, through Takoma, and Fort Totten, by Union Station to the National Mall. DDOT Presentation to ANC 4B (June 22, 2020), <http://metbranchtrail.com/wp-content/uploads/ANC4BMeetingPresentationJune22.pdf>.

**Foot traffic, not traffic jams.** The more people who can easily get to Union Station, the better its prospects for success. The design of the station and its surrounding environment has to encourage people to come in rather than placing barriers in their way.

When we put foot traffic first, people tend to make a day of their visit. They might originally come for brunch, then stay to explore the station, pop into a shop that catches their eye, spend a while in the shady breeze above, and choose to try a new place for dinner. Simply piling all of the project's objectives onto the same small footprint does not create connections between them or achieve a sense of place.<sup>14</sup> We have to make it easy to see and get to something new to encourage exploration and make the whole area a magnificent destination.

We have seen the cost of too many cars. Columbus Circle is a quagmire. Since at least 2014, it regularly takes about 30 minutes for a vehicle to reach the historic stationfront from Massachusetts Avenue,<sup>15</sup> a distance of only 475 feet—less than  $\frac{3}{4}$  the length of a standard Acela train. That is a far cry from the Master Plan's hope to achieve an "alternative vision" for Columbus Circle to become "a pedestrian friendly public plaza free of vehicles."<sup>16</sup>

The proposal's siren call for more cars would doom all the roads around the station to the same fate. The ring road to access Dulles airport often backs up onto the highway, taking an hour to reach the terminal. Houston built highways with eight lanes in each direction and still suffers traffic jams.<sup>17</sup> This intensity of traffic keeps people out and risks everyone's safety. No one would walk across a highway. We should not surround the station with one.

This is why so many people have come out against the aspects of the project that bait cars to drive in. The Commission of Fine Arts remarked that the "ungainly above-ground volume" of the parking garage was "based on a model of past decades that may not be a useful predictor of future needs."<sup>18</sup> The local ANC warned that the proposal would result in "a snarl of cars" surrounding the station,<sup>19</sup> which D.C. Councilmember Charles Allen predicted would inflict "substantial harm that cannot be easily reversed in the future."<sup>20</sup>

The National Capital Planning Commission directed the FRA in January to "substantially reduce the number of parking spaces" and to consult with the D.C. Office of Planning and the D.C. Department of Transportation "to evaluate and confirm the appropriate amount of parking."<sup>21</sup>

<sup>14</sup> Union Station Master Plan at 26 ("a collective effort to implement the Master Plan will be more productive and cost-effective than if each player were to attempt to meet its needs individually at separate locations"); Akridge *Information Presentation to the National Capital Planning Commission*, at 4-5 (May 7, 2020); Transcript, Hearing before the NCPC at 205 (May 7, 2020) ("this is an important multimodal zone first.").

<sup>15</sup> See Press Release, Office of Congresswoman Eleanor Holmes Norton, *As Members of Congress & D.C Residents Miss Trains Due to Union Station Traffic, Norton Calls for Traffic Changes* (July 10, 2014).

<sup>16</sup> Union Station Master Plan at 17.

<sup>17</sup> Patrick Sisson, *Houston's \$7 billion solution to gridlock is more highways*, CURBED (Aug. 5, 2019), <https://www.curbed.com/2019/8/5/20754435/houston-traffic-highway-i-45-north-txdot>.

<sup>18</sup> January 2020 NCPC Report at 92-93 (Commission of Fine Arts letter)

<sup>19</sup> *Id.* at 94-95 (Advisory Neighborhood Commission 6C letter)

<sup>20</sup> *Id.* at 90-91 (Ward 6 Councilmember Charles Allen letter)

<sup>21</sup> National Capital Planning Commission, Commission Action, at 3 (Jan. 9, 2020), [https://www.ncpc.gov/docs/actions/2020January/7746\\_Washington\\_Union\\_Station\\_Expansion\\_Project\\_Commission\\_Action\\_Jan2020.pdf](https://www.ncpc.gov/docs/actions/2020January/7746_Washington_Union_Station_Expansion_Project_Commission_Action_Jan2020.pdf).

The FRA meaninglessly satisfied only half of this directive, consulting as requested but refusing to reduce its parking estimate by a single space.<sup>22</sup> The National Capital Planning Commission recently reiterated that it will require the FRA to reduce parking, and both the Commission and Congresswoman Norton have had to go to great lengths simply to remind the FRA that it needs to take public input seriously.<sup>23</sup>

**The proposal's dependence on parking leaves behind all imagination.** More people visiting Union Station means many more opportunities for the station to generate revenue to support itself. As the 2012 Vision predicted, “by increasing the number of rail passengers arriving at Union Station, the community should expect to see a dramatic increase in revenue from lodging, food and beverage, entertainment, retail purchases, and local transportation.”<sup>24</sup>

Rather than get creative and identify business models that could work in today's station or the station of 2040, the FRA doubles down on parking fees. That's because USRC obtains 70% of its revenue from the parking garage.<sup>25</sup> But that revenue has nothing to do with Union Station. Monthly pass holding commuters occupy almost 80% of the utilized spaces.<sup>26</sup> In 2014, the Inspector General questioned the potential lifespan of a parking-dependent station.<sup>27</sup> Regional airports have suffered a 40% decline in parking over just the past two years.<sup>28</sup>

If those 1,400 people had to go elsewhere, hardly anyone would use the garage at all; and it is obvious that the 1,600 spaces the FRA wants to rebuild are specifically designed to have them stay. There is no basis to believe that these commuters park at Union Station because they work there. They are simply taking advantage of Union Station's central location, all the while contributing to the congestion that plagues the region as they drive in to park at the region's most-connected hub.

After a 2011 earthquake damaged the station and set the creation of the Master Plan in motion, USRC gave away its right to most of the money its sublease could earn, all the way into 2084.<sup>29</sup>

<sup>22</sup> DEIS Appendix A6 at 16-17, 23.

<sup>23</sup> *NCPC Adopts Comprehensive Plan's Transportation Element* (July 14, 2020), <https://www.ncpc.gov/news/item/117/> (At the July 9, 2020 session, “Commissioners expressed their concerns that there had been no change to the amount of proposed parking with little justification provided, and frustration at the lack of responsiveness to the concerns of federal, District, and local stakeholders.”); Press Release, Office of Congresswoman Eleanor Holmes Norton, *Norton Opposes Large Parking Garage at Union Station, Calls on House Appropriators to Instruct FRA to Reduce Size* (June 22, 2020); H. Rpt. 116-452 (July 16, 2020) (reminding the FRA “to consider the feedback of all stakeholders, including residents of affected neighborhoods, in its planning process.”)

<sup>24</sup> Union Station Master Plan at 23.

<sup>25</sup> DEIS Appendix A6 at 4.

<sup>26</sup> See National Capital Planning Commission Staff, *Executive Director's Recommendation: Washington Union Station Expansion Project*, at 5 (Jan. 9, 2020) (“January 2020 NCPC Report”) (1,390 monthly parkers in December 2019, with only approximately 1,750 spaces in regular use).

<sup>27</sup> DOT OIG, *Inadequate Planning, Limited Revenue, and Rising Costs Undermine Efforts to Sustain Washington, DC's Union Station*, at 9, 11 (Apr. 2014) (“IG Report”), <https://www.oig.dot.gov/sites/default/files/FRA%20and%20USRC%20Oversight%20of%20Union%20Station%20Final%20Report%2004-01-14.pdf>.

<sup>28</sup> Metropolitan Washington Council of Governments, *How did people get to the airport in 2019 and how much were they willing to spend?* (Apr. 7, 2020), <https://www.mwcog.org/newsroom/2020/04/07/how-did-people-get-to-the-airport-in-2019-and-how-much-were-they-willing-to-spend/>.

<sup>29</sup> IG Report at 4, 11-16; Amanda Whiting, *How Union Station Traded the Center Café for More Advertising*, WASHINGTONIAN (Mar. 14, 2016).

Amtrak predicts that Union Station’s arriving passengers’ spending will grow 200% to \$2.75 billion per year.<sup>30</sup> Sadly, much of this will go to benefit private investors rather than USRC, and will do little to sustain this historic treasure. Six years ago, the Inspector General directed that USRC improve its revenue streams, to share of the success of the station.<sup>31</sup> The FRA agreed at the time that it should.<sup>32</sup> The FRA and USRC could come up with other approaches that make *even more* money for the maintenance and preservation of Union Station than parking can. Their refusal to take action to fix this mistake ironically makes USRC—which was created to rescue the station from disrepair—the principal driver putting the station at risk once more.

**Rebuilding this much parking at Union Station is contrary to law.** The Union Station Redevelopment Act does not require any set number of spaces. The Act appropriated funds for 1982-1983 to complete the garage, but the Act does not require any garage to exist today.

The Act gave the FRA three interlocking missions: “the development of [Union Station] as a multimodal transportation facility; the restoration and preservation of the historic station; and operational self-sufficiency for [Union Station].”<sup>33</sup> This proposal sacrifices the first two aims to satisfy the third under USRC’s self-imposed constraints.

Revealing the severity of this limitation, the FRA argues it has to provide peak-level parking capacity to achieve self-sufficiency.<sup>34</sup> The FRA takes one phrase of the Act out of context to support its overbuilding of parking at USRC’s behest, but this provision merely provides guidance for setting the rate charged for parking in the garage:

The rate of fees charged for use of the facility may exceed the rate required for maintenance and operation of the facility. The rate shall be established in a manner that *encourages use of the facility* by rail passengers and participants in activities in the Union Station complex and area.<sup>35</sup>

The plain directive here is that the FRA build only as much garage as will be used, not for the FRA to “encourage” parking without end. Congress directed the FRA, as a good steward, to set an appropriate rate: high enough so the garage did its part to generate a profit and support the station, and low enough to “encourage[] use of the facility.” The clear vision of Congress is a garage that is nearly always full, not a garage big enough never to turn a single car away.

Tellingly, the FRA points to no statutes since the 80s to support its parking plan. Since that time, Congress has moved sharply towards multimodal travel and high-speed rail. Neither the Passenger Rail Investment and Improvement Act of 2008 (“PRIIA”) nor its companion title made any mention of parking facilities whatsoever. Instead, PRIIA authorized federal grants so Amtrak and states could advance “high priority rail corridor projects necessary to reduce

<sup>30</sup> Union Station Master Plan at 4.

<sup>31</sup> IG Report at 14.

<sup>32</sup> IG Report at 21 (FRA response).

<sup>33</sup> DEIS Appendix A6 at 23.

<sup>34</sup> DEIS Appendix A6 at 8.

<sup>35</sup> 40 U.S.C. § 6908(b) (the provision the FRA relies upon is emphasized).

congestion or facilitate ridership growth in intercity rail passenger transportation.”<sup>36</sup> The Recovery Act expanded high-speed rail funding and launched carbon reduction programs.<sup>37</sup>

The FRA’s National Rail Plan, responding to both of these laws, did not mention parking either, marveling that by using the “efficiencies of rail, roadway congestion can be reduced.”<sup>38</sup> “Traffic congestion and lost productivity as well as their related effects will continue to diminish the quality of life” in our communities.<sup>39</sup> “Each state from Maine to Virginia,” and the District, “is forecasting substantial increases in passenger and freight [rail] demand and calling for considerably higher levels of rail service,” which in turn “helps support economic development, reduces carbon pollution, and mitigates highway congestion.”<sup>40</sup>

The FRA will demolish the existing garage to expand the tracks. The “Federal Government,” not the FRA, not USRC, and not USPG, “has the right, title, and interest in and to the parking facility at Union Station.”<sup>41</sup> The federal government is the owner and is obligated to avoid waste.<sup>42</sup> The law only allows rebuilding for the true and lasting 2040 need for on-site parking.

Amtrak says it needs none. More than 100 million people per year will find their way to Union Station just fine through multimodal transit. And the ADA will require reasonable accommodation in many areas of the Union Station and Burnham Place grounds but does not require the FRA to build a garage of any size, let alone one with 1,600 spaces.

The FRA’s delegation of the day-to-day operation of the station’s shops cannot get in the way of its duties to preserve the historic station and develop the station as a multimodal hub.<sup>43</sup> If the FRA truly believes otherwise, it must seek relief from Congress because the Act and every law since prohibits the FRA’s plan. To the extent any lease suggests there needs to be some amount of customer parking at Union Station, the FRA must see to it that those provisions are revised.<sup>44</sup>

**This project is for trains. Trains need no parking.** Union Station is at capacity today and will see 50% more demand by 2030 even without any changes.<sup>45</sup> “Amtrak does not support any entity building a parking garage specifically to support Amtrak passengers” because, according to common sense, parking “is not essential to Amtrak’s operation of intercity passenger rail.”<sup>46</sup>

<sup>36</sup> Passenger Rail Investment and Improvement Act of 2008 (“PRIIA”) § 302 (codified at 49 U.S.C. § 24105).

<sup>37</sup> American Recovery and Reinvestment Act of 2009 (providing \$8 billion for high-speed rail and \$2.9 billion to reduce greenhouse emissions).

<sup>38</sup> FRA, *Preliminary National Rail Plan*, at 24, 34, 36 (Oct. 2009).

<sup>39</sup> FRA, *National Rail Plan Progress Report*, at 3-5, 11-12, 25 (Sept. 2010).

<sup>40</sup> NEC Working Group, *Northeast Corridor Infrastructure Master Plan* at 12-13 (May 2010). Out of 300 capital projects listed in the NEC Plan, the only one to expand parking was for a commuter station in a suburb of Richmond, Virginia. *Id.* at 119. “Core urban centers” like D.C. must focus on intercity service, such as the expansion of MARC and VRE at Union Station. *Id.* at 14-15.

<sup>41</sup> 40 U.S.C. § 6908(a).

<sup>42</sup> Union Station “is expected to be preserved indefinitely.” IG Report at 8 n.19. *See also* Union Station Master Plan at 24 (setting the stage “for the next century” and “accommodate future service changes and ridership growth”).

<sup>43</sup> Union Station Redevelopment Act § 3 (codified at 40 U.S.C. § 812) (listing the delegation of the federal government’s role as subservient to the three interlocking missions).

<sup>44</sup> *See* DEIS Appendix A6 at 7 (asserting that USRC’s 99-year lease requires 600 parking spaces for retail).

<sup>45</sup> NEC Infrastructure Master Plan at 15, 109-10, 113, 117, 157, 159.

<sup>46</sup> DEIS Appendix A6 at 17; *see also id.* 40-41 (Amtrak letter).

This is not the first time Amtrak has said so. The 2012 Master Plan called for demolishing the parking garage permanently, never to build an above-grade structure again, relying instead on what can fit underground and directing most drivers to other nearby venues.<sup>47</sup> No other city center train station in the entire country plans to build parking.<sup>48</sup>

**This project is for buses. Buses need cars to keep out of their way.** Proving there is ample supply of parking nearby, the DEIS plans to locate an existing garage within walking distance that has room to host all the buses during the demolition of Union Station’s garage in Phase 4.<sup>49</sup>

There was a long fight to welcome buses to Union Station. Plans dating from the 1960s were supposed to include buses in its intermodal ecosystem, but it was not until 2012 that buses found a home there.<sup>50</sup> Buses are an essential part of this proposal, capable of carrying many times more people along city roads than cars can, especially when they can enjoy bus-only lanes.<sup>51</sup>

Buses cannot receive short shrift in this project. The DEIS recognizes that the absence of buses will be a “disproportionately high and adverse effect” on low-income and minority communities that the law requires the FRA to avoid if at all possible, and mitigate otherwise.<sup>52</sup> The absurd imbalance in the FRA’s priorities is clear in providing two levels for buses but six levels for private vehicle storage! Buses need the ability to safely come and go with as little as possible in their way. We cannot have thousands of cars per hour fighting for access to the same garage as buses. Akridge agrees H Street is the best place for buses to enter and exit, as buses do today.

**The only parking worth having is for accessibility.** We strongly support ensuring all people can access Union Station. We expect that all the trains, the platforms, and Metro trains will be fully accessible. We also expect buses will provide more accessibility than the national best standards.<sup>53</sup> The DEIS reports that 90 spaces are enough both to provide access to persons with disabilities and passengers with too much luggage.<sup>54</sup> There is no need for six levels of car parking to provide this. That would not be very accessible anyway.

The D.C. Office of Planning studied this carefully and could not come up with any reasonable use for six levels of parking.<sup>55</sup> The Office made no specific recommendation for the number of

<sup>47</sup> Union Station Master Plan at 3, 10-12, 18.

<sup>48</sup> Akridge Letter to the National Capital Planning Commission (Jan. 2, 2020) at 4.

<sup>49</sup> DEIS Executive Summary at 60, 65 (envisioning an “adequately sized interim bus facility” close to the station and “adequately sized interim parking facilities outside the Project Area” during Phase 4).

<sup>50</sup> Robert Thomson, *Union Station to become intercity bus center*, Wash. Post (July 30, 2011), [https://www.washingtonpost.com/local/union-station-to-become-intercity-bus-center/2011/07/29/gIQAFcPwjI\\_story.html](https://www.washingtonpost.com/local/union-station-to-become-intercity-bus-center/2011/07/29/gIQAFcPwjI_story.html); Press Release, *Intercity Bus Service at Union Station to Begin After Years of Norton Hearings and Persistence*, Congresswoman Norton (Aug. 2, 2011); Press Release, Congresswoman Norton (Jan. 25, 2010); Statement of Congresswoman Norton, Hr’g before the House Cmte. on Transp. and Infrastructure (July 22, 2008) (citing 1967 NCPC documents); *see also* Union Station Redevelopment Act § 3 (envisioning a “rail passenger station, together with holding facilities for charter, transit, and intercity buses in the Union Station complex”).

<sup>51</sup> *E.g.*, Simon Jeffrey, *We should talk trains less – and buses more*, CityMetric (Mar. 20, 2018), <https://www.citymetric.com/transport/we-should-talk-trains-less-and-buses-more-3760>.

<sup>52</sup> DEIS Executive Summary at 59-60.

<sup>53</sup> PRIIA §§ 219-20 (directing Amtrak to ensure ADA compliance in all facilities, without suggesting parking).

<sup>54</sup> DEIS Appendix A6 at 19-20.

<sup>55</sup> DEIS Appendix A6 at 43-46 (D.C. Office of Planning letter recommending 295 spaces); *see also* Akridge Information Presentation at 5 (concluding 300 spaces sufficient).

rental cars, observing “this service can be provided elsewhere.”<sup>56</sup> Many other locations naturally have more demand, and rental cars need less space than private parking.<sup>57</sup> There should be at most only one level of parking, and it should focus on accessibility.

**Multimodal transit works magic.** Avoiding the “snarl of cars” the proposal would bring is easy and is the purpose and need of the project: expanding and encouraging multimodal transit.

Mass transit can carry *many* people easily, using well defined routes within well connected networks, so a person can quickly get from any point on the combined network to any other even if a few transfers are part of the journey. This makes the choice of mode of transit irrelevant. A person can look at a map of the entire combined network to find a path and follow it, regardless of which mode carries them along each leg. Journey times become shorter as a result.<sup>58</sup>

Airports are known for their capacity to handle many people, but while airplanes can travel long distances, they can only carry so many on board. A 747 jet can carry up to 416 people.<sup>59</sup> From 2021, the Acela high-speed train will carry 386 passengers<sup>60</sup>; an eight-car Metro train can carry up to 960 passengers; even a standard Metrobus has approximately 40 seats and can comfortably fit many more people standing.<sup>61</sup> Cars regularly carry one person even when they can seat four. A side-by-side comparison shows that 50 passengers in 33 cars would take up half the space on bikes, an eighth of the space walking, or could all comfortably ride in a single bus.<sup>62</sup>

Multimodal transit has been the purpose of Union Station since at least the Union Station Redevelopment Act in the 1980s.<sup>63</sup> Many different modes of transit reaching hundreds of miles away converge at Union Station, as the maps attached to this public comment show.<sup>64</sup>

<sup>56</sup> DEIS Appendix A6 at 22.

<sup>57</sup> DEIS Appendix A6 at 5, 7 (noting more than 300 rental cars are presently stacked together where striped spaces would only allow for 225 cars).

<sup>58</sup> Union Station Master Plan at 6.

<sup>59</sup> *Top 10 Largest Passenger Aircraft in the World*, Aerotime Hub (June 7, 2016). The rarely used Boeing 747-8 can carry 700 passengers; and a 777 actually carries fewer passengers than a 747. *Id.* The Airbus A380 was the world’s largest passenger plane, able to carry 853 passengers, but was discontinued because there is insufficient demand to make that size of aircraft useful. Press Release, Airbus (Feb. 14, 2019), <https://www.airbus.com/newsroom/press-releases/en/2019/02/airbus-and-emirates-reach-agreement-on-a380-fleet--sign-new-widebody-orders.html>.

<sup>60</sup> Luz Lazo, *Amtrak aspires to a 2-hour D.C.-N.Y. trip, but it’s going to take a lot more than faster trains*, Washington Post (Nov. 3, 2019), [https://www.washingtonpost.com/local/trafficandcommuting/amtrak-aspires-to-a-2-hour-dc-ny-trip-but-its-going-to-take-a-lot-more-than-faster-trains/2019/11/02/b761a61a-e523-11e9-a331-2df12d56a80b\\_story.html](https://www.washingtonpost.com/local/trafficandcommuting/amtrak-aspires-to-a-2-hour-dc-ny-trip-but-its-going-to-take-a-lot-more-than-faster-trains/2019/11/02/b761a61a-e523-11e9-a331-2df12d56a80b_story.html). The Acela Nonstop enjoyed 320 roundtrip passengers per day in its debut month. *Id.*

<sup>61</sup> WMATA, *Metro Core Capacity Study* (2001), [https://www.wmata.com/initiatives/plans/upload/CoreCapacity\\_ExecSum.pdf](https://www.wmata.com/initiatives/plans/upload/CoreCapacity_ExecSum.pdf); WMATA, *Metro Bus Fleet Management Plan* (2017), [https://www.wmata.com/business/procurement/solicitations/documents/Board%20Adopted%202017%20Metrobus%20Fleet%20Plan%20\(28%20Sep%2017\).pdf](https://www.wmata.com/business/procurement/solicitations/documents/Board%20Adopted%202017%20Metrobus%20Fleet%20Plan%20(28%20Sep%2017).pdf).

<sup>62</sup> Jared Whalen, *How Much Road do Fifty Commuters Need?*, in Jason Laughlin, *Why is Philly Stuck in Traffic?*, PHILA. INQUIRER (Jan. 29, 2018), <https://www.inquirer.com/transportation/inq/traffic-philadelphia-center-city-bike-lanes-subway-bus-transit-solutions-20190129.html>.

<sup>63</sup> IG Report at 5 (noting the USRA gave DOT ownership and responsibility for renovating Union Station into “a multiple use transportation terminal and commercial complex” with three interlocking goals of preserving the historic aspects of the station, operating an intercity multimodal hub, and developing commercial opportunities for revenue for the station).

<sup>64</sup> Union Station Master Plan at 1, 5.

Union Station is WMATA's busiest station with over 68,000 riders every weekday.<sup>65</sup> As the 2012 Vision expressed, "an overarching theme of the Master Plan is connectivity, and this applies not just to connections between transit systems, but also the connectivity between the transportation systems and the surrounding city."<sup>66</sup>

The DEIS tries to fit cars into the multimodal ecosystem but that is not exactly right. Although we have invested heavily in roads and highways in the past, these paved networks promise flexibility but often result in problem spots near the places people want to reach, as Columbus Circle demonstrates today.

There is a place for cars in multimodal transit: where optimized mass transit does not go.

**Make "no little plans" for convenience.** Most of the cars that will come and go from the future Union Station will be for drop-off and pick-up, by both residents transporting friends and family and ridesharing and taxi services. Although in past decades the phrase "door-to-door" captured the convenience of stepping in a car at your driveway, and out of that car facing your destination, 2040 can offer a new vision.

Imagine stepping in a train door from a wide platform and two hours later stepping off into the hustle and bustle of New York City, or Raleigh-Durham, or in less than five hours, Chicago.

The promise of this project is convenience on a much grander scale. This project, for the first time, will allow MARC and VRE trains to "run-through" Union Station to take their passengers into the other state, creating exciting new opportunities and simplifying the commutes of 10,000 people today and many more by 2040.<sup>67</sup> Few people now think of weaving these separate networks into a single journey, but run-through service could usher in a Chesapeake Bay Regional Transit network that seamlessly unites customer experience across the WMATA Metro, the Baltimore Metro, and MARC's and VRE's rail lines.<sup>68</sup> Union Station would be the crown jewel of this system, connecting riders effortlessly onto local and intercity buses and Amtrak's next century high-speed train network, including a Southeast high-speed rail corridor.<sup>69</sup>

<sup>65</sup> Union Station Master Plan at 15.

<sup>66</sup> Union Station Master Plan at 19.

<sup>67</sup> Matthew Yglesias, *HQ2 is a perfect opportunity to massively upgrade the DC area's commuter rail*, Vox (Nov. 17, 2018), <https://www.vox.com/2018/11/17/18096010/amazon-hq-2-marc-vre>.

<sup>68</sup> Peter Dovak, *Greater Baltimore-Washington Commuter Rail Service Map* (July 2015), [https://66.media.tumblr.com/36deec506e7ff76a6d48a8c294b8f5fa/tumblr\\_nrdxnfsAJ61twvxioo3\\_r1\\_1280.png](https://66.media.tumblr.com/36deec506e7ff76a6d48a8c294b8f5fa/tumblr_nrdxnfsAJ61twvxioo3_r1_1280.png); see also Dan Malouff, *Maryland and Virginia's commuter rail look great together on one map*, Greater Greater Washington (Aug. 6, 2019), <https://ggwash.org/view/73313/maryland-and-virginias-commuter-rail-look-great-together-on-one-map> (a copy is included as page 13 of this public comment).

<sup>69</sup> Union Station Master Plan at 4, 13, 24; e.g., FRA, Record of Decision, DC to Richmond Southeast High Speed Rail, at 18 (Sept. 5, 2019), [http://dc2rvarail.com/files/3115/6803/2848/DC2RVA\\_ROD\\_05Sept2019.pdf](http://dc2rvarail.com/files/3115/6803/2848/DC2RVA_ROD_05Sept2019.pdf); FRA, Record of Decision, Southeast High Speed Rail Richmond, VA to Raleigh, NC, 8-9 (Mar. 24, 2017), [https://railroads.dot.gov/sites/fra.dot.gov/files/fra\\_net/17148/Southeast%20High%20Speed%20Rail%20Corridor%200%20Richmond%20to%20Raleigh%20-%20Record%20of%20Decision.pdf](https://railroads.dot.gov/sites/fra.dot.gov/files/fra_net/17148/Southeast%20High%20Speed%20Rail%20Corridor%200%20Richmond%20to%20Raleigh%20-%20Record%20of%20Decision.pdf) (a copy is included on page 14 below).



By comparison, one-person-per-vehicle point-to-point trips are a step backward. Worse yet, the DEIS predicts the station will suffer 4,000 cars per hour during peak periods.<sup>70</sup> That is 67 cars per minute, or in other words, fully half the peak volume of I-66.<sup>71</sup>

It is no answer as FRA suggests to hope Columbus Circle, pull-out lanes on side streets, and levels of a parking garage stories above the nearest pavement will be enough. It is no answer either as Akridge suggests to believe a few below-grade garages can handle this flood.<sup>72</sup> Drivers stopping on side streets will quickly overflow the available pull-out spaces, blocking bike lanes, traffic, and crosswalks, further delaying everyone and turning Union Station into a morass.

The solution should have been the plan from the beginning: to make transit more convenient for accessing this area than cars.

All the roads around Union Station are small. They are our neighborhood. Union Station and Burham Place must join forces to establish a limited set of designated pick-up/drop-off points that are distributed around the site, mapping each destination to a specific pick-up point. These areas should take up minimal space in the built environment so they blend in with the beauty of their surroundings, are well-marked with wayfinding, and so neither the waiting spot or the path to reach it conflicts with the uninterrupted travel of pedestrians, bicyclists, and the Streetcar. For example, if riders can hurry across the middle of a street to reach their vehicle, they will. To prevent such dangerous games of Frogger, we must direct riders to go a different way. Akridge's proposal of below-grade pick-up garages might help avoid these conflicts but their entrance and exit ramps cannot possibly handle 67 cars per minute, and must be carefully directed to keep vehicles flowing without impacting this area or the surrounding neighborhoods.

The location of the pick-up spaces will naturally lead directly into the main doorway of one of Union Station's premier transit options, showing riders how much more easily they could have reached the station if they had chosen not to drive. Taxis should abide by the same system as rideshare services. Charging a fee on every ride, as many airports do, will also help limit the convenience of driving in, and could restore some of USRC's long-lost revenue.

This technology is changing rapidly. The 2012 Vision did not foresee Uber at all.

One thing is certain about 2040 though: there will be trains, and they will be very popular.

**The proposal must do more to present a vision for bikes.** The DEIS recommends that bike infrastructure around Union Station ... just stay the same.

The most the FRA recommends is to keep the existing bikeshare docks and bike storage but double the capacity of each.<sup>73</sup> These are obvious improvements but leave out so much more that is simple and affordable to achieve.

<sup>70</sup> DEIS Executive Summary at 48.

<sup>71</sup> Robert Thomson, *Traffic study shows why I-66 is a mess*, Washington Post (Jan. 21, 2016), <https://www.washingtonpost.com/news/dr-gridlock/wp/2016/01/21/traffic-study-shows-why-i-66-is-a-mess/> (showing a peak total volume of 8,000 cars per hour, with about 1,500 using the HOV lane).

<sup>72</sup> See Akridge Information Presentation at 5, 20.

<sup>73</sup> DEIS Executive Summary at 25.

Here are six easy improvements:

- Confirm construction of the “greenway,” extending the Metropolitan Branch Trail alongside the Burnham Wall to provide walking and biking trails that will not conflict with people walking out onto First Street.<sup>74</sup>
- Create bikeshare docks and storage on all streets and levels on all sides of the station:
  - H Street bridge level, on both sides of the station.
  - H Street Concourse level, on both sides of the station.
  - The existing Second Street location.
  - A new First Street location immediately next to the bike storage.
  - At least one K Street location to the north of the project area, adjacent to and supporting the planned K Street bike lanes.
- Rather than rebuilding garage ramps for cars, build sloped bike paths to welcome people to and among all the levels of the station, including the H Street Concourse, the Streetcar level, K Street, Columbus Circle, etc. that will connect to (or encourage the District to build connections with) neighboring bike lanes and cycle tracks heading in all directions.
- Do not pit deliveries of goods or people in conflict with bikes. Cycle tracks should be away from other uses so bicyclists can move freely and easily reach all areas.
- Provide a protected cycletrack in front of Union Station connecting the First and Second Street bikeways, to make it easy to pass by Union Station and decide to stop in.
- Reduce crosswalk distances everywhere. The broader the street, the more cars and the more barriers prevent people who want to enter the station from being willing to come.

**Stop building for cars—Build for community.** There is a push from every corner to slash carbon by 2050, and to start cutting back in every way we can as soon as we can. It is anachronistic to plan for a 2040 Union Station without aligning the project with those critical ambitions. This project is, after all, for future generations.

Eleven years of construction involves serious growing pains, but it will be worth it. This project is about connecting many types of transit but ultimately that is about connecting people, creating and facilitating community. We encourage the use of trains to move debris out during construction,<sup>75</sup> especially during school zone hours, but agree it is essential to maintain good train service during construction while fewer tracks can be safely operated.

As the FRA moves into the design phase, the FRA should actively incorporate aspects that will make Union Station even more of a special place. To facilitate the multimodal connections that are the purpose of this project, the FRA should give careful thought to clear and easy to follow wayfinding. This signage should guide everyone from everywhere to each of the types of transit

<sup>74</sup> Union Station Master Plan at 17; Akridge Information Presentation at 9 (showing a rendering of a new First Street Metro entrance). The current proposal may not keep the greenway. *See* DEIS Executive Summary at 25-26, 36.

<sup>75</sup> DEIS Executive Summary at 39-40, 61.

available at the station. These elements should be organized within the station like a bull's eye, placing the most important connections close to each other in the center, and building the less important features increasingly further away.<sup>76</sup>

All people should be able to fully enjoy Union Station. The FRA needs to include accessible pathways and wayfinding that include everyone in all the spaces. No one should be sent to one side or have to navigate a twisting, unclear route to receive the accommodations the ADA requires. This includes people in wheelchairs as well as deaf people and blind people.

Consistent with the need to reduce carbon pollution, the FRA should also work to incorporate as many living trees as possible, in addition to attractive green spaces. To the extent the FRA provides any parking, it should make a substantial investment in car charging ports that will last well beyond 2040. The FRA and Akridge should work together to maximize the contribution of the roofs to this goal, incorporating solar panels and green roofs throughout the development.

\* \* \*

Since the vision of the 2012 Master Plan, we have followed along with awe and anticipation, excited for the interconnectedness this project can bring to the station and our neighborhoods, cutting back carbon pollution as we come closer together. The FRA fell far short of these hopes in November when it released its preferred alternative that weighs down the station with six levels of private vehicles going nowhere and threatens to plague our streets with a snarl of cars.

This is a moment of enormous promise and deep responsibility. We choose to carry forward the treasured history of Union Station into a future all of us can treasure.

We invite you to the day you can visit Union Station unsure just where it will take you.

Very truly yours,

Noah N. Gillespie  
Brent Huggins  
Nicole Mogul  
Keya Chatterjee  
on behalf of *Safe Streets for  
Hill East and Near Northeast*

Robb Dooling  
Member, *D.C. Multimodal  
Accessibility Advisory Council*

The Members of *Arm in Arm (DC)*

-and-

*Washington Area Bicyclist Association*

<sup>76</sup> Cf. Union Station Master Plan at 15.



# Greater Baltimore-Washington Commuter Rail Service Map



-  Brunswick Line
-  Camden Line
-  Penn Line
-  Manassas Line
-  Fredericksburg Line

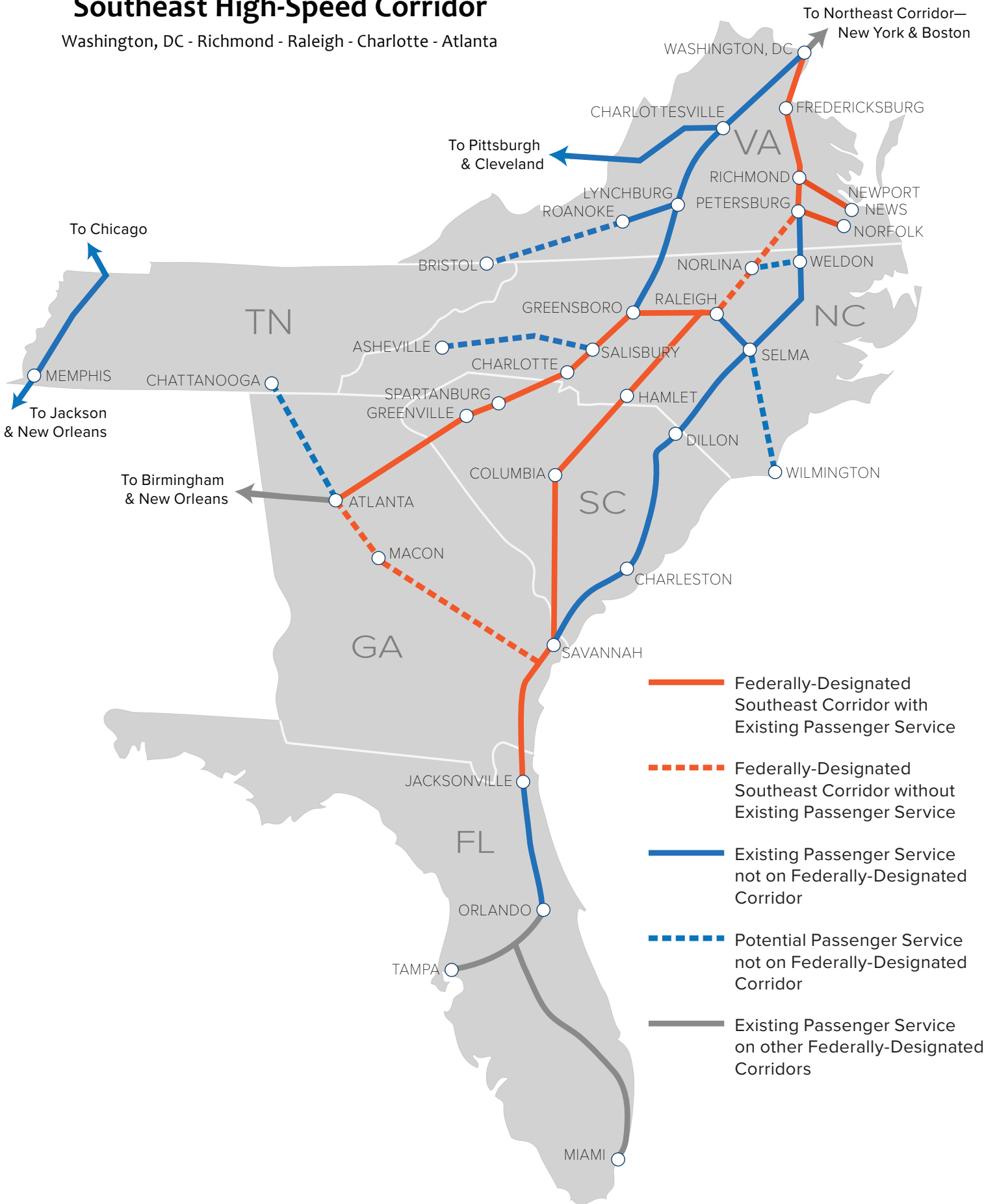


**Legend**

-  Station
-  Out-of-System Transfer Station

# Southeast High-Speed Corridor

Washington, DC - Richmond - Raleigh - Charlotte - Atlanta



To Northeast Corridor—  
New York & Boston

To Pittsburgh  
& Cleveland

To Chicago

To Jackson  
& New Orleans

To Birmingham  
& New Orleans

- Federally-Designated Southeast Corridor with Existing Passenger Service
- - - Federally-Designated Southeast Corridor without Existing Passenger Service
- Existing Passenger Service not on Federally-Designated Corridor
- - - Potential Passenger Service not on Federally-Designated Corridor
- Existing Passenger Service on other Federally-Designated Corridors

# The Amtrak Network



For information and reservations,  
call 1-800-USA-RAIL or visit [Amtrak.com](http://Amtrak.com)

Due to space limitations, not all stops are shown. Services are subject to change. Amtrak System Map effective October 2018. Amtrak and see where the train can take you are registered service marks of the National Railroad Passenger Corporation.

**From:** Teresa Pezzi  
**To:** [Union Station Expansion](#); [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [ddot@dc.gov](mailto:ddot@dc.gov)  
**Subject:** Regarding the Union Station Renovation and Expansion Plans  
**Date:** Monday, August 17, 2020 6:05:07 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Teresa Pezzi, a licensed, professional tour guide in Washington, DC. I have resided in the District since 2013 and have been bringing groups to Union Station since 2017. I currently live in Capitol Hill East, just a 20 minute walk to Union Station, so this issue is very relevant to me. Over the course of the year I escort 10 or more tour groups in motor coaches to Union Station. Having to bring groups to Union Station by Motor Coach has highlighted the importance and ease of having 1 hour parking. Many of my groups are large groups of students or passengers with medical or mobility issues. Being able to have parking in the Station allows for guests to enter Union Station easily and safely. Also, itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time. Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk as well as creating horrible traffic and extra pollution in these neighborhoods as well as failing to take into consideration the business of tourism, and its importance to the city.

As a resident of DC as well as a tour guide, I am sensitive to ensuring that traffic and safety of residents and neighborhoods is addressed. I think one of the best ways to do this is to keep motorcoaches parked instead of having to roam the city. Parking is a huge issue all over this city, but providing spots for coach drivers (longer than 30 minutes) is crucial in supporting tourism and residents.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,

Teresa Pezzi

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**From:** Mili Steele-Hollenbeck  
**To:** [Union Station Expansion](#)  
**Cc:** [portia.boone@mail.house.gov](mailto:portia.boone@mail.house.gov); [info@ncpc.gov](mailto:info@ncpc.gov); [planning@dc.gov](mailto:planning@dc.gov); [ddot@dc.gov](mailto:ddot@dc.gov)  
**Subject:** Motor Coach parking at Union Station  
**Date:** Monday, August 17, 2020 6:19:27 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Mili Hollenbeck , a licensed, professional tour guide in Washington, DC. Over the course of the year I escort 30 or more tour groups in motor coaches to Union Station. Bringing groups to the station by motor coach has made me recognize the importance of the coach's ability to park in the station. Tour groups have strict schedules and some visitors have mobility issues. Guests are always forgetting something and needing to return to the coach. But more than anything else, coach operators need a break from driving. I am always glad to see the station on my itinerary because I know my driver will be able to stretch his legs and enjoy his lunch while it is still hot - something they don't often get to do. Also, itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time, not only damaging the environment, but putting neighborhood residents at risk. This decision fails to take into consideration the business of tourism, and its importance to the city.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
Mili Hollenbeck

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**From:** Nathan Harrington  
**To:** [Union Station Expansion](#)  
**Subject:** preserve tour bus parking  
**Date:** Monday, August 17, 2020 6:25:25 PM

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Dear Project Committee Members,

My name is Nathan Harrington, a licensed, professional tour guide in Washington, DC. I have resided in the District since 2008 and I currently live in Ward 8.

As a tour guide, I host many school groups from around the country on their trips to DC. Nearly all of these trips include a stop at Union Station for a meal and shopping, with the added benefit that students get to see the inside of one of DC's most impressive buildings.

While encouraging station users to use public transportation is a laudable goal, the student tour industry is based on almost entirely on motor coaches. Compared to single occupancy vehicles, motor coaches are an efficient use of energy and space.

Making it harder for coaches to drop off, remain parked at, and collect groups from Union Station will lead to a loss of visitation for the station and customer for its businesses. Allowing drivers to park on site while their groups are inside allows the drivers much needed rest and allows them to patronize Union Station businesses.

I urge committee members to adopt a plan that:

- Maintains, at a minimum, the current number of 61 slots for motorcoach parking;
- Keeps the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,

Nathan Harrington

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**From:** aiwbaro@aol.com  
**To:** [Union Station Expansion](#)  
**Cc:** [Portia.Boone@mail.house.gov](#); [info@ncpc.gov](#); [DCOfficeofPlanning@aol.com](#); [planning@dc.gov](#); [ddot@dc.gov](#)  
**Date:** Monday, August 17, 2020 6:30:44 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Alan Weinstein, a licensed, professional tour guide in Washington, DC. I have resided in the District since 2004. Over the course of the year I escort 5 or more tour groups in motor coaches to Union Station. My experience in bringing groups to the station by motor coach has made me recognize the importance of the coach's ability to be able to park in the station. Tour groups hold to strict schedules and often include visitors with mobility issues. Guests frequently must return to the coach for needed items they have left behind, like medications or money, and coach operators have time for a much-needed break from driving as well. Also, itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby

streets until the designated pick-up time. Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk and fail to take into consideration the business of tourism, and its importance to the city.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large

group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
Alan Weinstein

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**From:** Richard Snowden  
**To:** [Union Station Expansion](#)  
**Subject:** Union Station  
**Date:** Monday, August 17, 2020 8:04:34 PM

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To whom it may concern: I've been a licensed tour guides in DC since February 2003. I have retired, but retain my license.

Your renovation of Union Station is badly needed. I think your redevelopment plans should focus on the rail road, metro, Marc, Virginia Rail Express, and Bus Company travelers. The tour industry wants to maintain a parking space for their motor coach drivers in this transportation hub while guides are out somewhere with their groups.

In a post pandemic world where we hope for some semblance of normalcy, the return of visitors, and a marketing strategy that will have to work around Black Lives Matter demands for defunding the police, the safety and security and the exclusive use of the facility by your travelers need be your top priority.

In my years as a guide I brought thousands of students to Union Station to eat in the food court. I never met or dispatched a group from Union Station on the rail system. I ALWAYS warned them before entering the building to be aware of their surroundings, the panhandlers, the vagrants, and all the bad actors that they would undoubtedly encounter.

Groups never went to the airport just to eat, nor did the Motor Coach ever park there while the group was out touring.

Is it your responsibility to provide parking for Touring Motor Coaches?

Good luck,  
Rick Snowden

Sent from my iPhone

My name is MARVIN GERBER, a tour operator bringing hundreds of groups into Washington, DC. Over the course of the year we bring 200 or more tour groups in motor coaches to Union Station. My experience in bringing groups to the station by motor coach has made me recognize the importance of the coach's ability to be able to park in the station. Tour groups hold to strict schedules and often include visitors with mobility issues. Guests frequently must return to the coach for needed items they have left behind, like medications or money, and coach operators have time for a much-needed break from driving as well. Also, itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time. Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk and fail to take into consideration the business of tourism, and its importance to the city.

I have also found that more and more itineraries that our groups follow designate a block of four hours or more of touring on foot with their guide. This allows the drivers to log off the clock so they will meet D.O.T. standards of time behind the wheel.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
MARVIN GERBER

**From:** Michael Ruggieri  
**To:** [Union Station Expansion](#)  
**Cc:** [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [info@ncpc.gov](mailto:info@ncpc.gov); [planning@dc.gov](mailto:planning@dc.gov); [ddot@dc.gov](mailto:ddot@dc.gov)  
**Subject:** Motor coaches at Union Station  
**Date:** Wednesday, August 19, 2020 1:59:18 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Mike Ruggieri, a licensed, professional tour guide in Washington, DC. During the Spring of each year, I escort at least 30 tour groups to Union Station and we arrive via motor coach. Bringing groups to the station by motor coach has made me recognize the importance of the coach's ability to be able to park in the station. Tour groups have very strict schedules and often include visitors with mobility issues (wheel chairs, scooters, crutches). It's very common for my guests to return to the coach for needed items they have left behind, like medications or money. Also, parking at Union Station allows the motor coach drivers to have a much-needed break from driving. In addition, our itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will circle nearby streets until the pick-up time.

In my humble opinion, limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes will make for unnecessary traffic around the station and more importantly, it fails to take into consideration the business of tourism, and its importance to the our capital city.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be considered essential and be included in any expansion project. As the project moves forward, I urge committee members to:

- Maintain the current number of 61 slots for motor coach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concerns for the coach parking alternatives in the June 2020 DEIS.

Thanks very much for your consideration and for your time,

Mike Ruggieri  
Licensed Tour Guide, Washington DC

**From:** David Shaw  
**To:** [Union Station Expansion](#)  
**Cc:** [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [info@ncpc.gov](mailto:info@ncpc.gov); [planning@dc.gov](mailto:planning@dc.gov); [ddot@dc.gov](mailto:ddot@dc.gov)  
**Subject:** Proposed 30 minute motor coach parking rule at Union Station  
**Date:** Thursday, September 10, 2020 11:21:01 AM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

I am a licensed, professional tour guide in Washington, DC. I have resided in the District since 1988 and I currently live in Chevy Chase DC so this issue is very relevant to me. Over the course of the year I escort 20 or more tour groups in motor coaches to Union Station. My experience in tour guiding makes me recognize the importance of flexibility. Groups going to Union Station can be delayed for many reasons - lost children, mobility issues, long lines in the food court, or simply wanting to take in this wonderful space. The 30 minute proposed rule is untenable. It will translate into chaos and ultimately lost tax revenue as word spreads that Union Station is not worth the hassle. (This may be the ultimate reason behind this rule - driving tourists out to make way for other revenue sources).

As a long-time city resident, I know how much motor coaches can clog up city streets. One of the reasons for this is there is no coach parking. This rule will leave buses roaming the streets of Capitol Hill while waiting to return to Union Station to pick up passengers. As a former Hill resident I know what this will be like. In addition, the impact of this rule on the city's air quality is obvious.

While the city loves the tax dollars tourists bring in, it does precious little to ease their movement in the city. Thus, accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward the committee should:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Yours truly,

David Shaw

David G. Shaw

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Licensed Tour Guide: Washington, Philadelphia, New York City



International Visitor Liaison, U.S. Department of State

**From:** NFTGA President  
**To:** [Union Station Expansion](#)  
**Cc:** [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [info@ncpc.gov](mailto:info@ncpc.gov); [planning@dc.gov](mailto:planning@dc.gov); [ddot@dc.gov](mailto:ddot@dc.gov)  
**Subject:** Concern about Bus parking in the Union Station Expansion Project  
**Date:** Thursday, September 10, 2020 2:31:57 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Ellen Malasky, a licensed, professional tour guide in Washington, DC and president of the National Federation of Tourist Guide Associations. I have resided in the District since 1982 and I currently live in Wesley Heights. My son and his family live in Navy Yard. Over the course of the year, I escort 20 or more tour groups in motor coaches to Union Station. I bring buses of tour groups to Union Station on a weekly basis in the Spring and Fall season. We come because of the ability to be able to park in the station, allow the tourists to eat and shop and allow the coach operators to also have lunch. I bring some students but more often senior citizens who often have mobility issues. Guests frequently must return to the coach for needed items they have left behind, like medications or money. Tours have to stick to strict schedules, usually an hour, so that we can give seniors enough time for a non-rushed lunch. I'm concerned about the alternatives that reduce bus parking slots and move the parking far from the station. If coach drivers cannot park at Union Station, they will drive nearby streets until pick-up time. So, limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes will put the neighborhood residents at risk and also fails to take into consideration the business of tourism, and its importance to the city.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Limiting bus parking and putting time limits will impact not only the travelers but also the restaurants and shops. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
Ellen Malasky

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*Ellen Malasky*  
*President, National Federation of Tourist Guide Associations-USA*  
[www.NFTGA.com](http://www.NFTGA.com)

**From:** Dawn Bryant  
**To:** [Union Station Expansion](#)  
**Cc:** [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [info@ncpc.gov](mailto:info@ncpc.gov); [planning@dc.gov](mailto:planning@dc.gov); [ddot@dc.gov](mailto:ddot@dc.gov)  
**Subject:** Protect Motor Coach use of Union Station  
**Date:** Thursday, September 10, 2020 2:32:54 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Dawn Bryant, a licensed, professional tour guide in Washington, DC. Over the course of the year I escort 40 or more tour groups in motor coaches to Union Station. I am very concerned about the possibility of motor coach parking being limited and/or restricted at Union Station. I believe that this proposal is ill conceived and will lead to numerous negative second-and-third-order effects that MUST be considered. The fewer motor coaches allowed at Union Station, and the more limited the time they are able to remain, the more traffic congestion, the greater risk to pedestrians, the greater the degree of air pollution in the District, and the greater the noise on the streets. Nobody wins.

My experience in bringing groups to the station by motor coach has made me recognize the importance of the coach's ability to be able to park in the station. Tour groups hold to strict schedules and often include visitors with mobility issues. Guests frequently must return to the coach for needed items they have left behind, like medications or money, and coach operators have time for a much-needed break from driving (<This is especially important for the well being of US ALL). Also, itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time. Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes puts neighborhood residents at risk and fails to take into consideration the business of tourism, and its importance to the city. This is something that has been clearly highlighted during the current pandemic - D.C. can NOT take tourism for granted.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motor coach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

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Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
Dawn Bryant  
Alexandria, VA

**From:** Yasmin Bhalloo  
**To:** [Union Station Expansion](#)  
**Cc:** [PortiaBoone@mail.house.gov](mailto:PortiaBoone@mail.house.gov); [info@ncpc.gov](mailto:info@ncpc.gov); [planning@dc.gov](mailto:planning@dc.gov); [ddot@dc.gov](mailto:ddot@dc.gov)  
**Subject:** MOTORCOACH PARKING AT UNION STATION  
**Date:** Thursday, September 10, 2020 3:55:16 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Yasmin Bhalloo , a licensed, professional foreign language tour guide in Washington, DC. I have resided in the District since 2010 and I currently live in the Tenleytown neighborhood area so this issue is very relevant to me. Over the course of the year I escort 120 or more tour groups in motor coaches to Union Station. My experience in bringing groups to the station by motor coach has made me recognize the importance of the coach's ability to be able to park in the station. Tour groups hold to strict schedules and often include visitors with mobility issues. Guests frequently must return to the coach for needed items they have left behind, like medications or money, and coach operators have time for a much-needed break from driving as well. Also, itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time. Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk and fail to take into consideration the business of tourism, and its importance to the city. Motorcoaches drivers also come from other cities and Canada and have been driving for several hours and have a limited amount of break and time for lunch. Foreign groups enjoy using the facilities inside the station such as the bank for foreign currency exchange, the shopping area and the several restaurants.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
Yasmin Bhalloo

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**From:** STEVEN KLINE  
**To:** [Union Station Expansion](#);  
**Subject:** My thoughts on Proposed Union Station Bus Parking Plans  
**Date:** Friday, September 11, 2020 11:55:24 PM

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Office of Railroad Policy and Development

USDOT Federal Railroad Administration (MS-20 RPD-10)

1200 New Jersey Avenue, SE

Washington, DC 20590

Dear Project Committee Members,

My name is Steven Kline, and I am a licensed, professional tour guide in Washington in my 10th year of guiding in the District.

Over the course of the year, I escort 6 or more tour groups in motor coaches to Union Station. Having a reserved bus stop at Union Station has been crucial to me and my tours especially with senior citizens and younger children. The stop gives us access to much-needed bathrooms, restaurants, and the ability of our guests just to stretch their legs often after spending many hours traveling to Washington DC. This also gives the drivers of our motorcoaches a well needed and necessary break from driving and you should know that bus drivers have a limit to the number of hours they can drive in a given day so that if the bus driver has to spend their time on the streets surrounding Union Station looking for a place to park, this obviously shortens the amount of time the driver can actually drive on the tour and meet their required maximum number of hours for the day. Limiting the number of motorcoach parking slots and moving coaches out of the station every 30 minutes also will put neighborhood residents at risk and fail to take into consideration the business of tourism, and its

importance to the city.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motorcoach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30-minute parking.

In sum, limiting the bus slots and the shortened time of 30 minutes that would be allotted under various plans for the future of Union Station will cause more traffic congestion, add to the already serious air pollution that exists in the District, limit a very necessary amount of shopping and eating our guests would avail themselves of, and make neighborhoods less safe by adding lots of noise as our motorcoaches have to roam the neighborhood streets looking for parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,

Steven Kline

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**From:** Mary Thorne  
**To:** [Union Station Expansion](#)  
**Cc:** [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [info@ncpc.gov](mailto:info@ncpc.gov); [planning@dc.gov](mailto:planning@dc.gov); [ddot@dc.gov](mailto:ddot@dc.gov)  
**Subject:** Tour Guide Comments Union Station parking changes  
**Date:** Saturday, September 12, 2020 11:41:58 AM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Mary Thorne, a licensed, professional tour guide in Washington, DC. Over the course of the year I escort 10 or more tour groups in motor coaches to Union Station. I have been a tour guide since 2012. One of the venues that is popular for tour groups is Union Station. Not only does it have a large food court but tourists like to shop there as well. It fulfills a number of needs for visitors coming to DC. Sometimes it is a place to meet a tour group arriving in the city. After a long trip groups need a place with enough restrooms to accommodate one, or multiple buses and a place to eat. They also need a venue that is easy to find since not all drivers are familiar with the city. Union Station is also a popular spot for groups that have visited, or are about to visit, Capitol Hill. There is no parking associated with the Capitol Visitor Center and the food choices are limited and sometimes exceed the budgets of the travelers. Probably the most frequent use of Union Station, in my experience, is as a starting place for night tours of the city. Beginning with the beautiful view of the Capitol at night, there is easy access to the memorials and the White House. All these uses of Union Station bring business to the vendors there which will likely be reduced if the proposed changes to the motorcoach rules go through. Reducing the number of slots, changing the parking configuration, and limiting coaches to 30 minutes will not only discourage use of the facility but likely increase coach traffic in residential areas. These motor coaches seeking a nearby spot to access their clients will add to the congestion and pollution and put an unnecessary hardship on the DC residents in the neighborhood.

As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
Mary Thorne

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**From:** Helga Warren  
**To:** [Union Station Expansion](#)  
**Cc:** [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [info@ncpc.gov](mailto:info@ncpc.gov); [planning@dc.gov](mailto:planning@dc.gov); [ddot@dc.gov](mailto:ddot@dc.gov)  
**Subject:** Union Station Expansion Project  
**Date:** Tuesday, September 15, 2020 10:29:41 AM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Helga Warren and I am a licensed, professional tour guide in Washington, DC. Over the course of a year, I welcome at least 50 to 75 tour groups in motor coaches to Union Station. I have been a Washington, DC tour guide for the past 8 years; it would have been 9 if it weren't for the coronavirus shutting down tourism this year. My specialty is French and German tour groups, to whom I give city tours in their language. A large number of those tours make a stop at Union Station for lunch when they arrive from Amish Country in Pennsylvania. Data shows that foreign tourists spend much more per person than native tourists, even though they represent only a fraction of the total tourists who visit Washington. Much of this spending takes place at Union Station, where they eat lunch, buy souvenirs and visit the mall stores.

My experience in bringing groups to the station by motor coach has made me recognize the importance of the coach's ability to be able to park in the station. Tour groups hold to strict schedules and often include visitors with mobility issues. Guests frequently must return to the coach for needed items they have left behind, like medications or money, and coach operators have time for a much-needed break from driving as well. Also, itineraries usually allot an hour or more stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time. Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk and fail to take into consideration the business of tourism, and its importance to the city.

We need assistance from the city and lots of goodwill to rebuild the tourism business in Washington, DC following this huge setback. Having sufficient motor coach parking at Union Station will help ensure a rebound to previous levels of DC tourism: upwards of 22 million tourists per year, having increased every year for the past 10 years except for this one. Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station, especially once it is renovated. It will be a transportation showplace and groups will want to come here. Accommodation of large group travel and motor coach access should therefore be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

This will allow Union Station to fully participate in a tourism comeback, possibly the likes of which the city has never seen. Thank you for the opportunity to present my concern for the

coach parking alternatives in the June 2020 DEIS and I wish you all the best with the renovation.

Sincerely,

Helga Warren

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**From:** Christen Eliason  
**To:** [Union Station Expansion](#)  
**Cc:** [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [info@ncpc.gov](mailto:info@ncpc.gov); [planning@dc.gov](mailto:planning@dc.gov); [ddot@dc.gov](mailto:ddot@dc.gov)  
**Subject:** Comments due by September 28 for Union Station DC Expansion  
**Date:** Tuesday, September 15, 2020 10:04:59 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Christen Eliason, and I am responding to your plans for Union Station Expansion as a licensed tour guide in Washington, DC. I am also a proud member of the Guild of Professional Tour Guides of Washington, DC and co-chair of our Training Committee. Our committee serves our membership throughout the year on tour guide knowledge and skill development. Tour guides route their groups through the city, presenting relevant facts and stories about what visitors are seeing. Both a group's tour guide and their motor coach operator facilitate memories of their visit to their capital city. Our semi-annual motor coach workshops always begin and end at Union Station.

Further, I am a COVID furloughed Tour Planner with The Group Tour Company, a tour operator company bringing students and adults to Washington. My clients are students from across the country, as well as older adults, often tired from visiting memorials, the halls of Congress or waiting for their White House tours. For all of them visiting Unions Station is a positive stop, a chance to get some shopping in and a choice of restaurant or eatery. For these visitors knowing where their motor coach is parked and limiting the walk from and back to that sightseeing coach, is empowering. In my role as I tour planner I am responsible for some 100 coaches every year that park at Union Station, all allowing the motor coach operator some needed time away to refresh and regroup.

Whatever my role in my 25 years of tourism in Washington, Union Station parking has been a place of welcome. Without parking available motor coach operators will be riding the streets of Washington, particularly near Union Station. These drivers will be looking for a parking spot, using fuel and getting into traffic, just trying to find a free spot. There is always one person in a tour group that realizes at lunch they need something left on the coach, medication, money, something important. Knowing where to find their coach is essential. Limiting the number of motor coach parking slots at Union Station, and moving coaches out of the station every 30 minutes will not do. Motor coach operators will not get lunch or a necessary trip to a rest room, groups will be bewildered and most of all the neighborhoods near Union Station will have coaches clogging up traffic and waiting to get back to pick up their groups. This proposed policy fails to take tourism seriously and will even hinder the industry. When tourists see how un-friendly an area is to them and their needs, word gets back home that DC does not really want tourists.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be integral to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motor coach parking
- Keep the parking facility within the station complex as currently located
- Reject plans to limit coaches to 30 minute parking

Thank you for the opportunity to present my concerns for the coach parking alternatives for Union Station redevelopment plans spelled out in the June 2020 Draft Environmental Impact Statement.

*Think Global*

**Christen M. Eliason**

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**Tour Guide, Washington, DC**

**Home of the 2019 World Series Champions, the Washington Nationals!**

**Member The Guild of Professional Tour Guides of Washington, DC  
& Training Committee Co-Chair**

**From:** James Carr  
**To:** [Union Station Expansion](#)  
**Subject:** Motor Coach parking at Union Station  
**Date:** Tuesday, September 22, 2020 2:56:41 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Committee Members,

My name is Jim Carr. I have been a licensed, professional tour guide in Washington, DC for more than 20 years. Over the course of this past year I escort 25 or more tour groups in motor coaches to Union Station. My experience in bringing groups to the station by motor coach has made me recognize the importance of the coach's ability to be able to park in the station. Tour groups hold to strict schedules and often include visitors with mobility issues. Guests frequently must return to the coach for needed items they have left behind, like medications or money, and coach operators have time for a much-needed break from driving as well. Also, itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time. Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk, as well as guests on motor coaches, and fails to take into consideration the business of tourism, and its importance to the city.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,

Jim Carr  
Co-chair, Certified Master Guide Program  
Guild of Professional Tour Guides of Washington, DC

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Jill Blakeman Award for Outstanding Service  
to the Tour Guiding Profession

**From:** Maribeth Oakes  
**To:** [Union Station Expansion](#)  
**Subject:** Union Station Expansion Project Comments  
**Date:** Tuesday, September 22, 2020 3:02:44 PM  
**Attachments:** [Points of Consideration for Additional Commentary.pdf](#)

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Russell Preble, a licensed, professional tour guide in Washington, DC. Over the course of the year I escort 20 or more tour groups in motor coaches to Union Station. My experience in bringing groups to the station by motor coach has made me recognize the importance of the coach's ability to be able to park in the station. Groups usually have an hour at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time. Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk and fail to take into consideration the business of tourism, and its importance to the city.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking. The thought that there will be such a reduced space for coach parking is completely unsatisfactory.

If Union Station is to be a transportation hub parking for motor coaches is required. I strongly recommend that space for coach parking be increased and a two hour limit is suggested. Motor coaches are the life blood of tourism in DC

Thank you for the opportunity to present my objections to the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
Russell Preble

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## Points of Consideration for Additional Commentary

**Pedestrian Safety** - At Union Station a first step towards safe travel means ensuring that the motorcoach on which visitors are traveling can secure an onsite parking space. Groups, often school-age children or the elderly, should not be walking through tunnels, under bridges, or taking long pathways to reach restaurants and retail establishments.

**Traffic** - Examining all anticipated traffic growth is important to give a fair assessment of travel patterns. However, plan proposals that direct buses to exit east onto H Street, NE, where an eastbound turn from the bus station ensures that buses will be entering into local neighborhoods, seems to be in direct conflict with the plan's goals. A left hand turn, westward, directs coach traffic to the larger thoroughfares of North Capitol Street or Massachusetts Avenue, avoiding the H Street and Capitol Hill neighborhoods and providing tour buses the most logical route to return to tourist areas like the National Mall and the monumental core of the city.

**Retail Viability and Consumer Spending** - Large-group tours that come to Union Station generate much needed revenue for food and retail establishments. A bus of fifty, just spending \$10 each on lunch, will generate \$500 in a one hour stop. Without adequate parking that allows sufficient time at the station, tour groups may forgo eating and shopping at Union Station altogether, which would have a devastating impact on the vendors who rent space in the station. With adequate facilities for tour buses, however, the traffic impact on the neighborhood could be minimized while maintaining this important revenue stream.

**Air and Noise Quality** - Limiting tour bus access to the station will undermine the goal of improving the quality of life in the area and add to traffic congestion, smog and commotion. An approach that requires buses to exit the facility in 30 minutes will result in long-term problems for local residents who will experience an increased number of buses roaming their neighborhood streets until the scheduled time for the coach driver to pick up tourists who are at the station to eat and shop.

### In Summary...

Forcing coaches out into the streets every 30 minutes means:

- More traffic congestion;
- Heightened pedestrian safety concerns;
- Worse air quality caused by increased pollutants;
- Additional street noise; and
- Could limit retail spending.

**From:** Julie Moody  
**To:** [Union Station Expansion](#)  
**Subject:** Motor Coaches at the station  
**Date:** Tuesday, September 22, 2020 3:52:14 PM

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Dear Project Committee Members,

My name is Julie Moody, a licensed, professional tour guide in Washington, DC. Over the course of the year I escort 50 or more tour groups in motor coaches to Union Station. My experience in bringing groups to the station by motor coach has made me recognize the importance of the coach's ability to be able to park in the station. Tour groups hold to strict schedules and often include visitors with mobility issues. Guests frequently must return to the coach for needed items they have left behind, like medications or money, and coach operators have time for a much-needed break from driving as well. Also, itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time. Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk and fail to take into consideration the business of tourism, and its importance to the city. I urge you, especially after this past year to keep tourism alive for this beautiful city. Without it, so many DC natives and visitors go without incomes they need to support themselves and the community.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
Julie Moody



**From:** Garrett Ethridge  
**To:** [Union Station Expansion](#)  
**Subject:** Union Station expansion concerns  
**Date:** Tuesday, September 22, 2020 4:23:47 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Garrett Ethridge, a licensed, professional tour guide in Washington, DC. Over the course of the year I escort 6 or more tour groups in motor coaches to Union Station. I am contacting you to indicate my concerns regarding the Union Station Redevelopment Project proposal, specifically the expected limitations regarding motor coach capacity. I specialize in student educational trips and Union Station is an outstanding option for us as it can accommodate large groups at meal times and offers some intriguing architecture discussions. One of the greatest benefits however is the safety it provides from a loading and unloading perspective. By having our coach drop and/or pickup in the secure garage, we limit the risks to my students who have more than once been nearly hit while trying to navigate the various pickup lanes out front.

Beyond physical safety for my students, allowing our motor coach to park at Union Station provides a number of additional benefits. It enables my driver to eat a meal and take a break as opposed to forcing him or her to continue searching for a parking space. This prevents even further competition for limited parking sites, plus has a direct impact on the driver's readiness and alertness as I often meet groups at Union Station after they have driven directly from NYC. As student groups, we rarely spend more than one hour for lunch thus if not allowed to park, the coach will merely just circle around nearby exacerbating the traffic congestion we already have.

I ask that you consider maintaining the current motor coach parking slots near the Union Station Terminal and set maximum time to at least 90 minutes. Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
Garrett Ethridge

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**From:** Rebecca Grawl  
**To:** [Union Station Expansion](#)  
**Cc:** [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [info@ncpc.gov](mailto:info@ncpc.gov); [planning@dc.gov](mailto:planning@dc.gov); [ddot@dc.gov](mailto:ddot@dc.gov)  
**Subject:** Proposed Union Station Expansion  
**Date:** Tuesday, September 22, 2020 5:50:45 PM  
**Attachments:** [cidAF4729B3-939E-4C36-86FF-9FB587331585.pdf](#)

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
[1200 New Jersey Avenue, SE](#)  
[Washington, DC 20590](#)

Dear Project Committee Members,

My name is Rebecca Grawl, a licensed, professional tour guide in Washington, DC. Over the course of the year I escort 50 or more tour groups in motor coaches to Union Station. My experience as a full time tour guide, bringing groups to the station by motor coach has made me recognize the importance of the ability to be able to park in the station. Tour groups hold to strict schedules and often include visitors with mobility issues, especially the adult groups. Guests frequently must return to the coach for needed items they have left behind, like medications or money, and coach operators have time for a much-needed break from driving as well. Also, itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time - this is bad for local traffic, bad for the environment, and bad for managing the drivers' hours. Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk and fail to take into consideration the multimillion dollar impact of the business of tourism, and its importance to the city.

Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking (and reject any time limit less than 60 minute)

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
Rebecca Grawl

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## Points of Consideration for Additional Commentary

**Pedestrian Safety** - At Union Station a first step towards safe travel means ensuring that the motorcoach on which visitors are traveling can secure an onsite parking space. Groups, often school-age children or the elderly, should not be walking through tunnels, under bridges, or taking long pathways to reach restaurants and retail establishments.

**Traffic** - Examining all anticipated traffic growth is important to give a fair assessment of travel patterns. However, plan proposals that direct buses to exit east onto H Street, NE, where an eastbound turn from the bus station ensures that buses will be entering into local neighborhoods, seems to be in direct conflict with the plan's goals. A left hand turn, westward, directs coach traffic to the larger thoroughfares of North Capitol Street or Massachusetts Avenue, avoiding the H Street and Capitol Hill neighborhoods and providing tour buses the most logical route to return to tourist areas like the National Mall and the monumental core of the city.

**Retail Viability and Consumer Spending** - Large-group tours that come to Union Station generate much needed revenue for food and retail establishments. A bus of fifty, just spending \$10 each on lunch, will generate \$500 in a one hour stop. Without adequate parking that allows sufficient time at the station, tour groups may forgo eating and shopping at Union Station altogether, which would have a devastating impact on the vendors who rent space in the station. With adequate facilities for tour buses, however, the traffic impact on the neighborhood could be minimized while maintaining this important revenue stream.

**Air and Noise Quality** - Limiting tour bus access to the station will undermine the goal of improving the quality of life in the area and add to traffic congestion, smog and commotion. An approach that requires buses to exit the facility in 30 minutes will result in long-term problems for local residents who will experience an increased number of buses roaming their neighborhood streets until the scheduled time for the coach driver to pick up tourists who are at the station to eat and shop.

### In Summary...

Forcing coaches out into the streets every 30 minutes means:

- More traffic congestion;
- Heightened pedestrian safety concerns;
- Worse air quality caused by increased pollutants;
- Additional street noise; and
- Could limit retail spending.

**From:** Debra Wiley  
**To:** [Union Station Expansion](#)  
**Subject:** Comments on Union Station Expansion  
**Date:** Tuesday, September 22, 2020 8:35:26 PM

---

Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
[1200 New Jersey Avenue, SE](#)  
[Washington, DC 20590](#)

Dear Project Committee Members,

My name is Debra Wiley. As a licensed, professional tour guide in Washington, DC, I delight in sharing the nation's capital with visitors from far and wide.

Over the course of the year I escort 10 or more tour groups in motor coaches to Union Station, and I often meet groups there to begin tours. Much as I appreciate the commitment to update and expand Union Station, I have deep concerns about the recommendation to limit access to motor coach parking.

As you know, motor coach parking is a challenge throughout DC, which seems counterintuitive to the number of visitors who reach the nation's capital via tour buses.

Reducing motor coach parking at Union Station will make an already-difficult situation more problematic. I strongly urge rejection of any reduction in parking spaces, or in the time a motor coach can remain in the garage.

Union Station is a major transportation hub and the need for reasonable tour bus access is expected to increase as we move beyond the COVID-19 crisis. Accommodation of large group travel and the role of motor coaches in that travel, should be paramount to the expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motor coach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Recovery from the devastating COVID-19 impact on the tourism industry should focus on maintaining or improving accommodations to visitors. Reducing motor coach access within the often-visited parts of Washington, DC sends the wrong message, and especially at Union Station which meets needs of many kinds of visitors. Union Station was designed to serve travelers' needs, and those needs should take priority. Creating a situation where motor coaches must spend more time on nearby streets means more traffic, noise, and pollution for the newly developed residential neighborhoods, and it erodes the traveler experience. Area residents, Union Station retail establishments, and the needs of visiting groups all suffer.

My experience in bringing groups to Union Station, or in meeting groups there, has shown me how important it is for the motor coach to be able to park in the station. Tour groups hold to strict schedules and often include visitors with mobility issues. Guests sometimes need to return to the coach for items left behind, like medications or money, and coach operators benefit from a short respite from driving. For multiple-coach tours, the time at Union Station can often be an opportunity to regroup for a portion of the day. Itineraries usually allow little

more than an hour's stay at the station, suggesting that it is more efficient to give motor coaches the needed time in the garage than to force them to leave and return.

I hope the committee will give priority to an approach that welcomes motor coaches who bring visitors excited to enjoy all that DC has to offer, including the iconic Union Station.

Thank you for the opportunity to present my concerns for motor coach parking at Union Station.

Sincerely,

Debra Wiley

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[Sent from Yahoo Mail for iPad](#)

**From:** Philip Hanner  
**To:** [Union Station Expansion](#); [info@ncpc.gov](mailto:info@ncpc.gov); [ddot@dc.gov](mailto:ddot@dc.gov)  
**Subject:** Union Station  
**Date:** Tuesday, September 22, 2020 9:09:58 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is P. Cole Hanner, a licensed, professional tour guide in Washington, DC. Over the course of the year I escort 20 or more tour groups in motor coaches to Union Station. As a Tour Guide for WorldStrides, I have been bringing groups to Union Station for the past five (5) years. The food court at Union Station is one of just a few places where my groups have chosen to eat lunch in the DC area. Our tours are often on a very tight schedule, so allowing us access to Union Station via the bus parking has always been a critical part of the arrangement. Many tour groups also find the Union Station to be a highly desirable location for lunch, which results in many buses using the parking slots afforded by Union Station. If these bus slots were to be reduced by as much as 50%, which is something I understand is being proposed, the tour business would be significantly impacted. Tourism in DC is a very important part of the economy and offers access/exposure to the historical importance of our nations Capital. If buses would not be able to park at Union Station it would likely cancel any incentive to visit there by the visiting schools. For the bus drivers, it would require them to find alternative parking - assuming the schools would still desire to have lunch there - or drive the crowded streets of the city until the schools were ready to get back onboard the bus. Delays for an already burdened tour schedule would be inevitable.

Union Station is a major transportation hub, but it is also an important landmark and historical site in the city of Washington. Schools visiting Washington DC find the historical importance of this building to be helpful for their development of the American Railroad and U.S. transportation in general.

I would like to encourage the committee to retain the current 61 bus parking spaces so that tour groups could continue to visit Union Station and enjoy eating their lunches and visiting this wonderful historic site. Tour groups logically would want to have 60 minutes for lunch, and it would be highly beneficial if the buses could remain on location for that entire period of time. This would also be safer, as the students could be loaded and off-loaded away from heavy traffic.

Thank you for any consideration you might give to this proposal.

Thank you for the opportunity to present my concern for the coach parking

alternatives in the June 2020 DEIS.

Sincerely,  
P. Cole Hanner

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Attachments area

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Cole Hanner

**From:** Kevin Golden  
**To:** [Union Station Expansion](#)  
**Subject:** Union Station Plans  
**Date:** Tuesday, September 22, 2020 10:44:06 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Kevin Golden. I am a licensed, professional tour guide in Washington, DC.

Over the course of the year, I escort 40 or more busloads of eighth-graders in motor coaches to Union Station. We park the bus, I walk my groups in to the food court, and set them loose to eat, get a bathroom break, maybe do a little shopping. We meet up in the Main Hall at the designated time, walk out to the bus, and move on. We can reliably do this in an hour, and this is only possible because of the way Union Station is configured today.

The changes you are proposing will make this more difficult and will result in delays and problems, and tour operators will find alternatives to Union Station when scheduling lunch. Yes, the buses are unsightly and loud, but each bus that comes in during tour season brings 50 lunches in the food court, stops at the drugstore for suntan lotion, bandages, and aspirin, and a certain number of stops at the souvenir kiosks and the Starbucks.

As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
Kevin Golden

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**From:** Katie Chambers  
**To:** [Union Station Expansion](#)  
**Cc:** [portia.boone@mail.house.gov](mailto:portia.boone@mail.house.gov); [info@ncpc.gov](mailto:info@ncpc.gov); [planning@dc.gov](mailto:planning@dc.gov); [ddot@dc.gov](mailto:ddot@dc.gov)  
**Subject:** Union Station Expansion  
**Date:** Wednesday, September 23, 2020 8:20:15 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Dear Project Committee Members,

My name is Katie Chambers, Tour Operator that sends 100's of groups to Washington, DC each year. My experience in bringing groups to the station by motor coach has made me recognize the importance of the coach's ability to be able to park in the station. Tour groups hold to strict schedules and often include visitors with mobility issues. Guests frequently must return to the coach for needed items they have left behind, like medications or money, and coach operators have time for a much-needed break from driving as well. Also, itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time.

Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk and fail to take into consideration the business of tourism, and its importance to the city.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Forcing coaches out into the streets every 30 minutes means:

- More traffic congestion;
- Heightened pedestrian safety concerns;
- Worse air quality caused by increased pollutants;
- Additional street noise; and
- Could limit retail spending.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Yours in Partnership,

**Katie Chambers**

**Office Manager**



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**From:** Elaine Moulder  
**To:** [Union Station Expansion](#)  
**Cc:** [info@ncpc.gov](mailto:info@ncpc.gov); [ddot@dc.gov](mailto:ddot@dc.gov); [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [planning@dc.gov](mailto:planning@dc.gov)  
**Subject:** Union Station Bus Parking Changes  
**Date:** Wednesday, September 23, 2020 10:46:17 AM  
**Attachments:** [image002.png](#)  
[image005.png](#)  
[image008.png](#)  
**Importance:** High

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Hello,

My name is Elaine Moulder, a professional tour operator and member in good standing of the National Tour Association, American Bus Association and many other travel industry associations. Over the course of each year I send 3 or more tour groups in motor coaches to DC and Union Station. I believe that tourism is an important industry for Washington DC yet often changes in DC often overlook how it will impact tourism and group travel in particular.

Union Station is usually included in our group itineraries. My experience in bringing groups to the station by motor coach has made me recognize the importance of the coach's ability to be able to park at the station. Tour groups must adhere to strict schedules and often include visitors with mobility issues. Guests frequently must return to the coach for needed items they have left behind, like medications or money, and coach drivers must have time for a much-needed break from driving as well. Also, itineraries usually allow an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time. There is already a shortage of parking spots for coaches in DC.

Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk and fail to take into consideration the business of tourism, and its importance to the city.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking.
- Keep the parking facility within the station complex as currently located.
- Reject plans to limit coaches to 30 minute parking.

Forcing coaches out into the streets every 30 minutes means:

- More traffic congestion;
- Heightened pedestrian safety concerns;
- Worse air quality caused by increased pollutants;
- Additional street noise; and
- Could limit retail spending.

Given the challenges and losses we have already experienced this year due to the pandemic, we don't need added issues making group travel in DC more difficult to operate. Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS. Please give this your utmost consideration.

Memory Maker at your service,  
Elaine Moulder, Owner



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**From:** Charlotte Liebig  
**To:** [Union Station Expansion](#)  
**Cc:** [GPTGDCBoard@gmail.com](mailto:GPTGDCBoard@gmail.com)  
**Subject:** Union Station expansion  
**Date:** Wednesday, September 23, 2020 12:24:41 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
[1200 New Jersey Avenue, SE](#)  
[Washington, DC 20590](#)

Dear Project Committee Members,

My name is Charlotte Liebig , a licensed, professional tour guide in Washington, DC. Over the course of the year I escort 10 or more tour groups in motor coaches to Union Station. During the time I have been bringing groups to Washington, one of my biggest concerns has been parking and off-loading of motor coaches. I recognize that the coaches contribute to congestion in the city's traffic. However, motor coaches full of people visiting our nation's capitol also brings much needed and significant revenue to the city. The more difficult it becomes to accomodate motor coaches and the visitors they carry, the more reluctant tour operators and tourists and their dollars will be to visit. Moreover, Washington DC is our nations capitol. We should encourage everyone to journey to Washington out of a sense of obligation to our democracy, to teach civics and to instill a sense of patriotic pride in young and old alike. Washington is not just for those who reside there. It belongs to every citizen! Let's encourage visitors, not make it even more difficult for them to enjoy it!

My experience in bringing groups to the station by motor coach has made me recognize the importance of the coach's ability to be able to park in the station. Tour groups hold to strict schedules and often include visitors with mobility issues. Guests frequently must return to the coach for needed items they have left behind, like medications or money, and coach operators have time for a much-needed break from driving as well. Also, itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time. Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk and fail to take into consideration the business of tourism, and its importance to the city.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Charlotte Liebig

Professional Tour Director  
Certified/Licensed DC and NYC

**From:** Russ Norfleet  
**To:** [Union Station Expansion](#)  
**Cc:** [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [planning@dc.gov](mailto:planning@dc.gov); [ddot@dc.gov](mailto:ddot@dc.gov); [info@ncpc.gov](mailto:info@ncpc.gov)  
**Subject:** Union Station Redevelopment-Motor Coach Parking Alternatives-Public Comments  
**Date:** Wednesday, September 23, 2020 9:32:52 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

I am an east coast tour director/guide. Most all of my tours involve a tour of Washington, DC. I manage adult, senior, and student tours. At some point in the group's visit to Washington, DC, we go to Union Station. I meet and depart from my groups at Union Station. We often eat and shop there. Union Station is a convenient location for my groups to be dropped off so we can visit Capitol Hill sites. I meet, bring, or leave approximately 100 groups a year at Union Station.

It is essential that there be an adequate number of parking slips for tour motor coaches at redeveloped Union Station and that coaches be permitted to park for a reasonable amount of time (at least an hour). The parking needs to be convenient to food, shopping, rest rooms, Metro, and trains.

Tourism is a major component of the Washington, DC economy and is expected to increase. Union Station is primarily a multi-modal transportation center. Redeveloped Union Station should be designed and operated to meet the city's transportation needs now and in the future. Doing so provides the experience the city needs and wants for visitors and residents. The Washington, DC economy benefits. The businesses in Union Station benefit.

Motor coach operators need a break from driving, food, and rest rooms. Make redeveloped Union Station work for them. If there is no parking, they drive around. This is stressful for them and contributes to traffic congestion and pollution.

Groups need time to eat and shop. There is much to see and do in Washington, DC. We need to know that the motor coach driver can quickly and safely drop us off at Union Station and will be there to pick us up. It is desirable for the motor coach driver to be able to park at Union Station for a reasonable time period, because tour participants leave items on the motor coach that they need, like money and medicines.

The motor coach parking facility in redeveloped Union Station must have a minimum of 61 slips (the existing number of motor coach slips in the Union Station parking deck) and be convenient to food, shopping, rest rooms, Metro, and trains. Tour motor coach drivers need to be able to park for at least an hour and make a left turn onto H Street. The bulk of their trips are to the west. Why make coach drivers turn right and drive through residential areas?

Thank you for the opportunity to express my concerns about the motor coach parking alternatives in the June 2020 DEIS.

Sincerely,

Russ Norfleet  
Arlington, VA 22201



**From:** John Days  
**To:** [Union Station Expansion](#)  
**Cc:** [info@ncpc.gov](mailto:info@ncpc.gov); [ddot@dc.gov](mailto:ddot@dc.gov); [planning@dc.gov](mailto:planning@dc.gov); [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov)  
**Subject:** Union Station  
**Date:** Wednesday, September 23, 2020 9:51:55 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

I am a licensed, professional tour guide in Washington, DC. I have been a tour guide for the past eleven years and on average I bring a group to Union Station about fifteen times a year. So, I know the importance of having the bus park in the garage and available when we are ready for it. My groups are on a short time schedule and they rely on the bus being available when they are ready to leave. If the coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time. Limiting the number of motor-coach parking slots and moving coaches out of the station every 30 minutes will not work. This is too important to the revenue the tourism industry brings to the city to handle lightly. Accommodation of large group travel and motor-coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to do the following:

- Maintain, at a minimum, the current number of 61 slots for motor-coach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30-minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
John Days

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Virus-free. [www.avast.com](http://www.avast.com)

**From:** Sean Grant  
**To:** [Union Station Expansion](#); [ddot@dc.gov](mailto:ddot@dc.gov); [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [info@ncpc.gov](mailto:info@ncpc.gov); [planning@dc.gov](mailto:planning@dc.gov)  
**Subject:** Union Station Redevelopment  
**Date:** Thursday, September 24, 2020 9:15:13 AM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Sean Grant, tour operator and licensed professional tour guide in Washington, DC. I have resided in the District since 2014, and as my business depends on adequate parking at Union Station. Over the course of the year, I escort 50 or more tour groups in motor coaches to Union Station. Tour groups hold to strict schedules and often include visitors with mobility issues. Guests frequently must return to the coach for needed items they have left behind, like medications or money, and coach operators have time for a much-needed break from driving as well. Itineraries usually allot an hour's stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time. Limiting the number of motorcoach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk and fail to consider tourism's business and its importance to the city by causing additional coach traffic in the area. Union Station has historically been a convenient and viable option for group dining. As the regulations get more complicated and drivers are not allowed to park, we will be looking for other options that will, in turn, take business away from Union Station.

Accommodation of large group travel and motorcoach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30-minute parking.

Thanks,  
Sean Grant  
Great Falls Travel

---

**From:** Angalee Schmidt  
**To:** [Union Station Expansion](#)  
**Cc:** [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [ddot@dc.gov](mailto:ddot@dc.gov); [gptgdcboard@gmail.com](mailto:gptgdcboard@gmail.com); [info@ncpc.gov](mailto:info@ncpc.gov); [planning@dc.gov](mailto:planning@dc.gov)  
**Subject:** Union Station Expansion Plan  
**Date:** Thursday, September 24, 2020 9:46:46 AM

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Dear Project Committee Members,

My name is Angalee Schmidt, a licensed, professional tour guide in Washington, DC. Over the course of the year I escort 25 or more tour groups in motor coaches to Union Station.

Washington DC has a booming tourism industry. For just the cherry blossom festival alone, 2 million tourists and tour groups pour into the city. Along with them come tour busses. It is a constant struggle for tour bus drivers to find parking in a city that thrives on tourism. If we want tourism to continue to grow and prosper we must think about tour busses and the back end of the industry.

I have been working in DC as a tour director for 4 years and every year bus parking is at the forefront of my mind. If my drivers cannot rest or eat, they put their passengers and pedestrians at risk. If the city created more space for bus parking, it would relieve an immense pressure to the bus drivers, tour directors, tour companies, tour passengers, and the city itself. Wouldn't it be nice to keep motor coaches off the streets as much as possible? Bus parking would benefit everyone in the city, whether they are visitors or residents.

My experience in bringing groups to the station by motor coach has made me recognize the importance of the coach's ability to be able to park in the station. Tour groups hold to strict schedules and often include visitors with mobility issues. Guests frequently must return to the coach for needed items they have left behind, like medications or money, and coach operators have time for a much-needed break from driving as well. Also, itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time. Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk and fail to take into consideration the business of tourism, and its importance to the city.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

I would also like to see efforts to fund new bus only parking lots in or very near the city.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
Angalee Schmidt

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September 25, 2020

Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members

My name is Ms. Chandini Bachman. I am a licensed, professional tour guide in Washington, DC. I oppose the Union Station plan because motor coach drivers who do not have parking access will and do drive around the nearby neighborhoods. With more coaches on the streets it leads to more pollution, pedestrian safety issues, and traffic congestion. There are many moving parts to planning group tours. Motorcoach drivers are legally required to limit driving hours. Tour operators could have to cut back on itineraries to plan in the extra time the drivers could spend circling Union Station. School group tours are not mere entertainment, they educate students and engage them in citizenship responsibilities. During the COVID-19 pandemic times, school and group tours are pretty much on hold. But long-term planning requires Union Station to create more opportunity for DC's income-generating tourism for years to come.

Union Station is the central train, subway, and bus station of the Capital City of the "greatest nation on earth," as folks here are fond of calling the USA. Union Station is a major transportation hub and the DEIS projects tour bus use of Union Station to increase greatly in the future. Specifically, limiting the number of motor coach parking slots and moving coaches out of Union Station every 30-minutes puts neighborhood residents at risk and fails to take into consideration the business of tourism, and its importance to the city. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking
- Keep the parking facility within the station complex as presently located
- Reject plans to limit coaches to a 30-minute minute park time
- Remember the current situation well accommodates the elderly and persons with disabilities

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,

/s/

Ms. Chandini Bachman

- DC Licensed Tour Guide TGL-12555 (2017-Present)
- Member, Guild of Professional Tour Guides of Washington, DC (2017-Present)
- ITMI Certified Tour Director/Guide (2017-Present)
- Certified Interpretive Guide, National Association for Interpretation (2012-Present)
- Retired U.S. Capitol Visitor Guide (2008-2015)

cc: Guild of Professional Tour Guides of Washington, DC  
WorldStrides

**From:** Sally Stotter  
**To:** [Union Station Expansion](#); [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [info@ncpc.gov](mailto:info@ncpc.gov); [planning@dc.gov](mailto:planning@dc.gov); [ddot@dc.gov](mailto:ddot@dc.gov)  
**Subject:** UNION STATION EXPANSION PROPOSAL  
**Date:** Saturday, September 26, 2020 12:29:33 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

I am a licensed, professional tour guide in Washington, DC. Over the course of the year I escort 20 or more tour groups in motor coaches to Union Station.

The parking at Union Station is the primary reason I bring my groups to the station. Without the hour coach parking, the station becomes much less attractive for my groups. The other food courts in the District are much more appealing--no beggars, cleaner, better bathroom facilities, more food options in the food court, enough seats, which you never have during the busy spring season. It was infuriating to see the game stations kiosks in the food court, when my guests couldn't find seats. What are you people thinking?

I doubt expansion will bring in more dollars if coaches can't park there. At best, the coaches will end up circling the neighborhood, which is the last thing DC needs. The additional exhaust will hardly add to the District's ambiance. Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes puts neighborhood residents at risk and fails to take into consideration the importance of tourism to the city. I'm sure Union Station felt the effect from the drop in the number of coaches from Covid. I would think you would want to encourage more visitation in the coming years, not discourage it.

Tour groups hold to strict schedules and often include visitors with mobility issues. Guests frequently must return to the coach for needed items they have left behind, like medications or money, and coach operators have time for a much-needed break from driving and the opportunity to grab a meal.

Union Station is a major transportation hub and the DEIS forecasts a large increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion.

I urge committee members to: Maintain current number of 61 slots for motor coach

parking; Keep the parking facility within the station complex as currently located; and  
Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking  
alternatives in the June 2020 DEIS.

Sincerely,  
Sally Stotter

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**From:** W. B. Smith  
**To:** [Union Station Expansion](#)  
**Cc:** [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [planning@dc.gov](mailto:planning@dc.gov); [info@ncpc.gov](mailto:info@ncpc.gov); [ddot@dc.gov](mailto:ddot@dc.gov)  
**Subject:** IMPORTANT: Future Access of Union Station by Motor Coaches  
**Date:** Saturday, September 26, 2020 1:55:11 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is W. Bart Smith, a licensed, professional tour guide in Washington, DC. As a DC tour guide, I have personal experience in bringing groups to Union station by motor coach. This has made me recognize the importance of the ability of motor coaches to be able to park in the station. My groups hold to strict schedules and often include elderly visitors with mobility issues. On occasions, my guests frequently have had to return to the coach for needed items they have left behind, like medications or money, and coach operators have time for a much-needed break from driving as well, both for their well-being as well as to conserve their driving time availability. Also, itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time.

Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes puts neighborhood residents at risk and fails to take into consideration the business of tourism, and its importance to this city.

Union Station is a major transportation hub in a major national tourist destination, Washington, DC. When tourism returns, the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access must be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Doing otherwise comprises both safety and economic well-being of our residents, our guests, and our business community.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS and I look forward to hearing that you will be able to reach a reasonable conclusion to this issue.

Sincerely,  
W. Bart Smith

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**From:** Paul Rose  
**To:** [Union Station Expansion](#); [ddot@dc.gov](mailto:ddot@dc.gov)  
**Subject:** Concerns re Union Station bus parking  
**Date:** Saturday, September 26, 2020 4:58:28 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Paul Rose, a licensed, professional tour guide in Washington, DC. Over the course of the year I escort 20 or more tour groups in motor coaches to Union Station. My experience in bringing groups to the station by motor coach has made me recognize the importance of the coach's ability to be able to park in the station. Tour groups hold to strict schedules and often include visitors with mobility issues. Guests frequently must return to the coach for needed items they have left behind, like medications or money, and coach operators have time for a much-needed break from driving as well. Also, itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time. The City is concerned about air quality from operating diesel engines. Forcing tour buses to drive an unneeded amount of time adds to pollution. Parking for tour buses outside of Union Station is extremely limited so the driver will have to drive around for the entire time. And the Federal government limits the time any driver has behind the wheel, so forcing the driver to stay active instead of having "down time" means the driver will have to end any tour even earlier or be fined for over-limit hours. Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk and fail to take into consideration the business of tourism, and its importance to the city. Frankly, the alternative to the plans to limit tour bus parking at Union Station will result in tour buses going to venues other than Union Station and thus deprive the Station of parking and food revenue as well as revenue to the shops within the Station. I feel sure that all merchants inside the Station will be very upset at this deprivation.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
PaulRose

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**From:** Michael Hollingsworth  
**To:** [Union Station Expansion](#)  
**Subject:** Fwd: Union station coach access  
**Date:** Sunday, September 27, 2020 9:53:39 PM

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Sent from my iPad

Begin forwarded message:

**From:** Michael Hollingsworth <[mhollingsworth38@msn.com](mailto:mhollingsworth38@msn.com)>  
**Date:** September 27, 2020 at 4:37:57 PM EDT  
**To:** [info@wustationexpansion.com](mailto:info@wustationexpansion.com)  
**Subject:** Union station coach access

Office of Railroad Policy and  
Development  
USDOT Federal Railroad  
Administration (MS-20 RPD-  
10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee  
Members,

My name is Michael  
Hollingsworth, a licensed,  
professional tour guide in  
Washington, DC. Over the  
course of the year I escort 22 or  
more tour groups in motor  
coaches to Union Station. My  
experience in bringing groups to  
the station by motor coach has  
made me recognize the  
importance of the coach's  
ability to be able to park in the  
station. Tour groups hold to  
strict schedules and often  
include visitors with mobility  
issues. Guests frequently must  
return to the coach for needed  
items they have left behind, like  
medications or money, and  
coach operators have time for a

much-needed break from driving as well. Also, itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time. Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk and fail to take into consideration the business of tourism, and its importance to the city.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
Michael Hollingsworth

**From:** William Plenefisch  
**To:** [Union Station Expansion](#)  
**Cc:** [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [info@ncpc.gov](mailto:info@ncpc.gov); [planning@dc.gov](mailto:planning@dc.gov); [ddot@dc.gov](mailto:ddot@dc.gov)  
**Subject:** Union Station Parking Plan for Coach Busses  
**Date:** Sunday, September 27, 2020 10:03:16 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
[1200 New Jersey Avenue, SE](#)  
[Washington, DC 20590](#)

Dear Project Committee Members,

My name is William Plenefisch , a licensed, professional tour guide in Washington, DC. Over the course of the year I escort 25 or more tour groups in motor coaches to Union Station. My experience in bringing groups to the station over the last 8 years by motor coach has made me recognize the importance of the coach's ability to be able to park in the station. I cannot fathom why this question is even being considered.

Tour groups and drivers have strict schedules that need to be met. There are hourly guidelines that drivers must adhere to. Often, tour groups include visitors with mobility issues. Guests frequently must return to the coach for needed items they have left behind, like medications or money, and coach operators have time for a much-needed break from driving (not to mention they buy lunch in the station as well).

My groups generally also spend time at the station shopping, which means the retail tenants have a customer base in addition to the restaurants. As a tour guide, I also love showing off the historical value of Union Station. Also, itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time. Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk and fail to take into consideration the business of tourism, and its importance to the city.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. After all, Union Station was built for transportation and coach buses and tourists certainly are the reason it exists in the first place. It makes zero sense to exclude buses from using the facilities and unleashing them on the city streets.

The residents of the surrounding areas and the drivers, bicycles, and pedestrians will be grateful to have that many fewer busses driving in circles awaiting their appointed time to pick their guests back up. Also, to drop off a group, leave the station, only to return within 30 minutes is almost an impossible feat. It takes at least 30 minutes of time to negotiate city traffic and the lights to circle one time around.

I urge committee members to:

1. Maintain, at a minimum, the current number of 61 slots for motorcoach parking (honestly, more would be better)

2. Keep the parking facility within the station complex as currently located.
3. Reject plans to limit coaches to 30 minute parking (I actually think there should be the possibility of extending time for tour buses to park, up to all day if needed).

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,

William Plenefisch

**From:** Kimberley Indovina  
**To:** [Union Station Expansion](#)  
**Cc:** [Kimberley Indovina](#); [GPTGDCBoard@gmail.com](mailto:GPTGDCBoard@gmail.com); [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [info@ncpc.gov](mailto:info@ncpc.gov); [planning@dc.gov](mailto:planning@dc.gov); [ddot@dc.gov](mailto:ddot@dc.gov)  
**Subject:** URGENT! Union Station Coach Parking  
**Date:** Sunday, September 27, 2020 10:04:17 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Kimberley Indovina, a licensed, professional tour guide in Washington, DC. Over the course of the year I escort 25 or more tour groups in motor coaches to Union Station. I've been leading tours in DC for 7 years during each Spring and most of my itineraries take my groups to Union Station. That being said, our timed lunch is an hour and to have our coach buses only having the ability to stay for 30 minutes does us absolutely no good because that would cause the driver to have to drop us off and pick us up, which is a huge problem for several issues.

- 1) The driver is only allotted to drive a certain number of hours every day. If he/she is not allowed to take a break during lunch, we will have to cut something out of our itinerary because he/she will be driving when he/she should be resting.
- 2) The driver deserves a much needed lunch break and looks forward to parking and coming in to use the restroom and to get something to eat as well.
- 3) I cannot tell you how many times I have had an adult or student come up to me during lunch to tell me they forgot their necessary medication or cash on the bus and that they need to go get it. I am able to simply call my driver who will then go and open the bus for us which avoids a disaster.
- 4) Every single minute counts when I am leading tours...literally, every minute. If my group is stuck waiting in a large clump of people for our driver to pick us up, besides the other groups waiting for their bus, especially if it's backed up due to traffic, this can possibly be a disaster, especially if we have an appointment after lunch like Ford's Theatre or the Capitol where we cannot be late under any circumstance or we lose our appointment. If we lose the appointment, there is nothing I can do to rectify the situation in certain circumstances and my group will lose the chance to see that site forever, unless they come back to DC possibly on their own years down the road, which some may never be able to do.
- 5) Having people angry at me because the bus doesn't pick us up on time causing them to miss their appointment makes my life miserable and it costs me and my driver more in tips and can greatly affect my ratings which is what my company bases future work on for me, which is more lost income and my livelihood. This in turn, will make the tour guides and drivers very unhappy.

6) Retail shops inside Union Station will suffer greatly because people love to shop when they are done eating. Some deem shopping more important than eating and will forgo lunch in order to shop because they live in such small towns that they don't have stores to shop in, so they try to take advantage of every shopping opportunity that comes about on the trip. If they can't shop, retail stores could possibly end up closing their doors and people will lose their incomes. This would be horrible.

NOT providing coach buses parking stalls and only giving 30 minute slots might seem like a solution to you, but it can literally ruin someone's entire trip, and I don't say that lightly. Coming to DC is on so many people's bucket list and I've had 10 year olds and 80 year olds tell me that they've dreamed about coming to DC their entire lives. Something that seems like it's not a big deal to you is a HUGE deal to them, the driver and myself!

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
Kimberley Indovina

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**From:** gkushnier@gmail.com  
**To:** [Union Station Expansion](#)  
**Cc:** [gkushnier@gmail.com](#)  
**Subject:** Renovation of Union Station and bus parking proposals  
**Date:** Monday, September 28, 2020 11:15:36 AM

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Office of Railroad Policy and Development USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Gary Kushnier, a licensed, professional tour guide in Washington, DC. Over the course of the year I escort 25 or more tour groups in motor coaches to Union Station, most of them occupied by 8<sup>th</sup> grade students. My times in bringing groups to Union Station by motor coach has made me see the importance of the coach's ability to be able to park in the station upon arrival, with a reservation. Tour groups hold to strict schedules and often include visitors with mobility issues. Guests frequently must return to the coach for needed items they have left behind, like medications or money (they are, of course, teenagers for the most part), and coach operators have time for a much-needed break from driving as well. Also, itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will drive around nearby streets until the designated pick-up time.

Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes will put neighborhood residents at risk and fail to take into consideration the business of tourism, and its importance to the city. I can't imagine living in this area with scores of busses/motor coaches just driving aimlessly around until they have to return to pick up their passengers. Or, worse yet, double park with engines running, despite DC air pollution regulations. Not to mention many of our clients, after eating at the station, go shopping which helps the economy of the station big time.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking. This would be unworkable.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
Gary Kushnier

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**From:** christina bauer  
**To:** [Union Station Expansion](#)  
**Subject:** Tour Bus Parking at Union Station: Public Comment on the Draft Environmental Impact Statement (DEIS)  
Washington Union Station Expansion Project  
**Date:** Monday, September 28, 2020 1:43:28 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Project Committee Members,

I am a licensed professional tour guide in Washington, D.C. During the past seven years I have escorted 150 or more adult and student tour groups traveling via 50-passenger motor coaches to Union Station. Hundreds of my guide colleagues, members of The Guild of Professional Tour Guides of Washington, D.C. have done so as well. The tourism industry is a critical sector of our local economy. Destination DC reported that in 2018, visitor spending totaled \$7.8 billion, representing more than \$851 million in new tax dollars for the District of Columbia.

The DEIS : , actually projects a substantial increase in tour bus traffic. Buses are an efficient way for large numbers of people to move in and out of the station, as they are led by knowledgeable guides familiar with the station layout.

Tourists love Union Station because it is often their first opportunity to purchase clothing at the eclectic mix of shops and souvenirs at the kiosks. Adults love the opportunity to dine at the high quality restaurants and students appreciate the economical choices at the food court. Waiting in long lines to purchase food and eating it takes much more than 30 minutes. Add to that the time needed for 50 people to walk to and from the buses. Anyone who has ever attempted it knows it is impossible.

As the project moves forward, **I urge committee members to:**

- 1) Maintain, at a minimum, the current number of 61 slots for motorcoach parking;**
- 2) Keep the parking facility within the station complex as currently located;**
- 3) Reject plans to limit coaches to 30 minute parking; and**

**4) Eliminate the long-term storage of vans and recreational vehicles in the motorcoach parking area, thus freeing up more spaces for motorcoaches.**

Help keep the tourist economy strong by allowing hundreds of thousands of tourists time to experience the best that Union Station has to offer as the gateway to our nation's capital.

Kind regards,

**Christina Bauer**

Licensed Professional Tour Guide

*Education Co-chair, The Guild of Professional Tour Guides of Washington, DC  
Washington National Cathedral Certified*

**From:** Bill Harris  
**To:** [Union Station Expansion](#)  
**Cc:** [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [info@ncpc.gov](mailto:info@ncpc.gov); [planning@dc.gov](mailto:planning@dc.gov); [ddot@dc.gov](mailto:ddot@dc.gov)  
**Subject:** Union Station Bus Parking Proposal  
**Date:** Monday, September 28, 2020 3:02:18 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Bill Harris, a licensed, professional tour guide in Washington, DC. Over the course of the year I escort 12 or more tour groups in motor coaches to Union Station. In my opinion, what this proposal really says to groups who'd like to visit Washington, DC is DON'T COME. UNLESS YOU'RE ARRIVING VIA AMTRAK OR PUBLIC MOTOCOACH SERVICES, YOU ARE NOT WELCOME. WE REALLY DON'T WANT YOU HERE.

The proposal disregards the experiences of bringing groups to the station by motor coach. This is especially critical as the city and the tourism industry tries to rebound from the devastating effects of Covid-19's impacts. The proposal disregards the importance of the coach's ability to be able to park in the station. The proposal's impact disregards that tour groups hold to strict schedules and often include visitors, especially SENIOR CITIZENS with mobility issues. Guests frequently must return to the coach for needed items they have left behind, like medications or money, and coach operators have time for a much-needed break from driving as well. Also, itineraries usually allocate a one hour's stay at the station, which means that if coach drivers cannot park at Union Station, they will drive nearby streets until the designated pick-up time. Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk and fail to take into consideration the business of tourism, and its importance to the city. Drivers will have to use their precious electronic log time limitations while idly having to drive around. Drivers also need to have restroom and meal time breaks just as passengers do.

There are additional impacts to take into consideration that this proposal will cause including: increased city traffic especially at peak rush hour times, air quality as more busses have to circle the streets rather than being parked.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to please

consider:

- Maintaining, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
BillHarris

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**From:** Laura Moore  
**To:** [Union Station Expansion](#)  
**Cc:** [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [info@ncpc.gov](mailto:info@ncpc.gov); [planning@dc.gov](mailto:planning@dc.gov); [ddot@dc.gov](mailto:ddot@dc.gov); [bnadeau@dccouncil.us](mailto:bnadeau@dccouncil.us)  
**Subject:** Comment on Washington Union Station expansion project June 2020 DEIS  
**Date:** Monday, September 28, 2020 7:15:09 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Laura Moore, and I am a licensed, professional tour guide in Washington, DC. I have resided in the District since 2005 (Ward One). Over the course of the year I normally escort 30 or more tour groups in motor coaches to Union Station. After ten years as a DC tour guide, I have accompanied thousands of visitors around the District. Meal stops at Union Station are one of the most common activities of tour groups and Union Station is one of the only safe and realistically convenient locations where motor coach operators can park, eat, and shop for themselves, as well. Tour groups hold to strict schedules and coach operators need time for much-needed, and DOT-required, breaks from driving.

These motor coaches are usually part of multiple bus caravans, very likely bringing a group of two hundred or more - and their dollars - to the station at the same time. During the busy tourist season, a few thousand visitors may arrive at Union Station via motor coach at lunch or dinner time alone. The vast majority of the groups I have brought to, or met at, Union Station are school groups on very tight itineraries, shepherded by teachers and parent-chaperones that must keep their students together. They need a safe location for loading and unloading and an ability to move efficiently and as a group to the food court or restaurant.

Group tour itineraries usually allot one hour at Union Station, which means that if coach drivers cannot park there, they will have no choice but to drive around neighborhood streets until the designated pick-up time. *I am very concerned about the negative environmental impact that the proposed limitations on bus parking will have and the resulting increase in traffic in local Capitol Hill neighborhoods.* As a DC tax payer, I'm also concerned about the likely *loss of revenue* for Union Station vendors.

Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes will put neighborhood residents at risk and fails to take into consideration the business of tourism, and its importance to the District. FRA may have good reasons for limiting car parking at the station - I am not weighing in on that, and personally am rarely a car driver in the city myself. But the proposals for bus parking show a remarkable lack of understanding of the way tour groups use Union Station (and it seems how the intercity bus riders do, too), and in fact do not seem based on any studies or data or even the very projections for increased usage of the Station cited in the DEIS.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion

project. Motor coaches efficiently carry large numbers of visitors to and around our city; managed properly they can contribute to a reduction in local neighborhood traffic and bolster our tax revenue. All of the proposed plans in the DEIS will do the opposite - which is, frankly, baffling.

As the project moves forward, I cannot more strongly urge that you:

- Maintain, at a minimum, the current number of 61 slots for motor coach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the motor coach parking alternatives in the June 2020 DEIS.

Sincerely,  
Laura Moore

**From:** Maria Limarzi  
**To:** [Union Station Expansion](#)  
**Cc:** [Representative Eleanor Holmes Norton](#); [National Capital Planning Commission](#); [DC Office of Planning](#); [DC Department of Transportation](#)  
**Subject:** Comments on planned reduction of motorcoach facilities and access in the Union Station Redevelopment plan  
**Date:** Monday, September 28, 2020 8:34:47 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

I am Maria Limarzi, a native Washingtonian, a current resident of Montgomery County MD, and a licensed DC tour guide since 2010. I have had groups visit Union station for lunch, and to admire the beautiful, iconic building, for all of the 11 years I have been guiding and over the course of a year I escort 15 or more tour groups in motor coaches to Union Station. When reviewing the Union Station Redevelopment plan, I was quite frankly stupefied to learn that the reduction of motorcoach parking is seriously being considered as a viable option.

There are many reasons that reducing motorcoach parking makes no sense, and I'm confident you have received letters from colleagues with stories of tourists forgetting items on the coach and needing to go back for them, explaining the need to minimize walking distance and time between coaches and the station to accommodate guests with mobility issue, to ensure safety of young pedestrians, and so as not to wreak havoc with tight itineraries that are always in jeopardy from Washington's traffic delays, and finally pointing out the need for a safe place for drivers to take breaks with sufficient time for rest and meals.

While I agree with all of the previously stated reasons for not reducing motorcoach parking, to me the number one reason that this proposal is nonsensical is environmental! I am sure you are receiving approving messages about the plan from neighbors of the station who see this as a viable traffic and pollution reduction initiative for their area. However, limiting motorcoach parking spaces and requiring motorcoaches to leave the station after 30 minutes will not meet their traffic and pollution reduction goals, quite the opposite! Coaches forced to leave after 30 minutes have no option other than circling the station until they can re-enter to pick-up their groups when their allotted visit time is over, and as tourism returns to normal after the pandemic, and increases as we hope in the future, this will make traffic and air quality worse, not better! It also seems to me that insufficient consideration has been given to how these changes will affect station revenues. Reducing the time groups can stay at the station will have a serious, negative impact on the vendors and restaurants in the station as tourists will be rushed in and out without the time to spend their tourist dollars. Since these businesses pay rent to Union Station for the use of their sites it seems that maximizing, not reducing, the length of tourist visits would be better for their financial well being.

The DEIS' own forecasts predict a large future increase in tour bus use of Union Station, a major transportation hub in the District. Accommodation of large group travel and motorcoach access should be a linchpin to any expansion project! As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and



- Reject plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,  
Maria Limarzi

---

cc: Representative Eleanor Holmes Norton: [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov)  
National Capital Planning Commission: [info@ncpc.gov](mailto:info@ncpc.gov)  
DC Office of Planning: [planning@dc.gov](mailto:planning@dc.gov)  
DC Department of Transportation: [ddot@dc.gov](mailto:ddot@dc.gov)

**From:** Joe Steinbock  
**To:** [Union Station Expansion](#)  
**Cc:**  
**Subject:** Comment on the Union Station Draft Environmental Impact Statement  
**Date:** Monday, September 28, 2020 11:50:05 PM

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Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Mr. Valenstein and Expansion Project Committee Members:

I endorse the comments submitted August 3, 2020 on behalf of the Guild of Professional Tour Guides of Washington, DC by Guild President Jackie Frend, and Maribeth Oakes, Co-Chair of the Government and Tourism Committee. Their comments focus on weaknesses in the six alternatives presented in the Union Station DC Expansion Proposal and June 2020 Draft Environmental Impact Statement (DEIS). These weaknesses include

- slashing the number of motor coach parking slots;
- minimizing considerations of a safe passenger access pathway;
- limiting motor coach parking time to 30 minutes.

The Guild recommends

- retaining a minimum of the current 61 motor coach parking slots;
- retaining the bus parking facility within the station complex as presently located;
- not limiting motor coaches to a 30 minute parking time.

I am a past President of the Guild and a retired USDOT employee. I have been a licensed professional tour guide in Washington, DC for 15 years. Many of my clients bring student groups who use motor coaches for transport to and within Washington, DC. These visitors contribute significantly to the retail economy of Washington and Union Station itself. In a normal year, I personally accompany 20 or more motor coach groups to Union Station. Many first meet me and other guides at Union Station.

I would like to underscore a few points made by Jackie, Maribeth and other colleagues:

Safety of our visitors is paramount. Children and the elderly need a short, safe path to and through motorcoach parking.

Traffic considerations should be addressed both with respect to parking and motorcoach departures from Union Station. Alternatives that do not permit a Westbound exit on H Street will result in needless congestion, noise and air pollution in residential neighborhoods as the motorcoaches seek alternative ways to go West.

Reduced motor coach parking options will not result in a better quality of life for the residents of Washington, DC. Motor Coaches circling, seeking parking or simply killing time until they can pick-up a group do not represent a victory for anyone. It is my hope that there will in time be recognition of the need for a dedicated centrally located motorcoach parking facility in

Washington, DC. In the absence of such a facility the limited existing options must be treasured. One of these is Union Station.

Realistic comprehensive transportation planning can be difficult but it is very important that it be done well. Thanks to those practitioners who have brought their skills and heart to the job.

Thank you for your consideration,

Sincerely,

Joe Steinbock, Guild Certified Master Guide

Mary Beth:

Hi, I am for guiding today. While I probably agree with the idea for a walkable community, the truth is that in guiding most of the motor coaches that come to the Union Station, they are from out of town. They bring our visitors from other [inaudible 00:28:41] into the city and they need a place to park. [inaudible 00:28:47] percent of the city's budget [inaudible 00:28:50] and have to accommodate [inaudible 00:28:54] on top of that. If you don't have adequate parking for them, then you will have more [inaudible 00:29:03], you will have buses go into the neighborhood and circulating around the street, and street pollution. [inaudible 00:29:12] And so I think, while we're trying to create a sustainable walkable community, we have to remember how this works [inaudible 00:29:28] D.C. And so I encourage folks to consider having enough bus parking so that we don't have the buses on the streets and creating more of a nuisance to the [inaudible 00:29:44]. Thank you.

**From:** Ann Yelle  
**To:** [Union Station Expansion](#)  
**Cc:** [Portia.Boone@mail.house.gov](mailto:Portia.Boone@mail.house.gov); [info@ncpc.gov](mailto:info@ncpc.gov); [planning@dc.gov](mailto:planning@dc.gov); [planning@dc.gov](mailto:planning@dc.gov)  
**Subject:** Proposed June 2020 DEIS  
**Date:** Monday, September 21, 2020 1:02:55 PM  
**Attachments:** [image002.png](#)

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Office of Railroad Policy and Development USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Ann Yelle, president of Scholastica Travel Inc. Over the course of the year, we schedule an estimated 100 student groups, ranging from one to seven motorcoaches to Washington, D.C.

Most of our tour group itineraries include eating at Union Station due to the convenience of motorcoach parking. If the parking is taken away, we will need to start planning for many of our groups to eat elsewhere. Many of our student groups have a tight schedule due to confirmed tour times, so the parking makes it convenient, along with giving the drivers much-needed breaks from driving. Our itineraries usually allow an hour at the food court, which means that if the drivers cannot park at Union Station, they may take much longer to meet the group. Limiting the number of motorcoach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk and fails to take into consideration how important tourism is to the city.

Union Station is a major transportation hub, and the DEIS forecasts a large future increase in tour bus parking at Union Station. Accommodation of group travel and motorcoach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking.
- Keep the parking facility within the station complex as currently located.
- Reject plans to limit coaches to 30 minute parking.

Safety is our number one feature. A first step towards safe travel means ensuring that the motorcoach can secure an onsite parking space. School groups should not be walking through tunnels, under bridges, or taking long pathways to reach restaurants and retail establishments.

Examining all anticipated traffic growth is important to give a fair assessment of travel patterns. However, plan proposals that direct buses to exit east onto H Street, NE, where an eastbound turn from the bus station ensures that buses will be entering into local neighborhoods, seems to be in direct conflict with the plan's goals. A left-hand turn, westward, directs coach traffic to the larger thoroughfares of North Capitol Street or Massachusetts Avenue, avoiding the H Street and Capitol Hill neighborhoods and providing tour buses the most logical route to return to tourist areas like the National Mall and the monumental core of the city.

Large groups generate much needed revenue for food and retail establishments. Without adequate parking, tour groups may forgo eating and shopping at Union Station altogether, which would have a devastating impact on the vendors

who rent space in the station. With adequate coach parking, the traffic impact on the neighborhood could be minimized while maintaining this important revenue stream.

In Summary, forcing coaches into the streets every 30 minutes means:

- More traffic congestion
- Heightened pedestrian safety concerns
- Worse air quality caused by increased pollutant
- Additional street noise
- May limit retail spending

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,

Ann Yelle



*Celebrating 40 years in business in 2020*

Scholastica Travel Inc

601 South Main Street

Greensburg, PA 15601

Office Phone: 724-837-4600 ext. 110

Fax: 724-837-4664

Web: [www.scholasticatravel.com](http://www.scholasticatravel.com)

**Re: Comments on the Washington Union Station (WUS) Expansion Project  
Environmental Impact Statement.**

For over a decade NationsClassroom has been bringing groups to Union Station by motor coach and has relied on the coach's ability to park at the station. Our groups often have time constrained schedules allowing for 45 minutes to an hour to eat and shop at the station.

Allowing parking for motor coaches makes Union Station a desirable destination for a group. When there is a guest with mobility issues and/or a wheelchair, the location of the coach is fixed for that guest to return to. If a guest leaves medication or money on the coach they are able to retrieve it. And groups of 50 or more will not be waiting in the garage for their coach to be able to return and pick them up, creating a hazard in the garage area.

Motor coach operators are able to have a much-needed break from driving when allowed to park. If the bus is not allowed to park, they will have no choice but to circle the nearby streets until the designated pick-up time. Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes puts the coaches on neighborhood roads, making neighborhood residents at risk and fails to take into consideration the business of tourism, and its importance to the city.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motorcoach parking;
- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

With regards,

The NationsClassroom Team

**From:** Timothy Smith  
**To:** [Union Station Expansion](#)  
**Subject:** Expansion Project Draft Environmental Impact Statement (DEIS)  
**Date:** Friday, September 25, 2020 8:59:24 AM

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To whom it may concern,

It has come to my attention that there is a proposal to decrease the number of motorcoach parking spaces in the Union Station parking garage, including a 30 minute span to drop off groups. **I would like to formally declare our strong opposition to such measures.** Decreasing motorcoach parking spaces and limiting parking time to 30 minutes would have disastrous consequences for tour operators, student groups, traffic, and retail viability in Union Station, to name a few.

I represent a tour operator that brings thousands of students and teachers to Washington, D.C. every year. These class trips are often the highlight of a student's and teacher's year. They take months to plan and years of experience to deliver an excellent and safe itinerary. Each stop for activities, lunches and dinners is carefully vetted and planned so that our groups have the safest, most enjoyable tour possible while in the nation's capital.

Union Station is integral to our DC tour, always used as a lunch stop following visits to the Capitol, Library of Congress and Supreme Court, not to mention dinner stops at Uno's Pizzeria. Groups love the food court, the Grand Hall and the fact that they can eat lunch in the famous and historic "Temple of Transport." If motorcoach parking spaces were decreased and motorcoaches were given only 30 minutes to drop off groups, that would make severe traffic issues around that area, frustrating both tour operators and local drivers. Considering that potential traffic and without adequate motorcoach spacing, we would be forced to remove Union Station from many of our itineraries out of logistical concerns. This would be a loss to our groups, to be sure, but it would also be a severe financial loss to the retailers within Union Station.

Just one of our student groups of 50 passengers carrying \$10 per person would be at minimum \$500 spent at Union Station each time we visit, and often more. Overall, we send thousands of students to Union Station per year. And if you are not aware, there are hundreds of student group companies like us, many with more groups in DC than us. Losing motorcoach spacing may force us to take our business elsewhere which would be a create more financial hardship for retailers inside Union Station, especially after an already financially disastrous year (2020).

We kindly and respectfully ask the decision makers to reconsider the proposed decrease in motorcoach spaces and maintain - at minimum - the same number of spaces currently available. This will be better for traffic around the Union Station area and the financial health of Union Station vendors.

Thank you for your consideration,

Sincerely,

Timothy A. Smith on behalf of Global Travel Alliance





**Timothy Smith**

Lead Guide

[Global Travel Alliance](#)

**From:** Rob Teweles  
**To:** [Union Station Expansion](#)  
**Subject:** WorldStrides comments on Draft Environmental Impact Statement regarding Bus Deck  
**Date:** Thursday, September 24, 2020 2:19:58 PM

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Dear National Capital Planning Commission,

My name is Rob Teweles and I am Sr. Director of Domestic Coaching at WorldStrides, the world's leading educational travel company. In business for 52 years, WorldStrides moves over 500,000 people around the globe each year and we bring around 120,00 students from all over the US to the Washington, D. C. area during a typical tour season (Feb – June). Obviously, 2020 was not a typical tour season due to COVID-19, but at some point our business will pick up again. We are fully accredited and are technically the world's largest school. Although we are not brick and mortar, students can take an on-line course after their trip and receive school credit, and teachers can earn accreditation points. You can learn more about WorldStrides at our website, <https://worldstrides.com/>

Having been involved in the motorcoach aspect of WorldStrides' operation for 27 years, I wanted to share with The National Capital Planning Commission and affiliated entities how important motorcoaches are to our students and in turn, the Union Station Bus Deck. First of all, we could not bring students to Washington without motorcoaches. About 60% of our groups fly from another part of the country and get off the airplane and onto a locally booked motorcoach. My team works with over 50 coach companies in the DC, VA and MD areas to accommodate these groups. The other 40% come "Over the Road" on a coach from their hometown to DC, tour on that coach, and then return home on the same coach/s. We work with over 200 additional OTR coach companies east of the Mississippi to accommodate these groups.

Unfortunately, there is not yet enough public transportation in the District to run our tours without a dedicated motorcoach. Most of the sites our groups see require an appointment, such as The Capital Tour, The Spy Museum, Ford's Theatre, Mt. Vernon, meetings with their congressman or senator etc. Our groups range in size from one coach up to seven or eight coaches. As you can imagine, it is very difficult to arrange timed entry tours for sometimes hundreds of students and allow time to get around town using only the Metro or other forms of public transportation. It would not be uncommon for a group to finish at Arlington National Cemetery at 11:00am for example, and then have a meeting with their senator at 11:15am. This would be conceivable for an individual or family on the Metro or Circulator bus, but not for a group of 200+ children. In New York City for example, we do not use the motorcoach for touring. The D.C. area coach drops the group in NYC and is dismissed. We of course do use the D.C. Metro where and when we can and all of our groups will use WAMATA at least once, but our tours are too packed to work without the use of a dedicated, chartered motorcoach. In addition, some of the sites our groups visit and hotels we use are not Metro accessible.

The motorcoach is also a safe haven for our groups while touring in DC. All of our groups travel with various crucial paperwork, such as emergency medical forms, meal tickets etc. and these are typically kept on the coach. Many groups also travel with one or more coolers for various medications which are kept on the coach. Of course, the group's luggage can be kept on the coach

the entire day for the first and last days of touring. If God forbid there was a catastrophic event in the District, our Emergency Evacuation Plans always ask the group to return to the coach so we can account for everyone and keep them together and hopefully evacuate the area. The coach is also an important shelter from rain, snow, cold, or heat and other extreme weather conditions.

Having expressed the importance of the motorcoach to our customers, the Union Station Bus Deck and easy access to Union Station is just as important. Most of our D. C. groups visit Union Station at least once. We have some groups that use Amtrack to get to and from Washington. We have groups that fly into and/or out of National Airport and then metro to or from Union Station. Almost all of our groups visit Union Station and most of those eat a meal there, bringing considerable revenue to the food court and other standalone restaurants. Our groups also tour Union Station, learning of its historical significance from their licensed Course Leader (guide) along with having time to shop.

Unlike cars, motorcoaches are not taking up one space for two or three travelers who are away for several days. We are either dropping 50 people and not parking at all, or at the most parking for an hour or so. By giving coaches close and convenient access to Union Station, you are getting more bang for your buck for each square foot of space. Over the past decade, the District has unfortunately removed much of the safe and convenient coach parking near the historically rich National Mall (Ohio Drive on East Potomac Park for example). Union Station is one of the last strategically located places that works with motorcoach drivers to safely get their passengers into and out of not only a site, but an extremely important multimodal hub of all forms of transportation.

Our society is moving away from individual cars being the main form of transportation in urban hubs. It should be every metropolitan area's goal to get travelers out of cars, and onto Metrorails, motorcoaches and other more environmentally friendly forms of transportation. Keep in mind that one motorcoach takes around 30 cars off the roads and EPA restrictions on coaches are very strict, such as the "regen" process that incinerates pollutants, so they are not released into the environment.

After reviewing parts of the proposal, I strongly hope an option will be chosen that keeps as many motorcoach parking spots and drop off slips as close to Union Station as possible. It is important for our students to have easy access to the food court, Amtrack gates and all that Union Station has to offer.

If I can be of further assistance, please do not hesitate to email me back or call me directly at (434) 982-8760.

Thank you for keeping my comments and the best interests of hundreds of thousands of our nation's middle schoolers in mind in the decision-making process regarding the Union Station expansion project.

Sincerely,  
Rob Teweles

**Rob Teweles**

Sr. Director of Domestic Coaching

**WorldStrides**

worldstrides.com

*WorldStrides is the approved domestic educational travel provider of the Smithsonian*

**From:** Edmund Hull  
**To:** [Union Station Expansion](#)  
**Subject:** EIS -- kudos on access  
**Date:** Friday, June 12, 2020 11:57:23 AM

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Strongly support enhanced access to Station from surrounding neighborhood. In so doing, you are avoiding mistake of mammoth Convention Center dropped in the middle of Shaw with minimal integration. Please protect this aspect of the design.

**From:** Bryan M  
**To:** [Union Station Expansion](#)  
**Subject:** Comments on environmental impact union station  
**Date:** Friday, June 26, 2020 6:20:59 PM

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As a resident on 2nd st adjacent to the tracks and a frequent visitor to the station, I am very in favor of renovating these spaces as long as they are made more accessible to residents walking biking and visiting the area. I imagine a station that allows an Amtrak visitor to wander outside the station and find a welcoming green space not clogged by buses or cars leaving and entering the station. Where a visitor could easily walk to a restaurant on h st. Also where residents of the surrounding neighborhoods can easily use the station and surrounding Outside areas with easy access from multiple locations. Perhaps on k st a passerby could easily find an entrance to a pavilion that leads to open spaces walkable or bikable to union station. As a resident I find it aggravating to walk all the way up 2nd st and to the front of the station to enter. Why not allow multiple access points from different sections of 2nd and first St above north of the tracks on green space with room for cafes or low rise buildings keeping more of a park feel.

Overall I think traffic flow will need to be addressed. Allowing for traffic to Move whilst dropPing individuals off without ruining the overall aestic of a park like calming space. To do this, Perhaps having underground parking and traffic flows could resolve this as well as Moving Platforms like those at airports to allow for multiple drop off and pick up locations dispersing traffic congestion to maybe k st, Noma metro, north Capitol st and other locations so travelers and the Neighborhood don't bear the brunt oF increased congestion.

I have specific comments on appendix A3b. For south of h st green space opportunity, I like the hyper pavilion or kings cross. It allows a transition to building and business to green space and helps break Up the urban spaces. For Columbus circle I like the idea of making it totally green similar to the 1906 rendering. And moving the traffic that drops of people underground and making the front entrance move Seamlessly to a park/ pavilion allowing for performances similar to the sculpture garden but more open w/o fencing. For north of h, Allen mulls Picture would allow for A great green space but also the opportunity for some buildings To exist similar to the warf. the Height restriction on the buildings Would allow for an intriguing area different from other parts of the surrounding noma. Perhaps giving one building more of a sculptural aspect. Keepin\* the buildings shorter also keeps the view from union station to the Capitol as the designers intended.

I think all of these green space opportunities should be implemented with some building/ business inclusion. But noma itself is becom8ng a built up city with few green spaces. This would give the entire neighborhood a place to congregate increasing community. These benefits are difficult to quantify but must be worth more including the health benefits to the surrounding areas for a calming green spaces with less traffic and air pollution.

Thank you  
Anonymous noma resident

**From:** See Baker  
**To:** [Union Station Expansion](#)  
**Subject:** Union Station Expansion  
**Date:** Monday, July 6, 2020 7:15:22 PM

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1. Please make H Street flat again. Take out that ridiculous hill.
2. Put the H street tunnel back in place. 60+years ago there was a fishmarket in one of those tunnels. Do your homework. Put the market back.
3. Extend the street car so it goes inside the building.

Speaker 1:

The DEIS for Union Station proposes an expansion plan that'll cost between 5.8 and \$7.5 billion and require 11 to 14 years to build. It will not be able to meet the required projected rail operations when it's finished. In fact, as the next paragraph explains, if it could be completed by 2030, it might meet capacity requirements for rail operators, but only at that time.

Amtrak's July 25, 2012 Rail Union Station Master Plan called for eight east side run-through tracks and 12 west side subtracks. The run-through tracks, which travel under the station through the First Street Tunnel to points south, would have to be reconstructed and two new run-through tracks added. It was estimated that by 2030, these tracks would be at capacity and it would be necessary to increase the capacity by adding six or nine new, additional below grade tracks that would serve rail operations for Union Station. As to how these would connect with the northeast corridor, it is proposed in the 2012 master plan that the tracks would go through a tunnel and merge somewhere in the vicinity of Anacostia River after traveling underground in the tunnel throughout northeast DC.

But the DEIS does not even consider that option for expansion beyond 2030. As a matter of fact, they say that this is a 2040 rail plan. In fact, it's a 2040 plan in terms of pedestrian-pedestrian access passengers, but when you go and look for the actual amount of trains that will come through, there, they say that they are designing it for 2030 plus. That is, 2030 and the decade thereafter, and they acknowledge, in that appendix, that by 2040 there will be a greatly increased number of trains that would like to be able to use Union Station, but there is no provision for how to accommodate those trains after what is called 2030 plus. When we look at the number of trains that we're talking about, there are 2030 plus says that there will be 360 daily train trips, although FRA is currently projecting 630 daily trips by 2040. That is, the plan provides for 360 daily trips, FRA is projecting 630 by 2040.

Another concern is the fact that the DEIS concludes that high speed rail requires 1200 foot platforms to accommodate future Acela high speed rail service, but those tracks are only provided in the upper ...



My name is Jay Adams, and I am speaking as a personal representative, as a neighbor to this area. We have been working on this issue at least since the public meeting number one in December, 2015. I do not believe we're any closer than we were at that time. My scorecard indicates that on the federal level, we have Congresswoman Norton, who has serious criticisms of this. From DC government, we have Chair Mendelson and Council Member Allen and possibly others. From DC government, we have the Office of Planning, Andrew Trueblood, and the head of DDOT, Jeff Marootian has voiced major criticisms. We have the ANC 6C, who has voiced concerns. We have grave concerns voiced by the Capitol Hill Restoration Society, as well as the National Capitol Planning Commission. And then also, we have concerns raised by the Committee of 100.

I don't know how we have gotten this far with so little. In the past, in other projects, we've had charrettes where all stakeholders have voiced ideas and have come in with open minds and open ideas and we have reached resolution. I am concerned that we are spiraling out of control. Or in terms of FRA, this train has gone off the track, and I don't know how to recover it. I want to get consensus [crosstalk 00:08:41] to get resolution.

Karen:

I don't have a prepared statement. I am a neighbor that lives on 3rd Street between G and H. I've lived here since 1992 and lived through, with my family, all of the construction that's gone on around us since about the year 2000. One of the things that when the NoMa was created that I was concerned about is that there were plans for lots of residents, and no plans for a police station, a library, green space and parks, and other amenities that communities throughout DC have that we don't seem to have here in NoMa. Also, I'm concerned about the traffic and traffic flow during the construction, as well as increased construction trucks and large deliveries of equipment and supplies that are disruptive to neighbors that live nearby. I'm also just concerned about the inability of being able to use the bridge during construction and what that will mean for traffic congestion in the neighborhood.

I'm very happy to share the space that I bought in 1992 with others, but all of this encroaching development on neighborhoods that have been here for all 130 years now is a lot and it's very tiring, particularly when developers do not let the neighbors know what's going on or take their input seriously. That's something that happened with the Senate Square building behind us, where the height was increased and increased and increased. And we had no say in the end because the measurement changed from 2nd Street to the bridge in terms of how high it could go. So I've always felt that a fast one was pulled on the residents that live right here and share. I'm very sorry for not having something more cogent, because I only found out about the meeting at 6:15. But thank you very much for the opportunity to comment.

Valerie:

Hey, thanks for holding this. I don't know what kind of commentary you're getting from the public right now, but I am a member of the public in DC. I have lived here almost 30 years in the neighborhood of Capitol Hill, which is adjacent to Union Station. I wanted just to mention something that others may have mentioned already and you may be very well aware of. As a resident here, my experience with Union Station is multifactorial. I use it for Amtrak as well as for shops, as well as for the Metro. So for me, Union Station is a hub of my neighborhood and city. But I can tell you that, over the time that I've lived in DC, the stewardship of this landmark building and of the functions that it serves has been very poor, and it's not merely through the access to Amtrak, which is in the back of the building. It's often crowded and difficult to navigate, but it's also, with regard to how the building itself, the beautiful landmark [inaudible 00:54:29] building itself, is taken care of.

So when my representative, my local DC representative, made it clear that the FRA was seeking feedback on the air rights and possibly expanding it, I don't really know how to put this, but if we can't even, for three decades, really take care of this very well, I don't know how you expect to expand and build upon the air rights. I appreciate that you're making that effort to pay attention to this, but at the same time, I really worry about what is being prioritized. I wanted just to make that clear. I get that you want to make use of the space that's there as much as possible, but honestly, it could be so much more than it is and that was true 30 some years ago. Honestly, you don't need to-... I just hope that you really focused on what's there currently, and also be aware of the effect of any development on the neighborhood around it, because those are the people who are using it. Thank you.

**From:** Brenda Tidwell, CTIS  
**To:** [Union Station Expansion](#)  
**Subject:** Expansion  
**Date:** Tuesday, September 15, 2020 2:42:13 PM

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Please expand parking at Union Station.  
Brenda

Brenda Tidwell  
Leisure Time

ltbus.com

**From:** Jay Melrose  
**To:** [Union Station Expansion](#)  
**Subject:** Washington Union Station  
**Date:** Friday, September 25, 2020 10:19:57 AM

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As the number of passenger trains increases, it seems only logical that spaces which were given over to retail within the historic Union Station building (i.e. the main waiting room, the ticketing hall and the immense train concourse) be restored to their intended uses. A restoration of these areas would be a significant improvement to Union Station.

Jay N. Melrose

**From:** Katie Kolodzie  
**To:** [Union Station Expansion](#)  
**Subject:** Comments on the Proposed Union Station Expansion plans  
**Date:** Saturday, September 26, 2020 11:53:04 AM

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Hello,

I would like to submit the following comments regarding the Washington Union Station expansion plan.

I am currently a commuter who takes the MARC every morning from DC to Baltimore, and back to DC in the evening. The current experience of MARC commuters is often frustrating due to the design of the train concourses, and I was pleased to see that Alternative A-C attempts to improve our experience. I wanted to highlight specific things, in the hope that the design of the expansion improves the following:

Pedestrian access to/from the train concourse, and metro entrance up to the MARC and Amtrak platforms is very frustrating. If you are exiting the trains, there is no way to avoid crossing the stream of people coming up from the metro entrance attempting to board departing trains, even when commuters are walking EXACTLY where directed to. This frequently leads to near-collisions as people run to catch their trains. Expanded hallways and more direct/sensible paths to and from the trains would help this. Within option A-C, please examine the pedestrian flow from the concourse and metro entrance to make sure streams of running commuters won't run directly into each other.

Upon exiting the MARK/Amtrak trains at Union station, you have to walk far out of your way to the right, past several doors to get to the primary pedestrian exit at the front of the building. This creates substantial confusion among visitors to the capitol, and is frustrating for commuters. Within option A-C, ensuring that commuters have a direct and efficient path from Union Station's main entrance to the Amtrak and MARC trains would really help the day-to-day experience of people who use the station.

Finally, and this may be outside the current scope of the project, but I really miss the circular bar in the concourse of the station. I was told it was removed due to historical accuracy issues, but this seemed to be slavishly placating the ghosts of the past at the expense of people who actually use the station each day in the present. Being able to grab a bite to eat in the grand hall of the station after a long day, and have a sit down restaurant experience in that space, was excellent. If it's possible, I'd like to encourage the possibility of a small, sit down restaurant in that space.

Thank you for the opportunity to provide commentary on the Union Station Expansion project. I look forward to seeing how it develops!

-Katie K

**From:** Peter Carlson  
**To:** [Union Station Expansion](#)  
**Cc:** [Peter Carlson](#)  
**Subject:** Comments on Union Station Proposal  
**Date:** Monday, September 28, 2020 10:20:18 AM

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I have only recently become aware of this effort. I've done a cursory review of the material provided electronically and seen and read some of the comments already provided.

I have lived and worked in Washington DC since 1975 and have traveled extensively by train up and down the North East Corridor during that time. I have also grown up with the interplay of the DC Metro system in relation to the Union Station area and partaken of the restaurants and shops in the station.

I also have a son who is physically disabled. One of the failures of the Metro system we have encountered is there is only one elevator down to the Metro tracks. And a few years ago I looked at the service data for that elevator and found that it was out of service 7% of the time. One of the issues that could be corrected by this effort is adding a second elevator down to those tracks and maybe a ramp down to the Amtrak and MARC trains.

Connected with this would be the addition of better lighting in the entrance/exit areas and visual boards or touch navigation boards for those here and from other countries that help navigate the station for those unfamiliar with where they need to go and get on the right train or to exit and pick up new external transportation under your redevelopment. Whether it is in/on the floors or signage above that is a decision for those better equipped on the issue of moving people through a crowded system, especially during holiday and major events. The disabled and the elderly and foreign visitors often seem to be a last thought. Kiosks at all the entrances with "knowledgeable visitor ambassadors" available for Q&A could help with that issue as well as eyes out for any criminal activity.

I would add in this regard that I have watched the Rick Steve's Travel Shows on PBS and seen the creativity of many European countries in this regard.

I understand the need for commercial space for part of a revenue generator for the effort. But like everywhere, e-commerce seems to be the new preferred shopping experience. Maybe some additional rethinking on that aspect of the plans can occur. And I often think people don't realize the food areas down in the bottom of the station. This gets back to the issue of "what else is here and how do I get to it issue.

Lastly, what have been the lessons learned by the industry in this new pandemic era for keeping travelers and workers safe and air movement in and out of such areas?

I have seen the renderings of the designers and makes me think (unless I missed something) what has been done with the idea of parks and gardens on top of the station instead of out into the neighborhood?

Thanks for the opportunity to catchup on this important effort and provide some thoughts on the plans. Just remember to keep the ADA community in with your thinking and planning.

Peter Carlson

Sent from [Mail](#) for Windows 10



**From:** Changing Grid  
**To:** [Union Station Expansion](#)  
**Subject:** Washington Union Station Expansion Project  
**Date:** Monday, September 28, 2020 1:16:45 PM

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Dear Mr. David Valenstein,

As a local resident in DC, I appreciate the opportunity to participate in the ongoing National Environmental Protection Act (NEPA) process for the Washington Union Station Expansion Project for which the Federal Railroad Administration (FRA) is the Lead Agency. I am supportive of the reduction in parking spaces from the existing parking garage's 2,450 spaces and the 2040 estimated peak parking demand of 2,730 spaces to the proposed 1,600 parking spaces. If parking were to be reduced further, as detailed in the Draft Environmental Impact Statement (DEIS), an increase in air pollution hotspots due to the shift to private or for-hire pickup and drop-off would occur, exasperating localized air pollution. For this reason, I recommend the following comments be incorporated into the expansion design for the above grade parking garage in Alternative A-C:

1. Time of use rates for parking spaces similar to the Demand-Based Parking Pricing in Penn Quarter/Chinatown (see <https://ddot.dc.gov/page/demand-based-parking-pricing-penn-quarterchinatown>);
2. Prioritization of areas in the parking garage for compact vehicle parking;
3. Offer electric vehicle charging stations in excess of expected demand in order to minimize the future cost of electric vehicle charging station increased capacity;

Further, I have the following comments regarding the expansion project:

I support spoil removal by work train where two 20-gondola work trains per day would haul the same amount of spoil as 120 trucks. This change would limit daily truck traffic to 10–20 delivery trips per day, therefore reducing air pollution. I support the work trains scheduled in a manner that does not interfere or conflict with Amtrak, VRE, or MARC operations.

Separate air quality permitting processes will be required to take place prior to construction initiation on any installation of fuel-burning equipment (such as boilers) with heat input ratings greater than 5 MMBTU/hour, stationary generators (any size), or other stationary air pollutant emitting equipment. The applicant must obtain a permit before construction, installation, or operation of any generator and/or any other pollutant-emitting equipment subject to air quality permitting regulations begins. The applicant may contact AQD at (202) 535-1747 with any questions about this permitting process.

If any crushing or screening is to occur at the site, such as needed to crush concrete being removed from the site, an air quality permit must be obtained for such operations.

An air quality permit must be obtained if a small concrete batch plant is installed in

the West Rail Yard. The Project Proponent would likely require a Chapter 2 pre-construction review permit prior to commencement of construction rather than a Source Category Permit 7123-SC to Construct and Operate Temporary Portable Concrete Plants, due to the length of time (11 years, 5 months) of the project construction.

20 DCMR § 800, Control of Asbestos, must be followed during razing, demolition, or renovation of any existing structures at the site. It is likely these requirements are specifically applicable to the existing buildings at the site. The applicant may contact AQD at (202) 535-2998 with questions about asbestos abatement permitting or raze requirements as they relate to asbestos.

If any soil vapor extraction or groundwater remediation is required at the site, the applicant must comply with the requirements of 20 DCMR § 717, Soil and Groundwater Remediation.

Fugitive dust must be controlled by methods ensuring compliance with 20 DCMR § 605, Control of Fugitive Dust.

Odors and other nuisance pollutants must be controlled to ensure compliance with 20 DCMR § 903.

Engine idling for both on-road vehicles (gasoline or diesel) and nonroad diesel vehicles and engines must be limited so as to comply with 20 DCMR § 900. I recommend posting signs, like the signs that currently exist in the existing bus slips, in the proposed 40 bus slips to provide awareness about engine idling in the District and to help comply with the engine idling requirements in 20 DCMR § 900.

Thank you very much for the opportunity to comment.

Thomas Olmstead

*Rohulamin Quander, Esq.  
QuanderQuality DC Tours  
1703 Lawrence Street, N.E.  
Washington, D.C. 20018  
202-487-9922 - c  
E mail: [quanderquality@gmail.com](mailto:quanderquality@gmail.com)*

September 23, 2020

Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

My name is Rohulamin Quander, a licensed, professional tour guide in Washington, DC. I am a native Washingtonian and I currently live in Ward Five, Brookland. The issues related to the redevelopment plan for Union Station are very relevant to me. Over the course of the year I escort 10 or more tour groups in motor coaches to Union Station. As a licensed tour guide, and certified by the Guild of Professional Tour Guides of Washington, DC, my experience in bringing groups to the station by motor coach has made me recognize the importance of the coach's ability to be able to park in the station. Once I learned of the proposal options to redevelop the Union Station site, my immediate inquiry concerned how tour groups and their mode of transportation would be accommodated.

Tour groups hold to strict schedules and often include visitors with mobility issues. Guests frequently must return to the coach for needed items they have left behind, like medications or money. Further, coach operators must have time for a much-needed break from driving as well, which directed breaks are sometimes within the federal mandates for coach operators. Also, itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park at Union Station, they will continuously have to drive through nearby streets, clogging traffic, until the designated pick-up time. Limiting the number of motor coach parking slots and moving coaches out of the station every 30 minutes put neighborhood residents at risk and fail to take into consideration the business of tourism, and its importance to the city.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in tour bus use of Union Station. Accommodation of large group travel and motor coach access should be paramount to any expansion project. As the project moves forward, I urge committee members to:

- Maintain, at a minimum, the current number of 61 slots for motor coach parking;

- Keep the parking facility within the station complex as currently located; and
- Reject plans to limit coaches to 30 minute parking.

Thank you for giving consideration to my comments with regard to this matter. and the opportunity to present my concerns for the coach parking alternatives in the June 2020 DEIS.

  
Sincerely,

Rohulamin Quander, [rquander@aol.com](mailto:rquander@aol.com)

Anthony Spadafora  
929 Potomac Avenue SE  
Washington, DC 20003  
21 September 2020  
tonyspad3@gmail.com

Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Project Committee Members,

I am a licensed, professional tour guide in Washington, DC, and have have resided in the District since 2007. Over the course of the year I escort 50 or more tour groups in motor coaches. As a professional Tour Guide and Director, I create what is, for young Americans, a pilgrimage : honoring their history and learning what being an American means. Washington, unlike other cities, does not belong solely to its inhabitants. it contains spaces sacred to the American Spirit, and is thus a Federal city. Visitors come here by right.

Bringing groups to the station has made me recognize the importance of the coach's ability to be able to park in the station. Itineraries usually allot an hour stay at the station, which means that if coach drivers cannot park, they must and will drive nearby streets until the designated pick-up time.

Coach operators need time for a much-needed break from driving. For city residents, this break both reduces local congestion and decreases the risks caused by exhausted drivers.

Tour groups often include visitors with mobility issues. One recent visit involved a high-school band leader who could not walk, and was hampered by the bus's inability to park, for example.

Union Station is a major transportation hub and the DEIS forecasts a large future increase in bus use of Union Station. Accommodation of large group travel is in accordance with the Union Station Redevelopment Act of 1981 (Public Law 97-125), which directed the Secretary of Transportation to "provide for the rehabilitation and redevelopment of the Union Station complex primarily as a multiple-use transportation terminal serving the Nation's Capital." Let me ask the committee to comply with the letter and spirit of this law by:

- Maintaining, at a minimum, the current number of 61 slots for motorcoach parking;
- Keeping the parking facility within the station complex as currently located; and
- Rejecting plans to limit coaches to 30 minute parking.

Thank you for the opportunity to present my concern for the coach parking alternatives in the June 2020 DEIS.

Sincerely,



Anthony Spadafora



September 28, 2020

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, S  
Washington, DC 20590

Re: Public Comment to the Washington Union Station Draft Environmental Impact Statement (DEIS)

Dear Mr. Valenstein:

As a regular customer of Union Station from multiple facets and who frequently meets guests at Union Station or takes them there as part of their private tour experiences of our city and region, I'm excited for and supportive of the expansion and improvements of Union Station. I'm excited for improved user experiences for long distance and commuter rail users, long distance and local bus riders, and for Metro users. And as a bicyclist and pedestrian I feel strongly that your plans fall far short of meeting the safety needs and the potential for an optimized multimodal hub worthy of the nation's capital city and one of the greatest cities in the world. This is an exciting opportunity and the most important time to focus on creating the best transit epicenter that includes optimized access and experiences for bicyclists and pedestrians as these first / last mile connections are what will decide if this new and improved Union Station is an expensive waste of resources on inefficient and past transportation practices or a success that weaves itself into the fabric of a vibrant city and region.

As a businessperson, I respect the planners and advocates who have made great strides over the past few decades to transform Washington DC and the region into a more vibrant community that supports active transportation and enhanced intermodal opportunities. As a member of the Capital Trails Coalition, I strongly endorse their specific recommendations. From my business perspective, the simple points, highlights and recommendations I strongly urge you to include in your plans include:

- Focus on street level enhancements for walking 1<sup>st</sup> and biking 2<sup>nd</sup> to make Union Station an inviting and safe destination / intermodal connection.
- Integrate bicycle access and parking INTO the primary entrances of Union Station. I've experienced firsthand in the Netherlands, Denmark and Japan where easily accessible, inviting, sheltered, and secure bicycle parking are integrated into the stations design with parking for thousands or tens of thousands of bicycles.
- Incorporate bikeshare at multiple access points and utilize this expansion to help create Union Station as a true hub for bikeshare.
- Create a safe space for pick-up and drop-off underground – separate from pedestrian and bicyclists on the surface for safety and aesthetic reasons.

- Weave the completion of the Metropolitan Branch Trail as a key connection and component to your plans.
- Improve East-West connections for bicyclists and walkers to reconnect neighborhoods and the community who have faced significant barriers from the track and rail yards. As a neighbor a few miles up the tracks, many of my trips are made painfully more circuitous, dangerous or thwarted all together due to the lack of these connections in the community.
- Don't waste so many resources and space and create such inefficiencies by focusing on so much car parking and excessive bus bays.

I realize the Bike Station at Union Station is not as successful as we all would have liked, but it is largely because it was a retrofit, an add-on and ensnarled with the social challenges of a significant homeless community in this vicinity. I know the business owner who finally abandoned his contract and left the space and others who desperately wanted to make it work but ultimately realized that it not integrated well enough to be successful. Your planning for the expansion of Union Station is THE opportunity to learn from the mistakes of not including bicycling as a significant and vital opportunity to increase efficiency and usage. In many other countries, bicycling accounts for over 40% of connections to and from transit hubs.

As DC continues to become more bicycle friendly, Union Station would be well served and more successful to incorporate bicycling and bicyclists as one of the priority audiences / customers to incentivize. From what I can see, the plans for the expansion of Union Station are failing badly to include much less prioritize bicycling. I hope you take advantage of the significant opportunities these suggested improvements would make. I know myself, the many members of the Capital Trails Coalition, and an even larger community of planners, businesses, organizations, and community groups would be excited to work with and support this important project.

Sincerely,



Jeffrey Miller, Owner

Cc: The Honorable Eleanor Holmes Norton  
Mayor Muriel Bowser  
Chairman Phil Mendelson  
Councilmember Charles Allen  
Andrew Trueblood, OP  
Jeff Marootian, DDOT  
C. Andrew Lewis, SHPO  
Johnette Davies, Amtrak  
Marcel Acosta, NCPC  
Beverley Swaim-Staley, USRC



**From:** Harvey Botzman  
**To:** [Union Station Expansion](#)  
**Cc:** [Snow, Saara](#); [Burnley, Champe](#); [Bill Nesper](#)  
**Subject:** Washington DC Union Station & Bicycle facilities  
**Date:** Monday, September 28, 2020 3:44:29 PM

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1. Now that almost every train, the exception being Acela trains, using Washington DC Union Station has bicycle racks for the carriage of unboxed bicycles a secure & weather protected bicycle parking facility shall be installed at this Station.
2. Any stairs interior & exterior to this Station shall have a ramp on which a bicyclist will be able to roll rather than carry their bicycle to another level of the station or the exterior of the Station.
3. The architects, engineers, and construction general contractors & others shall consult with and implement ideas for the inclusion of bicycle facilities in the reconstruction of the Washington DC Union Station from the Amtrak/Adventure Cycling Association Bicycle Task Force, WABA (Washington Area Bicycling Association), LAB (League of American Bicyclists), and other bicycling organizations/individuals.



**From:** Schwartz, Matthew [USA]  
**To:** [Union Station Expansion](#)  
**Subject:** Washington Union Station Expansion Project  
**Date:** Monday, September 28, 2020 7:59:45 PM

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Hi Mr. David Valenstein,

I am a resident of Washington and frequent Amtrak traveler to my hometown in Norfolk, VA. I strongly agree with Akridge's Burnham Place development philosophies. The Union Station redevelopment must integrate into the neighbor, promote clean transportation, and discourage parking at the station. Union Station is highly connected through public transportation options like Metro Rail, Metro Bus, ride share services, taxis, and is within biking/walking distance of thousands of residents. I have never parked at the station and I never plan too.

The 'new' Union Station must be a destination for both DC residents and travelers. Union Station is the gives millions of visitors their first impressions of the United States Capital and it must be treated as such. It should be a model train station for Americans and people around the world. This is a once in a century development and the decisions made now will affect residents and visitors far in the future.

Thank you for listening,  
Matt

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Matthew Schwartz  
Staff Scientist  
Global Defense Group

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Booz | Allen | Hamilton  
[BoozAllen.com](http://BoozAllen.com)



**Robert J. Flanagan**  
President

September 21, 2020

Mr. David Valenstein  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration (MS-20 RPD-10)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: Public Comment to the Washington Union Station Draft Environmental Impact Statement

Dear Mr. Valenstein:

The expansion of Union Station represents the single greatest economic development and transportation opportunity for the District of Columbia and the region as a whole. An opportunity of this magnitude requires a bold vision, modern and innovative thinking, and dedication to the highest and best standards of planning and design. Finally, and importantly, projects of this scope need the full support of key stakeholders in order to garner the political and financial underpinning required to make the project a reality.

This project does not currently have that support. The National Capital Planning Commission (NCPC) NCPC, an approving body for this project, has indicated that the project outlined in the DEIS would not be approved and that significant changes are needed in order for the project to move successfully forward. To ensure that all key stakeholders are actively supporting this project, and to ensure its ultimate success, we strongly encourage that the Final EIS address the following issues:

- **Revise the parking program to align with recommendations from the DC Office of Planning and NCPC**

There appears to be no project proponent or project stakeholder other than FRA that supports the number of parking spaces included in the Draft EIS. We encourage FRA to lower the number of parking spaces included in the Final EIS so that it falls in line with the 295-space maximum recommended by the DC Office of Planning and National Capital Planning Commission (NCPC).

- **Provide space for dedicated, centralized Pick-Up Drop-Off (PUDO) Facilities, and locate parking and PUDO facilities below-grade**

Pick-up and drop-off demand at Washington Union Station already represents an operational challenge, and is likely to increase in the coming years.

We appreciate that the FRA has attempted to address the popularity and impact of PUDO demand at Union Station. However, the approach proposed by FRA does not provide a workable solution. Even at current demand, the proposed solution would increase congestion around the station, cause traffic spillover into adjacent neighborhoods, and increase conflicts at key access points like intercity bus ramps and bike lanes.

To fully acknowledge and manage the impacts of the fast and growing popularity of Transportation Network Companies (TNCs) trips to and from Union Station, Clark Enterprises, Inc. encourages the FRA to allow for a centralized, below-grade facility. This kind of modern PUDO solution, similar to those that have been implemented at airports and transportation centers throughout the country, will enhance traveler experience and address the critical issues of congestion and conflicts with other modes accessing the station that are not adequately addressed in the DEIS.

A centralized PUDO area will maximize the efficiency of TNCs by reducing idling and VMT, creating new access points to the station, and enhancing the customer experience by creating greater platform access and reduced distance to PUDO areas. Importantly, the creation of below-grade PUDO facilities located close to the rail concourse will enhance the passenger experience and unlock key urban design opportunities – creating more civic space, and allowing for the realization of a vibrant and efficient station setting.

- **Create a more efficient bus facility that treats intercity bus riders with dignity and realizes the opportunity for enhanced multimodal service**

The Draft EIS proposes 40 slips for intercity and bus facility, which far exceeds the amount FRA concluded in the DEIS would be adequate to meet future demand. As proposed, the oversized facility is an inefficient and potentially harmful recommendation for the future of both the intercity bus rider experience, and the urban design and multimodal opportunities the project presents. Similar to PUDO, we encourage FRA to embrace modern best practices in establishing operating efficiencies to ensure thoughtful utilization of facilities.

Right-sizing the bus facility and adopting a design that optimizes operations will ensure the success of intercity bus travel, an essential component of Union Station's multimodal transportation service. We encourage FRA to reduce the size of the bus facility in the Final EIS and mitigate adverse impacts to the surrounding community by allowing options for exiting the station via western access points.

A right-sized facility will provide substantially enhanced multimodal, civic, and economic opportunity for Union Station and the District—and also a significantly better experience for the 3 million intercity bus riders who are projected to travel through Union Station annually by 2040.

- **Improve bicyclist and pedestrian safety, and promote multimodal access to Union Station**

The Draft EIS indicates that “multimodal operations and access” to the station should be improved. However, bicycle access, bicycle and bike share parking and programming are not a readily recognizable component of the Draft EIS, which is a missed opportunity. As stated above, the currently proposed parking, PUDO, and bus facility plans present conflicts and safety concerns for bike lanes and pedestrian zones.

We encourage the Final EIS to include a more detailed bicycle access, parking, and operational strategy that provides access and parking to the station from all sides. This strategy should achieve the District of Columbia’s MOVE DC goal of *Enhancing the Multimodal System* and Sustainable DC’s goal to *Expand provision of safe, secure infrastructure for cyclists and pedestrians* and the related target to *Increase biking and walking to 25% of all commuter trips*. Such a strategy would be in line with other planning action being taken by the FRA at this time and in this region. In particular, [the Final EIS for the Long Bridge project](#), in which there was strong consideration and weight given to multimodal improvements.

We encourage the FRA to incorporate and focus on the quality of multimodal connectivity, and the future Station’s urban design and surroundings.

- **Plan for a vibrant urban place and create an opportunity for mixed-use development on federally owned land**

The draft EIS inadequately discusses how the Preferred Alternative affects the economic development and the urban environment surrounding the Station. In fact, DC Office of Planning states the “Land use planning is poorly developed reflecting outmoded suburban condition rather than an immensely vibrant, urban context in the heart of our Nation’s Capital....it is clear that the current approach would make high-quality urban design impossible to achieve.” A project of this magnitude needs to be configured to achieve world class urban design and place making. The existing DEIS does not take on this important task and we strongly recommend that the final EIS deliver upon the promise of this project for the region, the District of Columbia and neighboring communities.

We also encourage FRA to recognize the value of the real estate it owns next to the station and create opportunities for mixed-use development in lieu of the large federal garage as currently envisioned. Dedicating this federal real estate to an above grade parking structure destroys valuable economic potential for the federal government, for the District, and the greater Washington region. By changing the approach, the federal government can create developable space and above the tracks for a much more productive use. This real estate offers the potential for public and private spaces that can fill important needs relative to parks, public spaces, and connections to the surrounding community, reinforcing the importance and prominence of the station in its broader neighborhood context.

The Washington Union Station Expansion Project is of critical and significant importance to the region, and Clark Enterprises, Inc. is dedicated to ensuring the success of this project. To this end, it is imperative that FRA addresses these comments. Once this is done, we will move forward, as one region in concert with the federal government, to realize the opportunity of a greatly improved Washington Union Station.

Sincerely yours,



Robert J. Flanagan  
President  
Clark Enterprises, Inc.

- Cc: The Honorable Eleanor Holmes Norton
- Mayor Muriel Bowser
- Chairman Phil Mendelson
- Councilmember Charles Allen
- Andrew Trueblood, OP
- Jeff Marootian, DDOT
- C. Andrew Lewis, SHPO
- Johnette Davies, Amtrak
- Marcel Acosta, NCPC
- Beverley Swaim-Staley, USRC

## **Union Station Expansion**

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**From:** William Gallagher <bgallagher@kgpds.com>  
**Sent:** Monday, September 28, 2020 2:23 PM  
**To:** Union Station Expansion  
**Subject:** Union Station DEIS Comments

September 28, 2020

September 28, 2020

### **Reference: Comments on Union Station Master Plan DEIS:**

#### **Overall**

1. A lot of work has been done on this project – congratulations. The rail and platforms all look well worked out and much more functional.

#### **Concourse areas**

2. The four concourse areas work well and the new entrances on 1<sup>st</sup> and 2<sup>nd</sup> Streets will give much needed relief for egress and access. The lower concourse seems in direct conflict with the 1<sup>st</sup> Street loading dock? And access into Metro?? I don't see anything that explains how all that might work – since they are all at the same level?
3. The concourse areas need daylight. It is not obvious how this might happen. The last thing this station needs is lot of dark underground 'hallways' with no light. The roof of the main concourse should be all open to the sky. The central concourse also needs to be all open to the sky for daylight. Light can be brought in from the west for the west concourse – even though under a building. H Street has it's sky domes?

#### **Surface area**

4. There is logic in traffic changes around the building – there needs to be a way that people can walk out any door of the building and find a cab – like any urban transit center, maybe there's a cue on the south, but cabs need to be allowed and encouraged at every entrance – think Penn Station NYC. Provide taxi pickup at all entrances – 1<sup>st</sup> 2<sup>nd</sup> streets, (all entrance areas) H Street. Traffic going north on 1<sup>st</sup> Street will put people out into the bike lane – or is that planned to move to the west side of the street? DO NOT put the taxi's in the basement – what a terrible place for someone coming to Washington to be greeted.
5. There is no need to bring a lot of traffic through the site – the roads in the plaza should be minimal – not major source of drop-off pickup. Access to the station area is all along H Street – not in the middle of the plaza – there is not an entrance into the station in the plaza area – this needs to have a pedestrian focus.

- 6. **Parking should be all but eliminated.** This an urban transit hub – not a shopping mall. Maximum number of cars should be 200 for the entire site. No one wants more except USRC and the developer – let them find another source of funding or let them go away.
  
- 7. Buses do not need to need be front and center. Even their position in Alt A is questionable – and certainly not over the main pedestrian concourse as in C and D. Many buses can stop along the streets like in other cities.

**William B. Gallagher, Jr., FAIA**

Principal

KGP Design Studio, LLC

Web: [www.kgpds.com](http://www.kgpds.com)

Hello, my name is David Tuchmann, and I'm a Vice-President of Development at Akridge, owner of Burnham Place, the air rights above Union Station's tracks. While we ardently support the expansion's goals, we are gravely concerned about flaws that will unnecessarily harm our project and impede public benefit. The backbone of Alternative A-C is strong. The locations of rail tracks, platforms, concourses, train hall, and bus station form a foundation upon which future planning and design can build. However, review agencies, public officials, and neighbors have all condemned the plan's prioritization of vehicles over pedestrians. We agree. Akridge believes just three significant changes are required, and they all relate to vehicles. Pickup and drop-off plan, parking quantity and location, and bus facility size all must be adjusted.

The DEIS estimates more than 90% of peak hour traffic will be caused by nearly 4,000 arriving and departing rail and bus passengers. Absent a convenient and efficient pickup and drop off, or PUTO operation, the station expansion will fail to realize its rail and bus ridership goals as many passengers choose to avoid the gridlock that will surround Union Station. Equally troubling are the litany of adverse impacts to the station environment, historic resources, surrounding area, and Burnham Place caused by the plans' unworkable PUTO plan. The station must provide a centralized high-capacity PUTO facility directly below the new rail concourses and save spaces around the station for pedestrians. Several DEIS alternatives already consider a similar smaller facility. Station parking should be provided for no more than 300 cars, per DCOP and DDOT recommendation. This reduction is critical because 300 parking spaces can easily fit in one level below the concourses, which is Amtrak's preferred location.

Along with the PUTO facility, the DEIS finds that limiting below-grade parking to one instead of two levels avoids significant construction costs and time. Right-sizing and relocating parking, along with PUDO below-grade, address many stakeholder concerns. However, it is the oversized bus facility footprint that impairs opportunities for open space and activated street frontages, while harming critical [inaudible 00:11:34]. At 25, the number of bus lifts proposed is roughly double what is required to handle the FRA's estimated future peak-hour intercity and charter bus demand, using industry best-practice operation. And at 40 slips, A-C even includes 60% more slips than the already twice too-large facility proposed.

Run efficiently, this facility could send more than 1000 buses per day east into Capitol Hill. These three flaws cannot be fixed later during project design. The final EIS represents the planning framework officially sanctioned for future federal funding. I urge all stakeholders to study these flaws in the coming weeks and coalesce around solutions. Thank you for your time. Akridge will continue to review the draft EIS, collaborate with others, and submit written commentary.



**From:** Michelle Chang  
**To:** [Union Station Expansion](#)  
**Cc:** [David Tuchmann](#); [david.valenstein@dot.gov](mailto:david.valenstein@dot.gov); [Matt Klein](#); [Kevin Dunmire](#)  
**Subject:** Washington Union Station Expansion Project - Akridge comments to the Draft EIS  
**Date:** Monday, September 28, 2020 11:54:48 PM  
**Attachments:** [2020.0928 Akridge Comments to SEP DEIS.PDF](#)

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Dear Mr. Valenstein,

Akridge is pleased to provide comments on the Draft EIS for the Washington Union Station Expansion Project. Attached please find a PDF of the main body of Akridge's comments. In addition, due to file size, we are also providing a link to an FTP site that includes the comments and all appendices. Please let us know if you have any trouble accessing the FTP site. I will follow up with a separate email without the attachment and just the link to the FTP site in case the file size is too large.

Sincerely,

Michelle Chang

FTP site: <https://shalombaranes.sharefile.com/share/view/sd19f3183b9f47878/fo02607e-31cd-48b9-b07f-14c7afe6e825>

Michelle Chang, Development Manager  
601 Thirteenth Street, NW, Suite 300, Washington, DC 20005  
T 202.210.9981 E [mchang@akridge.com](mailto:mchang@akridge.com) [Akridge.com](http://Akridge.com)

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