

# Final Environmental Impact Statement

## Appendix F3c

Responses to Comments on the DEIS and SDEIS

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U.S. Department of Transportation  
Federal Railroad Administration

March 2024

**RESPONSES TO COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) AND the  
SUPPLEMENTAL DEIS (SDEIS)**

**INDEX OF COMMENTERS**

Table 1 (starting on page ii) lists commenters on the DEIS. Table 2 (starting on page vii) lists commenters on the SDEIS.

In both tables, within each category, commenters are listed in alphabetical order, along with: Comment ID; where to find the response(s) in this document; and where to find the original comment in Appendix F3a (DEIS) or F3b (SDEIS).

The number of commenters and the number of comments and responses do not coincide. Many commenters submitted more than one comment. Several commenters submitted the same or similar comments, for which a common response is provided.

<b>Table 1 – Index of Commenters on the DEIS</b>			
<b>COMMENTER</b>	<b>COMMENT ID</b>	<b>Response(s) on Page(s) No.</b>	<b>Comment in Appendix F3a, Page(s) No.</b>
<b>Federal Agencies</b>			
Advisory Council on Historic Preservation	ACHP_1006	6-7	9-11
Architect of the Capitol (AOC)	AOC_1002	12-14	44-46
US Department of the Interior (DOI)	DOI_0928	2	1-2
US Environmental Protection Agency (EPA)	EPA_0928	2-5	3-8
National Capital Planning Commission (NCPC)	NCPC_0714	7	12
	NCPC_0722	8	13-24
	NCPC_0925	9-12	25-43
<b>District Government; District, State, and Regional Agencies</b>			
Advisory Neighborhood Commissioner (ANC) 2A08	ANC2A08_0722	18	57
	ANC2A08_0818	18	58
ANC 6C – Commissioner Drew Courtney	ANC6C_0714	18-19	59-60
ANC 6C	ANC6C_0922	20-23	61-66
	ANC6C_Supp_0928	24	67
Council of the District of Columbia	DC Council_0922	15-16	49-53
Councilmember Charles Allen	CM Allen_0928	16-17	54-56
District of Columbia Office of Planning (DCOP)	DCOP_0928	24-28 50-71	68-141
District Department of Transportation (DDOT)	DDOT_0925	30-42	148-156
District Department of Energy and the Environment (DOEE)	DOEE_0928	42-45	157-162
District Historic Preservation Office (SHPO)	SHPO_0928	29-30	142-147
DC Multimodal Accessibility and Advisory Council	MAAC_0714	45	163
Mayor of the District of Columbia	DC Mayor_0928	15	47-48
Virginia Department of Rail and Public Transportation (DRPT)	DRPT_0928	46	164-166
Washington Metropolitan Area Transit Authority (WMATA)	WMATA_0925	47-49	167-172
<b>Public Commenters: Groups and Organizations</b>			
Arlington Chamber of Commerce	Multiple NGOs_0928	90-91	260-261
Arm in Arm (DC)	Multiple_0807	101 114-116	306-320
Adventure Cycling Association	ACA_0928	79	227-229
Akridge	Akridge_0714	119	423
	Akridge_0928	119	424-1076
American Bus Association	ABA_0714	73	221
	ABA_0928	77	222-226
Amtrak	Amtrak_0928	75-77	218-220

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<b>COMMENTER</b>	<b>COMMENT ID</b>	<b>Response(s) on Page(s) No.</b>	<b>Comment in Appendix F3a, Page(s) No.</b>
Baltimore-DC Metro Building Trades	Multiple NGOs_0928	90-91	260-261
The BWI Business Partnership, Inc.	Multiple NGOs_0928	90-91	260-261
Capital Trails Coalition	CTC_0928	73	185-189
Capitol Hill Restoration Society	CHRS_0714 CHRS_0925	85 86-88	249 250-255
Clark Enterprises	Clark_0921	116-117	417-420
Coalition for Smarter Growth	CSG_0928 Multiple NGOs_0928	88-89 90-91	256-258 260-261
Coalition for the Northeast Corridor	Multiple NGOs_0928	90-91	260-261
Committee of 100 on the Federal City	C100_0714 C100_0928	79 80-85	230 231-248
DC Sustainable Transportation	DCST_0929	73 74	173-177
DC Trails	DCTrails_0925	74	194-199
Economic Alliance of Greater Baltimore	Multiple NGOs_0928	90-91	260-261
Federal City Council	FC2_0928 FC2_0714	73 74 90	178-181 259
Global Travel Alliance	GTA-0925	102	394-395
Greater Washington Partnership	GWP_0928 Multiple NGOs_0928	73 74 90-91	182-184 260-261
Greyhound	Greyhound_0826	74	200-211
Guild of Professional Tour Guides of Washington DC	TourGuides_0803	97-98	272-275
JBG SMITH	Multiple NGOs_0928	90-91	260-261
KGP Design Studio	KGPDS_0928	117-118	421-422
Coach USA/Megabus	CUSA Megabus_0928	74	212-217
Montgomery County Chamber of Commerce	Multiple NGOs_0928	90-91	260-261
National Railway Historical Society, DC Chapter	NRHS_0727	93-94	266-267
National Trust for Historic Preservation	NTHP_0928	95-96	268-271
Nations Classroom	NaCL_0925	102	393
NoMA Business Improvement District	NoMA BID_0714 NoMA BID_0928	91 92-93	262 263-265
Northern Virginia Chamber of Commerce	Multiple NGOs_0928	90-91	260-261
Rail Passengers Association	Multiple NGOs_0928	90-91	260-261
Rail Passengers Maryland	Multiple NGOs_0928	90-91	260-261
Safe Streets for Hill East and Near Northeast	Multiple_0807	101 114-116	306-320

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<b>COMMENTER</b>	<b>COMMENT ID</b>	<b>Response(s) on Page(s) No.</b>	<b>Comment in Appendix F3a, Page(s) No.</b>
Scholastica Travel Inc.	STI-0921	102	391-392
Southern Environmental Law Center	Multiple NGOs_0928	90-91	260-261
Travelers Aid International	TravelerAid_0629	98	276-277
Uber	Uber_0713	98	278
Virginia Bicycling Federation	VABF_0928	99	279
Virginians for High Speed Rail	Multiple NGOs_0928	90-91	260-261
Virginia Transit Association	Multiple NGOs_0928	90-91	260-261
Washington Area Bicyclist Association	WABA_0928	73	190-193
	Multiple_0807	101	306-320
WorldStrides	WS_0924	103	396-398
<b>Public Commenters: Individuals</b>			
Anonymous	PI_0626_002	104	400
Anonymous	PI_0714_006	105	402
Jay Adams	PI_0714_007	106	403
Andrew	PI_0714_011	101	290
Mike Aiello	PI_0727_001	101	296
Chandini Bachman	PI_0925_002	102	367
See Baker	PI_0706_001	104	401
Karthik Balasubramanian	PI_0728_001	101	297
Christina Bauer	PI_0928_004	102	380-381
Yasmin Bhalloo	PI_0910_004	102	335
Harvey Botzman	PI_0928_007	112	415
Josh Boxerman	PI_0924_003	101	300
Louise Brodnitz	PI_0607_001	101	280
	PI_0828_001		298-299
William Wright Bryan III	PI_0626_001	101 103	282
Dawn Bryant	PI_0910_003	102	333-334
Peter Carlson	PI_0928_001	108	409-410
James Carr	PI_0922_001	102	343
Katie Chambers	PI_0923_001	102	355-356
John Days	PI_0923_005	102	363
Andrew DeFrank	PI_0630_001	101	284
Randy Downs	PI_0714_015	101	294
Robb Dooling	Multiple_0807	101 114-116	306-320
Christen Eliason	PI_0915_003	102	341-342
Garrett Ethridge	PI_0922_004	102	347
Hannah Follweiler	PI_0724_001	101	295
Bill Gallagher	PI_0928_013	101 113-114	304
Noah Gillespie	PI_0714_002	101 105	287
Marvin Gerber	PI_0818_001	102	328

<b>Table 1 – Index of Commenters on the DEIS</b>			
<b>COMMENTER</b>	<b>COMMENT ID</b>	<b>Response(s) on Page(s) No.</b>	<b>Comment in Appendix F3a, Page(s) No.</b>
Kevin Golden	PI_0922_008	102	354
Sean Grant	PI_0924_001	102	364
Rebecca Grawl	PI_0922_005	102	348-349
P. Cole Hanner	PI_0922_007	102	352-353
Nathan Harrington	PI_0817_003	102	324
Bill Harris	PI_0928_006	102	382-383
Michael Hollingsworth	PI_0927_001	102	373-374
Brent Huggins	PI_0714_005	101	288
Edmund Hull	PI_0612_001	103	399
Kimberley Indovina	PI_0927_003	102	377-378
Jeff Johnson	PI_0928_009	101	303
Karen	PI_0714_008	106	404
Matthew Keitelman	PI_1001_001	101	305
Stewart Kerr	PI_0627_001	101	283
Steven Kline	PI_0911_001	102	336-337
Katie Kolodzie	PI_0926_002	107	408
Gary Kushnier	PI_0928_002	102	379
Charlotte Liebig	PI_0923_003	102	359-360
Maria Limarzi	PI_0928_011	102	386-387
Alex Lopez	PI_0714_012	101	291
Barton Lynch	PI_0926_001	101	302
Ellen Malasky	PI_0910_002	102	332
Marina	PI_0714_014	101	293
Mary Beth	PI_0714_003	102	390
Taquann McKinney	PI_0701_001	101	285
Jay Melrose	PI_0925_001	107	407
Troy Michalak	PI_0925_003	101	301
Jeffrey Miller (DC Cycling Concierge)	PI_0928_005	110-112	413-414
Julie Moody	PI_0922_003	102	346
Laura Moore	PI_0928_008	102	384-385
Elaine Moulder	PI_0923_002	102	357-358
Russ Norfleet	PI_0923_004	102	361-362
Thomas Olmstead	PI_0928_003	109	411-412
Teresa Pezzi	PI_0817_001	102	321-322
William Plenefisch	PI_0927_002	102	375-376
Russell Preble	PI_0922_002	102	344-345
Rohulamin Quander	PI_0923_006	102	412a-412b
Paul Rose	PI_0926_005	102	371-372
Michael Ruggieri	PI_0819_001	102	329
Angalee Schmidt	PI_0924_002	102	365-366
James Schulman	PI_0714_001	101	286
Matthew Schwartzer	PI_0928_010	113	416
David Shaw	PI_0910_001	102	330-331
W. Bart Smith	PI_0926_004	102	370

<b>Table 1 – Index of Commenters on the DEIS</b>			
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Richard Snowden	PI_0817_005	102	327
Anthony Spadafora	PI_0921_001	102	412c
Mili Steel-Hollenbeck	PI_0817_002	102	323
Joe Steinbock	PI_0928_012	102	388-389
Sally Stotter	PI_0926_003	102	368-369
Mary Thorne	PI_0912_001	102	338
Brenda Tidwell	PI_0915_002	107	406
Rami Turayhi	PI_0616_001	101	281
Andrew Turner	PI_0714_013	101	292
Valerie	PI_0714_010	106	405
Helga Warren	PI_0915_001	102	339-340
Alan Weinstein	PI_0817_004	102	325-326
Debra Wiley	PI_0922_006	102	350-351
<i>Unidentified</i>	PI_0714_009	101	289

<b>Table 2 – Index of Commenters on the SDEIS</b>			
<b>COMMENTER</b>	<b>COMMENT ID</b>	<b>Response(s) on Page(s) No</b>	<b>Comment in Appendix F3b, Page(s) No.</b>
<b>Federal Agencies</b>			
US Department of the Interior (DOI)	DOI_0706	123	1-3
US Environmental Protection Agency (EPA)	EPA_0706	121-123	4-9
Federal Transit Administration (FTA)	FTA_0706	124	10-11
National Capital Planning Commission (NCPC)	NCPC_0706	123-124	12-15
<b>District Government; District, State, and Regional Agencies</b>			
Advisory Neighborhood Commission (ANC) 6C	ANC 6C_0706	125-127	16-19
Commissioners ANC 6C01 (Christy Kwan), 6C03 (Jay Adelstein), 6C02 (Leslie Merkle), C607 (Tony Goodman)	ANC6_Add'l_0706	127-128	20-21
Councilmember Charles Allen	CM Allen_0706	124-125	22-24
District Department of Transportation (DDOT)	DDOT_0706_Cover DDOT_0706_ByLine	129 132-138	25-26 27-32
District of Columbia Office of Planning (DCOP)	DDOT_0706_ByLine	138-139	32-33
Maryland Transit Administration	MTA_0630	128-129	34-36
Virginia Railway Express	VRE_0706	130	37-39
Washington Metropolitan Area Transit Authority (WMATA)	WMATA_0706	131	39-40
<b>Public Commenters: Groups and Organizations</b>			
Akridge	Akridge_0620 Akridge_0706	173 174-179, 183	42-44 45-82
American Bus Association	ABA_0627 ABA_0706	144 145-148	83-86 87-93
Amtrak	Amtrak_0706	141	94-95
Capital Trails Coalition	CTC_0706	150-152	96-98
Capitol Hill Restoration Society	CHRS_0706	148-149	99-101
Coach USA/Megabus	Coach_0627	143	102-104
Coalition for Smarter Growth	CSG_0706	149-150	105-108
Committee of 100 on the Federal City	C100_0706	157-164	109-143
Federal City Council	FC2_0627 FC2_0705	152 152-153	144-146 147-150
Greater Washington Partnership	GWP_0706	153	151-152
Greyhound	Greyhound_0627	142	153-155
National Trust for Historic Preservation	NTHP_0706	154-155	156-166
NoMA Business Improvement District	NoMA BID_0706	153-154	167-169



<b>Table 2 – Index of Commenters on the SDEIS</b>			
<b>COMMENTER</b>	<b>COMMENT ID</b>	<b>Response(s) on Page(s) No</b>	<b>Comment in Appendix F3b, Page(s) No.</b>
Virginians for High Speed Rail	VHSR VTA_0622	164	170-171
Virginia Transit Association	VHSR VTA_0622	164	170-171
Washington Area Bicyclist Association	WABA_0706	155-157	172-174
Washington Union Station Intercity Bus Coalition	BusCarriers_0706	142-143	175-178
<b>Public Commenters: Individuals</b>			
Anonymous	PI_0627_002	170	179
Ra Amin	PI_0627_005	182	180-181
Karthik Balasubramanian	PI_0614_002	167	182-183
Louise Brodnitz	PI_0614_001	167	184
Xavier Domenico	PI_0618	169	185
Gregory Dun Osborne	PI_0514	166	186
Hannah Follweiler	PI_0517_002	167	187
Izzy Gholl	PI_0515_002	167	188
Sean Gilliam	PI_0517_001	167	189
Bruce W. Hain	PI_0706	172-173	190-192
Christine Healey (former Commissioner ANC 6C01)	ANC6_Add'l_0706		19-20
Gene Hunt	PI_0616_002	169	193
Ken Jarboe	PI_0628_003	180	194-195
Jake Lighter	PI_0515_001	166	196-197
	PI_0628_001	180	198
Chase Matthew	PI_0627_004	182	199-200
Kevin Moore	PI_0702	170	201
Ennis Parker	PI_0513	166	202
Jazmin Pilar	PI_0521	167	203
Ashton Rohmer	PI_0616_001	168	204-205
James A. Smailes	PI_0706_001	170-171	206-207
Gail Sullivan	PI_0627_001	169-170	208-210
	PI_0627_003	181-182	211-214
Lisa Turner	PI_0628-002	180	215-216

# DEIS Comments: Agencies.

DEIS Comments: Agencies

Comment ID	Commenter	Item #	Comment	Topic	Response
DOI_0908	Department of the Interior (DOI)	1	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.	Impacts on NPS properties	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS. As documented in the SDEIS and FEIS, the new Preferred Alternative (Alternative F) would not affect any properties under the jurisdiction of the National Park Service (NPS) property, including Columbus Plaza.  NPS was originally identified as a Cooperating Agency for the EIS. However, on January 24, 2023, NPS indicated that they would no longer serve as such due to the lack of Project impacts on lands under their jurisdiction.
	DOI	2	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.	Section 4(f)	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS.  The SDEIS supplemented the Draft Section 4(f) Evaluation presented in the 2020 DEIS and documented that the new Preferred Alternative would result in least overall harm; it would offer the best opportunities for successful mitigation and, consequently, for less severe remaining harm after mitigation than the Action Alternatives previously considered. In their comment on the Draft Supplemental Evaluation, the Department of the Interior stated that they “Concur with the findings of the least harm analysis and that while the Preferred Alternative will have impacts to Section 4(f) resources, most of these impacts will be mitigated through measures implemented as part of the Section 106 Programmatic Agreement” (see DOI_0706, Item #2).
EPA_0928	US Environmental Protection Agency (EPA)	1	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.	Air rights development	The private air rights development is a private undertaking subject to its own review and approval process, distinct and independent from the Station Expansion Project. As such, it is addressed in the EIS through analysis of the No-Action Alternative and of cumulative impacts. In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed in the SDEIS and FEIS.  The Preferred Alternative provides for new access to the station and would improve neighborhood integration through the provision of a new east-west link (H Street Concourse), independently from the private development. The private air rights development may separately enhance neighborhood integration and the Preferred Alternative would not preclude the construction of a civic space by the private developer south of H Street that would further enhance access to the Station. As explained in Section 3.5, <i>Description of the Preferred Alternative</i> , of the FEIS, this would be achieved by defining a “Visual Access Zone” free of Project elements between H Street and the train hall and a “Daylight Access Zone,” also mostly free of Project elements but within which skylights would be installed to provide the new station concourse underneath with natural light. The private air rights developer would have primary responsibility for the design of the public space and would implement it, in coordination with USRC for the Project elements and shared elements supporting the Project, such as the skylights.
	EPA	2	Please define for the reader what “Wayfinding” entitles. Consider including the term in the glossary.	Glossary	The following text was added to Chapter 11, Glossary, of the FEIS: <i>Wayfinding: information systems that guide people through a physical environment.</i>
	EPA	3	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.	Groundwater/Wastewater impacts	The referenced statement in the DEIS was corrected in the SDEIS and FEIS. Discharge would be to the Combined Sewer System.

DEIS Comments: Agencies

Comment ID	Commenter	Item #	Comment	Topic	Response
	EPA	4	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.	Groundwater impacts	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The development of the new Preferred Alternative and preparation of the SDEIS included a re-evaluation of the mitigation program.  Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #2a through 2c, address impacts on groundwater. Items #2c provides that USRC will require the construction contractor to provide on-site monitoring and treatment of pumped groundwater and obtain a Temporary Discharge Authorization permit for discharge through the District's combined sewer system.
	EPA	5	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.	Project - PUDO	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed in the SDEIS and FEIS. The development of the new Preferred Alternative included a re-evaluation of the pick-up and drop-off program (documented in Section 2, <i>Pick-Up and Drop-off Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS). The new Preferred Alternative features a below-ground pick-up and drop-off facility anticipated to handle approximately half of all Station-related pick-ups and drop-offs, as well as pick-up and drop-off areas in front of the Station, on First and Second Streets NE, and on the H Street deck, adjacent to the train hall. The distribution of pick-up and drop-off activities across the Project area (taxis, Uber-types, and private) is designed to be responsive to demand and is anticipated to reduce idling.
	EPA	6	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.	Project - Bus facility	The Purpose and Need for the Project, described in FEIS Section 2.3, <i>Purpose and Need Statement</i> , includes facilitating intermodal travel. As explained in Section 3.1.1, <i>Identification of Project Elements</i> , of the FEIS, the bus facility is one of eight Project elements or components of the multimodal Station. All Action Alternatives provide for a new bus facility at Union Station. Alternatives that would not do so would not meet the Purpose and Need or the terms of the Union Station Redevelopment Act of 1981.  As documented in Section 6.4 of Appendix A4, <i>Concept Screening Report</i> , of the DEIS, FRA considered nine sites outside the Project Area for potential use as a bus or parking facility, none of which was found suitable.
	EPA	7	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.	Construction - Spoil disposal	Noted.
	EPA	8	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.	Construction - Noise	As currently planned, work outside Monday-Saturday from 7 AM to 7PM would be required to meet the Project's schedule and, as such, require a permit from the District of Columbia as indicated in Table 7-2, Item #20 of the FEIS. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #37a specifies how noise impacts would be minimized and mitigated through the preparation and implementation of a Construction Noise and Vibration Control Plan. The plan would include a public engagement program specifying measures that would be implemented to inform neighbors and other relevant parties, of anticipated noisy activities, noise or vibration level projections and exceedances, and measures to be taken to remedy these exceedances.
	EPA	9	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.	Environmental justice	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed in the SDEIS and FEIS. In the SDEIS and FEIS, FRA updated the demographic analysis based on 2020 Census data, as documented in Section 17.3, <i>Study Area</i> , of Appendix C3S of the SDEIS. Based on the updated data and the potential impacts of the new Preferred Alternative, FRA conducted additional outreach during the preparation of the SDEIS, as documented in Section 8.8.2, <i>Public Involvement During Preparation of the SDEIS</i> , of the FEIS. For all public meetings, FRA offered free translation service upon request.

DEIS Comments: Agencies

Comment ID	Commenter	Item #	Comment	Topic	Response
	EPA	10	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.	Project - Rail planning	<p>Planning for the Project remains based on the long-term rail planning presented in the Northeast Corridor (NEC) FUTURE study and the various rail operators' future operating plans. FRA recognizes that the pandemic has resulted in a reduction in ridership on all rail services in 2020-2023; however, current trends are positive (see for instance <a href="https://media.amtrak.com/2022/11/amtrak-fiscal-year-2022-the-beginning-of-a-new-era-of-rail/">https://media.amtrak.com/2022/11/amtrak-fiscal-year-2022-the-beginning-of-a-new-era-of-rail/</a>, last accessed January 12, 2024, and <a href="https://vapassengerrailauthority.org/amtrak-virginia-sets-another-ridership-record-in-april/">https://vapassengerrailauthority.org/amtrak-virginia-sets-another-ridership-record-in-april/</a>, last accessed January 12, 2024). Additionally, the continued use of pre-pandemic long-term ridership analysis provides an appropriately conservative assumption to inform impacts.</p> <p>FRA also notes that Amtrak developed the rail program documented in Appendix B of the DEIS and that both Virginia Railway Express (VRE) and the Maryland Transit Authority (MTA) commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item 3 and VRE_0706, Item 1).</p>
	EPA	11	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.	Project - General	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed in the SDEIS. The development of the new Preferred Alternative included a re-evaluation of parking and pick-up/drop-off programs (documented in Section 1, <i>Parking Program</i> , and Section 2, <i>Pick-Up and Drop-off Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS), which resulted in a reduction in the number of parking spaces provided by the Project and in their being collocated below-ground with a pick-up and drop-off facility that is anticipated to handle about half of all Station-related pick-ups and drop-offs.
	EPA	12	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)”). 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	Air quality	In the SDEIS and FEIS, the air quality impacts of the Preferred Alternative (Alternative F) are presented in a manner that addresses this comment. Table 5-41 of the FEIS presents combined annual operational and construction NO <sub>x</sub> and VOC emissions in the Preferred Alternative. As explained in Section 5.6.3.4, <i>Combined Operational and Construction NO<sub>x</sub> and VOC Emissions</i> , of the FEIS, this approach yields very conservative estimates of Project-related emissions.
	EPA	13	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 (NO <sub>x</sub> ).	Air quality	In the referenced table of the DEIS, the high estimates for CO emissions are for total emissions; the same table also shows emissions attributable to the Project for each alternative, which are substantially below the <i>de minimis</i> .
	EPA	14	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 <i>de minimis</i> limits. We note that if total annual emissions resulting from the action in any year exceed the <i>de minimis</i> limit for an applicable NAAQS pollutant or precursor, conformity must be demonstrated using one of the methods set forth in 40 CFR 93.158	Air quality	In the SDEIS and FEIS, the air quality impacts of the Preferred Alternative (Alternative F) are presented in a manner that addresses this comment. Table 5-41 of the FEIS presents combined annual operational and construction NO <sub>x</sub> and VOC emissions in the Preferred Alternative. As explained in Section 5.6.3.4, <i>Combined Operational and Construction NO<sub>x</sub> and VOC Emissions</i> , of the FEIS, this approach yields very conservative estimates of Project-related emissions.

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	EPA	15	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.	Air quality	In the SDEIS and FEIS, the air quality impacts of the Preferred Alternative (Alternative F) are presented in a manner that addresses this comment. As explained in Section 5.6.1.2, <i>Construction Impacts</i> , of the FEIS, construction-related air quality impacts were estimated for each phase, based on emissions associated with excavation; support of excavation construction; caisson drilling; foundation slab construction; overbuild deck construction; track demolition and reconstruction; terminal demolition; subbasement column removal; and construction of the G Street Ramp, First Street Ramp, and East Ramp. For each phase, emissions were annualized, conservatively assuming that all types of activity would take place during each year of the phase. This conservative assumption allows for comparison with EPA’s applicable <i>de minimis</i> criteria and a General Conformity applicability determination.
	EPA	16	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).” 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.	Air quality	Figure 6-1 of Appendix C3S, <i>Supplemental Environmental Consequences Technical Report</i> , of the SDEIS shows a visual representation of the new Preferred Alternative's combined operational and construction emissions, in accordance with this comment.
	EPA	17	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.” 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).	Air quality	In the SDEIS and FEIS, the analysis prepared to assess the impacts of the new Preferred Alternative (Alternative F) on air quality incorporates quantitative estimates for the column removal work.
	EPA	18	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.” 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.	Air quality	The qualitative analysis of MSAT emissions was updated in the SDEIS and FEIS to address this comment (Section 5.6.3.2, <i>Indirect Operational Impacts, Mobile Source Air Toxics Analysis</i> of the FEIS). In summary, the project would result in increases in bus and rail activity, which would likely lead to higher diesel particulate matter emissions (a component of MSAT). However, there are many other components of MSAT to be considered that would be reduced by a decrease in regional traffic due to greater use of commuter rail and increased speed on area highways because of the decrease in commuter traffic. Increasing speeds on highways not only benefits light duty vehicles but also existing diesel traffic, which would reduce diesel PM emissions and other MSATs.

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ACHP_1006	Advisory Council on Historic Preservation (ACHP)	1	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.	Project-General	<p>FRA and the Project Proponents developed a new alternative (Alternative F) in response to this and other public and agency comments received on the 2020 DEIS alternatives, identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>FRA also prepared a Supplemental Assessment of Effects (SAOE) to assess the effects of the Preferred Alternative (Alternative F) on historic properties in accordance with Section 106. The SAOE was included in the SDEIS as Appendix D1S.</p> <p>FRA notes that in their comments on the SAOE, the SHPO stated that the new Preferred Alternative "represents a very substantial improvement over the previously proposed Alternative A-C and addresses many of the consulting parties' comments in meaningful ways" (Letter to FRA dated February 9, 2023).</p> <p>The Preferred Alternative would have an adverse effect on the three same historic properties as the 2020 DEIS Action Alternatives because these adverse effects arise from aspect of the Project that are required to meet the Purpose and Need and, therefore, are common to all Action Alternatives. To resolve the adverse effects, FRA executed a Programmatic Agreement (PA) that is included in the FEIS as Appendix F4.</p>
	ACHP	2	<p>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.</p> <p>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.</p>	Historic preservation	<p>The Section 106 Assessment of Effect (AOE) and SAOE prepared for the Project adhere to the guidance and language 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." The Section 106 process considers effects to historic properties in relation to existing conditions, which does not include the projects assumed to be constructed as part of the No-Action Alternative defined for the purposes of the National Environmental Policy Act (NEPA), including the private air rights development project, which is not a Federal undertaking.</p> <p>However, to acknowledge projects outside of the Federal undertaking, the AOE provided a summary of the No-Action Alternative and the likely changes that it would cause to WUS and the WUS Historic Site. Cumulative effects from the physical, visual, noise, vibration, and other effects of each of the Action Alternatives were considered in the assessment for each historic property, resulting in a finding of potential adverse effect to the Capitol Hill Historic District in the AOE. This potential adverse effect would not occur in the new Preferred Alternative (Alternative F) developed in response to public and agency comments on the DEIS and analyzed in the SAOE.</p>

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	ACHP	3	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.	Historic preservation	Development in the privately owned air rights will occur to the extent that it is allowed by USN Zoning and approved by SHPO consistent with the historic preservation covenant applying to the property. To acknowledge projects outside of the Federal undertaking, the AOE provided a summary of the No-Action Alternative and the likely changes that it would cause to WUS and the WUS Historic Site. Cumulative effects from the physical, visual, noise, vibration, and other effects of each of the Action Alternatives were considered in the assessment for each historic property, resulting in a finding of potential adverse effect to the Capitol Hill Historic District in the AOE. This potential adverse effect would not occur in the new Preferred Alternative (Alternative F) developed in response to public and agency comments on the DEIS and analyzed in the SAOE.
NCPC_0714	National Capital Planning Commission (NCPC)	1	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 <a href="http://ncpc.gov">ncpc.gov</a> . 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.	Project - General	FRA and the Project Proponents developed a new alternative (Alternative F) in response to this and other public and agency comments received on the 2020 DEIS alternatives, identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS. The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550 in the new Preferred Alternative (Alternative F), all of them in a below-ground facility.



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NCPC_0722	NCPC	1	<p>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. 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. Give 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 service neighborhood 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 the 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.</p>	Project - Parking	<p>FRA and the Project Proponents developed a new alternative (Alternative F) in response to this and other public and agency comments received on the 2020 DEIS alternatives, identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550 in the new Preferred Alternative (Alternative F), all of them in a below-ground facility.</p>
	NCPC	2	<p>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. 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 give 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.</p>	Project - Urban design	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. During the development of the new Preferred Alternative, FRA and the Project Proponents coordinated with the owner of the private air rights on opportunities to enable a civic space on the H Street deck level that would be commensurate with Union Station's historic and architectural significance and centered on the historic station building. As explained in Section 3.5, <i>Description of the Preferred Alternative</i>, of the FEIS, this would be achieved by defining a "Visual Access Zone" free of Project elements between H Street and the train hall and a "Daylight Access Zone," also mostly free of Project elements, but within which skylights would be installed to provide the new station concourse underneath with natural light. The private air rights developer would have primary responsibility for the design of the public space and would implement it, in coordination with USRC for the Project elements and shared elements supporting the Project, such as the skylights.</p>

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NPC_0925	NPC	1	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 expected growth in service. It is unclear, however, how the Long Bridge Project and the Washington to 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. NPC 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.	Project - Rail planning	The basis of the planning for the rail component of the Project is presented in Appendix B of the DEIS. In addition to being based on the long-term rail planning presented in the NEC FUTURE study and the various rail operators' future operating plans, rail planning assumptions also align with the plans advanced in the DC to Richmond Southeast High Speed Rail project, Long Bridge Project, and Transforming Rail in Virginia. FRA notes that Amtrak developed the rail program documented in Appendix B of the DEIS in coordination with FRA, VRE, and Maryland Area Regional Commuter trains (MARC). Both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item 3 and VRE_0706, Item 1).
	NPC	2	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 grad 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.	Project - Urban design	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS.  FRA submitted Alternative F to the National Capital Planning Commission (NPC) for review in July 2022. NPC expressed support for the Alternative F concept plans and noted that Alternative F substantially responds to previous comments regarding parking, urban design, and coordination among necessary stakeholders.
	NPC	3	The DEIS does not appear to provide a 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.	Project - User experience	The benefits of the Project to user experience are described in various sections of the DEIS, SDEIS, and FEIS, such as Section 5.5, <i>Transportation</i> , Section 5.14, <i>Social and Economic Conditions</i> , and Section 5.16, <i>Public Health, Elderly and Persons with Disabilities</i> . The more granular factors influencing user experience mentioned in the comment, such as signage and shade, will be addressed during engineering and design.

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	NCPC	4	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.	Visual impacts	Noted.
	NCPC	5	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 affect 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 the 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 there and other factors when reviewing and approving the ultimate design for the project, including the height and bulk of new development.	Visual impacts	Noted.
	NCPC	6	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 and 2nd Street to improve access from 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 to accommodate long-term bus growth at the station.	Project - Multimodal access	<p>The Purpose and Need for the Project, described in FEIS Section 2.3, <i>Purpose and Need Statement</i>, includes facilitating intermodal travel. As explained in Section 3.1.1, <i>Identification of Project Elements</i>, of the FEIS, the bus facility is one of eight Project elements or components of the multimodal Station. All Action Alternatives considered provide for a new bus facility.</p> <p>In response to public and agency comments on the DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the bus program documented in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS.</p> <p>On the basis of the updated program, the bus facility in the new Preferred Alternative would have 39 slips. This would accommodate anticipated intercity and tour/charter bus service most days. In times of exceptional demand, space on the H Street deck level would accommodate approximately 15 additional buses. Additionally, FRA and the Project Proponents developed a revised design for the bus facility, which places it in the deck above the rail terminal and immediately adjacent to the future train hall, providing bus passengers with easy access to multimodal transfers and waiting areas.</p>
	NCPC	7	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.	Traffic impacts and mitigation	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The FEIS identifies multiple mitigation measures, including measures to address traffic impacts, that are listed in Table 7-1 of the FEIS/Table 13-2 of the ROD. Items #28a through 28i address traffic impacts. A key mitigation step will be the development and implementation of a multimodal Performance Management Plan (Item #28a).</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
	NCPC	8	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 further distribution of vehicular trips around the station. Additional discussions with the private development of Burnham Place will also be necessary.	Project - PUDO	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the pick-up and drop-off program documented in Section 2, <i>Pick-Up and Drop-off Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS. The new Preferred Alternative features a below-ground pick-up and drop-off facility (anticipated to handle approximately half of all Station-related pick-ups and drop-offs) as well as pick-up and drop-off areas in front of the Station, on First and Second Streets NE, and on the H Street deck, adjacent to the train hall.</p>
	NCPC	9	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.	Project - Circulation	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative involved coordination with multiple stakeholders including DDOT (documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i>, of the FEIS), and a re-evaluation of circulation patterns.</p>
	NCPC	10	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.	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550 in the new Preferred Alternative (Alternative F), all of them in a below-ground facility.</p>
	NCPC	11	Regarding the DEIS analysis, questions remain as to the sources of the baseline parking information as well as the assumptions about future needs. 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.	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS.</p> <p>In developing the new Preferred Alternative, FRA re-evaluated the Project's parking program, as documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS. Appendix F1 supersedes the parking information and analysis contained in the DEIS.</p>
	NCPC	12	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.	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS.</p> <p>In developing the new Preferred Alternative, FRA re-evaluated the Project's parking program, as documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS. Appendix F1 supersedes the parking information and analysis contained in the DEIS.</p>

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	NCPC	13	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 occurs 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 review process	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS.  FRA submitted Alternative F to NCPC for review in July 2022. NCPC expressed support for the Alternative F concept plans and noted that Alternative F substantially responds to previous comments.
	NCPC	14	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.	NCPC review process	Noted.
	NCPC	15	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 or 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.	Air rights development	Noted. In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS.  FRA developed the new Preferred Alternative in coordination with Akridge and looks forward to continued collaboration with Akridge to advance the Station Expansion Project and Akridge's development project. FRA supports the vision of commercial air rights development and open space that creates a vibrant neighborhood north of Washington Union Station. The Preferred Alternative is consistent with this vision.
	NCPC	16	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.	Project - General	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS.  FRA submitted Alternative F to NCPC for review in July 2022. NCPC expressed support for the Alternative F concept plans and noted that Alternative F substantially responds to previous comments regarding parking, urban design, and coordination with stakeholders.
AOC_1002	Architect of the Capitol (AOC)	1	Traffic analyses and projections do not, and should, account for AOC-owned streets, which can be (temporarily or permanently) closed at any time.	Traffic impacts	FRA acknowledges that all roadways controlled by public entities, including DDOT and the Architect of the Capitol (AOC), can be closed, abandoned, or modified at any time. AOC's ability to close their roads has been noted in the FEIS (Section 4.5.2, <i>Study Area</i> ).
	AOC	2	Traffic impacts to the Thurgood Marshall Federal Judiciary Building should be reevaluated. Day-to-day Marshall Building operations should not be impacted.	Traffic impacts	The traffic impact analysis presented in the DEIS and, for the new Preferred Alternative (Alternative F), in the SDEIS and FEIS, considers several intersections in the vicinity of the Thurgood Marshall Federal Judiciary Building. The DEIS identified an impact at the intersection of First Street and Massachusetts Avenue NE, near the building (DEIS Figure 5-22 and Table 5-59). In the new Preferred Alternative, conditions at that same intersection would improve relative to No-Action conditions (see FEIS Figures 5-1 and 5-2). Access to the building is not anticipated to be substantially affected by the Project.
	AOC	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.	Project - Pedestrian and bicycle	The impacts of the new Preferred Alternative on pedestrian circulation are evaluated in Section 5.5.3.1, <i>Direct Operational Impacts, Pedestrians</i> , of the FEIS.  Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #23 provides for the consideration of measures to minimize or mitigate potential conflicts among pedestrians, bicyclists, and vehicles along the east side of WUS, including between Columbus Circle and F Street NE.

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Comment ID	Commenter	Item #	Comment	Topic	Response
	AOC	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.	Project - Pedestrian and bicycle	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #23 provides for the consideration of measures minimize or mitigate potential conflicts among pedestrians, bicyclists, and vehicles along First Street NE and the east side of WUS, including between Columbus Circle and F Street NE.
	AOC	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.	Construction impacts	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #12 identifies AOC as one of the agencies with which the integrated Construction Transportation Management Plan would be coordinated.
	AOC	6	The Safety and Security Operations Plan should be coordinated with the AOC's Office of Security Programs and the U.S. Capitol Police.	Safety and security	Noted. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #45 specifies that USRC would identify security features that the Project design would incorporate in coordination with Federal law enforcement and security agencies, as necessary.
	AOC	7	The Capitol complex land use designation is incorrect on page 4-511 and should be adjusted.	Correction	DEIS Figure 4-10 (on page 4-51) was based on the cited District of Columbia GIS land use information, which does not (nor intends to) specifically delineate the Capitol Complex Land Use. However, FRA recognizes that the U.S. Capitol Complex's buildings/facilities and grounds are within the land uses designated on the map.
	AOC	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.	Project - Energy supply	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #35d specifies that coordination regarding chill water and steam capacity would take place in the post NEPA phase, during Project engineering and design.
	AOC	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.	Construction impacts - Hazardous materials	During construction, applicable Federal and local requirements for hazardous materials management and release prevention would be followed. These requirements were described in Section 5.4.7, <i>Permits and Regulatory Compliance</i> , of the DEIS and are incorporated in the avoidance, minimization, and mitigation measures specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #4 through 11.
	AOC	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.	Stormwater impacts	Applicable District of Columbia stormwater and sanitary system design requirements would be incorporated into the Project engineering and design in the post NEPA phase of the Project.
	AOC	11	The FRA should seek congressional approval if the WUSEP requires digging or excavation on government property.	Construction	USRC would obtain all required Federal and local permits and authorizations, including any Congressional approvals, if applicable, to construct and operate the Project. FRA does not anticipate that the Project will involve excavating government property requiring a Congressional permit.

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Comment ID	Commenter	Item #	Comment	Topic	Response
	AOC	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 facade cladding system.	Construction noise	<p>Construction-related noise and vibration impacts were addressed in Section 5.10 of the DEIS. Noise levels were modeled at 164 locations, including at the Marshall Building (Location R156). The DEIS did not identify any major noise or vibration impacts at this location.</p> <p>However, the analysis conducted for the new Preferred Alternative (Alternative F) in the SDEIS and FEIS did predict a severe noise impact at this location (see Section 5.10.3.3, <i>Construction Impacts</i>, and Figures 5-10, 5-11, and 5-12 of the FEIS). This impact is associated with the construction of a new exit ramp on the east side of the Station that was not part of the DEIS Action Alternatives.</p> <p>The analysis did not identify any construction vibration impacts at the Marshall Building (see Figure 5-15 of the FEIS). Vibration would remain below the Federal Transit Administration (FTA) Criteria for Potential Structural Damage.</p> <p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #37a through 38 specify the steps that would be taken to minimize and mitigate noise and vibration impacts, including the development and implementation of a Construction Noise and Vibration Control Plan. The plan would provide for a public engagement plan to inform neighbors and other relevant parties of anticipated noisy activities, noise or vibration level exceedances, and measures to be taken to remedy these exceedances.</p> <p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #2a provides for the completion of geotechnical groundwater studies that will assess risks of subsidence from groundwater drawdown.</p>
	AOC	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.	Construction noise	Neither the DEIS, SDEIS, or FEIS identifies any potential construction noise impacts at or close to the Senate office buildings. As shown in the analyses presented in Section 5.10.4, <i>Impact Analysis</i> , of the DEIS, and Section 5.10.3.3, <i>Construction Impacts</i> , of the FEIS, all noise and vibration impacts would occur adjacent to the Project Area.
	AOC	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.	Visual impacts	The private air rights development is a private undertaking subject to its own review and approval process. FRA has no authority on this project.
	AOC	15	The DEIS and Section 106 identify impacts to Senate parks but do not specify said impacts. These impacts should be clarified.	Cultural resources impacts	<p>Impacts to Senate Parks are addressed for each Action Alternative in the DEIS in the Parks and Recreation Areas section, specifically in subsections 5.13.4.2, 5.13.4.3, 5.13.4.4, 5.13.4.5, 5.13.4.6, and 5.13.4.7. In addition, Senate Parks impacts are addressed in DEIS Section 5.12, <i>Cultural Resources</i>, in Table 5-142, Table 5-147, Table 5-148, Table, 5-151, Table 5-154, Table 5-155, Table 5-158, Table 5-159, Table 5-162, and Table 5-163. More information on those impacts is provided in Appendix D1, <i>Draft Section 106 Assessment of Effects</i>, and Appendix C3a, <i>Aesthetics and Visual Quality: Visual Assessment</i>, of the DEIS.</p> <p>The impacts of the Preferred Alternative evaluated in the SDEIS and FEIS on Senate Parks would be similar to those of the 2020 DEIS Action Alternatives and are addressed in Sections 5.12.3.1, <i>Direct Operational Impacts</i>, <i>Visual Impacts</i>, and 5.13.3.2, <i>Indirect Operational Impacts</i>, of the FEIS.</p>
	AOC	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.	Construction mitigation	<p>Based on the analyses presented in the DEIS, SDEIS, and FEIS, no construction impacts are anticipated to Capitol Complex buildings or U.S. Supreme Court Operations, exception for the Thurgood Marshall Building, which would experience construction-related noise impacts (see response to Item #12 above).</p> <p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #12 and #37a provide for the development by USRC of a Construction Transportation Management Plan and a Construction Noise and Vibration Management Plan among measures to avoid, minimize, or mitigate construction impacts.</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
DC Mayor_0928	Office of the Mayor of the District of Columbia	1	<p>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.</p> <p>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.</p>	Project - General	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The new Preferred Alternative addresses the concerns expressed in the Mayor's comment. It includes a substantially reduced parking program relative to the DEIS Preferred Alternative and places all parking below ground. It features a below-ground pick-up/drop-off facility, as well as pick-up/drop-off in front of WUS, on First and Second Streets NE, and on the H Street deck. When developing the new Preferred Alternative, FRA and the Project Proponents coordinated with the owner of the private air rights on opportunities to enable a civic space on the H Street deck level that would be commensurate with Union Station's historic and architectural significance and centered on the historic station building.</p>
DC Council_0922	Council of the District of Columbia (DC Council)	1	<p>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 ("NCP") as well as District residents, Advisory Neighborhood Commissions, adjacent landowners, and Congresswoman Eleanor Holmes Norton. NCP has replied 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.</p>	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p>
	DC Council	2	<p>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.</p>	Project - Traffic	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p> <p>The development of the new Preferred Alternative also included a re-evaluation of the bus program (documented in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a bus facility integrated within the H Street deck.</p> <p>The new Preferred Alternative also features a below-ground pick-up and drop-off facility anticipated to handle approximately half of all Station-related pick-ups and drop-offs, as well as pick-up and drop-off areas in front of the Station, on First and Second Streets NE, and on the H Street deck, adjacent to the train hall (see Section 5.5.3.1, <i>Direct Operational Impacts, For-hire Vehicles</i>, of the FEIS).</p> <p>The new Preferred Alternative allows for the establishment of a civic space by the developer of the private air rights and for the Federally owned air rights not used for Project elements to be available for potential future transfer and development.</p>



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Comment ID	Commenter	Item #	Comment	Topic	Response
	DC Council	3	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.	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p>
	DC Council	4	<p>It is the sense of the Council that:</p> <p>(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;</p> <p>(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</p> <p>(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.</p>	Project - General	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The new Preferred Alternative addresses the Council's concerns about the Project, as explained in the above responses.</p>
CM Allen_0928	DC Council Member Charles Allen (Charles Allen)	1	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.	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
	Charles Allen	2	<p>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.</p> <p>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.</p>	Project- Urban design	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p> <p>The development of the new Preferred Alternative also included a re-evaluation of the bus program (documented in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a bus facility integrated within the H Street deck.</p> <p>The new Preferred Alternative allows for the establishment of a civic space by the developer of the private air rights and for the Federally owned air rights not used for Project elements to be available for potential future transfer and development.</p> <p>Together, these features support the creation of a vibrant, mixed-use community above the rail terminal. FRA is pleased to note that in his comments on the SDEIS, DC Council Member Charles Allen stated "It is clear that FRA listened and responded to our concerns. With the recent revisions, I believe the SEP can now achieve the potential that this unparalleled opportunity affords the District and our region." (CM Allen_07 06, Item #1).</p>
	Charles Allen	3	<p>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.</p>	Project - PUDO	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>As documented in Sections 6.2 and 6.4 of Appendix A4, <i>Concept Screening Report</i>, of the DEIS, FRA evaluated concepts that would place the bus facility below ground either in or outside the Project Area and determined that such options were not feasible.</p> <p>The new Preferred Alternative features a below-ground pick-up and drop-off facility (anticipated to handle approximately half of all Station-related pick-ups and drop-offs) as well as pick-up and drop-off areas in front of the Station, on First and Second Streets NE, and on the H Street deck, adjacent to the train hall (see Section 5.5.3.1, <i>Direct Operational Impacts, For-hire Vehicles</i>, of the FEIS).</p> <p>The distribution of pick-ups and drop-offs across the Station, including on the H Street deck, would help maintain adequate vehicular circulation near and around the Station. During the preparation of the FEIS, FRA performed a microanalysis of curbside activity around Union Station in the areas where pick-ups and drop-offs would occur, including along Second Street NE, using the VISSIM model. While the analysis did not indicate severe congestion, FRA recognizes that actual operations may differ. The FEIS also recognizes challenging operational conditions at the intersection of H and Third Streets.</p> <p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #27a through 28i specify measures to avoid, minimize, and mitigate such impacts.</p>

DEIS Comments: Agencies

Comment ID	Commenter	Item #	Comment	Topic	Response
ANC2A08_0722	Advisory Neighborhood Commissioner (ANC) 2A08	1	The Union Station Environmental Impact Statement cannot move forward without significant reductions or a complete elimination of 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.	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p> <p>The improvements to multimodal access incorporated into the new Preferred Alternative and the required mitigations would support the use of public transit to access Union Station in the future.</p>
ANC2A08_0818	ANC 2A08	1	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.	Project - General	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p> <p>The improvements to multimodal access incorporated into the new Preferred Alternative and the required mitigations would support the use of public transit to access Union Station in the future.</p>
ANC6C_0714	ANC 6C/Drew Courtney	1	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.	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p> <p>FRA is pleased to note that in their comments on the SDEIS, ANC-6C stated: "ANC 6C is very pleased with the significant adjustments that have been made in the project design since the release of the previously proposed Alternative A-C in 2020. These improvements include the greatly reduced parking program located with a pick-up/drop-off (PUDO) facility below grade; the enhanced, one-level bus station located close to the train hall; the opportunity for a central, open public space south of H Street NE; and the better integration of the multimodal facility into the existing and planned neighborhoods, including more desirable circulation routes in and around the station for vehicles, buses, pedestrians and bicyclists. We thank the FRA for its efforts to make these changes." (ANC 6C_0706, Item #1)</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
	ANC 6C/Drew Courtney	2	<p>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.</p>	Traffic impacts	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The new Preferred Alternative features a below-ground pick-up and drop-off facility (anticipated to handle approximately half of all Station-related pick-ups and drop-offs) as well as pick-up and drop-off areas in front of the Station, on First and Second Streets NE, and on the H Street deck, adjacent to the train hall (see Section 5.5.3.1, <i>Direct Operational Impacts, For-hire Vehicles</i>, of the FEIS). The distribution of pick-ups and drop-offs across the Station, including on the H Street deck, will help maintain adequate vehicular circulation near and around the Station.</p> <p>During the preparation of the FEIS, FRA performed a microanalysis of curbside activity around Union Station in the areas where pick-ups and drop-offs would occur, including along Second Street NE, using the VISSIM model. While the analysis did not indicate severe congestion, FRA recognizes that actual operations may differ. The SDEIS also recognized challenging operational conditions at the intersection of H and Third Streets.</p> <p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #27a through 28i specify measures to avoid, minimize, and mitigate such impacts.</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
ANC6C_0922	ANC6C	1	<p>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:</p> <p>Easy access by all modes of transportation—especially person-scale and sustainable modes such as walking, biking, and public transportation;</p> <p>Creation of active, inviting public spaces that enhance quality of life for those visiting the station and surrounding area and for those living nearby;</p> <p>Prioritization of the sustainable transportation modes that are the future of mobility and right-sizing private automobile parking and the intercity bus garage.</p> <p>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.</p>	Project - General	<p>As described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, the Purpose and Need for the Project is to support current and future long-term growth in rail service and operational needs; achieve compliance with the Americans with Disabilities Act (ADA) and emergency egress requirements; facilitate intermodal travel; provide a positive customer experience; enhance integration with the adjacent neighborhoods, businesses, and planned land uses; sustain WUS’s economic viability; and support continued preservation and use of the historic station building.</p> <p>As required under NEPA, FRA developed a reasonable range of Action Alternatives for analysis in the 2020 DEIS, which all met the Project's Purpose and Need. The development of these Action Alternatives was described in Chapter 3, <i>Alternatives</i>, of the DEIS. Additionally, extensive background information on the alternatives development process was provided in Appendices A3a through A5e of the DEIS.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS.</p> <p>The new Preferred Alternative is consistent with the priorities identified in this comment. Relative to the 2020 DEIS Preferred Alternative (Alternative A-C), it reduces parking capacity from approximately 1,600 to approximately 400-550 spaces and places all parking below-ground. It integrates the bus facility into the H Street deck, making the surface of the deck behind Union Station available for future potential commercial development, including an area within which open space can be established; and it provides for approximately 900 bicycle storage spaces and 100 bikeshare spots.</p> <p>FRA is pleased to note that in their comments on the SDEIS, ANC 6C stated that they are "very pleased with the significant adjustments that have been made in the project design since the release of the previously proposed Alternative A-C in 2020. These improvements include the greatly reduced parking program located with a pick-up/drop-off (PUDO) facility below grade; the enhanced, one-level bus station located close to the train hall; the opportunity for a central, open public space south of H Street NE; and the better integration of the multimodal facility into the existing and planned neighborhoods, including more desirable circulation routes in and around the station for vehicles, buses, pedestrians and bicyclists. We thank the FRA for its efforts to make these changes." (ANC 6C_0706, Item #1).</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
	ANC6C	2	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	Project - Traffic	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The new Preferred Alternative is consistent with the priorities identified in this comment. Relative to the 2020 DEIS Preferred Alternative (alternative A-C), it reduces parking capacity from approximately 1,600 to approximately 400-550 spaces and places all parking below-ground. It integrates the bus facility into the H Street deck and provides for full movement of exiting buses on the H Street Bridge. It makes the surface of the deck behind Union Station available for future potential commercial development, including an area within which open space can be established. It provides for approximately 900 bicycle storage spaces and 100 bikeshare spots.</p> <p>During the preparation of the FEIS, FRA performed a microanalysis of curbside activity around Union Station, including on the H Street deck adjacent to the new train hall, using the VISSIM model. While the analysis did not indicate severe congestion, FRA recognizes that actual operations may differ. The SDEIS also recognized challenging operational conditions at the intersection of H and Third Streets.</p> <p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #27a through 28i specify measures to avoid, minimize, and mitigate such impacts.</p>

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	ANC6C	3	<p>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:            Further reduce the amount of private automobile parking to no more than 295 spaces;            Reduce the number of bus slips to no more than 20; and            Put all parking and the majority of pick-up/drop-off in underground facilities.</p> <p>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.</p>	Project - General	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p> <p>The below-ground facility would also include a pick-up and drop-off area anticipated to accommodate approximately half the pick-up/drop-off activity at Union Station. It would be accessed via ramps on G Street NE and First Street NE, consistent with the recommendations made in this comment.</p> <p>The new Preferred Alternative also includes a bus facility with 39 slips. The size of the bus facility was determined based on an updated demand analysis documented in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS. With 39 slips, the new facility would be able to adequately accommodate demand most days. In case of exceptional demand, the H Street deck pick-up and drop-off area would be used, providing the equivalent of 15 additional slips. Based on the demand analysis and coordination with the bus operators, a smaller facility would not adequately meet the demand.</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
	ANC6C	4	<p><b>Inadequate Bicycle Facilities</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>People arriving on bicycle will be more likely to utilize public spaces and visit the surrounding commercial establishments.</p> <p><b>Solutions and Desired Outcomes</b></p> <p>The Washington Union Station Expansion Project requires two elements to create a better-integrated station that attracts cyclists:</p> <p>Incorporate substantial, state-of-the-art bicycle parking with ride-up access; and</p> <p>Leverage direct connection to nearby cycling routes.</p> <p>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.</p> <p>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.</p> <p>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.</p>	Project - Pedestrian and bicycle	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The pedestrian and bicycle components of the new Preferred Alternative are described in Section F.8, <i>Pedestrian and Bicycle Access</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS. The Preferred Alternative includes parking for approximately 900 bikes in the undercroft of the east and west ramps as well as in the H Street Concourse near the entrances from First and Second Streets NE. The specific design of the parking facilities will be considered further during the engineering and design phase of the Project.</p> <p>The new Preferred Alternative also preserves protected bicycle infrastructure on First and Second Streets NE and provides a shared-use ramp to the deck level along the west side of the Station. Improvements to the Metropolitan Branch Trail are outside the scope of the Station Expansion Project.</p> <p>However, Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #23 provides for the consideration of measures to minimize or mitigate potential conflicts among pedestrians, bicyclists, and vehicles along First Street NE and Second Street NE.</p>



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Comment ID	Commenter	Item #	Comment	Topic	Response
ANC6C_Supp_0928	ANC6C	1	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.	Project-General	Following public and agency review of the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed in the SDEIS and FEIS. The new Preferred Alternative addressed many agency and public concerns, including the concerns expressed by ANC6C.
DCOP_0928	District of Columbia Office of Planning (DCOP)	1	<p>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.</p> <p>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.</p> <p>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.</p>	Project-General	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p> <p>The development of the new Preferred Alternative also included a re-evaluation of the bus program (documented in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a bus facility integrated within the H Street deck.</p> <p>The new Preferred Alternative also allows for the establishment by the private air rights developer of a civic space that would be commensurate with Union Station’s historic and architectural significance and centered on the historic station building.</p>
	DCOP	2	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.	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
	DCOP	3	<p>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.</p>	Project - Parking	In developing the new Preferred Alternative (Alternative F) evaluated in the SDEIS and FEIS, FRA re-evaluated the Project's parking program as documented in Section 1, <i>Parking Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS. This resulted in a program more in line with the Commenter's goals. FRA takes note of Commenter's objection to the referenced language, which has been deleted from the FEIS.
	DCOP	4	<p>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 21st and well into the 22nd centuries, rather than replicating a 20th 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.</p>	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p> <p>In addition to placing the parking below ground, the Preferred Alternative allows for the establishment by the private air rights developer of a civic space that would be commensurate with Union Station's historic and architectural significance and centered on the historic station building, resulting in a land use program that makes effective use of the location.</p>
	DCOP	5	<p>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.</p>	Project - PUDO	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The new Preferred Alternative features a below-ground pick-up and drop-off facility (anticipated to handle approximately half of all Station-related pick-ups and drop-offs) as well as pick-up and drop-off areas in front of the Station, on First and Second Streets NE, and on the H Street deck, adjacent to the train hall (see Section 5.5.3.1, <i>Direct Operational Impacts, For-hire Vehicles</i>, of the FEIS). The distribution of pick-ups and drop-offs across the Station, including on the H Street deck, would help maintain adequate vehicular circulation near and around the Station.</p> <p>During the preparation of the FEIS, FRA performed a microanalysis of curbside activity around Union Station in the areas where pick-ups and drop-offs would occur using the VISSIM model. While the analysis did not indicate severe congestion, FRA recognizes that actual operations may differ.</p> <p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #27a through 28i specify measures to avoid, minimize, and mitigate impacts from pick-up/drop-off activity and traffic.</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
	DCOP	6	<p>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:</p> <ul style="list-style-type: none"> <li>• Higher flexibility for one-way movements and turn restrictions;</li> <li>• The ability for intercity buses to move either east or west from the bus facility;</li> <li>• No offset intersections; and</li> <li>• Greater internal storage capacity within the site roadways for the overflow vehicles (which may be addressed by the PUDO facility noted above).</li> </ul>	Project - Circulation	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The new Preferred Alternative addresses the points made in this comment: it provides for buses to turn east or west on H Street after exiting the bus facility; it eliminates the offset western intersection that was part of Alternative A-C; and it features a below-ground pick-up and drop-off facility for for-hire vehicle queueing.</p>
	DCOP	7	<p>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:</p> <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 queueing.</li> </ul>	Project - Circulation	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The new Preferred Alternative addresses the points made in this comment: it includes only two new intersections with the H Street Bridge; it provides for buses to turn east or west on H Street after exiting the bus facility; it eliminates the offset western intersection that was part of Alternative A-C; and it features a below-ground pick-up and drop-off facility for for-hire vehicle queueing.</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
	DCOP	8	<p>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:</p> <ul style="list-style-type: none"> <li>• Walk</li> <li>• Bike/Scooter</li> <li>• Metrorail</li> <li>• Transit Bus</li> <li>• Streetcar</li> <li>• Private PUDO</li> <li>• Parking</li> <li>• For-Hire Vehicle</li> <li>• Rental car</li> </ul> <p>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:</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>	Mitigation - Traffic	<p>Detailed information on modes of access to the station under the Action Alternatives was provided in Table 5-131 of Appendix C3, <i>Environmental Consequences Technical Report</i>, of the DEIS. The SDEIS that analyzed the impact of the new Preferred Alternative (Alternative F) also provides this information in Appendix C3S, <i>Supplemental Environmental Consequences Technical Report</i>, Table 5-47.</p> <p>The Preferred Alternative (Alternative F) developed in response to public and agency comment and analyzed in the SDEIS and FEIS reserves the middle lanes in front of WUS for transit bus operations (Section F.9.2, <i>Front of WUS</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS), consistent with the Commenter's request that the use of transit buses be incentivized.</p> <p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #28a provides for a robust multimodal Performance Management Plan (PMP). Items #25a through 25f, specify measures that would further encourage transit bus usage by minimizing or mitigating the adverse impacts on transit buses identified in the FEIS.</p> <p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #18b specifies that, as part of the design of the bus facility, USRC would consider accommodating infrastructure supporting zero-emission vehicles, which may include accommodations for electric/zero emission commercial or alternative fuel vehicles.</p> <p>The mitigation measures presented in Table 7-1 of the FEIS/Table 13-2 of the ROD detail, as much as is possible at this stage, the coordination steps that will be taken in planning for and implementing the measures.</p>
	DCOP	9	<p>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.</p>	Project - Multimodal access	<p>The transportation impact analysis presented in Chapter 5 of the DEIS addressed traffic as only one of 12 modes considered in the analysis. However, FRA recognizes that traffic impacts are among the most prominent adverse impacts of the Project and have generated significant concerns from agencies and the public.</p> <p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #28a through 28i (which supersedes the measures presented in the DEIS) identify measures to minimize and mitigate these impacts. These measures would support achieving the 25 percent auto mode share reduction goal identified in the District of Columbia's Move DC plan.</p> <p>FRA further notes that facilitating multimodal access is one the Project's purposes as stated in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS. As such, the Preferred Alternative (Alternative F) incorporates significant improvements to pedestrian and bicycle access, as described in Section F.8, <i>Pedestrian and Bicycle Access</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS.</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
	DCOP	10	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.	Construction Mitigation	<p>FRA coordinated with DDOT through the FEIS, as documented in Chapter 8, <i>Public Involvement and Agency Coordination</i>, of the FEIS.</p> <p>As specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #12, USRC would prepare an integrated Construction Transportation Management Plan in coordination with DDOT and other stakeholders. The Plan will define the measures to be implemented by the construction contractor to avoid, minimize, or mitigate impacts from construction on all transportation modes in each phase of construction, along with procedures to enforce, monitor, and evaluate these measures and ensure consistency with District requirements for managing construction impacts.</p> <p>The DEIS identified a major adverse impact from the unavailability of intercity bus service at Union Station during Phase 4 of construction. During the preparation of the SDEIS for the new Preferred Alternative (Alternative F), FRA confirmed with the private air rights developer that interim bus facilities could be built on the completed portion of the air rights deck during that time, thereby addressing the risk of buses loading and unloading on public streets (see Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #21).</p> <p>Potential impacts on persons experiencing homelessness are addressed in Section 5.17, <i>Environmental Justice</i>, of the DEIS, SDEIS, and FEIS. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #53 specifies measures to avoid, minimize, or mitigate impacts from construction to these persons if any are present at the time.</p>
	DCOP	11	<p>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:</p> <ul style="list-style-type: none"> <li>• 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);</li> <li>• 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;</li> <li>• 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;</li> <li>• 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</li> <li>• 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.</li> </ul>	Project - General	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. FRA coordinated with the District of Columbia Office of Planning (DCOP) during the development of Alternative F, as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i>, of the FEIS.</p> <p>Alternative F responds to many of the commenter's concerns. It features a smaller parking facility (400 to 550 spaces); it places parking below ground, freeing up space on the deck level for mixed-use development; it features a below-ground pick-up and drop-off facility collocated with the parking; and it includes only two new intersections with the H Street Bridge. The transportation mitigation measures specified in Table 7-1 of the FEIS/Table 13-2 of the ROD were developed in coordination with DDOT and include a robust Performance Monitoring Management Plan (Item #28a) as requested by DDOT.</p>

DEIS Comments: Agencies

Comment ID	Commenter	Item #	Comment	Topic	Response
SHPO_0928	District State Historic Preservation Office (SHPO)	1	<p>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 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.”</p> <p>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.</p> <p>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.</p> <p>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.</p>	Historic preservation	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>SHPO’s comments were considered in the development of the new Preferred Alternative. FRA prepared an SAOE to assess the effects of the Preferred Alternative (Alternative F) on historic properties in accordance with Section 106. The SAOE was included in the SDEIS as Appendix D1S. The SAOE included revised text that notes the significance of the view from the center of the H Street Bridge and identifies a potential major visual effect to the view south towards WUS.</p> <p>The new Preferred Alternative (alternative F) includes a below-ground pick-up and drop-off facility and circulation patterns that make it unlikely that the traffic effects of the Preferred Alternative would diminish the integrity and significance of the property, which currently experiences busy, traffic-heavy activity as a major intermodal station.</p>

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	SHPO	2	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.	Historic preservation	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>SHPO's comments were considered in the development of the new Preferred Alternative. FRA prepared an SAOE to assess the effects of the Preferred Alternative (Alternative F) on historic properties in accordance with Section 106. The SAOE was included in the SDEIS as Appendix D1S.</p> <p>The SAOE included text that notes that given the long duration of construction activities and the relative proximity of the REA Building, the effect of vibration on the building would need to be monitored to ensure that structural damage does not occur. Because noise effects would be temporary and limited to the excavation portion of the easternmost phase of construction, such temporary noise effects would not diminish the significance or integrity of the property. However, the Section 106 PA (Appendix F4 of the FEIS) stipulates that a Construction Noise and Vibration Control Plan would be developed and implemented.</p>
	SHPO	3	<p>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.</p> <p>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.</p>	Historic preservation	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>SHPO's comments were considered in the development of the new Preferred Alternative. FRA prepared an SAOE to assess the effects of the Preferred Alternative (Alternative F) on historic properties in accordance with Section 106. The SAOE was included in the SDEIS as Appendix D1S.</p> <p>The concern about increased levels of traffic, especially to the east of WUS and within the Capitol Hill Historic District, were considered when developing the new Preferred Alternative, which eliminates the eastern ramp directing traffic to F Street; provides a below-ground pick-up/drop-off facility; and substantially reduces the parking program relative to the 2020 DEIS Preferred Alternative. The traffic analysis conducted for the new Preferred Alternative (Alternative F) indicated that there would be no adverse effect on the historic district because of traffic. Only one intersection on the edge of the district was modeled to have an unacceptable level of service. Current conditions show that two intersections in the historic district have unacceptable levels of service. The integrity and significance of the Capitol Hill Historic District would not be diminished due to the Project.</p>
	SHPO	4	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.	Section 4(f)	Noted.
DDOT_0925	District Department of Transportation (DDOT)	1	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.	Project - Pedestrian and bicycle	Noted.
	DDOT	2	(3.4.7.4 <i>Bus Facility</i> ). 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.	Project - Bus facility	This is specified in Section F.6, <i>Bus Facility</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , of the FEIS.
	DDOT	3	(Chapter 3) Please include private air rights development circulation assumptions for all build alternatives circulation	Project - Circulation	The private air rights development is a private undertaking subject to its own review and approval process. Circulation would be defined at that time.

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	DDOT	4	(Chapter 3 Line 191) Please provide a circulation diagram for No Action alternative.	Project - Circulation	The private air rights development is a private undertaking subject to its own review and approval process. Circulation would be defined at that time.
	DDOT	5	(Section 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)	Project - DC Streetcar	Noted. During the Project engineering and design phase of the Project, USRC will work closely with DDOT to ensure the Project complies with applicable DDOT requirements and permits regarding pedestrian pathway integration and safety during construction and operation.
	DDOT	6	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?	Project - K Street	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS. The new Preferred Alternative does not include Station access from K Street.
	DDOT	7	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.	Project - DC Streetcar	The DEIS, SDEIS, and FEIS figures showing the Project design elements are conceptual and for illustrative purposes only. During the engineering and design phase of the Project, USRC will work closely with DDOT to avoid conflicts with existing infrastructure or transit modes.
	DDOT	8	(Line 1245) There are no facilities on H Street to support bicycle use.	Project - Pedestrian and bicycle	The referenced line does not address bicycle uses on H Street.
	DDOT	9	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.	H Street Bridge	This information has been updated in the FEIS (Section 3.4.4.3, <i>H Street Bridge Replacement</i> )
	DDOT	10	(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.	Project - Loading	Noted. No reconstruction of the First Street loading dock is included in any of the Action Alternatives, including the Preferred Alternative (Alternative F).
	DDOT	11	(Chapter 3 Line 828) 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.	Project - Parking	FRA takes note of the Commenter's objection to the referenced language, which has been deleted from the FEIS.
	DDOT	12	(Chapter 3 Figure 3-2) 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.)	Project - Circulation	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS. The new Preferred Alternative (Alternative F) does not include an offset intersection.
	DDOT	13	(Chapter 3 Line 1785) 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	Project - PUDO	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS.  The new Preferred Alternative provides for a reduced parking program (400 to 500 spaces) collocated below ground with a pick-up and drop-off facility anticipated to accommodate approximately half of all pick-ups and drop-offs are Union Station.
	DDOT	14	(Chapter 4 Line 606) Clarify that 860 parkers per day park for 1-5 hours	Project - Parking	The 860 parkers per day for 1-5 hours information is included in Appendix A6, <i>Parking Program Memorandum</i> , of the DEIS. In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. In developing the new Preferred Alternative, FRA re-evaluated the Project's parking program, as documented in Section 1, <i>Parking Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS. Appendix F1 supersedes the parking information and analysis contained in the DEIS, including the referenced statement.



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	DDOT	15	(Chapter 4 Line 601) Please cite the year of USPG parking data	Project - Parking	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. In developing the new Preferred Alternative, FRA re-evaluated the Project's parking program as documented in Section 1, <i>Parking Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS. Appendix F1 supersedes the parking information and analysis contained in the DEIS, including the referenced text.
	DDOT	16	(Chapter 4 Line 635) Suggest citing DDOT data "from September 2019"	Correction	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. When developing the new Preferred Alternative, FRA re-evaluated the Project's parking program as documented in Section 1, <i>Parking Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS. Appendix F1 supersedes the parking information and analysis contained in the DEIS, including the referenced text.
	DDOT	17	(Chapter 4 Line 108) List of documents of District Policies, Regulations, and Guidance: add DC Streetcar Design Criteria and Utility Manual	Correction	This comment references the section summarizing regulations relevant to water and water quality impacts. The cited document is not germane to this section.
	DDOT	18	(Chapter 4 Line 108) Please insert both DC Streetcar Design Criteria 2019 and DC Streetcar Utilities Standard of Practice 2015 somewhere on Page 4-6 below Line 108.	Correction	This comment references the section summarizing regulations relevant to water and water quality impacts. The cited documents are not germane to this section.
	DDOT	19	(Section 5.5.4) 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; 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; all the underground parking can only be accessed from the K St entrance/exit, which may cause safety and operational issues.	Traffic impacts	The operation of the five-leg east intersection (Study Intersection 8) was analyzed in the DEIS, SDEIS, and FEIS as part of the traffic impact analysis. The analysis shows the intersection operating at an acceptable level of service in the Preferred Alternative (Alternative F).  The new Preferred Alternative does not feature an entrance to the Station from K Street.  Table 7-1 of the FEIS/Table 13-2 of the ROD, Items 28a through 28i identify traffic mitigation measures.
	DDOT	20	(Section 5.5.4) We want to re-emphasize our concerns on the proposed curb-cuts, and also recommend: minimize and consolidate the curb-cuts, especially on the south side of the H St; 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.	Project - roadways	Following the DEIS and when developing the Preferred Alternative (Alternative F) analyzed in the SDEIS and FEIS, FRA and the Project Proponents worked closely with the private air rights developer to minimize and coordinate curb cuts. In addition, in the Preferred Alternative (Alternative F), the west intersection is no longer offset. Both the east and west intersections are fully aligned.
	DDOT	21	(Section 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.	Project - Circulation	The private air rights development is a private undertaking subject to its own review and approval process. During the development of the new Preferred Alternative analyzed in the SDEIS and FEIS (Alternative F), FRA and the Project Proponents worked to align assumptions regarding circulation and curb cut locations with the private air right developer. This coordination will continue as Project engineering and planning advance.
	DDOT	22	(Section 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.	Project - Circulation	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The new Preferred Alternative addresses Commenter's concerns. It would create only two new intersections with H Street; it allows inbound and outbound buses to have full range of movement at the H Street Bridge; and the west intersection with H Street would not be offset.

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	DDOT	23	(Chapter 5 Line 837) 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 - including queuing on H St. Bridge, which is a major concern for DDOT.	PUDO impacts	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The new Preferred Alternative (Alternative F) features a below-ground pick-up and drop-off facility (anticipated to handle approximately half of all Station-related pick-ups and drop-offs) as well as pick-up and drop-off areas in front of the Station, on First and Second Streets NE, and on the H Street deck, adjacent to the train hall (see Section 5.5.3.1, <i>Direct Operational Impacts, For-hire Vehicles</i>, of the FEIS). The distribution of pick-ups and drop-offs across the Station, including on the H Street deck, would help maintain adequate vehicular circulation near and around the Station.</p> <p>During the preparation of the FEIS, FRA performed a microanalysis of curbside activity around Union Station in the areas where pick-ups and drop-offs would occur using the VISSIM model. While the analysis did not indicate severe congestion, FRA recognizes that actual operations may differ. Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #27a through 28i specify measures to avoid, minimize, and mitigate impacts from pick-up/drop-off activity and traffic.</p>
	DDOT	24	(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 estimated 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.	Mitigation - Traffic	Noted. Following further coordination with DDOT, FRA updated the traffic analysis in the FEIS based on an auto mode share reduction target of 25 percent, in keeping with the District of Columbia's Move DC plan.
	DDOT	25	(Section 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.	DC Streetcar	Noted.
	DDOT	26	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. 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. 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. 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. 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.	Mitigation - Transit buses	Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #25a through 25f specify measures applicable to transit buses that are consistent with this comment, including accommodating transit buses in front of the Station.
	DDOT	27	(Section 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.	Mitigation - DC Streetcar	The referenced DEIS mitigation measure was revised in the SDEIS and the FEIS in a manner that addresses the commenter's concern. Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #17a and 17b specify that USRC would develop, with DDOT, options for temporary access to the DC Streetcar station during construction and take steps with the District State Safety Office to address issues that may affect Streetcar certification. USRC would implement any required changes to public access, subject to DDOT approval, and provide safe accommodations for pedestrians in accordance with the District's Safe Accommodations law.

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	DDOT	28	(Chapter 5, Line 403) 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.	H Street Bridge	The DEIS statements on the effects of the H Street Bridge Replacement project were based on information available at the time of writing. After the DEIS was published, DDOT and FHWA released a Final EA/FONSI (June 2022) that includes information on the replacement project's traffic and transportation impacts. FRA reviewed the document and found that it is generally consistent with what was assumed in the DEIS. FRA notes that the DEIS did not state that the DC Streetcar service would be suspended, but that the Streetcar Union Station stop would temporarily close. This is consistent with the Final EA/FONSI, which explains that the DC Streetcar terminal station on the bridge would be closed during construction and streetcar service would terminate at Third Street NE.
	DDOT	29	(Chapter 5, Line 1061) 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.	Construction - DC Streetcar	Noted.
	DDOT	30	(Chapter 5, Line 561) 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.	Metrorail impacts	The DEIS assessed operational impacts on the WMATA station as moderate for all Action Alternatives (see Table 5-61 of the DEIS).
	DDOT	31	(Chapter 5, Line 620) 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.	Bus impacts	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS. The bus facility in the new Preferred Alternative (Alternative F) does not involve a maximum dwelling time and is capable of fully accommodating bus operational needs in the facility.
	DDOT	32	(Chapter 5, Line 652) 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.)	Loading impacts	As explained in Section F.2, <i>Loading</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , the Second Street loading dock would have 6 berths and 2 trash compactors. Trucks using the new loading dock would be similar to those using the existing docks. The new loading dock would be designed in accordance with District requirements, including head-in/head-out access. No change would be made to the First Street loading dock. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #23 provides for the consideration of measures to reduce conflicts among bicyclists, pedestrians, and vehicles on First Street NE, between Massachusetts Avenue and M Street NE at the First Street Loading Dock and on Second Street at the new Second Street loading dock.
	DDOT	33	(Chapter 5, Line 723) 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.	Pedestrian/ Bicycle impacts	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #23 provides for the consideration of measures to reduce conflicts among bicyclists, pedestrians, and vehicles on First Street NE, between Massachusetts Avenue and M Street NE at the First Street Loading Dock.
	DDOT	34	(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	Transit bus impacts	Identifying a precise V/C ratio for the variety of bus lines is not necessary or practical given the anticipated intensity of the impacts. Impact would be further reduced by the measures specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #25a through 25f and #28a through 28i.

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	DDOT	35	(Chapter 5, Line 788) 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.	Parking impacts	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p> <p>The DEIS, SDEIS, and FEIS assess the reduction in parking as an adverse impact on parking as a resource for which there is a demand.</p>
	DDOT	36	(Chapter 5, Line 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.)	Traffic impacts	Noted.
	DDOT	37	(Chapter 5, Lines 933-938) 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.	Traffic impacts	Noted. The new Preferred Alternative (Alternative F) that was developed to address public and agency comments on the 2020 DEIS, and was analyzed in the SDEIS and FEIS, is not anticipated to create spillovers, as explained in Section 5.5.3.1, <i>Direct Operational Impacts, Vehicular Traffic, Curbside Analysis</i> , of the FEIS.
	DDOT	38	(Chapter 5, Line 978) 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.	Air rights development	Noted. The private air rights development is a private undertaking subject to its own review and approval process.
	DDOT	39	(Chapter 5, Line 1102) 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	Construction impacts - General	The DEIS identified a major adverse impact from the unavailability of intercity bus service at Union Station during Phase 4 of construction. During the preparation of the SDEIS for the new Preferred Alternative (Alternative F), FRA confirmed with the private air rights developer that interim bus facilities could be built on the completed portion of the air rights deck during that time, thereby addressing the risk of buses loading and unloading on public streets (as specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #21). USRC will coordinate with DDOT regarding potential interim facilities for loading and pick-ups and drop-offs as part of the preparation of the integrated Construction Transportation Management Plan for the Project specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #12.
	DDOT	40	(Chapter 5, Line 1073) 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.	Construction impacts - Buses	The DEIS identified a major adverse impact from the unavailability of intercity bus service at Union Station during Phase 4 of construction. During the preparation of the SDEIS for the new Preferred Alternative (Alternative F), FRA confirmed with the private air rights developer that interim bus facilities could be built on the completed portion of the air rights deck during that time, thereby addressing the risk of buses loading and unloading on public streets (as specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #21).
	DDOT	41	(Chapter 5, Line 1190) FHV queuing onto H St. Bridge during construction is not acceptable. FRA should identify alternative circulation and FHV locations.	Construction impacts - PUDO	USRC will coordinate with DDOT regarding potential interim facilities for loading and pick-ups and drop-offs as part of the preparation of the integrated Construction Transportation Management Plan for the Project specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Item#12.
	DDOT	42	(Chapter 5, Line 984) 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.)	Construction impacts - General	USRC would coordinate with DDOT regarding potential interim accommodation for affected modes as part of the preparation of the integrated Construction Transportation Management Plan for the Project specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Item#12.

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	DDOT	43	Assume all comments on Alternative A above also apply to other build alternatives, except where noted otherwise below	General	Noted. In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS. The impacts of the new Preferred Alternative (alternative F) are evaluated in Chapter 5, <i>Environmental Consequences</i> , of the FEIS. Comments applicable to DEIS Alternative A and other 2020 DEIS Action Alternatives may not be applicable to the new Preferred Alternative (Alternative F).
	DDOT	44	(Chapter 5, Line 1422) 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.	Project - Parking	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS. The new Preferred Alternative features a below-ground pick-up and drop-off facility anticipated to handle approximately half of all Station-related pick-ups and drop-offs. In the new Preferred Alternative, there would be no access to the below-ground facility from K Street NE.
	DDOT	45	(Chapter 5, Line 1423) 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.	Project - K Street	As noted above, in the new Preferred Alternative (Alternative F), there would be no access to the below-ground facility from K Street NE.
	DDOT	46	(Chapter 5, Line 1461) 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.	Traffic impacts	Noted.
	DDOT	47	(Chapter 5, Line 1482) 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.	Mitigation - Traffic	Noted. Following further coordination with DDOT, FRA updated the traffic analysis in the FEIS based on an auto mode share reduction target of 25 percent, in keeping with the District of Columbia's Move DC plan.
	DDOT	48	(Chapter 5, Line 2253) 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.	Project - H Street intersections	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS. The new Preferred Alternative does not include an offset intersection.
	DDOT	49	(Chapter 5, Line 2394) 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.	Traffic impacts	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS.  The Preferred Alternative features a below-ground pick-up and drop-off facility that is anticipated to accommodate approximately half of all station-related pick-ups and drop-offs. As a result, the share of pick-up and drop-off on H Street would be smaller than in the 2020 DEIS Action Alternatives (from 19 to 32 percent instead of 35 percent).  Measures to minimize and mitigate impacts associated with pick-up and drop-off activity are specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #27a through 27f.  During the preparation of the FEIS, FRA performed a microanalysis of curbside activity around Union Station in the areas where pick-ups and drop-offs would occur using the VISSIM model. As explained in Section 5.5.3.1, <i>Direct Operational Impacts, Vehicular Traffic, Curbside Analysis</i> , of the FEIS, the analysis did not indicate spill-over on H Street.

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	DDOT	50	(Chapter 5, Line 2339) 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.	PUDO impacts	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The new Preferred Alternative features a below-ground pick-up and drop-off facility (anticipated to handle approximately half of all Station-related pick-ups and drop-offs) as well as pick-up and drop-off areas in front of the Station, on First and Second Streets NE, and on the H Street deck, adjacent to the train hall (see Section 5.5.3.1, <i>Direct Operational Impacts, For-hire Vehicles</i>, of the FEIS). The distribution of pick-ups and drop-offs across the Station, including on the H Street deck, would help maintain adequate vehicular circulation near and around the Station.</p> <p>During the preparation of the FEIS, FRA performed a microanalysis of curbside activity around Union Station in the areas where pick-ups and drop-offs would occur using the VISSIM model. The analysis did not indicate severe congestion.</p>
	DDOT	51	(Chapter 5, Line 2368) 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.	Traffic impacts	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS. The traffic impacts of the new Preferred Alternative are presented in 5.5.3.1, <i>Direct Operational Impacts, Vehicular Traffic</i> , of the FEIS. Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #28a through 28i, specify measures to minimize and mitigate traffic impacts.
	DDOT	52	(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 queuing.	Transportation impacts	<p>As explained in the DEIS, there would be greater use of the DC Streetcar under all Action Alternatives (a beneficial impact), as well as greater traffic congestion on H Street created by the Project (an adverse impact), resulting in a net impact that would still be beneficial but minor. The impact of the new Preferred Alternative (Alternative F) analyzed in the SDEIS and FEIS would be the same (Section 5.5.3.1, <i>Direct Operational Impacts, DC Streetcar</i>, of the FEIS).</p> <p>The loading impacts analysis in the DEIS (and SDEIS and FEIS for the new Preferred Alternative [Alternative F]) is specific to loading space availability and not the effects loading would have on traffic. The effects that the Project would have on traffic (which would include any impacts from traffic to and from the loading facilities) are addressed as part of the traffic impact analysis.</p> <p>While some of the Action Alternatives considered in the DEIS have potential to generate queuing, analysis indicated that this would not be the case with the new Preferred Alternative (Alternative F), as explained in Section 5.5.3.1, <i>Direct Operational Impacts, Vehicular Traffic, Curbside Analysis</i>, of the FEIS.</p>
	DDOT	53	(Table 5-63) Additional mitigations to include: For-Hire Vehicles should specifically mention performance based system for "minimum internal capture rate"	Mitigation - PUDO	Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #27d and 27e provide for strategies consistent with this request.

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	DDOT	54	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.	Pedestrian/ Bicycle impacts	<p>The DEIS analyses of bicycle activity concluded that there would be adverse impacts across all Action Alternatives due to the increased risk of conflicts between bicycles and vehicles because of greater vehicular, pedestrian, and bicycle volumes. For Action Alternatives A and A-C, these adverse impacts would be offset by beneficial impacts, thus resulting in an overall minor beneficial impact rating. Further, additional adverse impacts to bicycle activities were identified under Action Alternatives B, C, D, and E from conflicts with First and K Street NE; these impacts would be partially offset by beneficial impacts, but not enough to change the overall impact rating to beneficial.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The bicycle impacts of the new Preferred Alternative (Alternative F) are presented in Section 5.5.3.1, <i>Direct Operational Impacts, Bicycle Activity</i>, of the FEIS. They are assessed as major beneficial due to the improvements (parking for approximately 900 bikes, 100 bikeshare spots, shared-used west ramp) included in the new Preferred Alternative. Potential conflicts along First Street NE are recognized, however, and Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #23 specifies measures to be implemented to avoid, minimize, and mitigate this impact.</p> <p>The new Preferred Alternative (Alternative F) does not include Station access from K Street NE.</p>
	DDOT	55	(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.	Mitigation - Traffic	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #28a through 28i (which supersedes the measures proposed in the DEIS) identify measures to minimize and mitigate the traffic impacts of the new Preferred Alternative (Alternative F). These measures support achieving the 25 percent auto mode share reduction goal identified in the District of Columbia's Move DC plan.</p>
	DDOT	56	(Page 7-4, No. 14) DDOT agrees that proponents should contribute to improvements in the Station Access and Capacity Study, as a baseline.	Mitigation - Metrorail	Noted.
	DDOT	57	(Page 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)	Mitigation - Metrorail	Noted. Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #14a through 15b (which supersedes the measures proposed in the DEIS) specify measures to minimize and mitigate impacts related to Metrorail ridership at Union Station.
	DDOT	58	(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	Mitigation - PUDO	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #27d and 27e provide for strategies to manage pick-up/drop-off activity consistent with this recommendation. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #28a provides for a robust multimodal Performance Management Plan (PMP) that will help to prevent queuing on District streets. These measures were developed and refined in coordination with DDOT between the DEIS and the FEIS.</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
	DDOT	59	(No. 29) 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.	Mitigation - Traffic	Traffic impact analysis showed that specific deck-level circulation patterns do not make a substantial difference to deck-level operations. As can be seen in Section 5.5.3.1, <i>Direct Operational Impacts, Vehicular Traffic</i> , of the FEIS, operational conditions on H Street in the new Preferred Alternative (Alternative F), which does not assume a one-way circulation pattern, would be similar to what it they would be in the 2020 DEIS Action Alternatives, where a such a pattern was assumed.
	DDOT	60	(Page 7-4) insert "Proponents to coordinate with DDOT to obtain permission through TOPS program."	Correction	Section 5.5.7, <i>Permits and Regulatory Compliance</i> , of the DEIS specified that the "Project Proponents are expected to coordinate with DDOT to obtain necessary permits and permissions through the Transportation Online Permitting System (TOPS)." This is further stated in Table 7-2, Item #5 of the FEIS.
	DDOT	61	(Page 7-4) Insert "Construction contractors to coordinate with DDOT to receive safety training through DC Streetcar Track Allocation Program."	Correction	This language was incorporated in the FEIS (Section 5.15.3.3, <i>Construction Impacts</i> ).
	DDOT	62	(Chapter 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).	Mitigation - Transit buses	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS. Transportation mitigation measures are specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #12 through 30. These measures were developed in coordination with DDOT.
	DDOT	63	(Chapter 7) 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.	Permits	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The FEIS contains an updated list of permits, presented in Table 7-2.
	DDOT	64	Item 10 lists DDOT right of way permit. Please provide further information if this is a short term occupancy or a property transfer.	Permits	Both occupancy permits and property transfers may be required, as specified in Table 7-2, Item #5, of the FEIS.
	DDOT	65	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.	Mitigation - Traffic	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p> <p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #27a through 28i specify measures to avoid, minimize, and mitigate traffic and pick-up/drop-off impacts. These measures were developed in coordination with DDOT.</p>
	DDOT	66	(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.	Project - PUDO	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The new Preferred Alternative features a below-ground pick-up and drop-off facility (anticipated to handle approximately half of all Station-related pick-ups and drop-offs) as well as pick-up and drop-off areas in front of the Station, on First and Second Streets NE, and on the H Street deck, adjacent to the train hall (see Section 5.5.3.1, <i>Direct Operational Impacts, For-hire Vehicles</i>, of the FEIS).</p>



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	DDOT	67	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.	Parking impacts	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p>
	DDOT	68	(Appendix A6) 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.	Project - Rental cars	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), including rental car use. Appendix F1 of the FEIS provides rental car passenger information which supersedes the information on this matter provided in the DEIS.</p>
	DDOT	69	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 move DC.	Project - Parking	<p>Noted. In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p>
	DDOT	70	(Appendix A6) 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.	Project - K Street	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The new Preferred Alternative does not include access to the below-ground facility from K Street NE.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p> <p>The new Preferred Alternative also features a below-ground pick-up and drop-off facility anticipated to handle approximately half of all Station-related pick-ups and drop-offs, including those by for-hire vehicles.</p>

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	DDOT	71	(Appendix A6) 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 - but that our recommendation of a maximum of 295 parking spaces remains unchanged. 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.	Project - PUDO	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The new Preferred Alternative features a below-ground pick-up and drop-off facility (anticipated to handle approximately half of all Station-related pick-ups and drop-offs) as well as pick-up and drop-off areas in front of the Station, on First and Second Streets NE, and on the H Street deck, adjacent to the train hall (see Section 5.5.3.1, <i>Direct Operational Impacts, For-hire Vehicles</i>, of the FEIS).</p>
	DDOT	72	(Appendix A6) 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.	Project - Federal air rights	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The new Preferred Alternative places parking below ground and the bus facility within the deck above the rail terminal. The Federally owned air rights not needed to construct Project elements would be available for potential future transfer and development.</p> <p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #25a through 25f specify measures that would encourage transit usage.</p>
	DDOT	73	(Appendix A6) 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.	Traffic impacts	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>When developing the new Preferred Alternative, FRA re-evaluated the Project's parking program as documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS. Appendix F1 supersedes the parking information and analysis contained in the DEIS.</p>
	DDOT	74	(Appendix A6) 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)	Construction - Schedule	<p>The DEIS provided an estimated construction schedule (Table 3-11). The FEIS provides similar information for the new Preferred Alternative (Alternative F) in Table 3-9. Construction times are primarily driven by the amount of excavation required to build the below-ground parking and pick-up and drop-off facilities incorporated in the new Preferred Alternative in response to comments from DDOT and other agencies as well as from members of the public.</p>
	DDOT	75	(Appendix A6) For purposes of calculating impacts, what is the number of parking spaces you assume in your "significantly reduced" analysis?	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>When developing the new Preferred Alternative, FRA re-evaluated the Project's parking program as documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS. Appendix F1 supersedes the parking information and analysis contained in the DEIS.</p>
	DDOT	76	(Appendix A6) 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.	Project - Federal air rights	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. For the purposes of analyzing the impacts of the new Preferred Alternative, the potential Federal air rights development is assumed to be a mixed-use development.</p>

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	DDOT	77	(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.	Transit bus impacts	<p>Table ES-7 of the DEIS is a summary impact table. Methodology, analyses, and the reasoning for the impact determinations were described in the DEIS and Appendix C3 (Section 5.5, Transportation) of the DEIS.</p> <p>As noted in Section 5.5.3.1, <i>Direct Operational Impacts, City and Commuter Buses</i>, of the FEIS, the analysis recognizes that traffic conditions would adversely affect bus reliability and speeds due to the overall degradation of traffic operations. However, the FEIS also notes that ongoing DDOT planning efforts as part of the Bus Priority Program, which may include dedicated lanes or other measures to improve bus speed and reliability on North Capitol Street, H Street NE/NW, and Massachusetts Avenue NE/NW, would alleviate these conditions. Additionally, the accommodation of transit buses at the front of WUS in the new Preferred Alternative (Alternative F) would also reduce impacts from congestion, as loading and offloading activities would be on a dedicated curbside and off District streets.</p> <p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #25e specifies that USRC will coordinate with DDOT and WMATA to identify, study, design, and construct bus priority measures in the vicinity of Union Station in defined areas.</p>
	DDOT	78	(General) 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.	H Street Bridge	Noted. Project details would be developed during the engineering and design phase, during which USRC would work with DDOT, as applicable, to ensure the Project is consistent with any DDOT plans for the area and to prevent conflicts with existing transportation infrastructure (including the H Street bridge and surrounding area) and transit modes.
	DDOT	79	(Chapter 4, Line 549) 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.	Correction	The referenced documents are acknowledged in the FEIS in Section 4.9, <i>Land Use, Land Planning and Property</i> (NoMa Vision Plan and Development Strategy and Downtown East Re-Urbanization Strategy) and Section 4.14, <i>Public Safety and Security</i> (DCMR Title 24: Public Space and Safety)
DOEE_0928	District of Columbia Department of Energy and Environment (DOEE)	1	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.	Resiliency	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The development of the new Preferred Alternative included a re-evaluation of the mitigation program, including measures to address the Project's impacts on air quality, energy consumption, resilience, and greenhouse gas (GHG) emissions. The updated mitigation measures are identified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #31a through 35d.
	DOEE	2	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.	Resiliency	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the mitigation program, including measures to address the Project's impacts on air quality, energy consumption, resilience, and GHG emissions. The updated mitigation measures are identified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #31a through 35d. Among the measures to be considered for incorporation into Project design, Item #34 includes reducing dependency on centralized power by installing renewable energy systems at WUS, such as, for instance, solar panels.</p>

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	DOEE	3	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.	Resiliency	Noted. Resiliency is addressed in Section 5.7.3.2, <i>Indirect Operational Impacts, Resilience</i> , of the FEIS. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #34 specifies measures to support and increase resiliency, including achieving the requirements and standards of Public Buildings Service (PBS)-P100. PBS-P100 provides performance-based standards and prescriptive requirements focused on energy efficiency, carbon neutrality, and practices that protect against climate risks.
	DOEE	4	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.	Energy impacts	FRA recognizes that the approach taken to evaluate energy impacts is conservative. This is due to the conceptual nature of Project design, which does not allow for a more refined assessment. The EUI values used for the analysis were updated for the analysis of the new Preferred Alternative (Alternative F) in the SDEIS and FEIS based on the most recent available data at the time of writing. Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #33 through 35d specify measures to minimize energy consumption and associated GHG emissions, including the development and incorporation of Net-Zero Energy strategies into the design of the Project to the greatest extent practicable.
	DOEE	5	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.	Energy impacts	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS.  The development of the new Preferred Alternative included a re-evaluation of the mitigation program, including measures to address the Project’s impacts on air quality, energy consumption, resilience, and GHG emissions. Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #31a through 35d.  The Project will comply with the applicable building codes identified in Table 7-2, Item #5 of the FEIS, as applicable.
	DOEE	6	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.	Electrification	The Purpose and Need for the Project, described in FEIS Section 2.3, <i>Purpose and Need Statement</i> , includes supporting current and future long-term growth in rail service and operational needs; achieving compliance with ADA and emergency egress requirements; facilitating intermodal travel; providing a positive customer experience; enhancing integration with the adjacent neighborhoods, businesses, and planned land uses; sustaining WUS’s economic viability; and supporting the continued preservation and use of the historic station building.  The basis for rail planning for the Project is presented in Appendix B, <i>Washington Union Station Terminal Infrastructure EIS Report</i> , of the DEIS. It assumes the continuation of diesel operations, consistent with the rail operators’ operating plans .  While the Project does not preclude the implementation of future electrification strategies, such strategies are not part of the Purpose and Need and are corridor-level activities that are outside the scope of the Project.

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	DOEE	7	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.	GHG impacts	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the mitigation program, including measures to address the Project’s impacts on air quality, energy consumption, resilience, and GHG emissions. The updated mitigation measures are identified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #31a through 35d.</p> <p>The FEIS (Section 5.7.3.3, <i>Construction Impacts</i>) recognizes that the fabrication and transportation of materials used to construct the Project would generate substantial GHG emissions, but that these emissions cannot be quantified at this time because the quantity, origin, and fabrication method of the construction materials are not known.</p> <p>In response to this comment, Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #33 specifies that USRC will prepare a Life Cycle Assessment of GHG emissions associated with the Project (embodied emissions) and use this assessment to inform future decisions regarding the type of materials used and their sourcing, so that associated GHG emissions are minimized to the extent practicable. The measure also directs that, to the extent possible, USRC will use low GHG emissions materials for the Project.</p>
	DOEE	8	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: <ol style="list-style-type: none"> <li>1. Time of use rates for parking spaces similar to the Demand-Based Parking Pricing in Penn Quarter/Chinatown (see <a href="https://ddot.dc.gov/page/demand-based-parking-pricing-penn-quarterchinatown">https://ddot.dc.gov/page/demand-based-parking-pricing-penn-quarterchinatown</a>);</li> <li>2. Prioritization of areas in the parking garage for compact vehicle parking;</li> <li>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;</li> </ol>	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p> <p>As noted in Section F.7, <i>Parking</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS, provisions for electric vehicle charging would be made in the parking facility. The number of charging spots would be determined during the engineering and design phase of the Project.</p>
	DOEE	9	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.	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS.</p> <p>The new Preferred Alternative features a below-ground pick-up and drop-off facility collocated with the parking facility. As noted in Section F.9.1, <i>Below-Ground Pick-up and Drop-off Facility</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS, provisions for electrical vehicle charging would be made in the queueing and staging areas, as technically feasible. The number and location of charging spots would be determined during the engineering and design phase of the Project.</p>
	DOEE	10	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.	Construction - Spoil disposal	<p>Noted. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #29b specifies that USRC will coordinate with Amtrak to evaluate and maximize to the extent practicable the use of work trains instead of dump trucks to haul away excavation spoil during construction.</p>

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	DOEE	11	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 § 200.1 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.	Air quality	The regulatory references cited in the comment are included in Section 4.6.1, <i>Regulatory Context and Guidance</i> , of the FEIS. Table 7-2, Item #7 specifies permitting requirements under 20 DCMR Section 200 and the need to coordinate early with AQD.
	DOEE	12	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 <a href="https://doee.dc.gov/service/engine-anti-idling-law">https://doee.dc.gov/service/engine-anti-idling-law</a> .	Air quality	Noted. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item#31b specifies that USRC will ensure that signs promoting awareness of the District's anti-idling laws are posted in the below-ground facility and the bus facility.
	DOEE	13	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.	Project - Pedestrian and bicycle	Noted. The feasibility of establishing facilities for micromobility devices will be considered during the engineering and design phase of the Project.
	DOEE	14	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.	Resiliency	Noted. In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS.  The development of the new Preferred Alternative included a re-evaluation of the mitigation program, including measures to address the Project's impacts on stormwater, energy consumption, resilience, and GHG emissions. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #1 specifies that USRC will ensure that Project design incorporates stormwater management features, including green infrastructure practices such as rainwater collection and reuse, green roofs, and bioretention facilities, as appropriate to manage stormwater flows in accordance with DOEE's Stormwater Management. Item #34 specifies measures that would be considered to enhance resilience at Union Station, including, for instance, reflective roofs or green roofs to reduce urban heat island effect.
	DOEE	15	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.	Groundwater/Wastewater impacts	The referenced statement was in error and has been corrected in the FEIS (Table 7-1 of the FEIS, Item #2c). Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #2c and Table 7-2 of the FEIS, Item #3 identify the TDA permit requirement.
MAAC_0714	DC Multimodal Accessibility and Advisory Council/Rob Dooling	1	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.	Project - Accessibility	The Purpose and Need for the Project, described Section 2.3, <i>Purpose and Need Statement</i> , of the FEIS includes facilitating intermodal travel. As explained in Section 3.1.1, <i>Identification of Project Elements</i> , of the FEIS, parking is one of eight Project elements or components of the multimodal Station. Alternatives providing no parking at all would not meet the Project's Purpose and Need. Some parking is needed for Union Station to function as a multimodal transportation facility.  In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS.  The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550.

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Comment ID	Commenter	Item #	Comment	Topic	Response
DRPT_0928	Virginia Department of Rail and Public Transportation (DRPT)	1	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.	Project - Rail planning	The rail planning assumptions informing the Project's track and platform plan, detailed in Appendix B of the DEIS, align with the plans advanced in the DC to Richmond Southeast High Speed Rail project, Long Bridge Project, and Transforming Rail in Virginia. FRA notes that Amtrak developed the rail program documented in Appendix B of the DEIS and that both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item #3 and VRE_0706, Item #1).
	DRPT	2	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.	Project - Rail planning	The rail planning assumptions informing the Project's track and platform plan align with the plans advanced in the DC to Richmond Southeast High Speed Rail project, Long Bridge Project, and Transforming Rail in Virginia. FRA notes that Amtrak developed the rail program documented in Appendix B of the DEIS and that both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item #3 and VRE_0706, Item #1).
	DRPT	3	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.	Project - Rail planning	The Purpose and Need for the Project, described in Section 2.3, <i>Purpose and Need Statement</i> , of the FEIS includes facilitating intermodal travel and providing a positive customer experience. This includes wayfinding and circulation. Wayfinding and signage strategies would be developed during the engineering and design phase of the Project.
	DRPT	4	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.	Project - Rail planning	Tracks and platforms serve a core function of Union Station, and the Project is needed to improve rail capacity, reliability, safety, efficiency, accessibility, and security for both current and future long-term rail operations at the Station. Rail infrastructure at Union Station is continually maintained for safe and efficient operations. The aspect of the Project pertaining to the First Street Tunnel is described in Section F.1, <i>Tracks and Platforms/Rail Support Function</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , of the FEIS.
	DRPT	5	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.	Project - Rail planning	<p>The Purpose and Need for the Project, described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS includes facilitating intermodal travel. As explained in Section 3.1.1, <i>Identification of Project Elements</i>, the bus facility is one of eight Project elements or components of the multimodal Station. All Action Alternatives provide for a new bus facility.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the bus program (documented in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS). On the basis of the updated program, the bus facility in the Preferred Alternative would have 39 slips. This would accommodate anticipated intercity and tour/charter bus service most days. In times of exceptional demand, overflow space on the H Street deck level would accommodate approximately 15 buses.</p>

DEIS Comments: Agencies

Comment ID	Commenter	Item #	Comment	Topic	Response
WMATA_0925	Washington Metropolitan Area Transit Authority (WMATA)	1	<p>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.” 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.”</p>	Metrorail impacts	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the mitigation program. The mitigation recommended by the commenter was incorporated in Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #14a, which requires USRC to fund a new WMATA Station Access and Capacity study to address the impact of increased passenger volumes on circulation at the WUS WMATA Station.</p>
	WMATA	2	<p>WUS Capacity Impacts to Metrorail Red Line and Proposed Mitigation</p> <p>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."</p> <p>FRA’s proposed mitigation suggests: "Proponents to coordinate WMATA about regional efforts to increase mainline capacity along the Red Line."</p> <p>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:</p> <p>"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."</p>	Mitigation - Metrorail	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the mitigation program. The mitigation recommended by the commenter was incorporated in Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #15a, which requires USRC, in coordination with DDOT, to engage with WMATA about the determination of the preferred alternative for a new core line in the context of the Blue/Orange/Silver Capacity &amp; Reliability Study.</p>



DEIS Comments: Agencies

Comment ID	Commenter	Item #	Comment	Topic	Response
	WMATA	3	<p>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."</p> <p>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."</p> <p>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 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: <a href="https://www.wmata.com/business/adjacent-construction/index.cfm">https://www.wmata.com/business/adjacent-construction/index.cfm</a>.</p>	Mitigation - Metrorail	Noted. Table 7-2, Item #6 of the FEIS specifies the need for WMATA reviews and approvals for construction in the WMATA zone of influence in accordance with Joint Development and Adjacent Construction (JDAC) requirements.

DEIS Comments: Agencies

Comment ID	Commenter	Item #	Comment	Topic	Response
	WMATA	4	<p>Blue/Orange/Silver (BOS) Study Metrorail alternatives serving WUS</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	Mitigation - Metrorail	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #15b specifies that USRC will coordinate with WMATA during the engineering and design phase of the Project to work on maintaining compatibility between the Project and a potential construction of a new Metrorail tunnel and station as an outcome of the Blue/Orange/Silver Capacity & Reliability Study.

DEIS Comments: Agencies

#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
1	ES-45	Table ES-6. Summary of Direct and Indirect Operational Impacts	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.	Table ES-6 of the DEIS is a summary of the impacts. Detailed analysis was provided in DEIS Section 5.14.4, <i>Impact Analysis</i> . Potential revenue from the Federal air rights was noted and addressed qualitatively as an indirect impact like all impacts associated with the potential development of these air rights.
2	ES-59 through ES-61	772-778 through 791	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.	The status of Section 106 and ongoing consultation was presented in Section 8.4, <i>National Historic Preservation Act Section 106 Consultation</i> , of the DEIS. An updated summary is in Section 8.11, <i>National Historic Preservation Act Section 106 Consultation</i> , of the FEIS.
3	ES-62	795-802	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.	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. Development of Alternative F was coordinated with DCOP, as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i>, of the FEIS.</p> <p>Section 106 consultation for the new Preferred Alternative is summarily documented in Section 8.11, <i>National Historic Preservation Act Section 106 Consultation</i>, of the FEIS. FRA prepared an SAOE to evaluate the effects of the new Preferred Alternative on historic properties in accordance with Section 106. The Final SAOE was published as Appendix D1S of the SDEIS.</p> <p>The Section 106 consulting parties, including SHPO, reviewed the draft SAOE. FRA provided a determination of effect letter to all consulting parties on March 10, 2023. The letter stated that there would be adverse effects to three historic properties (WUS, WUS Historic Site, and REA Building) and a potential adverse effect to one property (City Post Office [Postal Museum]). SHPO concurred with these findings.</p> <p>A PA was developed in consultation with SHPO and the other Section 106 consulting parties to define measures to minimize or mitigate the adverse effects. A draft PA was published in the SDEIS. The final PA is included in the FEIS (Appendix F4).</p>
3	1-5	64 to 71	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.	The EIS addresses the architectural and historic characteristics of WUS in the context of the analysis of impacts to visual quality and cultural resources. FRA notes that as part of the Section 106 consultation process for the Project, and in consultation with SHPO, FRA prepared a Determination of Eligibility for the WUS Historic Site that documents the relationships discussed in the comment and their historic significance. The SHPO concurred with the Determination of Eligibility on April 29, 2019.
5	3-35	808-811	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>	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. Development of Alternative F was coordinated with DCOP and NCPC, as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i>, of the FEIS.</p> <p>FRA and the Project Proponents presented the Preferred Alternative to NCPC for comments at NCPC's July 7, 2022, public meeting. In its written response, NCPC expressed its support for the updated Project design and commended FRA and the Project Proponents for developing a design that is substantially responsive to previous comments.</p>

DEIS Comments: Agencies

#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
6	3-3	54-60	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.	<p>The Purpose and Need for the Project, described Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS includes facilitating intermodal travel. As explained in Section 3.1.1, <i>Identification of Project Elements</i>, parking is one of eight Project elements or components of the multimodal Station. Alternatives providing no parking at all would not meet the Project's Purpose and Need.</p> <p>In response to public and agency comments, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550 in the new Preferred Alternative, all of them in a below-ground facility. This represents a 77 percent reduction relative to existing conditions. The development of the new Preferred Alternative was coordinated with DDOT and DCOP.</p>
7	3-7	103-109	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.	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. Development of Alternative F was coordinated with DCOP, as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i>, of the FEIS.</p> <p>In developing the new Preferred Alternative, FRA re-evaluated the Project's parking program, as documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS. Appendix F1 supersedes the parking information and analysis contained in the DEIS.</p>
8	3-36	830-833	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>	The referenced statement has been deleted from the FEIS.
9	3-43	954-956	The text needs to be modified to reflect that the appropriate height above the tracks is closer to 30 feet.	This has been corrected in the FEIS.
10	3-43	957-967	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, <b>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)</b> 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 <b>matter-of-right</b> 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 <b>most of the area</b> <del>in all areas north of H Street NE.</del> <b>All development in the USN zone is subject to mandatory design review by the District's Zoning Commission.</b>	The FEIS has been revised consistent with this comment.

DEIS Comments: Agencies

#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
11	3-43	968-974	Revise text for technical accuracy, as follows: In the <del>areas sections</del> where maximum permitted heights are below 130 feet, <b>the Zoning Commission may permit, subject to review criteria, height increases</b> density bonuses are available that would add <del>of u to</del> 20 feet <del>of height (to a maximum of 110 feet adjacent to the station and 130 feet elsewhere).</del> The USN District allows <b>a mix of uses consistent with the uses permitted in similar zones in downtown, DC</b> as a <del>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) <del>57</del> of 5.5 with no minimum requirements for parking. At all heights, an additional 20 feet of inhabitable penthouse are permissible.	The FEIS has been revised consistent with this comment.
12	3-43	Footnotes	Revise text for technical accuracy, as follows: 55 <del>11-K DCMR (District of Columbia Municipal Regulations) (DCMR) § 305 Section 11-2905. 56 11-K DCMR §§ 313 and 314 Section 11-741.</del> 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. <b>58 11-K DCMR § 308.</b> <b>58.5 11-K DCMR § 311</b> <del>Section 11-2908.</del>	The FEIS has been revised consistent with this comment.
13	3-44	989-990	Revise text for technical accuracy, as follows: Buildings with heights in accordance with <b>11-K DCMR § 305</b> <del>Section 2905 (up to 130 feet above the elevation of H Street NE);</del>	The FEIS has been revised consistent with this comment.
14	3-81	1694-1696	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.	Noted. The term was used because the facility would accommodate several modes of transportation, including buses, personal cars, and rental cars.  In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS. Development of Alternative F was coordinated with DCOP, as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i> , of the FEIS. The multimodal surface transportation center is no longer a component of the Preferred Alternative.
15	3-82	1725-1728	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. 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> 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.	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS. Development of Alternative F was coordinated with DCOP as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i> , of the FEIS. The new Preferred Alternative places all parking below ground.

DEIS Comments: Agencies

#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
16	3-85	1779-1781	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.	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS. Development of Alternative F was coordinated with DCOP, as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i> , of the FEIS. The development of the Preferred Alternative involved a re-evaluation of the deck-level circulation plan. The new Preferred Alternative allows full range of movements for inbound and outbound buses.
17	3-87	1815-1816	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.	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS. Development of Alternative F was coordinated with DCOP, as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i> , of the FEIS. The development of the new Preferred Alternative included a re-evaluation of the pick-up and drop-off program (documented in Section 2, <i>Pick-Up and Drop-off Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS). The new Preferred Alternative features a below-ground pick-up and drop-off facility anticipated to handle approximately half of all Station-related pick-ups and drop-offs.
18	3-94	1985-1987	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.	During the preparation of the SDEIS, FRA and USRC confirmed with the private air rights developer that interim bus facilities could be placed on the completed portion of the private air rights deck during Phase 4 of construction. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #21 specifies that USRC will work with the private air rights developer to build the interim bus facilities as close as possible to an access point to the station and Metrorail, and with the best user amenities achievable.
19	4-6	108 - 114	Add Sustainable DC and the Comprehensive Plan as relevant District policy guidance.	The following has been added to the end of the bulleted list in the FEIS: <ul style="list-style-type: none"> <li>• Sustainable DC 2.0 Plan</li> <li>• The Comprehensive Plan for the National Capital: District Elements</li> </ul>
20	4-13	243 - 266	Add Sustainable DC and the Comprehensive Plan as relevant District policy guidance.	The following has been added to the end of the bulleted list: <ul style="list-style-type: none"> <li>• Sustainable DC 2.0 Plan</li> <li>• The Comprehensive Plan for the National Capital: District Elements</li> </ul>
21	4-18	410-412	Modify this text to reflect that MWCOG is the local MPO and that it includes local jurisdictions in Maryland, the District and Virginia.	The text has been revised to the following in the FEIS: The Regional Study Area is the MWCOG area of jurisdiction. MWCOG is the local Metropolitan Planning Organization that includes local jurisdictions in Maryland, the District, and Virginia.
22	4-42	904 - 906	Add D.C. Law 22-257. Clean Energy DC Omnibus Amendment Act of 2018	The following has been added to the end of the bulleted list in the FEIS: <ul style="list-style-type: none"> <li>• DC Law 22-257, Clean Energy DC Omnibus Amendment Act of 2018</li> </ul>
23	4-45	969-971	Include Sustainable DC, Clean Energy DC, and the 2018 Clean Energy Omnibus Act	The following has been added to the end of the bulleted list in the FEIS: <ul style="list-style-type: none"> <li>• Sustainable DC 2.0 Plan</li> <li>• Clean Energy DC: The District Of Columbia Climate and Energy Action Plan</li> <li>• D.C. Law 22-257, Clean Energy DC Omnibus Amendment Act of 2018</li> </ul>
24	4-48	1012	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.	The following has been added to the end of the bulleted list in the FEIS: <ul style="list-style-type: none"> <li>• Downtown East Re-Urbanization Strategy;</li> <li>• Ward 5 Works; and</li> <li>• Florida Avenue Market Small Area Plan</li> </ul>
25	4-51	null	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.	This figure has been updated in the FEIS (Figure 4-10) using the most recent District GIS layer of current land use (dated 2023).
26	4-52	1073-1074	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.	The neighborhood boundary descriptions are based on the DC GIS source cited in DEIS Figure 4-9. No part of the description or neighborhood boundary was changed for the purposes of the EIS. Therefore, the suggested edit was not made in the FEIS.
27	4-52	1081-1082	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> .	The text has been revised in the FEIS to the following: The corridor also has several Planned Unit Developments where specific development proposals are approved by the District's Zoning Commission.

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#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
28	4-52	Footnote	Revise text for technical accuracy, as follows: Planned Urban <del>Unit</del> Developments can be <del>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.</del>	The text in the footnote (Footnote 218 of the FEIS) has been revised in the FEIS to the following: Planned Unit Developments can be 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.
29	4-52	1083	Revise text for technical accuracy, as follows: This neighborhood, <u>for the purpose of this EIS</u> , is bounded by...	The neighborhood boundary descriptions are based on the DC GIS source cited in DEIS Figure 4-9. No part of the description or neighborhood boundary was changed for the purposes of the EIS. Therefore, the suggested edit was not made in the FEIS.
30	4-52	1083-1092	A reference to the NoMa BID is needed as there is narrative around the Mount Vernon Triangle the text references the CID.	A reference to the NoMA BID has been added to the text in the FEIS (Section 4.9.4.1)
31	4-53	1112-1115	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.	The text has been revised in the FEIS (Section 4.9.4.1) to reflect current conditions, as follows: Between K Street and Florida Avenue, uses immediately adjacent to the east side of the tracks are primarily mixed-use residential development, with new structures just south of Florida Avenue completed as recently as 2022. On the west side of the tracks there are high density office, residential, and mix use buildings, with some parking lots.
32	4-53	1103	Revise text for technical accuracy, as follows: Much of the land is Federally owned and <u>federal use therefore</u> not subject to zoning.	The text has been revised in the FEIS (Section 4.9.4.1) to the following: Much of the land is Federally owned and in Federal use, and therefore, not subject to zoning.
33	4-53	1104-1106	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: <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>	The text has been revised in the FEIS (Section 4.9.4.1) to the following: Other areas are designated as D-4 zones, which are areas that provide for the orderly development and use of lands and structures in areas the Comprehensive Plan generally characterizes 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.
34	4-53	1093 and 1101	Revise text for technical accuracy, as follows: Mount Vernon Triangle, <u>for the purpose of this EIS</u> , is the area bounded by.... The Monumental Core, <u>for the purpose of this EIS</u> , includes the....	The neighborhood boundary descriptions are based on the DC GIS source cited in DEIS Figure 4-9. No part of the description or neighborhood boundary was changed for the purposes of the EIS. Therefore, the suggested edit was not made.
35	4-70	1331	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.	The following has been added to the end of the bulleted list in the FEIS (Section 4.11.1): • The Comprehensive Plan for the National Capital: District Elements, Urban Design Element
36	4-71	1341	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.	As noted by the commenter, all such views are part of the Aesthetic and Visual Quality Study Area, as shown in Figure 4-18 of the DEIS and FEIS. The referenced text refers only to specific culturally significant viewsheds considered in the Section 106 process.
37	4-71	1361 to 1391	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.	Text has been added to this section in the FEIS (Section 4.11.4.2) to characterize architectural forms around WUS as noted in the comment.
38	4-73	Figure 4-18	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.	The description of the H Street Bridge view has been revised in FEIS Table 4-12 to point out the differences from the other street views as noted in the comment.

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#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
39	4-82 through 4-84	Table 4-15	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.	The table (Table 4-14 of the FEIS) has been reviewed when preparing the FEIS and is accurate.
40	4-85	1513-1520	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.	The WUS Historic Site, including the First Street Tunnel, is described in the 2020 AOE (Appendix D1 of the EIS), pages 266-69. This description is not repeated in the FEIS. Impacts on the First Street Tunnel and WUS Historic Site as historic properties are addressed in Section 5.12.3.1, <i>Direct Operational Impacts</i> , of the FEIS.
41	4-86	1553-1554	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.	DEIS Footnote 117 has been revised in the FEIS (as Footnote 250) to include the clarifying information regarding the Comprehensive Plan for the National Capital, as follows: The <i>Comprehensive Plan for the National Capital</i> is a unified plan comprised of two components: 1) the District Elements and 2) the Federal Elements. The District Elements are authored by DCOP, including the Parks, Recreation and Open Space elements of the plan. NCPC authors the Federal Elements including the Parks and Open Space element.
42	4-86	1549	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.	The following has been added to the end of the bulleted list in the FEIS (Section 4.13.1, <i>Regulatory Context and Guidance</i> ): <ul style="list-style-type: none"> <li>• DCMR Title 24: Public Space and Safety</li> <li>• NoMa Vision Plan and Development Strategy</li> <li>• Downtown East Re-Urbanization Strategy</li> </ul>
43	4-88	Figure 4-28	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.	The Parks and Recreation Areas Study Area figure has been updated in the FEIS (as Figure 4-22) with the most recent District GIS parks data. Swampoodle Park has been included in the FEIS (Table 4-15). For the purposes of this EIS and 4(f) evaluation, FRA does not consider public parking along streets to be parks or recreation areas.
44	4-90	Lines 1567 through 1573	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.	The following has been added to the end of the bulleted list in the FEIS (Section 4.14.1, <i>Regulatory Context and Guidance</i> ): <ul style="list-style-type: none"> <li>• The Comprehensive Plan for the National Capital: District Elements.</li> </ul>
45	4-92-93	Lines 1585 through 1611	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.	Section 4.14, <i>Social and Economic Conditions</i> , has been revised in the FEIS using the latest U.S. Census Bureau (2020 decennial census), and updated economic and labor data.
46	4-94	Lines 1633 through 1635	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.	The text has been revised in the FEIS (Section 4.14.4.4, <i>Economic Planning Policy</i> ) to the following: The DC's Economic Strategy report states two specific goals: 1) grow the DC private sector economy to \$100 billion (by 20%) by the end of 2021, and 2) reduce unemployment across wards, races, and educational attainment levels, bringing unemployment levels below 10% in all segments by the end of 2021. The unemployment 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, and reduce unemployment levels of Wards 7 and 8.
47	4-97	1705-1707	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.	Upon review, the text has been revised in the FEIS (Section 4.15.4.2, <i>Fire and Emergency Response</i> ) to the following: Four hospitals that provide emergency care are located within 3 miles of the WUS in the District, including three general hospitals (Howard University Hospital, MedStar-Washington Hospital Center, George Washington University Hospital) and one pediatric hospital (Children's National Medical Center).



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#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
48	4-106	NA	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.	The section has been updated in the FEIS (Section 4.16.4.1, <i>Public Health</i> ) and tabulates the number of childcare facilities and all schools in the Local Study Area using the most recent District GIS data (Table 4-19 has been deleted as part of the update). The figure that shows these facilities (Figure 4-27 of the FEIS) has also been updated.
49	4-106	1833-1835	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.	Per NEPA implementing regulations (40 CFR § 1502.15), when describing the affected environment for a resource, data and analysis in an EIS shall be commensurate with the importance of the impact. Air quality is identified as the primary source of potential impact in this section, which is why these other EIS sections are simply referenced without further details.
50	4-106	1840-1841	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.	The text and associated figure have been revised in the FEIS (Section 4.16.2, <i>Study Area</i> , and Figure 4-27) to include public housing sites, opioid treatment facilities, and homeless shelters, based on the most recent District GIS data.
51	4-106	1840-1841	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.	The text and associated figure have been revised in the FEIS (Section 4.16.2, <i>Study Area</i> , and Figure 4-27) to include public housing sites, opioid treatment facilities, and homeless shelters, based on the most recent District GIS data.
52	4-106	1840-1841	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.	The text and associated figure have been revised in the FEIS (Section 4.16.2, <i>Study Area</i> , and Figure 4-27) to include public housing sites, opioid treatment facilities, and homeless shelters, based on the most recent District GIS data.
53	4-107	1854-1856	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>	FRA has reviewed the referenced seven-page document. The information is not suitable for describing persons with disabilities populations for the Project because the information provided is District-wide and not broken down by any geographic region or area in the District. Therefore, information for the Project's defined study area is not available in this document. FRA updated the FEIS using 2021 American Community Survey (ACS) data (Section 4.16.4.2, <i>Transportation and Mobility of the Elderly and Persons with Disabilities</i> ).
54	4-107	1843-1853	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.	A project providing an elevator for Tracks 27 and 28 was completed in 2019, as indicated in the DEIS, Table 3-7.
55	4-107	1859-1861	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.	The text has been revised in the FEIS (Section 4.16.4.2, <i>Transportation and Mobility of the Elderly and Persons with Disabilities</i> ) to the following: The Local Study Area partially overlaps with the campus of Gallaudet University, an educational institution for the deaf and hard-of-hearing with approximately 1,400 students.

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#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
56	4-109	1902-1919	<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>Minority Populations 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>Low-Income Population 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>	Section 4.17, <i>Environmental Justice</i> , has been revised in the FEIS using the U.S. Census Bureau's 2020 decennial census data and updated ACS data.
57	4-109	1912-1913	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.	The referenced text (section 4.17.3, <i>Methodology</i> ) was rewritten as part of the updating of Section 4.17 with 2020 census data.
58	4-114	Figure	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.	Section 4.17, <i>Environmental Justice</i> , has been revised in the FEIS using the U.S. Census Bureau's 2020 decennial census data and updated ACS data. Figure 4-29 of the FEIS shows the distribution of low-income households in the study area based on the most recent information available and affordable housing locations based in current District GIS data.
59	5-27	457-458	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.	The analysis presented in the DEIS, SDEIS, and FEIS is based on the information available at this early stage of planning. The FEIS recognizes the need for more information. Table 7-1 of the FEIS/Table 13-2 of the ROD. Item 2a, specifies that during the engineering and design phase of the Project, USRC (the Project Sponsor) will conduct additional groundwater studies.
60	5-45	858-862	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.	Reference to the Green Area Ratio has been added to FEIS Sections 4.3.1 and 4.8.1, <i>Regulatory Context and Guidance</i> , and to Table 7-2, Item #8.
61	5-70	50-51	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.	FRA used a project-specific spreadsheet-based model tool, which estimated trips based on operator plans and ITE trip generation data. Mode splits are shown in Table 5-8 of the <i>Supplemental Environmental Consequences Technical Report</i> (Appendix C3S of the SDEIS).
62	5-73	151-154	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.	The text was revised in the FEIS (Section 5.5.3.1, <i>Direct Operational Impacts, Washington Metropolitan Area Transit (WMATA Metrorail)</i> ) to clarify that it is the northern exit.
63	5-101	783-784	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.	The term was used because the facility would accommodate several modes of transportation, including buses, personal cars, and rental cars. In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS. Development of Alternative F was coordinated with DCOP as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i> , of the FEIS. The multimodal surface transportation center is not a component of the new Preferred Alternative (Alternative F).
64	5-111	974-979	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.	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS. Development of Alternative F was coordinated with DCOP as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i> , of the FEIS. The new Preferred Alternative (Alternative F) assumes that the potential air rights development would consist of mixed uses.

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#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
65	5-117	1161-1175	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.	<p>The Purpose and Need for the Project, described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS includes facilitating intermodal travel. As explained in Section 3.1.1, <i>Identification of Project Elements</i>, parking is one of eight Project elements or components of the multimodal Station. Alternatives providing no parking at all would not meet the Project's Purpose and Need.</p> <p>In response to public and agency comments, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. The development of Alternative F was coordinated with DDOT and DCOP.</p> <p>The development of the new Preferred Alternative (Alternative F) included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility. This represents a 77 percent reduction relative to existing conditions.</p> <p>The loss of parking during construction is identified in the FEIS as a major adverse impact.</p>
66	5-175	Figure 5-20: Key Transportation Elements, Alternative A- C	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.	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. The development of Alternative F was coordinated with DCOP as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative (Alternative F) included a re-evaluation of the pick-up and drop-off program (documented in Section 2, <i>Pick-Up and Drop-off Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS). The new Preferred Alternative features a below-ground pick-up and drop-off facility anticipated to handle approximately half of all Station-related pick-ups and drop-offs. It would be accessed via new ramps on G Street NE and First Street NE. The impacts of the facility are described in the FEIS.</p>
67	5-178	2320	Confirm if the narrative here is correct. OP's understanding is that the train hall in Alternative A-C is east-west.	DCOP's understanding is correct. This was a typographical error in the DEIS.
68	5-181	Figure 5-21: Deck Level Circulation (All Movements), Alternative A- C	<p>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:</p> <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>	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. Development of Alternative F was coordinated with DCOP as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i>, of the FEIS.</p> <p>Development of the Preferred Alternative (Alternative F) involved a re-evaluation of the circulation plan, which now includes two Project-related intersections on H Street, neither of which is offset, and allows full range of movements for buses from and to H Street. During the preparation of the FEIS, FRA conducted micro-modeling of curbside operations at the various pick-up/drop-off areas. The modeling indicated acceptable operations at all locations, including the H Street level.</p>

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#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
69	5-255	464-476	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.	FRA reviewed the GHG impacts in light of the District's carbon neutrality goal and characterizes any impact above net zero additional CO <sub>2</sub> emissions as a moderate adverse impact in the FEIS. While the SDEIS assessed GHG impacts as major, FRA reviewed this finding in the FEIS because the estimates of GHG emissions impacts are extremely conservative. They do not take into account measures that would be implemented to minimize or eliminate net carbon emissions in accordance with the District's carbon neutrality goal. Such measures are still undefined at this stage of planning. Also, the estimates do not incorporate the long-term reduction in emissions that would result from the greater availability and use of rail travel along the Northeast Corridor due to the Project and corresponding reductions in global GHG emissions from automobile traffic. The FEIS (Section 5.7.3.2, <i>Indirect Operational Impacts</i> ) notes that the reduction is anticipated to be substantial. As a result, the impacts presented in the FEIS are only potential; GHG emissions can be anticipated to be much less after measures to reduce energy consumption and associated emissions have been taken and incorporated into Project design.  The FEIS/ROD specifies measures that will be developed and implemented during Project design, construction, and operation to minimize all emissions and energy consumption (Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #31 through 35d).
70	5-261	59-63	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.	The District's carbon neutrality goals is acknowledged in the FEIS (Section 5.7.1, <i>Methodology</i> ). The FEIS/ROD specifies measures that will be developed and implemented during Project design, construction, and operation to minimize all emissions and energy consumption (Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #31 through 35d).
71	5-274-275	305-313	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.	FRA reviewed the GHG impacts in light of the District's carbon neutrality goal and characterizes any impact above net zero additional CO <sub>2</sub> emissions as a moderate adverse impact in the FEIS. While the SDEIS assessed GHG impacts as major, FRA reviewed this finding in the FEIS because the estimates of GHG emissions impacts are extremely conservative. They do not take into account measures that would be implemented to minimize or eliminate net carbon emissions in accordance with the District's carbon neutrality goal. Such measures are still undefined at this stage of planning. Also, the estimates do not incorporate the long-term reduction in emissions that would result from the greater availability and use of rail travel along the Northeast Corridor due to the Project and corresponding reductions in global GHG emissions from automobile traffic. The FEIS (Section 5.7.3.2) notes that the reduction is anticipated to be substantial. As a result, the impacts presented in the FEIS are only potential; GHG emissions can be anticipated to be much less after measures to reduce energy consumption and associated emissions have been taken and incorporated into Project design.  The FEIS/ROD specifies measures that will be developed and implemented during Project design, construction, and operation to minimize all emissions and energy consumption (Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #31 through 35d).
72	5-277	42-45	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."	Text has been added to the FEIS (Section 5.9.1.1, <i>Operational Impacts</i> ) to indicate that greater heights are possible in the 100-foot and 90-foot areas if permitted by the Zoning Commission.
73	5-277	42-45	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."	The suggested sentence has been added to the FEIS (Section 5.9.1.1, <i>Operational Impacts</i> ).
74	5-278	64-65	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."	Text has been added to the FEIS (Section 5.9.2.1, <i>Direct Operational Impacts, Zoning, Land Use, and Development</i> ), as suggested.
75	5-279	Table 5-115	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.	The table (Table 5-60 of the FEIS) has been revised to include the plans in the comment.
76	5-280	105	Update the text to correctly reflect that the Station is "surrounded by moderate-density residential".	The FEIS has been revised to include the suggested text (Section 5.9.2.2, <i>Indirect Operational Impacts</i> ).
77	5-281 & 5-285	132, 226	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.	The FEIS has been revised to indicate that Federal buildings are not subject to local zoning (Section 5.9.1.1, <i>Operational Impacts</i> ).

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#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
78	5-281	149	Update the text to correctly reference the FLUM as follows: "the District of Columbia's Comprehensive Plan's Future Land Use Map".	The FEIS has been revised to reflect this naming convention (Section 5.9.2.1, <i>Direct Operational Impacts, Zoning, Land Use, and Development</i> ).
79	5-284	Table 5-116	The description of the Comprehensive Plan for the National Capital is currently only reflective of NCP'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.	The FEIS considers both the Federal and District elements (Table 5-60 and Table 5-61)
80	5-285	233-240 (including bottom page reference 7)	<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)</p> <p>The characterization of the FLUM is incorrect, it is not OP's FLUM it is the District's. Update the text to reflect this. 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. The expansion project should be compared against the Comprehensive Plan in its totality, not just against the FLUM in the FEIS.</p>	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. Development of Alternative F was coordinated with DCOP as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i>, of the FEIS. The new Preferred Alternative assumes that the potential air rights development would consist of mixed uses.</p> <p>FRA understands the FLUM to be the governing planning document for the long-range buildout of the District that provides a generalized view of how the District intends to use its land. Therefore, it is appropriate to assess the Preferred Alternative against the FLUM. The FEIS also assesses the Project against the relevant District elements of the Comprehensive Plan (Table 5-61).</p>
81	5-304	729-735	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.	The comment on Alternative E is noted. In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS. Development of Alternative F was coordinated with DCOP as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i> , of the FEIS. The impacts of the new Preferred Alternative on zoning are described in Section 5.9.3, <i>Impacts of the Preferred Alternative</i> , of the FEIS and are not qualified as positive and negative, consistent with this comment.
82	5-378	11 - 34	<p>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:</p> <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>	The methodology used to analyze visual impacts reflects the early stage of Project design. It was refined in the SDEIS and FEIS based on more detailed assumptions about massing, height, and setback for the private and potential Federal air rights developments, defined in collaboration with the private air rights developer during the post-2020 DEIS development of the new Preferred Alternative (Alternative F). However, the methodology does not incorporate any specific design or architectural elements, as these are not available at the present stage of project development. Views from New York Avenue are addressed below.
83	5-380	Figure 5-57	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.	Views from the eastern end of the New York Avenue Bridge are exceedingly limited due to new high-rise development immediately adjacent to the rail corridor. Additionally, the bridge's barrier wall does not allow for photographs to be taken. The view included in the DEIS, SDEIS, and FEIS is what is available. The importance of this view is captured in View 11 and View 28 (from H Street Bridge; See Table 4-12 of the FEIS for a characterization of these views).

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#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
84	5-382	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.	See response to Comment 83.
85	5-384	Table 5-122	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.	See response to Comment 83.
86	5-384	NA	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.	See response to Comment 83.
87	5-387	NA	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.	See response to Comment 83.
88	5-389	NA	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.	See response to Comment 83.
89	5-391	NA	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.	See response to Comment 83.
90	5-393	NA	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.	See response to Comment 83.
91	5-395	NA	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.	See response to Comment 83.
93	5-399	Table 5-140	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.	See response to Comment 83.
94	Entire Section	Mitigation	Mitigation for impacted views should include aesthetic improvements to railroad bridges over K, L, and M streets and Florida Avenue wherever possible.	Noted. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #40, specifies that USRC, the Project Sponsor, will design the Project with context-compatible architecture and materials, and in a manner sensitive to surrounding structures.
95	5-403	51-53	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."	The FEIS has been updated to reflect the most current adverse effect definition found at 36 CFR § 800.5 (Section 5.12.1, <i>Methodology</i> ).
96	5-404	72	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"	The text of the FEIS (Section 5.12.1, <i>Methodology</i> ) has been edited in accordance with this comment.
97	5-406	110-113	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).	Construction traffic impacts on cultural resources are addressed through the consideration of noise and vibration impacts, which are the way such traffic may affect historic resources. Construction traffic impacts are addressed as transportation impacts in Section 5.5.3.3, <i>Construction Impacts, Vehicular Traffic</i> , of the FEIS. No long-term road closures are anticipated.
98	5-412	Table 5-145 (erroneously labeled 5-4151)	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.	The impacts on cultural resources described in the DEIS (for Action Alternatives A through E and A-C), the SDEIS (for Alternative F, the new Preferred Alternative), and the FEIS are based on the analyses presented in the Section 106 AOE for the Project (Appendix D1 of the DEIS) and the SAOE (Appendix D1S of the SDEIS). The AOE and SAOE have been reviewed by the SHPO and other Section 106 consulting parties. In the AOE and SAOE, physical, visual, noise/vibration, and construction effects were considered.
99	5-415	Table 5-148	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.	The impacts on cultural resources described in the DEIS (for Action Alternatives A through E and A-C), the SDEIS (for Alternative F, the new Preferred Alternative), and the FEIS are based on the analyses presented in the Section 106 AOE (Appendix D1 of the DEIS) and the SAOE (Appendix D1S of the SDEIS). The AOE and SAOE have been reviewed by the SHPO and other Section 106 consulting parties. In the AOE and SAOE, physical, visual, noise/vibration, and construction effects were considered.  FRA provided a determination of effect letter to all consulting parties on March 10, 2023, finding that there would be adverse effects on three historic properties (WUS, WUS Historic Site, and REA Building) and a potential adverse effect on one property (City Post Office [Postal Museum]). SHPO concurred with the findings. FRA developed and executed a PA that stipulates measures to minimize or mitigate the adverse effects in consultation with SHPO and the other Section 106 consulting parties. The PA is included in the FEIS as Appendix F4.

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#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
100	5-421	Table 5-151	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.	See response on Comment 99.
101	5-422	329	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. 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.	See response on Comment 99. The visual access zone is a component of the new Preferred Alternative (alternative F) evaluated in the SDEIS and the FEIS.
102	5-427	Table 5-156	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.	DEIS Table 5-156 only lists impacts that would be different when assessed against the No-Action Alternative instead of existing conditions. WUS is not listed because impacts would be the same regardless of the baseline, not because there would be no impacts.
103	5-433	Table 5-160	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.	DEIS Table 5-160 only lists impacts that would be different when assessed against the No-Action Alternative instead of existing conditions. WUS is not listed because impacts would be the same regardless of the baseline, not because there would be no impacts.
104	5-442 & 443	628-647	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. 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.	See response on Comment 99.
105	5-444	Entire Section	Landscaped "Public Parking" should be added as a park and recreation resource assessed for impacts, as they provide park-like amenities for the area.	The DEIS, SDEIS, and FEIS focus on existing parks and recreation areas near WUS that have the potential to be affected by the Project. As stated in Section 4.13, <i>Parks and Recreation Areas</i> , for the purposes of analysis, parks and recreation areas include public parks, private parks open to the public, off-street bicycle trails, walking paths, and areas used for general recreation. Landscaped public parking does not fall under this definition.
106	5-444	Entire Section	The impact of increased trips on Columbus Plaza and other parks and open space resources in the area should be assessed in the FEIS.	The Parks and Recreation Areas Study Area is defined in DEIS and FEIS Section 4.13.2, <i>Study Area</i> , and shown in Figure 4-28 of the DEIS and Figure 4-22 of the FEIS. This is the area that the impact analysis in the DEIS and FEIS (Section 5.13) addresses. The study area and impact analysis include Columbus Plaza, as well as several other parks and recreational resources.
107	5-462	166-173	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.	The DEIS statements on the effects of the H Street Bridge replacement were based on information available at the time. Since the DEIS was published, DDOT and FHWA released a Final EA/FONSI (June 2022) that addresses the traffic and transportation impacts of the H Street Bridge replacement project. FRA reviewed the FONSI impact summary, which concludes that the H Street Bridge Replacement would "result in minor adverse short-term traffic and construction impacts to the traveling public as the reduced capacity across the bridge during construction will cause some traffic congestion and delays along H Street NE and divert some traffic to other, nearby streets." (page 17, <i>Traffic and Transportation</i> ). The DEIS and FEIS are consistent with both the analysis and the impact determination (of minor adverse impact) of DDOT and FHWA's EA/FONSI for the H Street Bridge Replacement.

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#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
108	5-465	238-241	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.	The approach in estimating the revenue loss under Alternative A and the other Action Alternatives, including the new Preferred Alternative (Alternative F) evaluated in the SDEIS and FEIS, is reasonable, as it is based on a known dollar amount. The analysis acknowledges qualitatively, as an indirect impact, the potential revenue from the development of the Federal air rights may in part offset the loss. The FEIS additionally notes that increases in parking rates from the reduced supply may also offset part of the loss (Section 5.14.3.1, <i>Direct Operational Impacts</i> ). Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #43, specifies as a mitigation measure that USRC will identify new funding sources sufficient, at a minimum, to ensure the continued preservation and maintenance of the historic Station building.
109	5-466	272-277	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.	The specific effects of the Project on local rents in the long term cannot be reliably evaluated. Any analysis would be speculative given the long-term horizon of the Project and the multiple factors that influence the cost of housing in the District over time.
110	5-466	287-290	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.	The approach in estimating the revenue loss under Alternative A and the other Action Alternatives, including the new Preferred Alternative (Alternative F) evaluated in the SDEIS and FEIS, is reasonable, as it is based on a known dollar amount. The analysis acknowledges qualitatively, as an indirect impact, the potential revenue from the development of the Federal air rights may in part offset the loss in the long term. However, FRA notes that while the potential development of the Federal air rights is analyzed in the EIS, as explained in Section 3.4.2, <i>Alternative A</i> , of the DEIS and Section 3.5, <i>Description of the Preferred Alternative</i> , of the FEIS, it is not part of the Project but an action that the Project would make possible in the future. The FEIS additionally notes that increases in parking rates from the reduced supply may also offset part of the loss (Section 5.14.3.1, <i>Direct Operational Impacts</i> ). Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #43, specifies as a mitigation measure that USRC will identify new funding sources sufficient, at a minimum, to ensure the continued preservation and maintenance of the historic Station building.



DEIS Comments: Agencies

#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
111	5-467	316-318	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.	<p>Multiple factors relevant to estimating the revenue that could be generated by the potential development of the Federal air rights are undetermined at this time and any quantitative analysis would be speculative. Additionally, while the potential development of the Federal air rights is analyzed in the EIS, as explained in Section 3.4.2, <i>Alternative A</i>, of the DEIS and Section 3.5, <i>Description of the Preferred Alternative</i>, of the FEIS, it is not part of the Project but an action that the Project would make possible in the future.</p> <p>The impact of parking reduction on WUS revenue was not a factor in the development of the Project's parking program and the Project alternatives. The Purpose and Need for the Project, described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, includes facilitating intermodal travel. As explained in Section 3.1.1, <i>Identification of Project Elements</i>, parking is one of eight Project elements or components of the multimodal Station. Alternatives providing no parking at all would not meet the Project's Purpose and Need.</p> <p>Throughout the planning process, the size of the parking program was based on an analysis of future demand that was updated and refined over time.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. Development of Alternative F was coordinated with DCOP as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i>, of the FEIS.</p> <p>The new Preferred Alternative places all parking below ground. The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them below ground. This represents a 77 percent reduction relative to existing conditions. The development of the new Preferred Alternative was coordinated with DDOT and DCOP.</p>
112	5-472	417-420	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.	Revenue generated by the WUS parking facility is used primarily to fund the preservation of the historic station building. There is no connection between the revenue generated by the WUS parking facility and the funding that will be needed for the Project. FRA recognizes that funding the Project will be a significant effort. FRA identified USRC as the Project Sponsor in Spring 2023 and the process of obtaining support and mobilizing resources has begun. An early step is the development of a Union Station Expansion Project Delivery and Governance Study by Infrastructure DC (IDC), in partnership with the District of Columbia Government. IDC worked with an Advisory Group composed of representatives from USRC, Amtrak, the United States Department of Transportation, FRA, DCOP, and DDOT to identify delivery, financing, and governance mechanisms needed to realize the Project ( see <a href="https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf">https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf</a> , last accessed January 12, 2024).
113	5-473	447-448	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.	See above response to Comment 111.

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#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
114	5-477	541-542	<p>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.</p> <p>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.</p>	See Responses to Comments 111 and 112.
115	5-478	562-566	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.	See above response to Comment 111.
116	5-483	698-699	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.	See above response to Comment 111.
117	5-490	828-830	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.	See above response to Comment 111.
118	5-490	835-838	<p>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:</p> <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>	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. Development of Alternative F was coordinated with DCOP as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i>, of the FEIS.</p> <p>While the DEIS, SDEIS, and FDEIS do recognize an adverse impact on WUS revenue from the reduction in the parking program, this reduction was not a consideration in developing the Project's parking program and the Project alternatives: see response to Comment 111.</p>
119	5-491	860-861	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.	See response to Comment 110.
120	5-493	909-914	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.	While the potential development of the Federal air rights is analyzed in the EIS, as explained in Section 3.4.2, <i>Alternative A</i> , of the DEIS and Section 3.5, <i>Description of the Preferred Alternative</i> , of the FEIS, it is not part of the Project but an action that the Project would make possible in the future. Consequently, it is appropriate not to include it when comparing the Action alternatives.
121	5-493	922-933	This statement should be modified in the FEIS, as this potential issue 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.	The statement is accurate. Revenue generated from the WUS parking facility is used to fund the preservation of the historic station building. Loss of this revenue would be a major significant impact. See also response to Comment 110.
122	5-515	36-37	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.	See response to Comment 123 below.

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#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
123	5-515	52-53	<p>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.</p> <p><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></p> <p>This impact should be acknowledged and reflected in the FEIS to appropriate reflect the adverse impacts NAAQs can have on residents health.</p>	<p>FRA acknowledges that there is information that indicates potential public health risks with air pollution levels under the National Ambient Air Quality Standards (NAAQS), such as the study cited in the comment. FRA notes that the US Environmental Protection Agency (EPA) periodically conducts comprehensive reviews of the scientific literature on health and welfare effects associated with exposure to the criteria air pollutants. The resulting assessments serve as the basis for making regulatory decisions on whether to retain or revise NAAQS that specify the allowable concentrations of each criteria pollutant in the ambient air. The standards are set at a level intended to protect public health, including the health of at-risk populations, with an adequate margin of safety. In selecting a margin of safety, EPA considers such factors as the strengths and limitations of the evidence and related uncertainties, the nature of the severity of the health effects and size of the at-risk populations, and whether discernible thresholds have been identified below which health effects do not occur. In general, for the criteria air pollutants, there is no evidence of discernible thresholds. On this basis, the FEIS has been updated to recognize a negligible adverse impact on public health from air emissions associated with the Project (Section 5.16.3.2, <i>Indirect Operational Impacts</i>).</p>
124	5-515	54-57	<p>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.</p>	<p>The actions that would result in potential beneficial impacts are addressed in the paragraph following the referenced text (DEIS Page 5-516 lines 58-66).</p>
125	5-516	64-66	<p>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?</p>	<p>The referenced shortcomings are addressed in Section 4.16.4.2, <i>Transportation and Mobility of the Elderly and Persons with Disabilities</i> of the DEIS and FEIS. "Insufficient" in the context of the cited DEIS text meant that there are fewer van-accessible spaces than required by the Standards for Accessible Design. This has been clarified in the FEIS (Section 5.16.3.1, <i>Direct Operational Impacts</i>).</p>
126	5-516	70-72	<p>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></p> <p>This risk should be reflected and integrated into the findings of FIES.</p>	<p>See response to Comment 123.</p>
127	5-516	77-78	<p>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.</p>	<p>The SDEIS and FEIS were updated to use the EPA standard (Section 5.16.2.1, <i>Direct Operational Impacts</i>). The impact conclusions were not affected by this adjustment.</p>
128	5-517	96-105	<p>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.</p>	<p>The cited text is the construction impact discussion for public health. The impact discussion for mobility concerns of elderly persons and persons with disabilities is further down the page, from lines 110 to 119. These impacts are also addressed on Section 5.16.3.3, <i>Construction Impacts</i>, of the FEIS.</p>
129	5-518	124-132	<p>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></p> <p>This risk should be reflected and integrated into the findings of FIES.</p>	<p>See response to Comment 123.</p>
130	5-519	162	<p>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></p> <p>This risk should be reflected and integrated into the findings of FIES.</p>	<p>See response to Comment 123.</p>

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#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
131	5-519	165-168	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.	<p>The potential impacts of the Project on people in situation of homelessness are addressed in Section 5.17, <i>Environmental Justice</i>, of the DEIS, SDEIS, and FEIS. The EPA's standard assumes 24-hour, 365-day exposure over a period of 40 years. The homeless population is transient by definition and there is limited basis to assume that a significant population of unhoused persons would be present near the Project Area during construction. For instance, the District closed an encampment in the K Street underpass in January 2020 and another one along First Street NE in June 2023. More broadly, the District has articulated a vision to make homelessness in the District of Columbia "rare, brief, and nonrecurring;" This vision guides Homeward DC 2.0, which is the District's strategic plan to end long-term homelessness.</p> <p>FRA recognizes that unhoused persons may still be present near the Project Area when construction begins and that these persons may be adversely affected. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #53, specifies that USRC would require that, "if and when the construction contractor encounters persons in situation of homelessness during staging and construction, the contractor should contact and coordinate with the appropriate authorities and organizations to ensure the displaced persons are given access to assistance services, including opportunities for shelter, and health and mental health care; that they are not deprived of their belongings or otherwise mistreated; and that neither they nor the workers interacting with them are put at risk of harm."</p>
132	5-520	210-215	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.	See response to Comment 123.
133	5-521	266-268	This summary statement should reflect the major adverse impacts that were shared in lines 237-529 in the FEIS.	The referenced section addresses operational impacts relative to existing conditions, as opposed to No-Action conditions. Construction impacts are only compared to existing conditions, so they are not relevant to this section.
134	5-522	275	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.	See response to Comment 123.
135	5-522	279-287	There should be more discussion of the impacts on access for persons with disabilities and the elderly. The current assessment appears to overstate 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.	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. Development of Alternative F was coordinated with DCOP as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility. This represents a 77 percent reduction relative to existing conditions. The development of the new Preferred Alternative was coordinated with DDOT and DCOP.</p> <p>The impacts of the Preferred Alternative on mobility are addressed in Section 5.16.3.1, <i>Direct Operational Impacts</i>, of the FEIS. Based on achieving full compliance with ADA requirements, providing multiple new entrances to WUS as well as a bus facility integrated into the train hall, and new circulation spaces, the FEIS concludes that the Preferred Alternative would have a major beneficial impact on the transportation and mobility of the elderly or persons with disabilities at WUS. The reduction in the number of parking spaces at the Station would not negate this benefit. Parking for disabled users would be provided in accordance with ADA requirements.</p>
136	5-522	288-290	There should be more information in the FEIS used to justify the finding of 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.	See responses to Comment 123 and 135.

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#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
137	5-522	298-301	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.	See responses to Comments 123 and 127.
138	5-523	311-313	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.	See response to Comment 135.
139	5-523	316-322	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.	See responses to Comment 123 and 127.
140	5-523	318-319	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."	See response to Comment 135.
141	5-523 524	344-349	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.	See responses to Comment 123 and 127.
142	5-525	379-382	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.	See response to Comment 135.
143	5-525	399-403	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.	See response to Comment 135.
144	5-526	429-430	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.	See responses to Comment 123 and 127.
145	5-527	456-458	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.	See response to Comment 135.
146	5-527	461-464	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.	See responses to Comments 123 and 127
147	5-529	487-491	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.	See responses to Comments 123 and 127.
148	5-529	497-500	There should be mitigation measures in the FEIS to reduce the impact on users with reduce mobility.	Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #51a through 51e, specify measures to minimize and mitigate adverse impacts on mobility from the construction of the Project. There are no major operational impacts that would require mitigation.

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#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
149	5-529	Table	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."	See response to Comment 135.
150	<del>5-579 &amp; 580</del> 5-577-579	774-818	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.	See response to Comment 82. Additionally, in response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS. Development of Alternative F was coordinated with DCOP, as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i> , of the FEIS. The new Preferred Alternative places all parking below ground.
151	5-579 - 5-580	819-849	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 needs to be reassessed and reflected in the FEIS due to the significant adverse effects that are likely to result explicitly from the expansion project.	See response to Comment 99.
152	NA 7-6	NA No. 29	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. 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.	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #28a, provides for the implementation by USRC, in coordination with DDOT, of a robust Performance Management Plan that will establish a baseline for further improvements and measures to minimize and mitigate transportation impacts. This updated measure was developed in coordination with DDOT.
153	NA	NA	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: <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>	Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #14a through 28i provide for a wide range of transportation mitigation measures to be implemented by USRC in coordination with DDOT and other parties, as appropriate. These measures were developed in coordination with DDOT. The items noted in the comment are addressed by these measures (bus infrastructure: Items #25a through #25f; electric/alternative fuel: Item 18b; wayfinding: Items #25d, 27e, 28f, and 28g).
154	NA	NA	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.	Reductions in vehicles trips are addressed through the measures specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #14a through 28i.

DEIS Comments: Agencies

#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
155	11 of 12	NA	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.	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. Development of Alternative F was coordinated with DCOP as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i>, of the FEIS.</p> <p>When developing the new Preferred Alternative (Alternative F), FRA re-evaluated the Project's parking program, as documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS. Appendix F1 supersedes the parking information and analysis contained in the DEIS, including Appendix A6. The lease agreement is not considered in Appendix F1.</p>
156	21 of 22	NA	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.	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. Development of Alternative F was coordinated with DCOP, as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i>, of the FEIS.</p> <p>When developing the new Preferred Alternative (Alternative F), FRA re-evaluated the Project's parking program, as documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS. This re-evaluation resulted in a substantial reduction of the parking program, from approximately 1,600 spaces in the DEIS Preferred Alternative (Alternative A-C) to approximately 400-550 spaces. Appendix F1 supersedes the parking information and analysis contained in the DEIS, including Appendix A6.</p>
157	21 of 22	NA	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.	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. Development of Alternative F was coordinated with DCOP as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i>, of the FEIS.</p> <p>When developing the new Preferred Alternative evaluated in the SDEIS, FRA re-evaluated the Project's parking program as documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS. This re-evaluation resulted in a substantial reduction of the parking program, from approximately 1,600 spaces in the DEIS Preferred Alternative (Alternative A-C) to approximately 400-550 spaces. Appendix F1 supersedes the parking information and analysis contained in the DEIS, including Appendix A6.</p>
158	21 of 22	NA	Parking is not the only use for this developable 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.	See response to Comment 157.
159	21 of 22	NA	The District research and Amtrak's letter are both substantial evidence of reduced parking needs.	See response to Comment 157.
160	23 of 24	NA	Indicate the number of parking spaces assumed in a reduced parking program.	See response to Comment 157.
161	23 of 24	NA	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.	See response to Comment 157. In addition, the development of the new Preferred Alternative (Alternative F) included a re-evaluation of the pick-up and drop-off program (documented in Section 2, <i>Pick-Up and Drop-off Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS). The new Preferred Alternative features a below-ground pick-up and drop-off facility anticipated to handle approximately half of all Station-related pick-ups and drop-offs.

DEIS Comments: Agencies

#	DEIS Page Nos.	DEIS Line Nos.	DCOP By-line Comments (Submitted with DCOP_0928)	Response
162	27 of 28	NA	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.	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. Development of Alternative F was coordinated with DCOP as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i>, of the FEIS.</p> <p>When developing the new Preferred Alternative (Alternative F), FRA re-evaluated the Project's parking program as documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS. This re-evaluation resulted in a substantial reduction of the parking program, from approximately 1,600 spaces in the DEIS Preferred Alternative (Alternative A-C) to approximately 400-550 spaces. Appendix F1 supersedes the parking information and analysis contained in the DEIS, including Appendix A6.</p>
163	28 of 29	Table 3.1	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.	See response to Comment 162.
164	28 of 29	Table 3.1	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.	See response to Comment 162.
165	5-184	NA	While there are more train riders in Alternative A-C than 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.	<p>The numbers are for peak-period trips and are affected by other factors than the size of the parking garage, such as the number of trains arriving or departing during the peak period.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. Development of Alternative F was coordinated with DCOP, as documented in Section 8.7, <i>Coordination During Post-DEIS NEPA Pause</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative (Alternative F) included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS). This re-evaluation resulted in a substantial reduction of the parking program, from approximately 1,600 spaces in the DEIS Preferred Alternative (Alternative A-C) to approximately 400-550 spaces., all of them in a below-ground facility. This represents a 77 percent reduction relative to existing conditions. The development of the new Preferred Alternative was coordinated with DDOT and DCOP.</p>
166	5-190	NA	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.	Mode splits are shown in Table 5-8 of the <i>Supplemental Environmental Consequences Technical Report</i> (Appendix C3S of the SDEIS).



# DEIS Comments: Organizations

DEIS Comments: Organizations

Comment ID	Commenter	Item #	Comment	Topic	Response
DCST_0929 FC2_0928 GWP_0928 CTC_0928 WABA_0928	DC Sustainable Transportation Federal City Council Greater Washington Partnership Capital Trails Coalition Washington Area Bicyclist Association (DC Sustainable Transportation and al.)	1	THEME COMMENT: Revise the parking program to align with recommendations from the DC Office of Planning and NCPC	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative (Alternative F) included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all below ground. This represents a 77 percent reduction relative to existing conditions. The development of the new Preferred Alternative was coordinated with DDOT, DCOP, and NCPC.</p>
	DC Sustainable Transportation et al.	2	THEME COMMENT: Provide space for dedicated, centralized Pick-Up Drop-Off (PUDO) Facilities, and locate parking and PUDO facilities below-grade	Project - PUDO	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative (Alternative F) included a re-evaluation of the pick-up and drop-off program (documented in Section 2, <i>Pick-Up and Drop-off Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS). The new Preferred Alternative features a below-ground pick-up and drop-off facility anticipated to handle approximately half of all Station-related pick-ups and drop-offs.</p>
	DC Sustainable Transportation et al.	3	THEME COMMENT: Create a more efficient bus facility that treats intercity bus riders with dignity and realizes the opportunity for enhanced multimodal service	Project - Bus facility	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative (Alternative F) included a re-evaluation of the bus program (documented in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a bus facility integrated within the H Street deck. The new bus facility would open onto the train hall, facilitating intermodal transfers. Supporting facilities for bus riders would be in the train hall.</p>
	DC Sustainable Transportation et al.	4	THEME COMMENT: Improve bicyclist and pedestrian safety, and promote multimodal access to Union Station	Project - Pedestrian and bicycle	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative (Alternative F) included a re-evaluation of the bicycle program and infrastructure (see Section 4, <i>Pedestrian and Bicycle Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS). The new Preferred Alternative supports multimodal access through the provision of approximately 900 bicycle parking spots; approximately 100 new bikeshare spots; the construction of a shared-use ramp along the west side of the Station; and other elements as described in Section F.8, <i>Pedestrian and Bicycle Access</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS.</p>

DEIS Comments: Organizations

Comment ID	Commenter	Item #	Comment	Topic	Response
DCST_0929 FC2_0928 GWP_0928	DC Sustainable Transportation Federal City Council Greater Washington Partnership	1	THEME COMMENT: Plan for a vibrant urban place and create an opportunity for mixed-use development on federally owned land	Project - Urban design	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>As explained in Section 3.5, <i>Description of the Preferred Alternative</i>, of the FEIS, the Federal air rights above the rail terminal not needed for the Project would be available for potential future transfer and development. While FRA supports the coordinated development of the Federal and private air rights above the rail terminal to create a new, vibrant neighborhood, the private development is a separate and independent project.</p>
DCTrails_0925 Greyhound_0826	DC Trails Greyhound	1	THEME COMMENT: Commenters oppose the proposed dynamic management approach of the bus facility that would impose a 30-minute maximum dwelling time, which doesn't leave enough time for staging or touring.	Project - Bus facility	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the bus program (documented in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS). In the Preferred Alternative (Alternative F), the bus facility would be integrated with the future train hall. Operation of the facility would not include a 30-minute dwelling limits. The bus program for the Preferred Alternative (Alternative F) was developed in a manner that incorporates data and feedback from bus operators on how much time buses would occupy a slip on average. The Preferred Alternative's bus facility, with a total of 39 slips in the facility and the equivalent to an additional 15 slips on the H Street deck for use in times of exceptionally high demand, would be adequate to meet the anticipated demand from intercity and tour/charter bus operators.</p>
CUSA Megabus_0928 DCTrails_0925 Greyhound_0826	Megabus/Coach USA DC Trails Greyhound (Megabus et al.)	1	THEME COMMENT: Commenters note the importance of bus travel to the multimodal character of Union Station; generally question the projections used to determine the size of the Project's bus program; state that the bus facility is inadequately sized to accommodate future demand; and express a preference for a facility that would preserve the current number of 61 bus slips.	Project - Bus facility	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative (Alternative F) included a re-evaluation of the bus program (documented in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS). This re-evaluation is the basis for the Preferred Alternative's bus facility, which includes 39 slips and would be capable of meeting future expected demand for bus activity. During days of exceptionally high demand, space for 15 more buses would be available on the H Street deck level. Additionally, the bus facility in the new Preferred Alternative would be integrated into the train hall, providing bus passengers easy access to multimodal transfers and waiting areas in the train hall. FRA notes that commenters Coach USA/Megabus and Greyhound were among the signatories of a collective comment letter from bus operators on the SDEIS and the new bus facility, which indicates a broad agreement with the bus facility in the Preferred Alternative (Alternative F), with some minor qualifications that have been addressed in the FEIS, as appropriate (see SDEIS Comment BusCarriers_0706 and response).</p>

DEIS Comments: Organizations

Comment ID	Commenter	Item #	Comment	Topic	Response
	Megabus et al.	2	THEME COMMENT: Commenters state the bus program presented in the DEIS may create an inequity of accessibility for low-income and minority travelers that rely on bus for intercity travel and may not be consistent with environmental justice and Title VI requirements.	Environmental justice	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative (Alternative F) included a re-evaluation of the bus program (documented in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS). The new Preferred Alternative's bus facility includes 39 slips and would be capable of meeting future expected demand for bus activity. During days of exceptionally high demand, space for 15 buses would be available on the H Street deck level. Additionally, the bus facility in the new Preferred Alternative would be integrated into the train hall, providing bus passengers easy access to multimodal transfers and waiting areas in the train hall.</p> <p>FRA recognizes that bus providers provide transportation service to minority and low-income communities, as noted in 5.17.3.1, <i>Operational Impacts, Transportation, Intercity Buses</i>, of the FEIS. Minority and low-income passengers, as well as all bus operators, would directly benefit from the improved bus facility at Union Station, which would be a purpose-built facility fully integrated with the train hall and the larger Station. An environmental justice assessment of the Preferred Alternative (Alternative F) is presented in Section 5.17.3, <i>Impacts of the Preferred Alternative</i>, of the FEIS.</p>
	Megabus et al.	3	THEME COMMENT: Commenters find a need for adequate parking at Union Station for all travelers, including bus travelers, and that parking should not be sacrificed to other interests.	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative (Alternative F) included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all below ground. This represents a 77 percent reduction relative to existing conditions. The development of the new Preferred Alternative was coordinated with DDOT, DCOP, and NCPC.</p>
Amtrak_0928	Amtrak	1	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.	Project – Rail planning	<p>Noted. All Action Alternatives, including the new Preferred Alternative (Alternative F) described and analyzed in the SDEIS and FEIS, incorporate the concourse program referenced in the comment.</p>

DEIS Comments: Organizations

Comment ID	Commenter	Item #	Comment	Topic	Response
	Amtrak	2	<p>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.</p> <p>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.</p> <p>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.</p>	Project – Parking and PUDO	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility. In the new Preferred Alternative, there would be no parking access from K Street.</p> <p>The development of the new Preferred Alternative also included a re-evaluation of the pick-up and drop-off program (documented in Section 2, <i>Pick-Up and Drop-off Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS). The new Preferred Alternative features a below-ground pick-up and drop-off facility anticipated to handle approximately half of all Station-related pick-ups and drop-offs. The Preferred Alternative also provides pick-up and drop-off areas in front of the Station, on First and Second Streets NE, and on the H Street deck, adjacent to the train hall. The distribution of pick-up and drop-off activities across the Project area (taxis, Uber-types, and private) is designed to be responsive to demand and is anticipated to reduce idling.</p> <p>FRA is pleased to note that in its comments on the SDEIS, Amtrak stated that "We support the reduction in the total number of parking spaces in the Preferred Alternative." Amtrak also commented that "Alternative F (Preferred Alternative), reflects [...] Amtrak's previous comments that were made in regard to the DEIS."(Amtrak_0706, Item #1)</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
	Amtrak	3	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.	Project – Bus facility	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility. The development of the new Preferred Alternative also included a re-evaluation of the bus program (documented in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a bus facility integrated with the H Street deck.</p> <p>The new Preferred Alternative allows for the establishment of a civic space by the developer of the private air rights. Also, Federally owned air rights not used for Project elements would be available for potential future transfer and development. Together, these features support the creation of a vibrant, mixed-use community above the rail terminal.</p>
	Amtrak	4	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.	Mitigations	<p>In Spring 2023, FRA identified USRC as the Project Sponsor to implement the Project in coordination with Amtrak. The mitigation measures developed in the process of preparing the EIS are identified in Table 7-1 of the FEIS/Table 13-2 of the ROD and were developed in coordination with USRC and Amtrak, as applicable.</p> <p>FRA notes that the process of mobilizing resources for the Project has begun. An early step is the development of a Union Station Expansion Project Delivery and Governance Study by IDC, in partnership with the District of Columbia Government. IDC worked with an Advisory Group composed of representatives from USRC, Amtrak, the United States Department of Transportation, FRA, DCOP, and DDOT to guide the study (<a href="https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf">https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf</a>, last accessed January 12, 2024). FRA is pleased to have participated in this study that can bring regional stakeholders together to support the expansion of Union Station.</p>
ABA_0714, ABA_0928	American Bus Association (ABA)	1	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?	Project - Bus facility	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. The development of the new Preferred Alternative included a re-evaluation of the bus program, documented in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS. As stated in Section 3.3.2, <i>Future Growth</i>, of Appendix F1, a 49% growth in intercity bus service and 51% growth in charter/tour service is projected and would be accommodated in the new bus facility.</p>

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	ABA	2	<p>As the project moves forward, we join our partners in the tourism community with three major recommendations:</p> <ol style="list-style-type: none"> <li>1) motor coach parking should be maintained at its current level and not reduced</li> <li>2) a satellite parking facility should not be considered</li> <li>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.</li> </ol>	Project - Bus facility	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The demand analysis underlying the size of the bus facility in the Preferred Alternative (alternative F) is documented in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS. Analysis indicated that the 39-slip bus facility, along with overflow space for 15 buses on the H Street deck level when needed, is sufficient to accommodate future demand for both intercity and tour/charter bus travel. FRA and USRC coordinated with multiple bus operators during the development of Alternative F and during the preparation of the SDEIS and FEIS. The following operators submitted a comment on the SDEIS which, with some minor qualifications that have been addressed in the FEIS, as appropriate, is in support of the bus program provided for in the new Preferred Alternative: Best Bus, Coach USA/Megabus.com, Greyhound, Peter Pan, Washington Deluxe, and Flix Bus.</p> <p>No satellite parking is assumed in the new Preferred Alternative beyond any satellite parking already provided by the District.</p> <p>In response to this comment and the comments from multiple tour guides and operators on the 2020 DEIS, FRA and the Project Proponents eliminated from the new Preferred Alternative (Alternative F) the 30-minute limit that was included in the 2020 DEIS Action Alternatives.</p>
	ABA	3	<p>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.</p>	Project - Bus facility	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the bus program, documented in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS. As stated in Section 3.3.2, <i>Future Growth</i>, of Appendix F1, a 49% growth in intercity bus service and 51% growth in charter/tour service is projected and would be accommodated in the bus facility. FRA and the Project Proponents reviewed a range of estimates of future bus demand and selected the highest estimate for the updated analysis. The Project Team did not find any evidence in DePaul University reports for the growth rate cited in this comment.</p> <p>FRA notes that the following operators submitted a comment on the SDEIS which, with some minor qualifications that have been addressed in the FEIS, as appropriate, is in support of the bus program of the new Preferred Alternative: Best Bus, Coach USA/Megabus.com, Greyhound, Peter Pan, Washington Deluxe, and Flix Bus.</p>

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ACA_0928	Adventure Cycling Association (ACA)	1	<p>To meet the needs of passengers with bicycles, we urge the FRA to include:</p> <ol style="list-style-type: none"> <li>1. Safe access to Union Station with protected bicycle lanes or separated bike path.</li> <li>2. Secure and covered bicycle parking – More rail and transit stations and airports are providing secure bike parking stations.</li> <li>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.</li> <li>4. Stairs with a ramp for bicycles – To allow bicyclists to roll rather than carry their bicycle to another level of the station.</li> <li>5. Incorporate bike share – increase bike share stations at Union Station to facilitate more convenient multimodal connections.</li> <li>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.</li> </ol>	Project - Pedestrian and bicycle	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative (Alternative F) included a re-evaluation of the bicycle program and infrastructure (see Section 4, <i>Pedestrian and Bicycle Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS). As described in Section F.8, <i>Pedestrian and Bicycle Access</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS, under the new Preferred Alternative, protected bicycle infrastructure would be preserved on First and Second Streets NE and a new shared-use ramp would be provided along the west side of WUS. Approximately 900 spaces of bicycle parking would be provided. Specific design elements, such as lockers and bicycle ramps on stairs, would be considered during the engineering and design phase of the Project. The new Preferred Alternative would also provide an additional 100 bikeshare spots. With regard to multimodal access, the new Preferred Alternative substantially reduced the amount of parking provided relative to the 2020 DEIS Action Alternatives and placed all parking below-ground, collocated with a pick-up and drop-off facility.</p>
C100_0714	Committee of 100 (C100)	1	<p>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.</p> <p>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.</p>	Project - Rail planning	<p>As is explained in Chapter 2, <i>Purpose and Need</i>, of the FEIS, supporting current and future long-term growth in rail service and operational needs is just one aspect of the Project's Purpose and Need. The Project also is intended to achieve compliance with the ADA and emergency egress requirements; facilitate intermodal travel; provide a positive customer experience; enhance integration with the adjacent neighborhoods, businesses, and planned land uses; sustain WUS's economic viability; and support continued preservation and use of the historic station building.</p> <p>The basis for the rail planning component of the Project is presented in Appendix B of the DEIS. Rail planning for the Project is based on the long-term planning presented in the NEC FUTURE study and the various rail operators' future operating plans. Rail planning assumptions for the Project align with the plans advanced in the DC to Richmond Southeast High Speed Rail project, Long Bridge Project, and Transforming Rail in Virginia. Amtrak developed the rail program documented in Appendix B of the DEIS in coordination with FRA, VRE, and MARC. As noted in Appendix B, Amtrak investigated the feasibility of a dedicated high speed rail alignment through WUS and found it not to be feasible.</p> <p>Both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item 3 and VRE_0706, Item 1).</p>



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C100_0928	C100	1	<p>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.</p> <p>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</p>	Project - Rail planning	<p>The basis for the rail planning component of the Project is presented in Appendix B of the DEIS. Rail planning for the Project is based on the long-term planning presented in the NEC FUTURE study and the various rail operators' future operating plans. Rail planning assumptions for the Project align with the plans advanced in the DC to Richmond Southeast High Speed Rail project, Long Bridge Project, and Transforming Rail in Virginia, which are still current. Amtrak developed the rail program documented in Appendix B of the DEIS in coordination with FRA, VRE, and MARC. Both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item 3 and VRE_0706, Item 1). Track planning carefully considered projected future demand to ensure that demand is adequately accommodated.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p> <p>The FEIS recognizes the loss in parking revenue that would result from the reduction of the parking program (Section 5.14.3.1, <i>Direct Operational Impacts, Washington Union Station Revenue</i>) and specifies as a mitigation measure that USRC will identify new funding sources sufficient, at a minimum, to ensure the continued preservation and maintenance of the historic Station building (Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #43).</p> <p>There is no connection between the revenue generated by the WUS parking facility and the funding that will be needed for the Project. As stated in the DEIS, revenue generated from the WUS parking facility is used to fund the preservation of the historic station building. There is no requirement for a project to be funded to go through the NEPA process, nor is there a requirement to disclose how it will be funded. Securing funding for a Project like the Station Expansion Project is a significant effort that will be further advanced in the post NEPA phase. An early step was the development of a Union Station Expansion Project Delivery and Governance Study by IDC, in partnership with the District of Columbia Government. IDC worked with an Advisory Group composed of representatives from USRC, Amtrak, the United States Department of Transportation, FRA, DCOP, and DDOT to identify delivery, financing, and governance mechanisms needed to realize the Project (see <a href="https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf">https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf</a>, last accessed January 12, 2024).</p>
	C100	2	<p>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. This assumption is wrong and the planning projections that result from it grossly underestimate 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.</p>	Project - Rail planning	<p>The basis for the rail planning component of the Project is presented in Appendix B of the DEIS. Rail planning for the Project is based on the long-term planning presented in the NEC FUTURE study and the various rail operators' future operating plans. Rail planning assumptions for the Project align with the plans advanced in the DC to Richmond Southeast High Speed Rail project, Long Bridge Project, and Transforming Rail in Virginia (the VRE L'Enfant Plaza Station Expansion project is part of the Transforming Rail in Virginia Program). CSX will continue to control dispatching in the future.</p>

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C100		3	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.	Project - Rail planning	<p>As stated in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, the Purpose and Need of the Project is to support current and future long-term growth in rail service and operational needs; achieve compliance with the ADA and emergency egress requirements; facilitate intermodal travel; provide a positive customer experience; enhance integration with the adjacent neighborhoods, businesses, and planned land uses; sustain WUS's economic viability; and support continued preservation and use of the historic station building.</p> <p>Separation of freight from passenger operations is not part of the Purpose and Need and is outside the scope of the Project. As noted above, the rail planning assumptions informing the Project's track and platform plan align with the plans advanced in the DC to Richmond Southeast High Speed Rail project, Long Bridge Project, and Transforming Rail in Virginia. Amtrak developed the rail program for the Project, which is documented in Appendix B of the DEIS, in cooperation with VRE and MARC. Both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item 3 and VRE_0706, Item 1).</p>
C100		4	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.	Project - Rail planning	The numbers in Appendix A3 and those in Table 7-1 of Appendix B of the DEIS are not derived from each other. Appendix B shows updated numbers relative to those in Appendix A3 and these numbers are the basis for Project rail planning and the train volumes presented in the DEIS, SDEIS, and FEIS. The commenter does not accurately characterize the volume number used. In addition to the 2030+ volumes that the commenter references, Table 7-1 of Appendix B shows 2040 numbers based on NEC Future for Amtrak, MARC, and VRE. The NEC Future volumes are those shown in the DEIS, SDEIS, and FEIS.
C100		5	Because of the significant under projections based on outdated assumptions and information, the DEIS' Preferred Alternative proposes too few tracks.	Project - Rail planning	The basis for the rail planning component of the Project is presented in Appendix B of the DEIS. Rail planning for the Project is based on the long-term rail planning presented in the NEC FUTURE study and the various rail operators' future operating plans. Rail planning assumptions align with the plans advanced in the DC to Richmond Southeast High Speed Rail project, Long Bridge Project, and Transforming Rail in Virginia, which are still current. Amtrak developed the rail program documented in Appendix B of the DEIS in coordination with FRA, VRE, and MARC. Both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item 3 and VRE_0706, Item 1). Track planning carefully considered projected future demand to ensure the demand is adequately accommodated.
C100		6	A key unaddressed issue in the plans: Must the platforms be as wide as 30 to 35'6"?	Project - Rail planning	Platform width is driven by the following operational goals and physical constraints: a) meeting current standards of accessibility, including ADA standards; b) providing sufficient space for increased circulation to allow larger trains turn around more quickly, thereby increasing the capacity of the rail terminal and c) physical constraints associated with infrastructure above and below the rail terminal. Final platform width would be determined during the Project's engineering and design phase.

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	C100	7	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.	Project - Rail planning	The basis for the rail planning component of the Project is presented in Appendix B of the DEIS. Rail planning for the Project is based on the long-term rail planning presented in the NEC FUTURE study and the various rail operators' future operating plans. Rail planning assumptions align with the plans advanced in the DC to Richmond Southeast High Speed Rail project, Long Bridge Project, and Transforming Rail in Virginia, which are still current. Amtrak developed the rail program documented in Appendix B of the DEIS in coordination with FRA, VRE, and MARC. Both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item 3 and VRE_0706, Item 1). Track planning carefully considered projected future demand to ensure the demand is adequately accommodated.
	C100	8	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.	Project - Rail planning	The rail planning assumptions informing the Project's track and platform plan align with the plans advanced in the DC to Richmond Southeast High Speed Rail project, Long Bridge Project, and Transforming Rail in Virginia. Amtrak developed the rail program documented in Appendix B of the DEIS in coordination with FRA, VRE, and MARC. Both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item #3 and VRE_0706, Item #1).
	C100	9	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	Project - Rail planning	The Purpose and Need for the Project, described in FEIS Section 2.3, <i>Purpose and Need Statement</i> , includes supporting current and future long-term growth in rail service and operational needs; achieving compliance with ADA and emergency egress requirements; facilitating intermodal travel; providing a positive customer experience; enhancing integration with the adjacent neighborhoods, businesses, and planned land uses; sustaining WUS's economic viability; and supporting continued preservation and use of the historic station building.  The basis for the rail planning component of the Project is presented in Appendix B of the DEIS. Project rail planning assumes the continuation of diesel operations, consistent with the rail operators' operating plans. While the Project does not preclude the implementation of future electrification south of WUS, electrification is not part of the Purpose and Need. It is a corridor-level activity that is outside the scope of the Project.
	C100	10	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.	Project - Parking	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS.  The development of the new Preferred Alternative (Alternative F) included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all below ground. This represents a 77 percent reduction relative to existing conditions. The development of the new Preferred Alternative was coordinated with DDOT, DCOP, and NCPC.
	C100	11	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.	Project - Parking	The commenter's concern about the impacts of monthly parkers entering and exiting the parking garage at the same peak times is addressed by the Project through the elimination of all monthly parking in the WUS garage in all the Action Alternatives considered, including the new Preferred Alternative (Alternative F) developed to address comments on the DEIS.
	C100	12	The economics of this arrangement raise important questions: <ul style="list-style-type: none"> <li>• Why does USRC receive so little from its lease to Ashkenazy Acquisition Corporation, the company that manages the retail leases?</li> <li>• Why do we now have benches in the East Hall and no restaurant in the Presidential Waiting Room?</li> <li>• Why is the revenue from retail operations received by USRC so low?</li> </ul>	Station revenue	The questions raised by the commenter are outside the scope of the Project and the EIS. Questions such as those posed in this comment should be directed to USRC.

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	C100	13	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.	Station revenue	<p>Revenue is not the primary reason for providing parking as part of the Project. The Purpose and Need for the Project, described Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS includes facilitating intermodal travel. As explained in Section 3.1.1, <i>Identification of Project Elements</i>, parking is one of eight Project elements or components of the multimodal Station. Alternatives providing no parking at all would not meet the Project's Purpose and Need.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. In the new Preferred Alternative, there would be a 77 percent reduction in the number of parking spaces available at WSU relative to existing conditions.</p> <p>As explained in the FEIS, the reduction in the parking program would result in a reduction in WUS revenue (Section 5.14.3.1, <i>Direct Operational Impacts, Washington Union Station Revenue</i>). The parking revenue is primarily used to maintain and preserve the historic station building. As a mitigation, the FEIS specifies that USRC will identify new funding sources sufficient, at a minimum, to ensure the continued preservation and maintenance of the historic Station building (Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #43). Such sources will be identified during the post-NEPA phases of the Project.</p>
	C100	14	<p>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:</p> <ul style="list-style-type: none"> <li>• Charging train operators for use of the station as airports charge airlines.</li> <li>• A charge added to train tickets as a passenger ticket "tax".</li> </ul> <p>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?</p>	Station revenue	<p>FRA recognizes that, as explained in the FEIS, the reduction in the parking program relative to existing conditions would result in a reduction in WUS revenue (Section 5.14.3.1, <i>Direct Operational Impacts, Washington Union Station Revenue</i>). The parking revenue is primarily used to maintain and preserve the historic station building. As a mitigation, the FEIS specifies that USRC will identify new funding sources sufficient, at a minimum, to ensure the continued preservation and maintenance of the historic Station building (Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #43). Such sources will be identified during the post-NEPA phases of the Project.</p>
	C100	15	<p>From a historic preservation perspective, we believe the following must be considered: The classical and symmetrical Beaux-Arts design of Union Station calls for a design that respects and complements these significant features -</p> <p>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.</p>	Historic station	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative (Alternative F) included a re-evaluation of the parking program, bus program, and pick-up and drop-off program (documented in Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS). Based on these re-evaluations, the new Preferred Alternative features below-ground parking; a below-ground pick-up and drop-off facility anticipated to handle approximately half of all pick-ups and drop-offs at WUS, and a bus facility integrated into the H Street Deck.</p> <p>During the development of the new Preferred Alternative (Alternative F), FRA and the Project Proponents coordinated with the private air rights developer on developing an approach to the Project elements at the H Street deck level that would enhance opportunities for the creation of a civic space commensurate with WUS's historic and architectural significance, symmetrical, and centered on the historic station building. To that end, the Preferred Alternative defines zones that would be free of Project elements and would allow the private developer to design and construct such a civic space to the north of WUS (Section 3.5, <i>Description of the Preferred Alternative</i>, of the FEIS).</p>

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	C100	16	<p>From a historic preservation perspective, we believe the following must be considered: Users should be able to still experience the historic station as a train station -</p> <p>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.</p>	Historic preservation	<p>The Purpose and Need for the Project, described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, includes facilitating intermodal travel; providing a positive customer experience; enhancing integration with the adjacent neighborhoods, businesses, and planned land uses; and sustaining WUS’s economic viability. The train hall and concourse plan included in all Action Alternatives, including the new Preferred Alternative (Alternative F) developed in response to public and agency comments on the DEIS, and described in the SDEIS and FEIS, are essential elements to meet the Purpose and Need.</p> <p>The Purpose and Need also includes supporting the continued preservation and use of the historic station building. Improving access at the front of the station, as described for the Preferred Alternative (Alternative F) in Section F.8, <i>Pedestrian and Bicycle Access</i>, and Section F.9, <i>Pick-up and Drop-off Areas</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS, would contribute to this goal. Continued and improved access at the front of the Station would ensure that the historic station building remains used for its original purpose. The visual and architectural relationship between the new train hall and the historic station building would be refined during the engineering and design phase of the Project. Historic preservation considerations would be incorporated through compliance with the Section 106 PA for the Project (appendix F4 of the FEIS).</p>
	C100	17	<p>From a historic preservation perspective, we believe the following must be considered: 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.</p>	Historic preservation	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>FRA prepared an SAOE to evaluate the effects of the new Preferred Alternative (Alternative F) on historic properties in accordance with Section 106 of the National Historic Preservation Act. The final SAOE was published as Appendix D1S of the SDEIS. In the SAOE, FRA found that the Preferred Alternative would result in mostly acceptable levels of service (LOS) at the six study intersections in and surrounding the Capitol Hill Historic District. This statement is based on the traffic impact analysis presented in Section 5.5.1.12, <i>Vehicular Traffic</i>, of the SDEIS. The SAOE also noted that these acceptable conditions make it less likely that traffic would divert through the Historic District than was the case with the 2020 Preferred Alternative (Alternative A-C). FRA found that the Preferred Alternative (Alternative F) would have no adverse effect on the Capitol Hill Historic District under the Section 106’s criteria of adverse effect (36 CFR § 800.5). The Section 106 consulting parties reviewed the draft SAOE. The comments received were documented in the final SAOE, comment matrix, and determination of effect letter provided to all consulting parties on March 10, 2023. No further comment on the effects was received within 30 days from March 10, per 36 CFR § 800.5.</p> <p>While FRA determined the project would have no adverse effect on the Capitol Hill Historic District, the traffic impacts on streets in or adjacent to the Capitol Hill Historic District were considered in the context of NEPA. Measures to minimize and mitigate these impacts are identified in the FEIS and incorporated as enforceable commitments into the ROD (Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #28a through 28i) and incorporated, as appropriate, in the Section 106 PA (Appendix F4 of the FEIS).</p>

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	C100	18	<p>From a historic preservation perspective, we believe the following must be considered: The impacts to the historic station itself should be minimized -</p> <p>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.</p>	Historic station	<p>Noted. The FEIS contains a PA (Appendix F4) that specifies the measures that will be taken in the post-NEPA phase of the Project to minimize and mitigate adverse effects on historic properties. As a Section 106 consulting party, the commenter was given the opportunity to comment on the draft PA, which was published as Appendix D2 of the SDEIS.</p>
CHRS_0714	Capitol Hill Restoration Society (CHRS)	1	<p>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.</p>	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative (Alternative A) included a re-evaluation of the Project's parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility. This represents a 77 percent reduction relative to existing conditions. The development of Alternative F was coordinated with DDOT and DCOP.</p>
	CHRS	2	<p>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.</p>	Project - General	<p>The Station Expansion Project is the culmination of a collaborative, multi-year planning process that is extensively documented in the appendices of the DEIS. The Project Area is significantly constrained both horizontally (as it is surrounded by urban neighborhoods on the east and west) and vertically (as much of the air rights above the rail terminal are privately owned and slated for development into a mixed-use neighborhood).</p> <p>Like all Action Alternatives considered, the new Preferred Alternative (alternative F) developed in response to public and agency comments on the DEIS, and described in the SDEIS and FEIS, incorporates provisions for daylighting of the new concourses (via skylights at the deck level) and for waiting spaces for passengers.</p> <p>As noted in Section 3.2.2.1, <i>Refinement Process</i>, of the FEIS, NCPC and the Commission of Fine Arts (CFA) both expressed support for the Preferred Alternative.</p> <p>The Station Expansion Project is a separate and independent action from the replacement of the H Street Bridge and the private air rights development project, which have different owners and are not subject to decisions by FRA or USRC. FRA and the Project Proponents coordinated with the owners of both projects (DDOT and Akridge, respectively) from the beginning of the NEPA process, including during the development of the new Preferred Alternative (Alternative F), to ensure their mutual compatibility.</p>

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CHRS_0925	CHRS	1	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.	Project - General	<p>The Station Expansion Project is the outcome of a multi-year planning process that is extensively documented in the appendices of the DEIS. All Action Alternatives considered—including the new Preferred Alternative (alternative F) developed in response to public and agency comments on the DEIS, and described in the SDEIS and FEIS—share common elements such as a concourse plan and pedestrian access from H Street because these elements were found to be needed to meet the Project's Purpose and Need, which includes facilitating intermodal travel; providing a positive customer experience; and enhancing integration with the adjacent neighborhoods, businesses, and planned land uses.</p> <p>FRA supports the development of the air rights above the rail terminal to create a new, vibrant neighborhood. However, the Station Expansion Project is a separate and independent action from the replacement of the H Street Bridge and the private air rights development project, which have different owners and are not subject to decisions by FRA or USRC. FRA and the Project Proponents coordinated, and USRC as the Project Sponsor will continue to coordinate, as appropriate, with both projects to ensure their mutual compatibility.</p>
	CHRS	2	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.	Project - Concourses	<p>The Station Expansion Project is the outcome of a multi-year planning process that is extensively documented in the appendices of the DEIS. The concourse plan is not incompatible with the provision of below-ground parking, which is part of several of the Action Alternatives considered, including Alternative F, the new Preferred Alternative that FRA and the Project Proponents developed in response to public and agency comments on the DEIS.</p>
	CHRS	3	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.	H Street Bridge	<p>The years-long planning process that led to the Action Alternatives considered in the DEIS is extensively documented in the appendices of the DEIS. FRA and the Project Proponents coordinated, and USRC as the Project Sponsor will continue to coordinate, with DDOT to ensure compatibility between the H Street replacement project and the Station Expansion Project. Opportunities to incorporate Station elements into the deck above the rail terminal were further considered during the development of Alternative F, the new Preferred Alternative. The new Preferred Alternative features a bus facility that is integrated into the deck.</p>

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	CHRS	4	<p>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. Buses 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.</p>	Project - Circulation	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. The new Preferred Alternative addresses many of the commenter’s concerns. In this alternative, the exit ramp to F Street is eliminated; buses would have full range of movement inbound and outbound; and parking and a pick-up and drop-off facility are place below ground, with entrances on G Street and First Street NE.</p>
	CHRS		<p>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.</p>	Historic station	<p>FRA acknowledges the commenter’s opinion and preferences regarding the design of various Project elements. The Action Alternatives considered in the DEIS, SDEIS, and FEIS are the outcome of a multi-year planning process that is documented in those three documents. These alternatives meet the Project’s Purpose and Need and are achievable within the constraints of the Project Area. The renderings provided in the DEIS, SDEIS, and FEIS are conceptual and for illustrative purposes only. Engineering and detailed design will be advanced in the post NEPA phase of the Project.</p>



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	CHRS	5	<p>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.</p>	Section 4(f)	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which Alternative F was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>FRA prepared an SAOE to evaluate the effects of the new Preferred Alternative (Alternative F) on historic properties in accordance with Section 106 of the National Historic Preservation Act. The final SAOE was published as Appendix D1S of the SDEIS. In the SAOE, FRA found that the Preferred Alternative would result in mostly acceptable LOS at the six study intersections in and surrounding the Capitol Hill Historic District (CHHD). This statement is based on the traffic impact analysis presented in Section 5.5.1.12, <i>Vehicular Traffic</i>, of the SDEIS. The SAOE also noted that these acceptable conditions make it less likely that traffic would divert through the Historic District than was the case with the 2020 Preferred Alternative (Alternative A-C). FRA found that the Preferred Alternative would have no adverse effect on the CHHD under the Section 106's criteria of adverse effect (36 CFR § 800.5).</p> <p>The Section 106 consulting parties reviewed the draft SAOE. The comments received were documented in the final SAOE, comment matrix, and determination of effect letter provided to all consulting parties on March 10, 2023. No further comments on the effect were received within 30 days from March 10, per 36 CFR § 800.5.</p> <p>As no part of the CHHD would become incorporated into the Project, and as the Project would have no adverse effect on the CHHD, there would be no use of the Historic District under Section 4(f).</p> <p>While FRA determined the project would have no adverse effect to the CHHD from traffic, traffic impacts on streets in or adjacent to the CHHD were considered in the context of NEPA. Measures to minimize and mitigate these impacts are identified in the FEIS, incorporated as enforceable commitments in the ROD (Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #28a through 28i), and incorporated, as appropriate, in the Section 106 PA (Appendix F4 of the FEIS).</p>
CSG_0928	Coalition for Smarter Growth (CSG)	1	The proposed parking supply should be reduced to 295 spaces	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility. This represents a 77 percent reduction relative to existing conditions. The development of the new Preferred Alternative was coordinated with DDOT, DCOP, and NCPC.</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
	CSG	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 drop-off facility	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the pick-up and drop-off program (documented in Section 2, <i>Pick-Up and Drop-off Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS). The new Preferred Alternative features a below-ground pick-up and drop-off facility anticipated to handle approximately half of all Station-related pick-ups and drop-offs.</p>
	CSG	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	Project - PUDO	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the pick-up and drop-off program (documented in Section 2, <i>Pick-Up and Drop-off Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS) and the pedestrian and bicycle program (Section 4, <i>Pedestrian and Bicycle Program</i>, of Appendix F1). The circulation plan was also revised.</p> <p>These aspects of the new Preferred Alternative are described in Section F.5, <i>H Street Bridge Intersections and Deck-Level Circulation</i>, Section F.8, <i>Pedestrian and Bicycle Access</i>, and Section F.9, <i>Pick-up and Drop-off Areas</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS. Changes made include a below-ground pick-up and drop-off facility; new shared-use ramp along the west side of WUS; parking for approximately 900 bicycles; and full movements to and from H Street NE for buses using the bus facility.</p>
	CSG	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	Project - Pedestrian and bicycle	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the pedestrian and bicycle program (Section 4, <i>Pedestrian and Bicycle Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>).</p> <p>The new Preferred Alternative supports multimodal access through the provision of approximately 900 bicycle parking spots; approximately 100 new bikeshare spots; the construction of a shared-use ramp along the west side of the Station; and other elements as described in Section F.8, <i>Pedestrian and Bicycle Access</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS.</p>
	CSG	5	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.	Preferred Alternative	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p>

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FC2_0714	Federal City Council (FC2)	1	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.	Project - General	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS. The new Preferred Alternative responds to the commenter's concerns about parking, pick-up/drop-off, and bus facilities, and urban design.
Multiple NGOs_0928	Arlington Chamber of Commerce Northern Virginia Chamber of Commerce JBG SMITH Baltimore-DC Metro Building Trades Coalition for the Northeast Corridor Montgomery County Chamber of Commerce Virginia Transit Association Greater Washington Partnership Rail Passengers Association Virginians for High Speed Rail Southern Environmental Law Center Coalition for Smarter Growth Rail Passengers Maryland The BWI Business Partnership, Inc. Economic Alliance of Greater Baltimore (Multiple NGOs)	1	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, and counter to recent Final EIS decisions made by FRA for other mega-projects on the Northeast Corridor. 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.	Project - Rail planning	As is explained in Chapter 2, <i>Purpose and Need</i> , of the FEIS, supporting current and future long-term growth in rail service and operational needs is part of the Project's Purpose and Need.  The basis for the planning for the rail component of the Project is presented in Appendix B of the DEIS. It is based on the long-term rail planning presented in the NEC FUTURE study and the various rail operators' future operating plans. Rail planning assumptions align with the plans advanced in the DC to Richmond Southeast High Speed Rail project, Long Bridge Project, and Transforming Rail in Virginia, which are still current.  FRA notes that Amtrak developed the rail program documented in Appendix B of the DEIS in coordination with FRA, VRE, and MARC. Both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item 3 and VRE_0706, Item 1). Track planning carefully considered projected future demand to ensure the demand is adequately accommodated, including planned through-service.

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Comment ID	Commenter	Item #	Comment	Topic	Response
	Multiple NGOs	2	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 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.	Project - General	In Spring 2023, FRA identified USRC as the Project Sponsor and the process of obtaining support and mobilizing resources has begun. An early step was the development of a Union Station Expansion Project Delivery and Governance Study by IDC, in partnership with the District of Columbia Government. IDC worked with an Advisory Group composed of representatives from USRC, Amtrak, the United States Department of Transportation, FRA, DCOP, and DDOT to identify delivery, financing, and governance mechanisms needed to realize the Project ( see <a href="https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf">https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf</a> , last accessed January 12, 2024). FRA is pleased to have participated in this study that can bring regional stakeholders together to support the expansion of Union Station.
	Multiple NGOs	3	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.	Project - General	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS); pick-up and drop-off program (documented in Section 2, <i>Pick-Up and Drop-off Program</i>, of Appendix F1); and the pedestrian and bicycle program (Section 4, <i>Pedestrian and Bicycle Program</i>, of Appendix F1).</p> <p>These aspects of the new Preferred Alternative are described in Section F.7, <i>Parking</i>, Section F.8, <i>Pedestrian and Bicycle Access</i>, and Section F.9, <i>Pick-up and Drop-off Areas</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS.</p> <p>During the development of the new Preferred Alternative, FRA and the Project Proponents also coordinated with the private air rights developer on developing an approach to the Project elements at the H Street deck level that would enhance opportunities for the creation of a civic space commensurate with WUS's historic and architectural significance, symmetrical and centered on the historic station building. To that end, the Preferred Alternative defines zones that would be free of Project elements and would allow the private developer to design and construct such a civic space to the north of WUS (see Section 3.5, <i>Description of the Preferred Alternative</i>, of the FEIS).</p>
NoMA BID_0714	NoMA Business Improvement District (NoMA BID)	1	<p>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.</p> <p>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.</p>	Project - General	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>FRA is pleased to note the following comments from NoMA BID on the SDEIS: "The revised SDEIS Preferred Alternative includes major improvements we support the FRA including in the Final EIS: Right-sized parking located below-grade, modernized and efficient PUDO (Pick-up and Drop-Off), bus facility better integrated with minimized impacts to the street network, improved bicycle facilities, and fully-integrated urban design" (NoMa BID_0706).</p>

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NoMA BID_0928	NoMA BID	1	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.	Project - General	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>FRA is pleased to note the following comments from NoMA BID on the SDEIS: "The revised SDEIS Preferred Alternative includes major improvements we support the FRA including in the Final EIS: Right-sized parking located below-grade, modernized and efficient PUDO (Pick-up and Drop-Off), bus facility better integrated with minimized impacts to the street network, improved bicycle facilities, and fully-integrated urban design" (NoMa BID_0706).</p>
	NoMA BID	2	<p>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.</p> <p>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.</p> <p>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.</p>	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p> <p>The impacts of the new Preferred Alternative on traffic are described in Section 5.5.3.1, <i>Direct Operational Impacts, Vehicular Traffic</i>, of the FEIS. Measures to avoid, minimize, and mitigate traffic impacts are specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #28a through 28i and include the development and implementation of a Performance Management Plan in coordination with DDOT (Item #28a).</p>
	NoMA BID	3	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.	Project - PUDO	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the pick-up and drop-off program (documented in Section 2, <i>Pick-Up and Drop-off Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS). The new Preferred Alternative features a below-ground pick-up and drop-off facility anticipated to handle approximately half of all Station-related pick-ups and drop-offs, as well as pick-up and drop-off areas in front of the Station, on First and Second Streets NE, and on the H Street deck, adjacent to the train hall. The distribution of pick-ups and drop-offs across the Station, including on the H Street deck, will help maintain adequate vehicular circulation near and around the Station.</p>

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	NoMA BID	4	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.	Project - Urban design	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the bicycle program (see Section 4, <i>Pedestrian and Bicycle Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS).</p> <p>As described in Section F.8, <i>Pedestrian and Bicycle Access</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS, under the new Preferred Alternative, protected bicycle infrastructure would be preserved on First and Second Streets NE and a new shared-use ramp would be provided along the west side of WUS. Approximately 900 spaces for bicycle parking would be provided. The new Preferred Alternative would also provide an additional 100 bikeshare spots.</p>
NRHS_0727	National Railway Historical Society (NRHS)	1	<p>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.</p> <p>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.</p>	Historic preservation	<p>In parallel to the NEPA process, FRA conducted an extensive Section 106 consultation process, as documented in Section 8.11, <i>National Historic Preservation Act Section 106 Consultation</i>, of the FEIS. All Action Alternatives, including the new Preferred Alternative (Alternative F) developed in response to comments on the DEIS, would require the reconstruction of the rail terminal. Alternatives that would not incorporate this feature would not meet the Purpose and Need for the Project, which includes supporting current and future long-term growth in rail service and operational needs, as stated in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS.</p> <p>The effects of this reconstruction were analyzed in the Assessment of Effects (AOE; Appendix D1 of the DEIS) and, for the new Preferred Alternative, the Supplemental Assessment of Effect (Appendix D1S of the SDEIS). In a determination of effect letter provided to all Section 106 consulting parties on March 10, 2023, FRA found that the Project would have an adverse effect on the Washington Union Station Historic Site, including the elements referenced in the comment.</p> <p>The FEIS includes a PA that specifies the measures USRC will implement to minimize and mitigate adverse effects on historic properties (Appendix F4 of the FEIS).</p>
	NRHS	2	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 an adequate means of addressing the issue. Private car parking in Washington, D.C. must be preserved.	Project - Private rail cars	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The impact of the Preferred Alternative on private rail cars is described in Section 5.5.3.1, <i>Direct Operational Impacts, Commuter and Intercity Railroads</i>, of the FEIS, which states that "under the reconfiguration of the rail terminal in the Preferred Alternative, Amtrak has identified space for eight private train cars to be stored at a time. Therefore, private car storage could continue." Specific decisions regarding storage conditions and movements would be made during the design phase of the Project.</p>

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	NRHS	3	All three of these elements [platforms covers/canopies, K Tower, private rail cars parking] 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).	Project - General	As noted above, in the Preferred Alternative analyzed in the SDEIS and FEIS (Alternative F), space for private rail cars would be available at WUS. The FEIS includes a Section 106 PA that specifies measures USRC will implement to minimize and mitigate adverse effects on historic properties, including the WUS Historic Site (Appendix F4 of the FEIS). The PA specifies that USRC will prepare and implement an Architectural Salvage Plan to identify and salvage historic materials and elements that contribute to the WUS Historic Site but must be removed to construct the Project. The Plan will set forth a process to determine which elements requiring removal or relocation can be salvaged and provide guidance and standards for their removal, treatment, relocation, storage, and reuse. The Plan will also address timeframes for how long historic materials and elements must be retained and where they are to be stored, and a process to determine whether items may be donated or disposed of.
	NRHS	4	Building a new station with LESS private automobile parking than currently exists today is a disservice to the traveling public.	Project - Parking	<p>Most commenters on the DEIS who provided feedback on the parking program commented that the DEIS Action Alternatives provided too much parking. These commenters included the Council of the District of Columbia; DCOP; DDOT; NCPC; ANC 6C and 2A; Amtrak; Federal City Council, the NoMA BID; and numerous private organizations and individuals.</p> <p>In response to these and other comments, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility. This represents a 77 percent reduction relative to existing conditions. The development of the new Preferred Alternative was coordinated with DDOT and DCOP.</p>

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NTHP_0928	National Trust for Historic Preservation (NTHP)	1	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.	Cultural resource impacts	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>FRA prepared a SAOE to evaluate the effects of the new Preferred Alternative on historic properties in accordance with Section 106 of the National Historic Preservation Act. The Final SAOE was published as Appendix D1S of the SDEIS. In the SAOE, FRA found that "the Preferred Alternative would result in mostly acceptable Levels of Service (LOS) at the six intersections in and surrounding the Capitol Hill Historic District." This statement is based on the traffic impact analysis presented in Section 5.5.1.12, <i>Vehicular Traffic</i>, of the SDEIS. The SAOE also noted that these acceptable conditions make it less likely that traffic would divert through the Historic District than was the case with the 2020 Preferred Alternative (Alternative A-C). FRA found that the Preferred Alternative would have no adverse effect on the Capitol Hill Historic District under the Section 106's criteria of adverse effect (36 CFR § 800.5).</p> <p>The Section 106 consulting parties reviewed the draft SAOE. The comments received were documented in the final SAOE, comment matrix, and determination of effect letter provided to all consulting parties on March 10, 2023. No further comment on the effect was received within 30 days from March 10, per 36 CFR § 800.5. While FRA determined the project would have no adverse effect on the Capitol Hill Historic District, FRA notes that the traffic impacts on streets in or adjacent to the Capitol Hill Historic District have been considered in the context of NEPA. Measures to minimize and mitigate these impacts are identified in the FEIS and incorporated as enforceable commitments into the ROD (Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #28a through 28i) and incorporated in the Section 106 PA.</p>



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Comment ID	Commenter	Item #	Comment	Topic	Response
	NHTP	2	<p>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. <i>Citizens to Preserve Overton Park, Inc. v. Volpe</i>, 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.” <i>Merritt Parkway Conservancy v. Mineta</i>, 424 F. Supp. 2d 396, 417 (D. Conn. 2006) (citing <i>Druid Hills Civic Ass’n v. FHWA</i>, 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.” <i>Merritt Parkway Conservancy v. Mineta</i>, 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.” <i>Citizens to Preserve Overton Park v. Volpe</i>, 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.”</p>	Section 4(f)	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The Preferred Alternative addresses the concerns expressed in this comment regarding the parking program. The development of the new Preferred Alternative involved a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility.</p> <p>During the development of the new Preferred Alternative, FRA and the Project Proponents also coordinated with the private air rights developer on developing an approach to the Project elements at the H Street deck level that would enhance opportunities for the creation of a civic space commensurate with WUS’s historic and architectural significance, symmetrical and centered on the historic station building. To that end, the Preferred Alternative defines zones that would be free of Project elements and would allow the private developer to design and construct such a civic space to the north of WUS (see Section 3.5, <i>Description of the Preferred Alternative</i>, of the FEIS).</p> <p>The SDEIS supplemented the Draft Section 4(f) Evaluation presented in the 2020 DEIS and documented that the Preferred Alternative would result in least overall harm; it would offer the best opportunities for successful mitigation and, consequently, for less severe remaining harm after mitigation than the Action Alternatives previously considered. In their comment on the Draft Supplemental Evaluation, the Department of the Interior stated that they “Concur with the findings of the least harm analysis and that while the Preferred Alternative will have impacts to Section 4(f) resources, most of these impacts will be mitigated through measures implemented as part of the Section 106 Programmatic Agreement” (see DOI_0706, Item #2).</p>

DEIS Comments: Organizations

Comment ID	Commenter	Item #	Comment	Topic	Response
TourGuides_0803	Guild of Professional Tour Guides of Washington DC (Tour Guides)	1	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.	Project – Bus facility	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the bus program, documented in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS.</p> <p>This re-evaluation is the basis for the Preferred Alternative's bus facility, which includes 39 slips and would be capable of meeting future expected demand for bus activity. During days of exceptionally high demand, space for 15 more buses would be available on the H Street deck level. Additionally, the bus facility in the new Preferred Alternative would be integrated into the train hall, providing bus passengers easy access to multimodal transfers and waiting areas.</p> <p>Operation of the bus facility in the Preferred Alternative would not involve a 30-minute dwelling limit. The bus program for the Preferred Alternative was developed in a manner that incorporates data and feedback of operators on how long buses would occupy a slip on average. With 39 slips in the facility and the equivalent of an additional 15 slips on the H Street deck for use in times of exceptionally high demand, the facility would be adequate to meet the anticipated demand from intercity and tour/charter bus operators.</p>
	Tour Guides	2	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 current facility in the station.	Project – Bus facility	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>As explained above, the development of the new Preferred Alternative included a re-evaluation of the bus program, documented in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS.</p> <p>In the new Preferred Alternative, the bus facility would be immediately adjacent to and integrated with the train hall. This would provide bus passengers with safe and direct access to multimodal transfers and waiting areas, as well as to the greater Washington Union Station facility. The bus facility in the Preferred Alternative is described in Section F.6, <i>Bus Facility</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS.</p>

DEIS Comments: Organizations

Comment ID	Commenter	Item #	Comment	Topic	Response
	Tour Guides	3	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 instances 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.	Traffic impacts	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative involved re-evaluating circulation patterns, including bus movements in and out of the bus facility. As explained in Section F.6, <i>Bus Facility</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS, the new Preferred Alternative would allow full range of movements for inbound and outbound buses, including allowing west bound or east bound turns for buses exiting onto H Street NE.</p>
TravelerAid_0629	Travelers Aid International	1	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.	Project - Public accommodations	Noted. Accommodation of specific activities or groups is not within the scope of the EIS.
Uber_0713	Uber	1	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 drop-off 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.	Project - PUDO	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>Pick-up and drop-off operations in the new Preferred Alternative are described in Section F.9, <i>Pick-up and Drop-off Areas</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS. Measures to avoid, minimize, or mitigate adverse impacts associated with pick-up and drop-off activities are identified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #27a through 27f. As specified there, USRC, the Project Sponsor, would be required to coordinate with DDOT and the District Department of For-Hire Vehicles (DDFHV) to develop and implement regulatory strategies to reduce excess taxi and Transportation Networking Companies (TNC) pick-up and drop-off activity at WUS, promote shared rides, and avoid adjacent spillovers or excessive congestion, including the creation of a geofenced area that determines specific pick-up locations; incentives; and pricing policies for for-hire vehicles.</p>

DEIS Comments: Organizations

Comment ID	Commenter	Item #	Comment	Topic	Response
VABF_0928	Virginia Bicycling Federation	1	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.	Project - Pedestrian and bicycle	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the bicycle program and infrastructure (see Section 4, <i>Pedestrian and Bicycle Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS).</p> <p>As described in Section F.8, <i>Pedestrian and Bicycle Access</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS, under the new Preferred Alternative, protected bicycle infrastructure would be preserved on First and Second Streets NE and a new shared-use ramp would be provided along the west side of WUS. Approximately 900 spaces for bicycle parking would be provided. Specific design elements, such as lockers and bicycle ramps on stairs, would be determined during the engineering and design phase of the Project. The new Preferred Alternative would also provide an additional 100 bikeshare spots.</p>

## **DEIS Comments: Private Parties**

DEIS Comments: Private Parties

Comment ID	Commenter	Item #	Comment	Topic	Response
PI_0607_001, PI_0616_001, PI_0626_001, PI_0627_001, PI_0630_001, PI_0701_001, PI_0714_001, PI_0714_002, PI_0714_005, PI_0714_009, PI_0714_011, PI_0714_012, PI_0714_013, PI_0714_014, PI_0714_015, PI_0724_001, PI_0727_001, PI_0728_001, PI_0828_001, PI_0924_003, PI_0925_003, PI_0926_001, PI_0928_009, PI_0928_013, PI_1001_001, PI_Multiple_0807	Louise Brodnitz, Rami Turayhi, William Wright Bryan III, Stewart Kerr, Andrew deFrank, Taquann McKinney, James Schulman, Noah Gillespie, Brent Huggins, Inaudible, Andrew, Alex Lopez, Andrew Turner, Marina, Randy Downs, Hannah Follweiler, Mike Aiello, Karthik Balasubramanian, Louise Brodnitz, Josh Boxerman, Troy Michalak, Barton Lynch, Jeff Johnson, Bill Gallagher, Matthew Keitelman, 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) Washington Area Bicyclist Association	1	THEME COMMENT: Several commenters strongly oppose expanding the parking garage/vehicle parking and suggest that the Project eliminate or significantly reduce vehicle parking at the station; and that the station design should prioritize and increase access for pedestrians and bicyclists and other non-car modes of transportation. Commenters are concerned that more parking would encourage more driving to the station, causing more traffic congestion and pedestrian and bike safety concerns, as well as contributing pollution (e.g., emissions) to the Project area. Commenters also note that 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. Some commenters state that if parking is necessary that it be put underground.	Project - Parking	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS.  The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all below ground. This represents a 77 percent reduction relative to existing conditions. The development of the new Preferred Alternative was coordinated with DDOT, DCOP, and NCPC.

DEIS Comments: Private Parties

Comment ID	Commenter	Item #	Comment	Topic	Response
PI_0817_001, PI_0817_002, PI_0817_003, PI_0817_004, PI_0817_005, PI_0818_001, PI_0819_001, PI_0910_001, PI_0910_002, PI_0910_003, PI_0910_004, PI_0911_001, PI_0912_001, PI_0915_001, PI_0915_003, PI_0921_001, PI_0922_001, PI_0922_002, PI_0922_003, PI_0922_004, PI_0922_005, PI_0922_006, PI_0922_007, PI_0922_008, PI_0923_001, PI_0923_002, PI_0923_003, PI_0923_004, PI_0923_005, PI_0923_006, PI_0924_001, PI_0924_002, PI_0925_002, PI_0926_003, PI_0926_004, PI_0926_005, PI_0927_001, PI_0927_002, PI_0927_003, PI_0928_002, PI_0928_004, PI_0928_006, PI_0928_008, PI_0928_011, PI_0928_012, PI_0714_003, STI-0921, NaCL_0925, GTA-0925, WS_0924	Teresa Pezzi, Mili Steel-Hollenbeck, Nathan Harrington, Alan Weinstein, Richard Snowden, Marvin Gerber, Michael Ruggieri, David Shaw, Ellen Malasky, Dawn Bryant, Yasmin Bhalloo, Steven Kline, Mary Thorne, Helga Warren, Christen Eliason, James Carr, Russell Preble, Julie Moody, Garrett Ethridge, Rebecca Grawl, Anthony Spadafora, Debra Wiley, P. Cole Hanner, Kevin Golden, Katie Chambers, Elaine Moulder, Rohulamin Quander, Charlotte Liebig, Russ Norfleet, John Days, Sean Grant, Angalee Schmidt, Chandini Bachman, Sally Stotter, W. Bart Smith, Paul Rose, Michael Hollingsworth, William Plenefisch, Kimberley Indovina, Gary Kushnier, Christina Bauer, Bill Harris, Laura Moore, Maria Limarzi, Mary Beth, Joe Steinbock, Scholastica Travel Inc., Nations Classroom, Global Travel Alliance, WorldStrides	1	THEME COMMENT: Numerous licensed, professional tour guides (both current and retired) in Washington, DC, provided individual comments expressing concern about constraints on coach parking under the Project, including the limits on the number of slots for motorcoach parking, location of coach parking, and time limits for coach parking. They requested that the Project maintain, at a minimum, the current number of 61 slots for motorcoach parking and; keep the facility within the station complex as currently located; reject the plan to limit coaches to 30 minute parking.	Project - Bus facility	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the bus program (documented in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS).</p> <p>The bus facility in the new Preferred Alternative is described in Section F.6, <i>Bus Facility</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS. In the Preferred Alternative, the bus facility would be integrated with the future train hall and operation of the facility would not include a 30-minute dwelling limit. The bus program for the Preferred Alternative was developed in a manner that incorporates data and feedback of operators on how long buses would occupy a slip on average. The Preferred Alternative's bus facility, with a total of 39 slips in the facility and the equivalent of an additional 15 slips on the H Street deck for use in times of exceptionally high demand, would be adequate to meet the anticipated demand from intercity and tour/charter bus operators.</p>

DEIS Comments: Private Parties

Comment ID	Commenter	Item #	Comment	Topic	Response
PI_0612_001	Edmund Hull	1	Strongly support enhanced access to Station from surrounding neighborhood. In so doing, you are avoiding the mistake of mammoth Convention Center dropped in the middle of Shaw with minimal integration. Please protect this aspect of the design.	Project - General	As described in Section 2.3, <i>Purpose and Need Statement</i> , of the FEIS, the Purpose and Need for the Project includes enhancing integration with the adjacent neighborhoods, businesses, and planned land uses. All Action Alternatives would enhance access to the Station from surrounding neighborhoods, including the new Preferred Alternative (Alternative F) described and analyzed in the SDEIS and FEIS, by adding new access points on H Street, First Street, and Second Street NE, and improving pedestrian and bicycle access, as described in Section F.8, <i>Pedestrian and Bicycle Access</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , of the FEIS.
PI_0626_001	William Wright Bryan III	1	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. Your planning for train improvements is forward-looking. Your planning for pedestrians, bikes and cars is backward looking.	Project - Pedestrian and bicycle	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the bicycle program (see Section 4, <i>Pedestrian and Bicycle Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), resulting in an increase in the amount of bicycle parking and storage included in the Preferred Alternative relative to the 2020 DEIS Action Alternatives.</p> <p>Bicycle storage would be provided in the undercroft of the east and west ramps as well as in the H Street Concourse near the entrances from First and Second Streets NE. A total of approximately 900 spaces for bicycle storage and approximately 100 additional bikeshare spots would be provided.</p>
	William Wright Bryan III	2	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.	Project - Schedule	<p>FRA's evaluation of the Project under NEPA is an important first step in moving the Project forward. Following FRA's decision at the conclusion of the NEPA process, USRC, as the Project Sponsor, would need to pursue and identify funding sources to continue the planning, design, and construction of the Project. The ultimate timeframe for the construction of the Project will depend on these post-NEPA steps.</p> <p>An early step was the development of a Union Station Expansion Project Delivery and Governance Study by IDC, in partnership with the District of Columbia Government. IDC worked with an Advisory Group composed of representatives from USRC, Amtrak, the United States Department of Transportation, FRA, DCOP, and DDOT to identify delivery, financing, and governance mechanisms needed to realize the Project (see <a href="https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf">https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf</a>, last accessed January 12, 2024).</p> <p>Currently, the Project is estimated to be completed as described in the FEIS. Construction durations will be refined as part of the construction planning during the engineering and design phase of the Project.</p>



DEIS Comments: Private Parties

Comment ID	Commenter	Item #	Comment	Topic	Response
PI_0626_002	Anonymous	1	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.	Project-General	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>Like the 2020 DEIS Action Alternatives, the new Preferred Alternative includes new entrances to Union Station through the new H Street Concourse from both First and Second Streets NE; entrances from H Street via new headhouses on either side of the H Street Bridge; as well as the continuing use of entrances via the historic Station building.</p> <p>As described in Section 3.5, <i>Description of the Preferred Alternative</i>, of the FEIS, the new Preferred Alternative allows for the development of a civic space on the deck south of H Street as part of the private air rights development.</p>
	Anonymous	2	Overall I think traffic flow will need to be addressed. Allowing for traffic to Move whilst dropping individuals off without ruining the overall aesthetic 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.	Traffic impacts	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The new Preferred Alternative re-evaluated the Project elements and addresses the concerns of the commenter, such as reducing the number of parking spaces at Union Station and moving the parking facility below ground, as well as adding a new pick-up and drop-off facility below ground.</p>
	Anonymous	3	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 wharf. 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. Keeping 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 becoming 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.	Project - Urban design	<p>Appendix A3b of the DEIS documents options for an open space framework that were considered early in the Project planning process. In the early stages of the planning process, FRA and the Project Proponents sought public feedback through a series of public meetings, as described in Chapter 8, <i>Public Involvement and Coordination</i>, of the FEIS. FRA and the Project Proponents considered public comments when deciding which options to advance.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>During the development of the new Preferred Alternative, FRA and the Project Proponents coordinated with the private air rights developer on developing an approach to the Project elements at the H Street deck level that would enhance opportunities for the creation of a civic space commensurate with WUS's historic and architectural significance, symmetrical and centered on the historic station building. To that end, the Preferred Alternative defines zones that would be free of Project elements and would allow the private developer to design and construct such a civic space to the north of WUS (see Section 3.5, <i>Description of the Preferred Alternative</i>, of the FEIS).</p>
PI_0706_001	See Baker	1	<ol style="list-style-type: none"> <li>1. Please make H Street flat again. Take out that ridiculous hill.</li> <li>2. Put the H street tunnel back in place. 60+years ago there was a fish market in one of those tunnels. Do your homework. Put the market back.</li> <li>3. Extend the streetcar so it goes inside the building.</li> </ol>	H Street Bridge	<p>H Street and the DC Streetcar are facilities administered by DDOT. DDOT has an ongoing project to replace the H Street Bridge, which is separate and independent from the Project. Removal of the bridge is not within the purview of FRA or the Project Proponents and is not needed to support the Purpose and Need for the Project.</p> <p>DC Streetcar currently terminates on the H Street Bridge. It is not feasible to bring the streetcar inside the WUS building. However, the Project would create new vertical connections through two headhouses on either side of the bridge that would facilitate transfers between the streetcar and other transportation modes at Union Station.</p>

DEIS Comments: Private Parties

Comment ID	Commenter	Item #	Comment	Topic	Response
PI_0714_002	Noah Gillespie	1	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.	Project-Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>In addition to making Union Station fully compliant with the ADA (like all Action Alternatives), the new Preferred Alternative includes a below-ground pick-up and drop-off facility that would accommodate approximately 50 percent of all pick-ups and drop-offs at Union Station (see Section F.9, <i>Pick-up and Drop-off Areas</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS).</p> <p>In the new Preferred Alternative, the bus facility would be integrated into the train hall, facilitating access and intermodal transfers for bus riders (see Section F.6, <i>Bus Facility</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS).</p>
PI_0714_006	Anonymous	1	<p>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.</p> <p>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.</p> <p>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.</p> <p>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 ...</p>	Project - General	<p>As is explained in Chapter 2, <i>Purpose and Need</i>, of the FEIS, supporting current and future long-term growth in rail service and operational needs is part of the Project's Purpose and Need. The rail planning assumptions informing the Project's track and platform plan are presented in Appendix B of the DEIS. As explained in Appendix B, rail planning for the Station Expansion Project is based on both the 2030+ and 2040 NEC FUTURE operating plans. The volumes assumed in planning for the Project are 2040 NEC Future volumes with some adjustments.</p> <p>The Station Expansion Project was developed in coordination with Amtrak and other rail operators and is designed to accommodate 630 daily trips, consistent with the referenced plans. The DEIS and SDEIS have been reviewed by Amtrak, VRE, and MTA, none of which have raised concerns related to the capacity of the Station in 2040 and beyond.</p> <p>Amtrak developed the rail program documented in Appendix B of the DEIS and both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item 3 and VRE_0706, Item 1).</p> <p>FRA notes that the 2012 Union Station Master Plan was an aspirational vision plan created by USRC, Amtrak, and Akridge (a private developer). It does not reflect current planning assumptions and does not provide a valid point of comparison with the Project.</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
PI_0714_007	Jay Adams	1	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.	Project General	<p>Throughout the EIS process, FRA engaged with the public on multiple fronts, as described in Section 8.4, <i>Public Involvement through DEIS Publication</i>, and Section 8.8, <i>Coordination and Public Engagement During the Preparation of the SDEIS</i>, of the FEIS.</p> <p>Following public review of the DEIS, and in response to the concerns summarized in this comment, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p>
PI_0714_008	Karen	1	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.	Traffic impacts	<p>The DEIS, SDEIS, and FEIS describe the traffic impacts of the various Action Alternative, including construction-related impacts, in their respective Sections 5.5, <i>Transportation</i>.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>As explained in Section 5.5.3.3, <i>Construction Impacts, DC Streetcar</i>, of the FEIS, closure of the H Street Bridge to construct the Preferred Alternative is not likely and, if it did occur, it would be rare and brief. The Project does not include development that would encroach on surrounding neighborhoods.</p>
PI_0714_010	Valerie	1	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.	Project-General	As described in Section 2.3, <i>Purpose and Need Statement</i> , of the FEIS, the Purpose and Need of the Project includes providing a positive customer experience and supporting the continued preservation and use of the historic Station building. All Action Alternatives, including the Preferred Alternative described and analyzed in the SDEIS and FEIS, are consistent with these elements of the Purpose and Need. Development of the private air rights behind the Station is a private project that is independent of the Project and will be subject to its own review and approval process in the District of Columbia.

DEIS Comments: Private Parties

Comment ID	Commenter	Item #	Comment	Topic	Response
PI_0915_002	Brenda Tidwell	1	Please expand parking at Union Station.	Project - Parking	<p>Most commenters on the DEIS who provided feedback on the parking program commented that the DEIS Action Alternatives provided too much parking. These commenters included the Council of the District of Columbia; DCOP; DDOT; NCPD; ANC 6C and 2A; Amtrak; Federal City Council, the NoMA BID; and numerous private organizations and individuals.</p> <p>In response to these and other comments, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility. This represents a 77 percent reduction relative to existing conditions. The development of the new Preferred Alternative was coordinated with DDOT and DCOP.</p>
PI_0925_001	Jay Melrose	1	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.	Historic station	As described in Section 2.3, <i>Purpose and Need Statement</i> , of the FEIS, the Purpose and Need of the Project includes supporting current and future long-term growth in rail service and operational needs as well as supporting the continued preservation and use of the historic Station building. All Action Alternatives, including the Preferred Alternative described and analyzed in the SDEIS and FEIS, are consistent with these elements of the Purpose and Need.
PI_0926_002	Katie Kolodzie	1	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.	Project - General	<p>As described in Section 2.3, <i>Purpose and Need Statement</i>, of the DEIS, the Purpose and Need of the Project includes supporting current and future long-term growth in rail service and operational needs; facilitating intermodal travel; and providing a positive customer experience. All Action Alternatives considered support these elements of the Purpose and Need.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The impacts of the Preferred Alternative on circulation within the Station are described in Section 5.5.3.1, <i>Direct Operational Impacts, Pedestrians</i>, of the FEIS.</p> <p>The scope of the Project does not encompass retail programming for the historic Station building.</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
PI_0928_001	Peter Carlson	1	I 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. Just remember to keep the ADA community in with your thinking and planning.	Project - Accessibility	<p>As described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, the Purpose and Need of the Project includes achieving compliance with the ADA and emergency egress requirements. All Action Alternatives considered support this element of the Purpose and Need.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The impacts of the Preferred Alternative on accessibility are described in Section 5.16, <i>Public Health, Elderly, and Persons with Disabilities</i>, of the FEIS.</p>
	Peter Carlson	2	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.	Project - Retail	<p>All Action Alternatives considered include space for future new retail at Union Station along the new concourse.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>As stated in Section 3.5, <i>Description of the Preferred Alternative</i>, of the FEIS, the Preferred Alternative would add approximately 64,000 square feet of new retail space to Union Station. The exact retail program for the expanded Station would be defined at a later date by the entity managing retail at Union Station, consistent with market conditions.</p>
	Peter Carlson	3	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?	Project - General	<p>While all Action Alternatives considered incorporate high-level assumption regarding ventilation structures, specifics will be determined post-NEPA, during the engineering and design phase of the Project.</p> <p>The Project does not include the provision of parks and gardens in the neighborhood. As explained in Section 3.5, <i>Description of the Preferred Alternative</i>, of the FEIS, the Preferred Alternative allows for the establishment of a civic space on the H Street deck level by the private air rights developer. This space is not part of the Purpose and Need for the Project.</p>

Comment ID	Commenter	Item #	Comment	Topic	Response
PI_0928_003	Thomas Olmstead	1	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 <a href="https://ddot.dc.gov/page/demandbased-parking-pricing-penn-quarterchinatown">https://ddot.dc.gov/page/demandbased-parking-pricing-penn-quarterchinatown</a> ); 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.	Project - Parking	In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i> , of the FEIS.  The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550, all of them in a below-ground facility. This represents a 77 percent reduction relative to existing conditions.  The operational impacts of the Preferred Alternative on air quality are presented in Section 5.6.3.1, <i>Direct Operational Impacts</i> , of the FEIS.  Management of the future parking facility, including rates and prioritization of certain types of vehicles, is not within the scope of the EIS. As explained in Section F.7, <i>Parking</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , of the FEIS, the new parking facility would make provisions for electric vehicle charging.
	Thomas Olmstead	2	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.	Construction - Spoil disposal	Noted.
	Thomas Olmstead	3	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 preconstruction 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 razing requirements as they relate to asbestos.	Air quality	The Project Sponsor, USRC, would obtain applicable District permits and authorizations, and comply with applicable District regulations, including those that relate to air emissions and asbestos.
	Thomas Olmstead	4	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.	Regulations	The Project Sponsor, USRC, would obtain applicable District permits and authorizations, and comply with applicable District regulations, including those that relate to soil vapor.
	Thomas Olmstead	5	Fugitive dust must be controlled by methods ensuring compliance with 20 DCMR §605, Control of Fugitive Dust.	Regulations	The Project Sponsor, USRC, would obtain applicable District permits and authorizations, and comply with applicable District regulations, including those that relate to fugitive dust control.
	Thomas Olmstead	6	Odors and other nuisance pollutants must be controlled to ensure compliance with 20 DCMR § 903.	Regulations	The Project Sponsor, USRC, would obtain applicable District permits and authorizations, and comply with applicable District regulations, including those that relate to odor and nuisance pollutants.
	Thomas Olmstead	7	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.	Air quality	The Project Sponsor, USRC, would obtain applicable District permits and authorizations, and comply with applicable District regulations, including those that relate to engine idling.

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Comment ID	Commenter	Item #	Comment	Topic	Response
PI_0928_005	Jeffrey Miller (DC Cycling Concierge)	1	I strongly urge you to include in your plans include: <ul style="list-style-type: none"> <li>• Focus on street level enhancements for walking 1st and biking 2nd to make Union Station an inviting and safe destination / intermodal connection.</li> </ul>	Project - Pedestrian and bicycle	<p>As described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, the Purpose and Need of the Project includes facilitating intermodal travel at Union Station. Pedestrian and bicycle access is one of eight Project elements, as explained in Section 3.1.1, <i>Identification of Project Elements</i>, of the FEIS, which specifies that ensuring quality bicycle and pedestrian access is essential for a multimodal facility in an urban environment.</p> <p>All Action Alternatives considered incorporate enhancements to bicycle and pedestrian access to Union Station as well as new opportunities for bicycle parking.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The bicycle component of the Preferred Alternative is described in Section F.8, <i>Pedestrian and Bicycle Access</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS.</p>
	Jeffrey Miller (DC Cycling Concierge)	2	I strongly urge you to include in your plans include: <ul style="list-style-type: none"> <li>• 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.</li> </ul>	Project - Pedestrian and bicycle	<p>As described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, the Purpose and Need of the Project includes facilitating intermodal travel at Union Station. Pedestrian and bicycle access is one of eight Project elements, as explained in Section 3.1.1, <i>Identification of Project Elements</i>, of the FEIS, which specifies that ensuring quality bicycle and pedestrian access is essential for a multimodal facility in an urban environment.</p> <p>All Action Alternatives considered incorporate enhancements to bicycle access to Union Station as well as new opportunities for bicycle parking.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The bicycle component of the Preferred Alternative is described in Section F.8, <i>Pedestrian and Bicycle Access</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS. It includes parking for approximately 900 bikes in the undercroft of the east and west ramps as well as in the H Street Concourse near the entrances from First and Second Streets NE.</p>

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	Jeffrey Miller (DC Cycling Concierge)	3	I strongly urge you to include in your plans include: <ul style="list-style-type: none"> <li>• Incorporate bikeshare at multiple access points and utilize this expansion to help create Union Station as a true hub for bikeshare.</li> </ul>	Project - Pedestrian and bicycle	<p>As described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, the Purpose and Need of the Project includes facilitating intermodal travel at Union Station. Pedestrian and bicycle access is one of eight Project elements, as explained in Section 3.1.1, <i>Identification of Project Elements</i>, of the FEIS, which specifies that ensuring quality bicycle and pedestrian access is essential for a multimodal facility in an urban environment.</p> <p>All Action Alternatives considered incorporate additional bikeshare spots.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The bicycle component of the Preferred Alternative is described in Section F.8, <i>Pedestrian and Bicycle Access</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS. The Preferred Alternative would add approximately 100 bikeshare spots at Union Station. The location of these spots would be determined during engineering and design, in coordination with DDOT.</p>
	Jeffrey Miller (DC Cycling Concierge)	4	I strongly urge you to include in your plans include: <ul style="list-style-type: none"> <li>• Create a safe space for pick-up and drop-off underground – separate from pedestrian and bicyclists on the surface for safety and aesthetic reasons.</li> </ul>	Project - PUDO	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The new Preferred Alternative includes a below-ground pick-up and drop-off facility, which is described in Section F.9, <i>Pick-up and Drop-off Areas</i>, of Appendix F2, <i>Description of the Purpose Alternative</i>, of the FEIS.</p>
	Jeffrey Miller (DC Cycling Concierge)	5	I strongly urge you to include in your plans include: <ul style="list-style-type: none"> <li>• Weave the completion of the Metropolitan Branch Trail as a key connection and component to your plans.</li> </ul>	Project - Pedestrian and bicycle	<p>Sections of the Metropolitan Branch Trail that are not yet completed are located far north of Washington Union Station and are outside the Project Area and the Project's scope.</p>
	Jeffrey Miller (DC Cycling Concierge)	6	I strongly urge you to include in your plans include: <ul style="list-style-type: none"> <li>• 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.</li> </ul>	Project - Pedestrian and bicycle	<p>As described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, the Purpose and Need of the Project includes facilitating intermodal travel at Union Station and enhancing integration with the adjacent neighborhoods, businesses, and planned land uses.</p> <p>Pedestrian and bicycle access is one of eight Project elements, as explained in Section 3.1.1, <i>Identification of Project Elements</i>, of the FEIS, which specifies that ensuring quality bicycle and pedestrian access is essential for a multimodal facility in an urban environment.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>Like all Action Alternatives considered, the Preferred Alternative incorporates enhancements to bicycle access to Union Station as well as new opportunities for bicycle parking. It would improve community cohesion by creating new pedestrian connections between Union Station and the surrounding neighborhoods and between the neighborhoods to the east and west of the Station via the new H Street Concourse, which would provide a direct link across the area currently occupied by the open-air rail terminal.</p>



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	Jeffrey Miller (DC Cycling Concierge)	7	<p>I strongly urge you to include in your plans include:</p> <ul style="list-style-type: none"> <li>• 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 was 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.</li> </ul>	Project - Parking	<p>As described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, the Purpose and Need of the Project includes facilitating intermodal travel at Union Station. Pedestrian and bicycle access is one of eight Project elements, as explained in Section 3.1.1, <i>Identification of Project Elements</i>, of the FEIS, which specifies that ensuring quality bicycle and pedestrian access is essential for a multimodal facility in an urban environment.</p> <p>All Action Alternatives considered incorporate enhancements to bicycle access to Union Station as well as new opportunities for bicycle parking.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The bicycle component of the Preferred Alternative is described in Section F.8, <i>Pedestrian and Bicycle Access</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS. It includes parking for approximately 900 bicycles in the undercroft of the east and west ramps as well as in the H Street Concourse near the entrances from First and Second Streets NE.</p>
PI_0928_007	Harvey Botzman	1	<ol style="list-style-type: none"> <li>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 &amp; weather protected bicycle parking facility shall be installed at this Station.</li> <li>2. Any stairs interior &amp; 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.</li> <li>3. The architects, engineers, and construction general contractors &amp; 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.</li> </ol>	Project - Pedestrian and bicycle	<p>As described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, the Purpose and Need of the Project includes facilitating intermodal travel at Union Station. Pedestrian and bicycle access is one of eight Project elements, as explained in Section 3.1.1, <i>Identification of Project Elements</i>, of the FEIS, which specifies that ensuring quality bicycle and pedestrian access is essential for a multimodal facility in an urban environment.</p> <p>All Action Alternatives considered incorporate enhancements to bicycle access to Union Station as well as new opportunities for bicycle parking.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The bicycle component of the Preferred Alternative is described in Section F.8, <i>Pedestrian and Bicycle Access</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS. It includes parking for approximately 900 bicycles in the undercroft of the east and west ramps as well as in the H Street Concourse near the entrances from First and Second Streets NE.</p> <p>The specific design of vertical circulation elements within and outside the station will be considered further during the engineering and design phase of the Project.</p> <p>Throughout the EIS process, FRA engaged with the public on multiple fronts, as described in Section 8.4, <i>Public Involvement through DEIS Publication</i>, and Section 8.8, <i>Coordination and Public Engagement During the Preparation of the SDEIS</i>, of the FEIS. The public, including bicycling organizations and individuals, were provided multiple opportunities to give feedback and input on the Project, and FRA considered their comments. Any future public involvement effort by USRC, the Project Sponsor, during the post-NEPA phases of the Project will be open to bicycling organizations and individuals, and their comments will be considered.</p>

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PI_0928_010	Matthew Schwartz	1	I strongly agree with Akridge's Burnham Place development philosophies. The Union Station redevelopment must integrate into the neighborhood, 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 to. 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.	Project - General	Noted.
PI_0928_013	Bill Gallagher	1	<p>Concourse areas</p> <p>The four concourse areas work well and the new entrances on 1st and 2nd Streets will give much needed relief for egress and access. The lower concourse seems in direct conflict with the First 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?</p> <p>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 opened 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?</p>	Project - Concourses	The Station Expansion Project is the culmination of a collaborative multi-year planning process that is extensively documented in the appendices of the DEIS. The concourse plan, which is the same for all Action Alternatives considered, including the new Preferred Alternative (Alternative F) described in the SDEIS and FEIS, was developed to be consistent with other existing and planned facilities and structures. The Lower Concourse would not conflict with the Metrorail Station or the First Street Loading Dock. Like all Action Alternatives, the Preferred Alternative makes provision for direct or indirect daylighting of the concourses, including via skylights. Specifics on lighting would be determined during the engineering and design phase of the Project.
	Bill Gallagher	2	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 - 1st 2nd streets, (all entrance areas) H Street. Traffic going north on First 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.	Project - PUDDO	<p>As described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, the Purpose and Need of the Project includes facilitating intermodal travel at Union Station. As such, the Project must account for all modes of transportation, including taxis and for-hire vehicles. All Action Alternatives considered would distribute vehicular traffic across the Project Area.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>As described in Section F.9, <i>Pick-up and Drop-off Areas</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS, the new Preferred Alternative distributes taxis and pick-ups and drop-offs across a below-ground facility and above-ground areas in front of the Station, on the H Street Deck, and, to a lesser extent, on First and Second Streets NE. The below-ground pick-up and drop-off facility is responsive to many comments received on the DEIS.</p> <p>The Preferred Alternative maintains the First Street Cycle track on the east side of the street, as agreed with DDOT.</p>

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	Bill Gallagher	3	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.	Project - PUDDO	<p>As described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, the Purpose and Need of the Project includes facilitating intermodal travel at Union Station. As such, the Project must account for all modes of transportation, including taxis and for-hire vehicles. All Action Alternatives considered would distribute vehicular traffic across the Project Area.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>As described in Section F.9, <i>Pick-up and Drop-off Areas</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS, the new Preferred Alternative distributes taxis and pick-ups and drop-offs across a below-ground facility and above-ground areas in front of the Station, on the H Street Deck, and, to a lesser extent, on First and Second Streets NE. The distribution of pick-ups and drop-offs across the Station, including on the H Street deck, is needed to maintain adequate vehicular circulation near and around the Station.</p>
	Bill Gallagher	4	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	Project - Bus facility	<p>As described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, the Purpose and Need of the Project includes facilitating intermodal travel at Union Station. As such, the Project must account for all modes of transportation, including intercity and tour/charter buses. All Action Alternatives considered include a bus facility. The new Preferred Alternative (Alternative F), which FRA and the Project Proponents developed in response to multiple public and agency comments, includes a bus facility integrated with the future train hall and below the H Street deck (see Section F.6, <i>Bus Facility</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS). Buses to and from Union Station cannot be accommodated on city streets, which provide neither adequate space for buses nor adequate supporting facilities for bus riders.</p>
Multiple_0807	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) Washington Area Bicyclist Association (Multiple)	1	<p>The proposal must do more to present a vision for bikes. The DEIS recommends that bike infrastructure around Union Station ... just stay the same.</p> <p>The most the FRA recommends is to keep the existing bikeshare docks and bike storage but double the capacity of each. These are obvious improvements but leave out so much more that is simple and affordable to achieve.</p> <p>Here are six easy improvements:</p> <p>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.</p> <p>Create bikeshare docks and storage on all streets and levels on all sides of the station:</p> <p>H Street bridge level, on both sides of the station.</p> <p>H Street Concourse level, on both sides of the station.</p> <p>The existing Second Street location.</p> <p>A new First Street location immediately next to the bike storage.</p> <p>At least one K Street location to the north of the project area, adjacent to and supporting the planned K Street bike lanes.</p>	Project - Pedestrian and bicycle	<p>As described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, the Purpose and Need of the Project includes facilitating intermodal travel at Union Station. Pedestrian and bicycle access is one of eight Project elements, as explained in Section 3.1.1, <i>Identification of Project Elements</i>, of the FEIS, which specifies that ensuring quality bicycle and pedestrian access is essential for a multimodal facility in an urban environment.</p> <p>All Action Alternatives considered incorporate enhancements to bicycle access to Union Station as well as new opportunities for bicycle parking.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The bicycle component of the Preferred Alternative is described in Section F.8, <i>Pedestrian and Bicycle Access</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS. The Preferred Alternative would provide approximately 900 spaces for bicycle storage and approximately 100 additional bikeshare spots. Bicycle storage would be provided in the undercroft of the east and west ramps as well as in the H Street Concourse near the entrances from First and Second Streets NE. The Preferred Alternative includes a shared-use ramp along the west side of Union Station that would connect the front of the Station to the H Street deck level. This ramp could potentially connect to a future "greenway" north of H Street NE if one is provided as part of a separate development project; however, such a greenway is not within the scope of the Project.</p>

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	Multiple	2	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, especially during school zone hours, but agree it is essential to maintain good train service during construction while fewer tracks can be safely operated.	Construction - Spoil disposal	Noted.
	Multiple	3	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.	Project - Pedestrian and bicycle	<p>As described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, the Purpose and Need of the Project includes facilitating intermodal travel at Union Station. Pedestrian and bicycle access is one of eight Project elements, as explained in Section 3.1.1, <i>Identification of Project Elements</i>, of the FEIS, which specifies that ensuring quality bicycle and pedestrian access is essential for a multimodal facility in an urban environment. All Action Alternatives considered incorporate improvements to pedestrian access.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The pedestrian component of the Preferred Alternative is described in Section F.8, <i>Pedestrian and Bicycle Access</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS. With the proposed improvements, pedestrians who currently need to navigate four crosswalks to reach the front of Union Station from the west side of First Street NE would only need to use one crosswalk. Additionally, as specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #22a through 22c, USRC, the Project Sponsor, would implement measures to further improve pedestrian access conditions, as needed.</p>
	Multiple	4	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.	Project - Accessibility	<p>As described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, the Purpose and Need of the Project includes achieving compliance with ADA and emergency egress requirements. All Action Alternatives considered incorporate this element of the Purpose and Need.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS</p> <p>As explained in Section 5.16.3.1, <i>Direct Operational Impacts</i>, of the FEIS, the Preferred Alternative would have a major beneficial impact on the transportation and mobility of persons with disabilities by making WUS easier to access and navigate. Specific approaches to ensure accessibility and ADA-compliance would be defined during the engineering and design phase of the Project.</p>
	Multiple	5	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 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.	Project - Accessibility	As described in Section 2.3, <i>Purpose and Need Statement</i> , of the FEIS, the Purpose and Need of the Project includes facilitating intermodal travel and providing a positive customer experience. All Action Alternatives considered, including Alternative F, the new preferred Alternative described and analyzed in the SDEIS and FEIS, support these elements of the Purpose and Need. Specific strategies for effective signage will be defined during the design phase of the Project.

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	Multiple	6	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.	Project - GHG	Several avoidance, minimization, and mitigation measures to address greenhouse gas emissions impacts are specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #33 and 34. Specific strategies will be refined during the engineering and design phase of the Project and may include installing renewable energy systems, such as, for instance, solar panels as well as reflective or green roofs. As explained in Section F.7, <i>Parking</i> , of Appendix F2, <i>Description of the Proposed Alternative</i> , of the FEIS, provisions for electric vehicle charging would be made in the parking facility.
Clark_0921	Clark Enterprises	1	Revise the parking program to align with recommendations from the DC Office of Planning and NCPC	Project - Parking	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550 spaces, all below ground. This represents a 77 percent reduction relative to existing conditions. The development of the new Preferred Alternative was coordinated with DDOT, DCOP, and NCPC.</p>
	Clark Enterprises	2	Provide space for dedicated, centralized Pick-Up Drop-Off (PUDO) Facilities, and locate parking and PUDO facilities below-grade	Project - PUDO	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the pick-up and drop-off program (documented in Section 2, <i>Pick-Up and Drop-off Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS). The new Preferred Alternative features a below-ground pick-up and drop-off facility anticipated to handle approximately half of all Station-related pick-ups and drop-offs.</p>
	Clark Enterprises	3	Create a more efficient bus facility that treats intercity bus riders with dignity and realizes the opportunity for enhanced multimodal service	Project - Bus facility	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the bus program (documented in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS). The new Preferred Alternative's bus facility includes 39 slips and would be capable of meeting future expected demand for bus activity. During days of exceptionally high demand, space for 15 buses would be available on the H Street deck level. Additionally, the bus facility in the new Preferred Alternative would be integrated into the train hall, providing bus passengers easy access to multimodal transfers and waiting areas.</p>

DEIS Comments: Private Parties

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	Clark Enterprises	4	Improve bicyclist and pedestrian safety, and promote multimodal access to Union Station	Project - Pedestrian and bicycle	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the bicycle program (see Section 4, <i>Pedestrian and Bicycle Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS). The new Preferred Alternative would support multimodal access through the provision of approximately 900 bicycle parking spots; approximately 100 new bikeshare spots; the construction of a shared-use ramp along the west side of the Station; and other elements as described in Section F.8, <i>Pedestrian and Bicycle Access</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS.</p>
	Clark Enterprises	5	Plan for a vibrant urban place and create an opportunity for mixed-use development on federally owned land	Project - Federal air rights	<p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>As explained in Section 3.5, <i>Description of the Preferred Alternative</i>, of the FEIS, the Federal air rights above the rail terminal not needed for the Project would be available for potential future transfer and development. While FRA supports the coordinated development of the Federal and private air rights above the rail terminal to create a new, vibrant neighborhood, the private development is a separate and independent project not subject to FRA's decisions.</p>
KGPDS_0928	KGP Design Studio	1	The lower concourse seems in direct conflict with the 1st 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?	Project - Concourses	<p>The Station Expansion Project is the culmination of a collaborative multi-year planning process that is extensively documented in the appendices of the DEIS. The concourse plan, which is the same for all Action Alternatives considered, including the new Preferred Alternative (Alternative F) described in the SDEIS and FEIS, was developed to be consistent with other existing and planned facilities and structures. The Lower Concourse would not conflict with the Metrorail Station or the First Street Loading Dock.</p>
	KGP Design Studio	2	The concourse areas need daylight. It is not obvious how this might happen. 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?	Project - Concourses	<p>Like all the Action Alternatives considered, the Preferred Alternative (Alternative F) described in the SDEIS and FEIS makes provision for direct or indirect daylighting of the concourses, including via skylights. Specific lighting approaches would be determined during the engineering and design phase of the Project.</p>
	KGP Design Studio	3	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 queue on the south, but cabs need to be allowed and encouraged at every entrance. Provide taxi pickup at all entrances – 1st 2nd streets, (all entrance areas) H Street. Traffic going north on 1st 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.	Project - PUDO	<p>As described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, the Purpose and Need of the Project includes facilitating intermodal travel at Union Station. As such, the Project must account for all modes of transportation, including taxis and for-hire vehicles. All Action Alternatives considered would distribute vehicular traffic across the Project Area.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>As described in Section F.9, <i>Pick-up and Drop-off Areas</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS, the new Preferred Alternative distributes taxis and pick-ups and drop-offs across a below-ground facility and above-ground areas in front of the Station, on the H Street Deck, and, to a lesser extent, on First and Second Streets NE. The below-ground pick-up and drop-off facility is responsive to many comments received on the DEIS.</p>

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	KGP Design Studio	4	There is no need to bring a lot of traffic through the site – the roads in the plaza should be minimal – not a 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.	Project - PUDDO	<p>As described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, the Purpose and Need of the Project includes facilitating intermodal travel at Union Station. As such, the Project must account for all modes of transportation, including taxis and for-hire vehicles. All Action Alternatives considered would distribute vehicular traffic across the Project Area.</p> <p>In response to public and agency comments received on the 2020 DEIS, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>As described in Section F.9, <i>Pick-up and Drop-off Areas</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS, the new Preferred Alternative distributes taxis and pick-ups and drop-offs across a below-ground facility and above-ground areas in front of the Station, on the H Street Deck, and, to a lesser extent, on First and Second Streets NE. The distribution of pick-ups and drop-offs across the Station, including on the H Street deck, is needed to maintain adequate vehicular circulation near and around the Station.</p>
	KGP Design Studio	5	Parking should be all but eliminated. This is an urban transit hub – not a shopping mall. The maximum number of cars should be 200 for the entire site.	Project - Parking	<p>The Purpose and Need for the Project, described Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS includes facilitating intermodal travel. As explained in Section 3.1.1, <i>Identification of Project Elements</i>, parking is one of eight Project elements or components of the multimodal Station. Alternatives providing no parking at all would not meet the Project's Purpose and Need.</p> <p>In response to public and agency comments, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the parking program (documented in Section 1, <i>Parking Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a reduction in the number of parking spaces from approximately 1,600 in the 2020 DEIS Preferred Alternative (Alternative A-C) to approximately 400-550 spaces, all in a below-ground facility. This represents a 77 percent reduction relative to existing conditions. The development of the new Preferred Alternative was coordinated with DDOT and DCOP.</p>
	KGP Design Studio	6	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.	Project - Bus facility	<p>The Purpose and Need for the Project, described in FEIS Section 2.3, <i>Purpose and Need Statement</i>, includes facilitating intermodal travel. As explained in Section 3.1.1, <i>Identification of Project Elements</i>, the bus facility is one of eight Project elements or components of the multimodal Station that are needed to meet the Project's Purpose and Need.</p> <p>In response to public and agency comments, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS.</p> <p>The development of the new Preferred Alternative included a re-evaluation of the bus program (documented in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS), which resulted in a bus facility integrated within the H Street deck. The new bus facility, described in Section F.6, <i>Bus Facility</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS, would open onto the train hall, facilitating intermodal transfers. Supporting facilities for bus riders would be in the train hall.</p>

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Akridge_0714	Akridge		<p>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 PUDO 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 PUDO plan. The station must provide a centralized high-capacity PUDO 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 PUDO 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.</p> <p>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.</p>	Project - General	<p>In response to public and agency comments, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. The new Preferred Alternative was developed collaboratively with Akridge and addresses Akridge's concerns as much as possible consistent with the Project's Purpose and Need.</p>
Akridge_0928	Akridge		<p>SUMMARY: Detailed, 600-page comment, presenting recommended alternative design options and providing detailed analyses of transportation impacts in support of the recommended options.</p>	Project - General	<p>In response to public and agency comments, FRA and the Project Proponents developed a new alternative (Alternative F), identified it as the new Preferred Alternative, and described and analyzed it in the SDEIS and FEIS. The process through which the new Preferred Alternative was developed is described in Section 3.2, <i>Development of the Preferred Alternative</i>, of the FEIS. The new Preferred Alternative was developed collaboratively with Akridge and addresses Akridge's concerns as much as possible consistent with the Project's Purpose and Need.</p>



# SDEIS Comments: Agencies.

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Comment ID	Commenter	Item #	Comment	Topic	Response
EPA_0706	Environmental Protection Agency (EPA)	1	Greenhouse Gas Emissions and Resilience states: "Major GHGs include carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), and fluorinated gases (such as hydrofluorocarbons and perfluorocarbons). The primary pollutant of concern from sources related to human activity is CO2, which is the most abundant and influential GHG." EPA finds FRA's GHG emissions analysis is based on calculating CO2 emissions to represent GHG emission from the Project instead of using the averaging factor CO2e. EPA encourages FRA to base the analysis on CO2e, a standard unit for measuring carbon footprints. This would also be consistent with section 5.18 Cumulative Impacts, where GHG emissions are cited as CO2e.	GHG impacts	<p>Carbon dioxide (CO<sub>2</sub>) is the primary GHG that would be emitted as a result of the operation and construction of the project. Therefore, for the purposes of the impact analysis, emissions of CO<sub>2</sub> stand for total GHG emissions and would be the same expressed in CO<sub>2</sub>e. This has been clarified in the FEIS (Section 5.7.1, <i>Methodology</i>).</p> <p>The quantitative estimates of CO<sub>2</sub> emissions presented in the SDEIS and FEIS are conservative, as they do not incorporate the long-term reduction in emissions that would result from the greater availability and use of rail travel along the Northeast Corridor due to the Project and corresponding reductions in global GHG emissions from automobile traffic. The FEIS (Section 5.7.3.2, <i>Indirect Operational Impacts</i>) notes that the reduction is anticipated to be substantial and that it is one of the strategies identified in the <i>U.S. Blueprint for Transportation Decarbonization</i>.</p> <p>The analysis also does not assume any measures that would reduce energy consumption at Union Station. The FEIS/ROD defines measures that will be developed and implemented during Project design, construction, and operation to minimize emissions (Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #31 through 34).</p>
	EPA	2	EPA finds the GHG emissions analysis in the SDEIS was not informed by the Council of Environmental Quality (CEQ) Interim NEPA Guidance on Consideration of GHG Emissions and Climate Change. On January 9, 2023, the CEQ published interim guidance to assist federal agencies in assessing and disclosing climate change impacts during environmental reviews. <sup>2</sup> CEQ developed this guidance in response to EO 13990, Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis. This interim guidance was effective immediately. CEQ indicated that agencies should use this interim guidance to inform the NEPA review for all new proposed actions and for evaluations in process, as agencies deem appropriate, such as informing the consideration of alternatives or helping address comments raised through the public comment process. EPA recommends the Final EIS (FEIS) apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues.	GHG impacts	<p>Council on Environmental Quality (CEQ)'s January 9, 2023, guidance states that "Agencies should exercise judgment when considering whether to apply this guidance to the extent practicable to an on-going NEPA process" and "Agencies should consider applying this guidance to actions in the EIS or EA preparation stage if this would inform the consideration of alternatives or help address comments raised through the public comment process."</p> <p>FRA developed Alternative F, the Preferred Alternative evaluated in the SDEIS and FEIS, in response to public and agency comments received on the 2020 DEIS. Analyses in the DEIS and SDEIS indicated that, despite small differences, potential GHG impacts would be on a similar scale across the Action Alternatives considered, including Alternative F. Additionally, all Action Alternatives, including Alternative F, offer the same opportunities for avoidance, minimization, and mitigation.</p> <p>Therefore, it was FRA's judgement that applying the January 29, 2023, guidance to this ongoing NEPA process would not generate new information that could further inform the consideration of alternatives or further address comments raised through the public comment process.</p>
	EPA	3	The process of making cement has a large carbon footprint. EPA recommends FRA include in the FEIS an evaluation of the GHG emissions and impacts of cement manufacturing for the Project.	GHG impacts	<p>As explained in the SDEIS (Section 5.7.4, <i>Construction Impacts</i>) and FEIS (Section 5.7.3.3, <i>Construction Impacts</i>), FRA recognizes that the fabrication and transportation of materials used to construct the Project would generate substantial GHG emissions. FRA also notes in the SDEIS and FEIS that these emissions cannot be quantified at this time because the quantity, origin, and fabrication method of the construction materials are not known.</p> <p>In response to a comment from the District of Columbia Department of Energy and Environment on the 2020 DEIS, in the SDEIS, FRA included a requirement for USRC (the Project Sponsor) to prepare a Life Cycle Assessment of total GHG emissions associated with the Project as a Project Commitment (SDEIS Table 7-1, Item #33).</p> <p>In response to this comment, in the FEIS, FRA updated Item #33 in Table 7-1 of the FEIS/Table 13-2 of the ROD to add the following requirements:</p> <ul style="list-style-type: none"> <li>• USRC to use the Life Cycle Assessment to inform future decisions regarding the type of materials used and their sourcing so that associated GHG emissions are minimized to the extent practicable.</li> <li>• To the extent possible, USRC to use low GHG emissions materials for the Project.</li> </ul>

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	EPA	4	Executive Order (EO) 14096, Revitalizing Our Nation’s Commitment to Environmental Justice for All (2023)3 was not considered in the SDEIS. EO 14096 builds upon the commitments in EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, EO 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, and EO 14008, Tackling the Climate Crisis at Home and Abroad, all of which we recommend be considered in the FEIS. As a member of the White House EJ Interagency Council, EPA understands the DOT has a robust Environmental Justice program with resources and subject matter experts (SMEs) that can assist with refining the Project’s EJ Analysis to ensure that current EOs are considered and incorporated. If FRA needs assistance and has not already, please consider contacting DOT SEMs such as Carolyn Nelson, Director of Environmental Policy & Justice Division, Office of Planning & Analytics.	Environmental justice	The White House Interagency Council has discussed this matter. Use of the following language was suggested as we await interim guidance on EO 14096 implementation: Executive Order (EO) 14096—“Revitalizing Our Nation’s Commitment to Environmental Justice for All” was enacted on April 21, 2023. EO 14096 on environmental justice does not rescind EO 12898 – “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” which has been in effect since February 11, 1994, and is currently implemented through DOT Order 5610.2C. This implementation will continue until further guidance is provided regarding the implementation of the new EO 14096 on environmental justice.
	EPA	5	EPA finds that conclusions such as “...all passengers would be equally affected. Congestion would also affect all road users, not only bus riders. While there would be an impact on EJ communities, it would not be disproportionately high and adverse,” which was stated under section 5.17.1.1 Transportation, fail to acknowledge that even though the impact will be felt by everyone in the community, this impact may potentially impact communities with EJ concerns more adversely due to extra stressors and hurdles they experience that others in the general population may not. For example, where others may be able to avoid or mitigate this impact by having the option to work from home or pay the expense to use another transportation option, that might not be the case for an individual in the affected community of EJ concerns. Please consider when evaluating impacts on communities of EJ concern that even though the impact might be felt universally, the degree of impact may be felt more acutely in an EJ community. EPA request FRA consider this, revise your impact analysis, and consider mitigation measure to address these impacts where appropriate.	Environmental justice	FRA recognizes that some impacts may affect communities with environmental Justice (EJ) concerns more adversely than other segments of the population. In the case of operational impacts on city and commuter buses (the cited section of the SDEIS), however, FRA finds that the adverse impacts (described in Section 5.5.1.8, <i>City and Commuter Buses</i> , of the SDEIS) would be small and likely reduced by ongoing District of Columbia planning as part of the Bus Priority Program.  The measures proposed in Table 7-1, Item #25, of the SDEIS and mandated in Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #25a through 25f, would minimize and mitigate these impacts in a manner that benefits all users. FRA's finding is based on these considerations.  To clarify the finding, the FEIS (Section 5.17.3.1, <i>Operational Impacts</i> ) was revised to read: "However, the increase in congestion and delay attributable to the Project in the Preferred Alternative would be small relative to the No-Action Alternative and the same bus lines would be affected. Congestion would also affect all road users, not only bus riders."
	EPA	6	EPA appreciates the effort FRA has made to reach out to the surrounding community, especially those of EJ concerns. Please provide in the FEIS the actions taken as result of those conversations and any specific EJ mitigation measures that were developed as a result.	Environmental justice	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #52, requires that “when implementing all transportation mitigation measures, USRC to incorporate EJ considerations informed by the targeted community outreach effort documented in Section 8.8.2 of the FEIS, as applicable.”
	EPA	7	Regarding traffic, EPA notes that several assumptions are being made when predicting the future flow of traffic during construction and the potential for construction-related congestion to impact communities of EJ concerns. EPA encourages FRA to monitor traffic patterns throughout the construction phases and its impact on the community. We encourage any necessary changes to traffic flow as a result of observations or community feedback be made in a timely manner. Providing the community with a point of contact during construction is recommended.	Environmental justice	The FEIS/ROD specifies the following measures: <ul style="list-style-type: none"><li>The preparation and implementation of an <i>Integrated Construction Transportation Management Plan</i> to avoid, minimize, or mitigate impacts from construction on all transportation modes in each phase of construction, along with procedures to enforce, monitor, and evaluate these measures (Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #12).</li><li>The development and implementation of a multimodal Performance Monitoring Plan according to a schedule defined in the measure that will inform future traffic mitigation strategies (Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #28a).</li></ul> Both measures will be implemented consistent with the requirement in Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #52 referenced in the previous response.
	EPA	8	EPA finds many of the mitigation measures mentioned in the SDEIS have not been fully developed and/or coordinated with other agencies to determine potential strategies and reduce Project impacts. EPA recommends FRA provide a brief description of each specific mitigation measure in the FEIS and/or Record of Decision (ROD) for increased transparency and understanding of steps that will be taken to avoid and minimize Project impacts.	Mitigations	The mitigation measures identified in the SDEIS were coordinated with multiple agencies or reflect comments received from relevant agencies during the preparation of the DEIS and SDEIS. During the preparation of the FEIS, FRA continued to coordinate with key stakeholders, including USRC and DDOT, to refine and finalize the mitigations measures. The FEIS incorporated comments from relevant agencies on the SDEIS mitigations, as appropriate, and as noted elsewhere in this document.  Table 7-1 of the FEIS/Table 13-2 of the ROD identify the final measures that will be implemented with the Project.  FRA notes that many of the measures may appear not fully developed because they set up frameworks for future coordination, refinement, and implementation of mitigations during the engineering, design, or operation phases of the Project, as is unavoidable and appropriate with a project on this scale at such an early stage of design.

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	EPA	9	EPA appreciates USRC's ongoing commitment to targeted EJ community outreach. EPA finds the SDEIS does not identify mitigation measures or project commitments with specific EJ considerations. Please include in the environmental consequence EJ section of FEIS and/or ROD the results of targeted EJ community outreach efforts and include in the project commitment section any specific mitigation measures that were developed as a result of these EJ outreach efforts.	Environmental justice	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #52, requires that "when implementing all transportation mitigation measures, USRC will incorporate EJ considerations informed by the targeted community outreach effort documented in Section 8.8.2 of the FEIS, as applicable."
DOI_0706	Department of the Interior (DOI)	1	The Department understands that the Federal Railroad Administration (FRA) prepared a SDEIS, Draft Programmatic Agreement, and Draft Section 4(f) Evaluation for the WUS Expansion Project. Columbus Circle (Circle), a property owned by the United States and administered by the National Park Service (NPS) through National Mall and Memorials Park is near the project site. Upon review of the SDEIS, the NPS understands that there are no impacts to the Circle and no permits needed from the NPS therefore the NPS has no federal action. In fact, the Preferred Alternative includes minor beneficial impacts by facilitating access to the Circle from the station, making it easier and safer for pedestrians to reach.	Section 4(f)	Noted.
	DOI	2	There are numerous Section 4(f) properties in the vicinity of the project including WUS itself. The FRA prepared a Draft Section 4(f) evaluation to determine whether there were any feasible and prudent alternatives to the use of the Section 4(f) properties, and whether the action includes all possible planning to minimize harm to the property resulting from the use. Because the Project elements are needed together to meet the project's Purpose and Need, all Action Alternatives include use of the WUS, the WUS Historic Site and the REA Building. The Department concurs that there is no prudent and reasonable alternative that would avoid a Section 4(f) use. As such, the Department recognizes that the proposal will have an adverse effect to historic properties and that FRA identified actions to minimize and mitigate harm within this Draft Section 4(f) Evaluation. Upon review of the Draft Section 4(f), the Department agrees that there is no feasible and prudent alternative, as defined in 23 CFR 774.17, to the "use" of land outlined in this SDEIS. We also concur with the findings of the least harm analysis and that while the Preferred Alternative will have impacts to Section 4(f) resources, most of these impacts will be mitigated through measures implemented as part of the Section 106 Programmatic Agreement.	Section 4(f)	Noted.
NCPC_0706	National Capital Planning Commission (NCPC)	1	Overall, the SDEIS is thorough and evaluates the potential impacts resulting from the proposed preferred alternative. The alternative is consistent with the concept the Commission reviewed and supported in July 2022.	General EIS	Noted.
	NCPC	2	NCPC staff will continue to coordinate with FRA and other consulting parties regarding the development of a Programmatic Agreement (PA) that is being prepared to resolve known adverse effects on historic properties pursuant to Section 106 of the NHPA. The PA will include avoidance, minimization, and mitigation strategies, as well as a design review process with guidelines. The content and applicability of the guidelines will need further development. NCPC will be a signatory to the PA.	Programmatic Agreement	Noted.
	NCPC	3	Staff recommends the applicant continue to work with stakeholders to further minimize or mitigate transportation impacts due to construction activities and project implementation. We support the development of transportation demand and management strategies, in coordination with the District Department of Transportation.	Traffic mitigation	Noted. Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #12 through 30 identify the avoidance, minimization, and mitigation measures USRC will implement in coordination with Amtrak, DDOT, and other Project stakeholders to address impacts on transportation. USRC will continue coordinating throughout the life of the Project.
	NCPC	4	Staff recommends the applicant continue to work with bus operators in the development of the dynamic management approach for the bus facility. The applicant should also continue coordination with transit, hop-on/hop-off, and sightseeing buses that will require curb space across the site.	Project - Bus facility	Noted. Coordination with the bus operators will continue through the finalization of the NEPA process, and the design and construction phases of the Project.  Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #18a through 18c require USRC to work with the operators to develop and implement an Operations Plan for the bus facility; coordinate on the design of the facility; and monitor trends in bus demand at WUS.  Following post-SDEIS coordination with DDOT and refined analysis of curbside operations in front of WUS, FRA determined that sight-seeing buses could be accommodated in the front of WUS using the middle lanes also used for transit bus stops.

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	NCPC	5	As project plans are further developed, it will be helpful to better understand what entities or agencies will be responsible for the various components and mitigation measures, to ensure the project is cohesive and designed in a comprehensive manner.	Mitigations	Table 7-1 of the FEIS/Table 13-2 of the ROD identify the party or parties responsible for implementing each measure as well as the agencies or organizations that they would consult or coordinate with.
	NCPC	6	Staff requests that FRA provide copies of the comments received on the SDEIS prior to the next Commission review, along with a summary of responses. This will assist in NCPC understanding any outstanding issues.	Comment responses	Noted. Draft responses to comments were provided to NCPC staff along with the Administrative Draft FEIS.
	NCPC	7	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.	Schedule	Noted.
FTA_0706	Federal Transit Administration (FTA)	1	FTA has reviewed the Supplemental Draft Environmental Impact Statement, Draft Section 4(f) Evaluation and the Draft Section 106 Programmatic Agreement for the Washington Union Station Expansion Project. We do not have any specific comments on the documents at this time. However, given the potential for FTA funds to be applied to a portion of the project in the future, FTA is requesting to be an invited signatory to the Section 106 Programmatic Agreement and a signatory to the Record of Decision. A formal letter will follow next week.	EIS - General	Noted. FRA acknowledges and accepts FTA's request to be an invited signatory to the Section 106 Programmatic Agreement and a signatory to the Record of Decision.
CM Allen_07 06	DC Councilmember Charles Allen (Charles Allen)	1	In 2019 and 2020, along with Advisory Neighborhood Commission (“ANC”) 6C and scores of other stakeholders, I expressed grave concerns with the previous proposed design. It is clear that FRA listened and responded to our concerns. With the recent revisions, I believe the SEP can now achieve the potential that this unparalleled opportunity affords the District and our region.	Preferred Alternative	Noted.
	Charles Allen	2	First, the proposal includes a substantial reduction and underground relocation of station parking spaces, aligning with the District Office of Planning’s recommendation. Specifically, the revised proposal includes 400 to 550 spaces for station parking and rental cars. Reducing parking at the station is crucial to encouraging travelers to use transit and other modes other than cars to reach the station. The removal of the proposed garage also opens the opportunity for world class parks, plazas, and commercial activity outside a dramatic and attractive train hall.	Project - Parking	Noted.
	Charles Allen	3	Second, the proposal incorporates a large-scale, underground facility for taxis, rideshare, and cell phone waiting areas. Even prior to the station’s expansion, Columbus Circle and the surrounding streets currently have significant vehicle congestion during peak periods. Adding a convenient, off-street area for people to connect with their driver makes sense. More staging areas will increase rideshare carpooling opportunities and decrease the presence of cars circling and parking in our neighborhoods.	Project - PUDO	Noted.
	Charles Allen	4	Third, the proposed intercity and charter bus station is now centrally located, attractive, and fully integrated into the multimodal passenger facility. Whereas the previous plan required buses to exit east along H Street, the revised configuration routes buses toward North Capitol Street—a much safer and neighborhood-friendly strategy. With regards to the intercity busses coming through Union Station, I want to emphasize that the bus slips should be used efficiently, so that the space dedicated to busses in the station does not sit unused, as it often does today.	Project - Bus facility	Noted. The basis for the Preferred Alternative's bus program is presented in Section 3, <i>Bus Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS. The facility provides enough slips to accommodate projected bus service on most days. At times of exceptionally high demand, space equivalent to an additional 15 slips would be available on the H Street deck pick-up and drop-off area for overflow bus operations. This approach results in a right-sized facility making as efficient a use of the available space as possible, consistent with operators' needs.
	Charles Allen	5	Fourth, the plan greatly improves bicycle and pedestrian access at the station’s perimeter. An attractive and graciously proportioned bicycle and pedestrian path parallel with First Street NE will provide safe access from Columbus Circle up to H Street. The proposal also shows seating and gathering opportunities at both sides of the historic building—a major improvement from the existing car-dominant conditions.	Project- Pedestrian/ Bicycle	Noted.
	Charles Allen	6	I encourage FRA to ensure that at all steps of the process moving forward, ANC 6C and other local stakeholders are called on to provide input about the design and the construction process. While Union Station is a national and regional architectural icon and important transportation connection, it is also a building in the middle of a vibrant neighborhood. The redevelopment of Union Station provides the District a great opportunity to add to this neighborhood and create a beautiful civic space, but only if local stakeholders continue to have a strong voice in the process.	Stakeholder engagement	Noted. USRC as the Project Sponsor will continue coordinating with the ANC and other local stakeholders, as required or appropriate, through the engineering, design, and construction phases of the Project.
	Charles Allen	7	I urge FRA to lead a thoughtful, inclusive process of aligning the air rights and private development surrounding Union Station. While the plans for a redesigned Union Station are stunning, allowing the structure itself to remain an island from the rest of the neighborhood will be a massive missed opportunity. Thoughtfully combining the planned private development around Union Station with the plans for the station will maximize opportunities for the economic development in the District and for dynamic civic spaces for the community.	Air rights development	Noted. FRA fully supports the development of the air rights above the rail terminal to create a new, vibrant neighborhood. However, FRA notes that the Station Expansion Project remains a separate action from the development of the private air rights, with independent value and utility. The Project would meet its Purpose and Need, and provide the associated public benefits associated with it, regardless of the development of the private air rights.

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	Charles Allen	8	to ensure that the project is developed and eventually run in the most efficient manner, I encourage FRA, going forward, to clarify Union Station Redevelopment Corporation's role as the Project Sponsor. A well-supported Project Sponsor that can work closely with federal, local, and neighborhood-level officials will ensure that there is one clear vision for a vibrant station and thoughtful connections to the neighborhood.	Project sponsor	Noted. FRA identified USRC as the Project Sponsor in Spring 2023 and the process of obtaining support and mobilizing resources has begun. An early step was the development of a Union Station Expansion Project Delivery and Governance Study by IDC, in partnership with the District of Columbia Government. IDC worked with an Advisory Group composed of representatives from USRC, Amtrak, the United States Department of Transportation, FRA, DCOP, and DDOT to identify delivery, financing, and governance mechanisms needed to realize the Project (see <a href="https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf">https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf</a> , last accessed January 12, 2024). FRA is pleased to have participated in this study that can bring regional stakeholders together to support the expansion of Union Station. FRA will continue to support USRC in its role as Project Sponsor through Project development and implementation within the limits of its responsibilities and authority.
ANC 6C_0706	Advisory Neighborhood Commission (ANC) 6C	1	As stated in testimony to the National Capital Planning Commission on July 5, 2022, ANC 6C is very pleased with the significant adjustments that have been made in the project design since the release of the previously proposed Alternative A-C in 2020. These improvements include the greatly reduced parking program located with a Pick Up/Drop Off (PUDO) facility below grade; the enhanced, one-level bus station located close to the train hall; the opportunity for a central, open public space south of H Street NE; and the better integration of the multimodal facility into the existing and planned neighborhoods, including more desirable circulation routes in and around the station for vehicles, buses, pedestrians and bicyclists. We thank the FRA for its efforts to make these changes.	Project-General	Noted.
	ANC C6	2	Ensure continued consultation and coordination with ANCs: In developing mitigation measures and meeting project commitments, as set forth in Chapter 7 of the SDEIS, project sponsor Union Station Redevelopment Corporation (USRC) should be specifically directed to consult and coordinate with ANC 6C on matters having an impact on the residents, businesses, and establishments east of the station (ANC 6C recommends USRC be similarly required to consult and coordinate with ANC 6E for the west side of the station). Individuals in this community will be hit hard by the project's construction and will experience the impact of the station's expanded operations.  ANC 6C as their representative is thus an appropriate body with which to coordinate and consult concerning mitigation measures related to transportation management, noise and vibration, and expanded station operations. In particular, USRC should be required to consult with ANC 6C in the development of the Integrated Construction Transportation Management Plan, the development of traffic mitigation measures for intersections in the study area, and the Bus Facility Operations Plan.	Stakeholder engagement	Noted. USRC as the Project Sponsor will continue coordinating with the ANC and other local stakeholders, as required or appropriate, through the engineering, design, and construction phases of the Project.
	ANC C6	3	Celebrate and enhance the Station as an architectural landmark. The historic Washington Union Station is not only a crown jewel within the ANC 6C area, but also a celebrated architectural masterpiece for the nation as a whole. ANC 6C urges that additional steps be taken to integrate the landmark building into the overall station complex to ensure its continued vitality, including restoration of more of the building's historic fabric and natural lighting, as well as improvement of the east and west terminations of the truncated historic passenger concourse, and restoration of the Columbus Plaza fountains.  As ANC 6C has previously testified, the historic station should retain its primacy as the symbolic and functional center of the larger multimodal facility and its role as a gateway to the nation's capital should be maintained. ANC 6C also encourages the station to include benches for residents and visitors to rest and enjoy the architectural beauty of the station.	Historic station	As is explained in Chapter 2, <i>Purpose and Need</i> , of the FEIS, supporting the continued preservation and use of the historic station building is part of the Purpose and Need for the Project.  As explained in Section F.8.1, <i>Front of WUS</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , of the FEIS, in the Preferred Alternative, the historic Station building would largely remain the main access point to the station for pedestrians and cyclists, due to its direct connection to the District's pedestrian and bicycle network and to Capitol Hill.  As explained in Section 5.9.3.1, <i>Direct Operational Impacts</i> , of the FEIS, the historic Station building would remain the heart of the expanded station and its most visible and inviting entrance; the additional concourse space and access points would alleviate congestion, especially during peak travel times, making it easier for passengers and visitors to appreciate and enjoy the grand architecture of the historic station.  The Project's adverse effect on the historic station building would be minimized and mitigated in accordance with the terms of the Section 106 PA (FEIS Appendix F4).  The outfitting of the historic Station building, including the provision of benches, is outside the scope of the Expansion Project.

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	ANC C6	4	<p>Enforce future parking restrictions and other measures related to pick up/drop off operations. Once the expanded station is operational, there must be vigorous enforcement of parking restrictions and other measures to ensure that the below ground PUDO facility anticipated to accommodate about half of station-related PUDO <i>actually</i> handles at least half of station-related PUDO. Furthermore, on-scene monitoring, signage and public outreach should be adopted to ensure the PUDO locations in front of Union Station and along 2nd Street NE do not become congested with noise and air-quality impacts adversely impacting the Capitol Hill Historic District.</p> <p>USRC should be directed to have a plan for ensuring efficient PUDO, involving all vehicles, both during construction and when the expanded station is fully operational. USRC should be responsible for adjusting this PUDO plan as conditions warrant.</p>	Project - Parking/PUDO	<p>Measures that would be implemented to avoid, minimize, or mitigate impacts from pick-up and drop-off activities are identified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #27a through 27f.</p> <p>The Performance Monitoring Plan provided for in Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #28a will also address these activities, as applicable, and set targets and thresholds consistent with the distribution among the pick-up and drop-off locations included in the Preferred Alternative.</p>
	ANC C6	5	<p>Ensure safe accommodations during construction. ANC 6C appreciates design modifications made during the development of the SDEIS's Preferred Alternative F to increase safety for bicyclists and pedestrians in and around Washington Union Station. While the additional access points, ramps, and vehicle circulation design modifications will be beneficial, ANC 6C urges that traffic management measures in and around the station be continually evaluated during construction and when the expanded station is fully operational with safety concerns being the top priority.</p> <p>In addition, USRC should ensure robust, hardy treatments for safe accommodations during construction since this is a long-term project. Emphasis on the construction management plan should be placed on safety, rather than the efficient movement of private and for-hire vehicles.</p>	Construction - Pedestrian/Bicycle	<p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #24 was updated to explicitly reference the District's Safe Accommodations law.</p> <p>Consistent with this comment, Table 7-1 of the FEIS/Table 13-2 of the ROD Item #12, provides for the development and implementation of a <i>Integrated Construction Transportation Management Plan</i> that will "minimize sidewalk and bicycle lanes closure, and ensure safe passage for pedestrians and cyclists around the construction site with as little inconvenience, impact, and delay as possible, in accordance with the District's Safe Accommodations law."</p> <p>The <i>Integrated Construction Transportation Management Plan</i> is also incorporated into the Section 106 PA (Appendix F4 of the FEIS)</p>
	ANC C6	6	<p>ANC 6C strongly supports requiring USRC to work with Amtrak to use construction trains to assist with hauling away excavation materials, to mitigate the potential use of up to 120 daily trucks in the neighborhood, which would greatly impact the safety of pedestrians and bicyclists.</p>	Construction - Spoil disposal	<p>Noted.</p>
	ANC C6	7	<p>Include future bicycle facilities, such as long-term storage and showers. ANC 6C supports the proposed measures to improve the experience of bicyclists in and around Union Station, including increased bicycle parking and storage, and greatly increased bikeshare availability. To further enhance multimodal use of Union Station, ANC 6C urges creation of a bicycle facility at the station on par with bicycle facilities found at train stations in Europe. Long-term bicycle storage facilities should be included for intercity and long-distance train and bus passengers accessing the station by bicycle.</p> <p>ANC 6C also recommends consideration of providing shower facilities alongside restrooms for commuters and other travelers in Union Station. Lastly, future bicycle networks around the station should ensure the safety of bicyclists using the heavily-used First Street NE cycle track and where bicyclists navigate around Columbus Circle.</p>	Project - Pedestrian/Bicycle	<p>As explained in Section F.8, <i>Pedestrian and Bicycle Access</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS, the Preferred Alternative would provide approximately 900 bicycle storage spaces and 100 new bikeshare spots at Union Station. The specific design of the bicycle facilities will be defined during the Project's design phase. The facilities will be designed in compliance with the District of Columbia's bicycle parking guidelines.</p> <p>Measures to avoid, minimize, or mitigate impacts to the safety of First Street Cycle track users are specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #23.</p>
	ANC C6	8	<p>Strongly discourage the use of extra 15 bus slips except in the most extraordinary circumstances. ANC 6C objects to the utilization of the H Street deck and removal of PUDO for 15 additional charter bus slips except in all but the <i>most</i> extraordinary circumstances (i.e., no more than once or twice a year). The H Street deck should not be used for bus slips 5 to 10 times a year as contemplated in the draft documents. Neither should the H Street deck be used for predictable or routine events such as the Cherry Blossom Festival or yearly political demonstrations. If the newly enhanced bus facility proves inadequate to provide bus slips for charter buses bringing out-of-town visitors to especially large events, then USRC, the bus carriers, DDOT, and the Mayor's Office of Special Events should find parking and PUDO areas for charter buses at locations adjacent to Blue-Orange-Silver-line Metro stations, such as Stadium-Armory and L'Enfant Plaza, thereby lessening bus traffic congestion experienced by District residents near Union Station.</p> <p>It should be noted that charter bus passengers such as these from out-of-town have no need for a multimodal connection to Amtrak, VRE or MARC trains. Their travel experience in the District would in fact be enhanced by having direct access to the three Metro lines running closest to the Capitol, the National Mall, and the Tidal Basin, rather than navigating a transfer to the Blue-Orange-Silver lines via the Red line.</p>	Project - Bus facility	<p>The basis for the Preferred Alternative's bus program is described in Section 3, <i>Bus Program</i>, of Appendix F1, <i>Multimodal Refinement Report</i>, of the FEIS. The facility is intended to accommodate future bus travel demand at Union Station, consistent with the Union Station Redevelopment Act of 1981, which envisions a critical role for buses at the Station, and with the Purpose and Need for the Project, which includes facilitating intermodal travel (see Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS). As explained in Section F.6, <i>Bus Facility</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS, the bus facility is expected to accommodate all bus service most days, with a few days a year during which the H Street pick-up and drop-off area would provide overflow space for up to approximately 15 buses. The estimate of 5 to 10 such days every <i>year</i> that was provided in the SDEIS was not intended as a goal or a minimum/maximum but was meant to provide a reasonable estimate of what may occur. Exactly how and how often the overflow space would be used will depend on operational conditions and will be governed by the Operations Plan USRC will develop with the bus operators serving Union Station (Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #18a).</p> <p>While FRA anticipates that both USRC and the bus operators will work to minimize the use of that space to the extent possible consistent with the successful operation of the facility, it is not appropriate at this time to cap it as requested by this comment.</p>

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	ANC C6	9	Ensure that USRC has sufficient resources. ANC 6C urges that USRC have sufficient resources and authorities to execute both project management and expanded operations successfully. In order for this project to be completed successfully, USRC should have the levels of staff and funding necessary to carry out the responsibilities it is being assigned, including when the expanded station is operational.	Project sponsor	Noted. FRA identified USRC as the Project Sponsor in Spring 2023 and the process of obtaining support and mobilizing resources has begun. An early step is the development of a Union Station Expansion Project Delivery and Governance Study by IDC, in partnership with the District of Columbia Government. IDC worked with an Advisory Group composed of representatives from USRC, Amtrak, the United States Department of Transportation, FRA, DCOP, and DDOT to identify delivery, financing, and governance mechanisms needed to realize the Project (see <a href="https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf">https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf</a> , last accessed January 12, 2024). FRA is pleased to have participated in this study that can bring regional stakeholders together to support the expansion of Union Station. FRA will continue to support USRC in its role as Project Sponsor through Project development and implementation within the limits of FRA's responsibilities and authority.
	ANC C6	10	Delegate authorities to shorten timeline. Likewise, ANC 6C urges that U.S. Department of Transportation authorities be delegated directly to USRC or to the lowest appropriate USDOT level in order to ensure the construction timetable is as streamlined as possible. If there are ways to bring this long-overdue infrastructure improvement project to a safe and successful completion in fewer than 13 years, ANC 6C strongly recommends those approaches be adopted to shorten the impact of the construction on the nearby communities.	Construction-Schedule	Noted. Construction duration is an element that considered as part of the Union Station Expansion Project Delivery and Governance Study (see previous response) and a detailed construction schedule will be developed during the engineering and design phase of the Project. FRA notes that it is in the interest of all parties involved to reduce the duration of the construction period as much as possible.
ANC6C_Add'l_0706	Christy Kwan, Commissioner, ANC 6C01 Christine Healey, Former Commissioner, ANC 6C01 Jay Adelstein, Commissioner, ANC 6C03	1	Our support for the Expansion Project is predicated on the actual implementation of Preferred Alternative F. Preferred Alternative F is the product of an extensive consultation process with stakeholders and embodies the best approach for meeting the complex goals of this extraordinary and much needed project to create a transportation center well-integrated into a thriving neighborhood within our nation's capital.	Preferred Alternative	Noted.
		2	As noted by the DC SHPO, the Programmatic Agreement should incorporate specific references to Preferred Alternative F to serve as a guide for future implementation of the Station Expansion Project and as the benchmark for determining whether future actions are consistent with, or differ from, what was agreed upon in the Section 106 process.	Programmatic Agreement	Noted.
	Tony Goodman, Commissioner, ANC 6C07 Leslie Merkle, Commissioner, ANC 6C02	3	The central civic space north of Washington Union Station found in the preferred alternative is of critical importance to fully realizing the benefits of the Expansion Project, in terms of mitigating the impact on the historic station and in developing a vibrant civic area north of the station. As noted by the DC SHPO, there should be a commitment within the documents on the part of the FRA and the Project Sponsor to work with the private developer and other applicable parties and review agencies to ensure the central civic space is fully realized according to plan.	Civic space	Noted. To clarify, as explained in the SDEIS and FEIS, the central civic space is not a component of the Project. The Project leaves room for the development of such a space as part of the development of the private air rights through the definition of a Visual Access Zone and a Daylight Access Zone, as described in Section 3.5, <i>Description of the Preferred Alternative</i> , of the FEIS. The private air rights developer would have primary responsibility for the design of the public space and would implement it, in coordination with USRC for the shared elements supporting the Project, such as the skylights in the Daylight Access Zone.
		4	the FRA should make a commitment to reorder the air rights boundaries north of the station between the federal government and the private developer to ensure an integrated development of the air rights and open spaces according to the plan envisioned in Preferred Alternative F. We agree with the private developer that the public benefits associated with Preferred Alternative F cannot be met if the FRA attempts to develop its private air rights independently, or chooses not to develop them at all. we believe there should be a commitment in the documents to the development of a consolidated air rights development plan to achieve a cohesive and viable approach to the myriad of remaining issues that must be addressed as the Station Expansion Project and the Burnham Place project move forward.	Air rights development	FRA developed the Preferred Alternative in coordination with Akridge and looks forward to continued collaboration with Akridge to advance the Station Expansion Project and Akridge's development project. FRA supports the vision of commercial air rights development and open space that creates a vibrant neighborhood north of Washington Union Station. The Preferred Alternative is consistent with this vision. The specific mechanism of property transaction for the potential transfer and development of the Federal air rights, which could include a long-term lease or an exchange of property rights, will be determined as the project advances.
MTA_0630	Maryland Transit Administration (MTA)	1	We appreciate the work that FRA and the Project Sponsor have undertaken to develop a Preferred Alternative with regional support and a balanced multimodal program. We echo the sentiment expressed by the region's Congressional delegation calling for the prompt completion of the National Environmental Policy Act (NEPA) process so that further planning and design activities can commence in concert with stakeholders.	EIS - General	Noted.
	MTA	2	Operation Rail Planning: The track and platform and operational plans incorporated in the Preferred Alternative provide for long-term growth of the MARC system. We look forward to working more closely with the Union Station Redevelopment Corporation (USRC) and Amtrak to refine the operating assumptions as the project moves forward.	Project - Rail planning	Noted.



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	MTA	3	Operation Rail Planning: To facilitate this growth, the continued planning must include sufficient flexibility and appropriate operational assumptions for MARC needs. Those needs include adequate accommodation for train layover, storage, and inspection to support existing and future levels of MARC service. MARC would appreciate additional information regarding planning assumptions for these activities.	Project - Rail planning	Planning assumptions for layover and storage space are presented in Appendix B of the DEIS, <i>Washington Union Station Terminal Infrastructure EIS Report</i> , Pp. 39 and 45.
	MTA	4	Operation Rail Planning: MARC anticipates that diesel locomotives will remain a critical piece of the fleet beyond the WUS horizon year of 2040. Accommodations for diesel locomotives, and any required exhaust infrastructure due to overbuild and station elements, must be maintained within the rail planning.	Project - Rail planning	Noted. The basis for rail planning for the Project is presented in Appendix B of the DEIS <i>Washington Union Station Terminal Infrastructure EIS Report</i> . It assumes the continuation of diesel operations.
	MTA	5	Operation Rail Planning: MARC plans to make investments to support alternative train storage locations along its commuter rail corridors. As these investments create capacity within the WUS terminal, MARC is developing strategies for a proposal to key stakeholders to leverage such capacity for increased MARC service consistent with our long-term plans and the vision incorporated in the SDEIS. We look forward to continued coordination with Amtrak on this issue as design and planning advance.	Project - Rail planning	Noted.
	MTA	6	Operation Rail Planning: MARC-to-Metrorail connections are a critical piece of the multimodal experience taws. We support the SDEIS's commitments to further advance circulation improvements at the Metrorail station and encourage refinement of that program as part of the next stage of design and planning.	Project - Rail planning	Noted.
	MTA	7	Run-Through Service: Maryland has strong interest in the implementation of through-running regional rail service. MDOT MTA has recently signed a framework agreement with Virginia Passenger Rail Authority (VPRA) to advance through-running. While the SDEIS incorporates some Penn Line through-running, we understand that Amtrak has evaluated additional through-running opportunities through a separate study. As planning for WUS advances, we will need to coordinate further with USRC, Amtrak, VPRA, and Virginia Railway Express (VRE) on strategies for further advancement of through-running. Those conversations should include additional modeling to develop a shared set of assumptions for through-running operations, confirming operational and infrastructural needs for through-running, and identifying opportunities for facilitating regional trips through "cross-station" transfers when one-seat through-running is not provided.	Project - Rail planning	Noted.
	MTA	8	Construction Period: The region is making major investments to improve passenger rail. While Virginia aims to unlock capacity through the Long Bridge Project, Maryland is working closely without partners at Amtrak to advance the Frederick Douglass Tunnel, BWI 4th Track, and other projects to enhance service. At the same time, MARC plans to implement incremental new service in the near-term as possible. As a result, MDOT MTA believes that shared assumptions about how the construction period at WUS will operate is critical.	Construction - Rail planning	Noted. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #13a specifies that Amtrak will coordinate with MARC, VRE, and USRC to (1) refine construction-period operating plans as appropriate (including further modeling if needed) to ensure that construction-period travel demand is reasonably accommodated and (2) identify feasible solutions to reasonably accommodate operators' layover, storage, and inspection needs during the construction period. Outcomes will be incorporated into the Integrated Construction Transportation Management Plan.
	MTA	9	Construction Period: As indicated in the SDEIS (Section 5.5.3.1), four daily MARC trains would be cancelled during Phases 2 and 4 of construction. Post-NEPA planning should work to identify opportunities to avoid these cancellations and identify adequate accommodations for MARC passengers if none are possible.	Construction - Rail impacts	Noted. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #13b specifies that Amtrak will coordinate with MARC, VRE, and USRC to identify opportunities to avoid service cancellation as much as possible and identify reasonable travel alternatives for passengers affected by construction-period service adjustments.
	MTA	10	Construction Period: the Frederick Douglass Tunnel MOU envisions new MARC service coming online in the 2030s as a result of that project. MDOT MTA expects that the construction period operations at WUS will permit this service and other growth planned before the WUS 2040 horizon year so that the traveling public can benefit from these critical service enhancements. The construction period will also need to account for the types of operational requirements, including layover, storage, and inspection, noted above. The FEIS should incorporate commitments to refine the construction-period rail modeling in coordination with MARC and VRE to address these considerations.	Construction - Rail planning	Noted. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #13a specifies that Amtrak will coordinate with MARC, VRE, and USRC to (1) refine construction-period operating plans as appropriate (including further modeling if needed) to ensure that construction-period travel demand is reasonably accommodated and (2) identify feasible solutions to reasonably accommodate operators' layover, storage, and inspection needs during the construction period. Outcomes will be incorporated into the Integrated Construction Transportation Management Plan.

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DDOT_0706 Cover	District Department of Transportation (DDOT)	1	While the SEP will be transformational, it will have adverse impacts on the transportation network which require mitigation. The long planning horizon for the SEP combined with DDOT's focus on near-term improvements to transit and bicycle infrastructure in the vicinity of Union Station mean the project's negative impacts outnumber the readily identifiable transportation mitigations. As such, a highly robust Performance Monitoring Plan (PMP) with specific and meaningful commitments, including a defined level of financial obligation, is needed. DDOT considers the PMP to be a centerpiece of the SEP's mitigation approach. The currently proposed language for the PMP lacks sufficient details, triggers, and commitment levels needed to adequately mitigate anticipated transportation impacts. Further, defined timelines for the delivery of transportation mitigations identified in the SDEIS are needed to ensure the mitigation is aligned with the expected timing of the impact. Coordination with DDOT prior to the Final Environmental Impact Statement (FEIS) to better define the PMP and mitigation timeline is required.	Transportation - Mitigation	Noted. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #28a provides for the development and implementation of a multimodal Performance Monitoring Plan and outlines key aspects of the plan. This measure was presented to DDOT at the August 8, 2023, coordination meeting.
	DDOT	2	The SEP's construction represents a massive undertaking that is expected to last for approximately 13 years. The construction scale and duration will result in negative impacts in the District, particularly for nearby residents and businesses. Every effort needs to be taken to avoid, minimize, and mitigate these impacts.	Construction - Schedule	Noted. Multiple measures to avoid, minimize, or mitigate impacts from construction are identified in Table 7-1 of the FEIS/Table 13-2 of the ROD.
	DDOT	3	DDOT strongly encourages the Project Proponent to commit to removing construction spoils via rail to significantly reduce truck traffic impacts to and from WUS. Additionally, construction related closures to transportation facilities, especially sidewalk and bicycle infrastructure such as the Metropolitan Branch Trail, must be minimized, and District law requires Safe Accommodations (DCMR 24-3315).	Construction - Spoil disposal	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #29b, specifies that USRC is committed to coordinating with Amtrak to evaluate and maximize to the extent practicable the use of work trains instead of dump trucks to haul away excavation spoil during construction.  Construction-related closures will be conducted in compliance with the District's Safe Accommodations law (as specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #12, 17b, 24, 42c, 42d, and 51c).
VRE_0706	Virginia Railway Express (VRE)	1	Platform and track plans and operational plans incorporated in the SEP Preferred Alternative provide for long-term VRE growth consistent with VRE's adopted System Plan. Ongoing design and construction of the Preferred Alternative platform, track, and internal station circulation and access to the run-through level platforms should be closely coordinated with existing VRE service and VRE implementation plans for service expansion to ensure long-term growth needs continue to be accommodated.	Project - Rail planning	Noted. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #13a specifies that Amtrak will coordinate with MARC, VRE, and USRC to (1) refine construction-period operating plans as appropriate (including further modeling if needed) to ensure that construction-period travel demand is reasonably accommodated and (2) identify feasible solutions to reasonably accommodate operators' layover, storage, and inspection needs during the construction period. Outcomes will be incorporated into the Integrated Construction Transportation Management Plan.
	VRE	2	Other planned WUS Terminal Infrastructure (TI) improvements, outside the scope of the SEP, should be closely coordinated with the design and construction of the run-through level improvements as well as VRE to ensure consistency with VRE growth assumptions. This includes adequate accommodation for train layover, storage, and inspection to support existing and future VRE service.	Project - Rail planning	Noted.
	VRE	3	VRE anticipates its locomotive fleet will remain a diesel-powered fleet through calendar 2030 at a minimum. Accommodation for diesel locomotives, and any required exhaust infrastructure due to the SEP improvements and/or overbuild must be incorporated in ongoing planning and design of both.	Project - Rail planning	Noted. The basis for rail planning for the Project is presented in Appendix B, <i>Washington Union Station Terminal Infrastructure EIS Report</i> , of the DEIS. It assumes the continuation of diesel operations.
	VRE	4	No VRE through-running trains to Maryland are assumed in VRE's adopted System Plan. VRE is currently analyzing future service markets; those analyses assume, however, that VRE-served regional travel needs between northern Virginia and Maryland destinations along the MARC Penn, Camden and/or Brunswick Lines through calendar 2030 at a minimum can be met by more closely coordinating VRE and MARC service at WUS in tandem with expanded concourses and other WUS improvements assumed in the Preferred Alternative.	Project - Rail planning	Noted. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #13a specifies that Amtrak will coordinate with MARC, VRE, and USRC to (1) refine construction-period operating plans as appropriate (including further modeling if needed) to ensure that construction-period travel demand is reasonably accommodated and (2) identify feasible solutions to reasonably accommodate operators' layover, storage, and inspection needs during the construction period. Outcomes will be incorporated into the Integrated Construction Transportation Management Plan.
	VRE	5	Ongoing design and construction of the SEP improvements to the run-through platforms should be closely coordinated with existing and planned VRE, Amtrak/Amtrak Virginia, and MARC service plans including adopted VRE System Plan service, Amtrak/Amtrak Virginia levels of service as outlined in the Transforming Rail in Virginia and DC2RVA service plans (i.e., 12 daily Amtrak Virginia trains plus Amtrak long distance trains and SEHSR trains), and potential MARC run-through service associated with the recently signed framework agreement between the Maryland Transit Administration (MTA) and the Virginia Passenger Rail Authority (VPRA). Coordination should include modeling or other analyses to confirm operational and infrastructure requirements to accommodate all operators' long-term service needs.	Project - Rail planning	Noted. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #13a specifies that Amtrak will coordinate with MARC, VRE, and USRC to (1) refine construction-period operating plans as appropriate (including further modeling if needed) to ensure that construction-period travel demand is reasonably accommodated and (2) identify feasible solutions to reasonably accommodate operators' layover, storage, and inspection needs during the construction period. Outcomes will be incorporated into the Integrated Construction Transportation Management Plan.

SDEIS Comments: Agencies

Comment ID	Commenter	Item #	Comment	Topic	Response
	VRE	6	<p>The Draft EIS (DEIS) indicates Construction Phasing and Sequencing would keep a minimum of three low-level, run-through platforms in operation at all times, which is necessary to adequately maintain VRE, long-distance train operations, and regional run-through service. Ongoing design and construction phasing should not tie planned VRE service expansion to the SEP construction timeline. Further discussion and clarification of the following is requested:</p> <ul style="list-style-type: none"> <li>• Will sufficient capacity be available during construction of the run-through platform and track improvements (i.e., three low-level platforms) to accommodate planned VRE service expansion during construction?</li> <li>• Does SEP rail terminal capacity at the run-through platforms and tracks provided during the phased construction of those improvements, also accommodate planned Amtrak/Amtrak Virginia and MARC service expansion?</li> </ul>	Construction - Rail planning	<p>As explained in Section 5.5.3.3, <i>Construction Impacts, Commuter and Intercity Railroads</i>, of the FEIS, construction of the Project is anticipated to result in up to two cancellations of VRE trains daily during Phase 1 and Phase 2.</p> <p>USRC will continue coordinating with VRE and other stakeholders during the engineering and design phase of the Project to ensure that cancellations are minimized and pre-2040 service growth is adequately accommodated throughout construction. To that effect, Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #13a and 13b specify that :</p> <p>a. Amtrak will coordinate with MARC, VRE, and USRC to (1) refine construction-period operating plans as appropriate (including further modeling if needed) to ensure that construction-period travel demand is reasonably accommodated and (2) identify feasible solutions to reasonably accommodate operators' layover, storage, and inspection needs during the construction period. Outcomes will be incorporated into the Integrated Construction Transportation Management Plan.</p> <p>b. Amtrak will coordinate with MARC, VRE, and USRC to identify opportunities to avoid service cancellation as much as possible and identify reasonable travel alternatives for passengers affected by construction-period service adjustments.</p>
	VRE	7	<p>Footnote No. 8, Chapter 2, Purpose and Need, VRE System Plan 2040 link in the footnote of the June 2020 DEIS no longer directs the reader to the correct location for the VRE document. The corrected link is <a href="https://www.vre.org/about/studies-and-reports/2040/">https://www.vre.org/about/studies-and-reports/2040/</a>.</p>	Correction	Noted. The link has been updated in the FEIS.
WMATA_0706	Washington Metropolitan Area Transit Authority (WMATA)	1	<p>As this project progresses into the Final Environmental Impact Statement and further design development, WMATA emphasizes the continued need for direct and sustained engagement between USRC and WMATA to proactively address circulation improvements to Metrorail red line station. As noted in the SDEIS, crowded circulation conditions between the WMATA platform and North Mezzanine are likely to further degrade under the Preferred Alternative due to increased volumes associated with the project. WMATA appreciates USRC's commitment to funding a new station capacity study and contributing to identified improvements. We further emphasize the need for early engagement with USRC to realize and/or preserve opportunities to implement needed circulation improvements as part of the WUS Expansion.</p>	Project - Metrorail	<p>Noted. Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #14a and 14b specify that :</p> <p>a. USRC will fund a new Union Station WMATA Station Access and Capacity Study early in the engineering and design phase of the Project.</p> <p>b. USRC will contribute to improvements identified in the study that have not been addressed by the Concourse Modernization Project or by WMATA by the time of implementation.</p>
	WMATA	2	<p>As this project progresses into the Final Environmental Impact Statement and further design development, WMATA emphasizes the continued need for direct and sustained engagement between USRC and WMATA to proactively address construction impacts to Metrorail red line. In addition to the need for a Construction Transportation Management Plan to mitigate construction impacts, work within the WMATA zone of influence requires thorough design review and WMATA approval. The introduction of a potential ramp from G Street underneath the Metro tracks will require significant coordination and understanding of potential impacts on WMATA facilities.</p>	Construction - Metrorail	<p>Noted. Table 7-2 of the FEIS, Item #6 has been updated to note the following requirement:</p> <p>Approvals for construction in the WMATA zone of influence in accordance with Joint Development and Adjacent Construction (JDAC).</p>
	WMATA	3	<p>As this project progresses into the Final Environmental Impact Statement and further design development, WMATA emphasizes the continued need for direct and sustained engagement between USRC and WMATA to proactively address impacts to metrobus. WMATA notes the various mitigation measures proposed to address bus overcrowding and delays. WMATA and USRC need to work together to develop a clear plan to address Metrobus service and customer connections as a part of project development to ensure a feasible approach is identified early to protect service and access during construction and that leads to a coordinated plan that improves bus intermodal connections in the final WUS built condition.</p>	Project - Metrobus	Noted. Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #25a through 25e specify that the listed measures will be implemented in coordination with DDOT and WMATA .

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Comment ID	Commenter	Item #	Comment	Topic	Response
	WMATA	4	As this project progresses into the Final Environmental Impact Statement and further design development, WMATA emphasizes the continued need for direct and sustained engagement between USRC and WMATA to proactively address blue/orange/silver (BOS) study Metrorail alternatives. A BOS Preferred Alternative could act as a vital component in addressing Metro capacity impacts identified in the SDEIS. The coordination required on BOS between WMATA and USRC relates not only to mitigating the identified capacity impacts, but very specifically to ensuring that the WUS Preferred Alternative does not affect the BOS tunnel alignment and new Union Station connection options, including the proposed alignment to run under the H Street concourse. The proposed underground parking and pick-up/drop-off facilities introduce new elements that need to be studied within the context of the potential Metro tunnel structure and addressed to not preclude potential alignments and station connections. We look forward to coordinating closely with USRC on this issue so that both projects can progress with compatible approaches that optimize the opportunities for inter-modal connections.	Project - Metrorail	Noted. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #15b specifies that:  USRC will coordinate with WMATA during the engineering and design phase of the Project to work on maintaining compatibility between the Project and a potential construction of a new Metrorail tunnel and station as an outcome of the Blue/Orange/Silver Capacity & Reliability Study.

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Comment ID	Agency	File or Chapter or Section	Line or Table or Figure Number	DDOT By-line Comments (Submitted with DDOT_0706)	Topic	Response
DDOT Item 1	DDOT	Appendix S-2	Line 44	Is the pull-out lane described here the existing lay-by/inset parking lane on the west side of the street? DDOT does not support widening this lane to facilitate truck movements because doing so would narrow the existing sidewalk.	Project - Loading	Yes. Based on current plans, the lane would be repurposed as First Street NE becomes one-way northbound between Massachusetts Avenue and G Street. The sidewalk would not be narrowed.
DDOT Item 2	DDOT	Appendix S-2	S.8.2 & S.8.3	Note that final locations of Capital Bikeshare stations are subject to approval by DDOT.	Project - Pedestrian/Bicycle	This has been noted in Section F.8, <i>Pedestrian and Bicycle Access</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , of the FEIS.
DDOT Item 3	DDOT	Appendix S-2	232-234	This text is unclear, particularly the reference to two commercial loading spaces on the "left side" of the segment. It is unclear if the area described is presently the location of a large Capital Bikeshare station within DDOT ROW. DDOT does not support the reduction in the bikeshare station. Further, any commercial loading to support Union Station should be located within the station.	Project - Loading	The referenced text was in error and has been deleted in the FEIS. No new spaces for commercial loading are included in the Preferred Alternative.
DDOT Item 4	DDOT	Supplemental Draft EIS, 6.6.2.2	3712-3713	Not clear what this sentence means. It needs to be rephased for clarity.	Section 4(f)	Section 4(f) requires Federal agencies to consider whether a proposed action would "use" a protected resource, including recreational properties. A "use" would occur when land is permanently incorporated into a transportation project or facility. The FEIS includes the full text of the Section 4(f) evaluation, with definitions clarifying the meaning of "use" (Section 6.2.2, <i>Use of Section 4(f) Properties</i> ).  The sentence referenced in the comment indicated that the Metropolitan Branch Trail would not be permanently incorporated in the Station Expansion Project. However, as part of their comments on the Administrative Draft FEIS (submitted by email dated November 9, 2023), DDOT, the official with jurisdiction on the Metropolitan Branch Trail, informed FRA that the trail is primarily a transportation facility. As such, the trail is exempt from Section 4(f) requirements. Therefore, the Metropolitan Branch Trail is not considered in the Final Section 4(f) Evaluation included in the FEIS.
DDOT Item 5	DDOT	Supplemental Draft EIS, 6.6.2.2	3714	For portions of the trail on 2nd NE, safe accommodations would be required during the period of closure	Construction - Pedestrian/Bicycle	As part of their comments on the Administrative Draft FEIS (submitted by email dated November 9, 2023), DDOT, the official with jurisdiction on the Metropolitan Branch Trail, informed FRA that the trail is primarily a transportation facility. As such, the trail is exempt from Section 4(f) requirements. Therefore, the Metropolitan Branch Trail is not considered in the Final Section 4(f) Evaluation included in the FEIS, making this comment moot.
DDOT Item 6	DDOT	Supplemental Draft EIS, 5.5.1.7	1018	For the bicycle ramp, the bike volumes are very high and would likely warrant a separate facility for bicyclists and pedestrians.	Project - Pedestrian/Bicycle	The peak-hour volumes shown in Table 5-12 of the SDEIS (Table 5-25 of the FEIS) are total trips generated by Union Station in the Preferred Alternative, not the volumes for the pedestrian/bicycle ramp on the west side of the Station. The need for separation of pedestrian and bicycle traffic on the ramp will be further considered during the engineering and design phase of the Project.
DDOT Item 7	DDOT	Line 1299	5.5.3.4	I appreciate the added detail around the accommodation of intercity and charter bus operations in an interim facility during phase 3 and 4 of construction, but I don't see DC Circulator buses specifically noted. I would propose that plans for allowing urban transit buses to operate in the center lanes of Columbus Circle (as described in 5.5.1.8, line 1063-1065) move forward prior to Union Station construction so there is a space for them. This will need to be coordinated with DDOT's Transit Delivery Division (Bus Priority and DC Circulator).	Project - DC Circulator	It is currently anticipated that DC Circulator buses would be accommodated in the interim bus facility, as noted in Section 5.5.3.3, <i>Construction Impacts, City and Commuter Buses</i> , of the FEIS. Accommodation of DC circulator buses during construction Phases 3 and 4 will be further considered as part of the Integrated Construction Transportation Management Plan (Table 7-1 of the FEIS/Table 13-3 of the ROD, Item #12).
DDOT Item 8	DDOT	5.5.1.7	1011	Please clarify that the Project will be responsible for providing 100 Capital Bikeshare docks with locations subject to DDOT approval.  As a supplement or alternative to the 100 docks, a commitment by WUS to staff a CaBi corral during peak periods may reduce the need for overall CaBi docks. A CaBi corral would require an MOU including funding with DDOT.	Project - Pedestrian/Bicycle	A note has been added to Section 5.5.3.1, <i>Direct Operational Impacts, Bicycle Activity</i> , of the FEIS, noting the need for DDOT's approval. It is also referenced in Table 7-2, Item #6.  FRA believes that a commitment to staff a corral as a supplemental or alternative solution is premature. Future design and operational coordination with DDOT following the NEPA process will determine the ultimate operational approach.
DDOT Item 9	DDOT	5.5.1.7	1011	Coordinate siting of Capital Bikeshare station with Greg Matlesky (greg.matlesky@dc.gov) and ensure there is a 120V/240V electric hookup for any station location. Stations are solar-powered today, but CaBi has plans to electrify stations in the near future.	Project - Pedestrian/Bicycle	Noted. The provision of electric hookups will be addressed during the engineering and design phase of the Project.

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Comment ID	Agency	File or Chapter or Section	Line or Table or Figure Number	DDOT By-line Comments (Submitted with DDOT_0706)	Topic	Response
DDOT Item 10	DDOT	5.5.1.7	1011	Ensure the 900 long-term bicycle parking spaces abide by the design and spacing standards stipulated in the DC Bike Parking Guide and Zoning regulations. While we have mandates that at least 50% of required bicycle parking be horizontal on the ground, I would recommend more than that to ensure accessibility for more folks. If using double-tier racks, recommend using racks with hydraulic-assist lift systems to more folks can use them. Also recommend dedicating at least 5% of spaces (45 spaces) for cargo or other oversized bicycle parking. These spots typically measure at 10'x4' (compared to 6'x2' for a typical bicycle). Also recommend including secure ebike charging facilities, which can be standard plugs in the wall to secure charging 'lockers' where folks can store and charge their battery.	Project - Pedestrian/Bicycle	Section F.8, <i>Pedestrian and Bicycle Access</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , of the FEIS notes that bicycle storage facilities would be designed in accordance with DDOT's Bike Parking Guidance. The layout of the facilities and other specifics will be addressed during the engineering and design phase of the Project.
DDOT Item 11	DDOT	5.5.1.7	1011	Highly recommend following the Dutch model (NS) on long-term storage at major railway hubs and have a staffed, secure bicycle parking area along with a bicycle repair and supply shop, or at the very least fix-it stands for routine maintenance.	Project - Pedestrian/Bicycle	Noted. The layout of and amenities included in the bicycle storage facilities will be determined during the engineering and design phase of the Project.
DDOT Item 12	DDOT	General	General	DDOT-TESD acknowledges the findings of major adverse impacts on traffic operations, and that the project proponents will work with DDOT on a Performance Monitoring Plan to develop, evaluate, and implement mitigation strategies that facilitate access and reduce impacts to traffic operations.	Traffic impacts - Mitigation	Noted.
DDOT Item 13	DDOT	5.5.1.12	1220-1221	Can further explanation be provided on why some study area intersections experience improvements in LOS? This is counter-intuitive given the large increases in traffic volumes associated with the Preferred Alternative.	Traffic impacts	<p>For any intersections showing a modest improvement in traffic operations in the Preferred Alternative relative to the No-Action condition, that improvement is associated with the optimization of signal timings and phasing.</p> <p>On H Street NE, some of the improvement can be attributed to the relocation of station parking access from H Street NE to other locations and the associated reassignment of station parking trips from H Street NE to those other access points; furthermore, the reconfiguration of the internal roadway network on the deck level in the Preferred Alternative allows for more efficient traffic circulation on the deck level for both station-related traffic and private air rights development traffic.</p> <p>At the front of the station, much of the improvement can be attributed to the increased number of station access points in the Preferred Alternative and the associated dispersal of trips across those access points, resulting in a relatively lower proportion of trips starting and ending at the front of the station.</p>
DDOT Item 14	DDOT	Appendix S-2	Figure S-14	Final design of the First Street ramp will be determined as part of the public space permitting process for the curb cut. In the FEIS, please address a) what are the expected vehicular traffic volumes on the First Street ramp, and how will conflicts with pedestrians and cyclists be managed? b) how are SB left turns proposed to be prohibited c) explore whether parking can be removed on the west side of the street in favor of widening the east side sidewalk in order to provide better site lines between site traffic and bicyclists.	Traffic impacts	<p>FRA agrees that the final design of the ramp to the below-ground facility from First Street NE will be determined as part of the public space permitting process for the curb cut.</p> <p>As previously discussed with DDOT, the FEIS presents an updated traffic analysis revised to assume a 25% reduction in auto mode share, consistent with Move DC. Vehicular volumes on the First Street ramp are 288 inbound/212 outbound in the AM Peak and 265 inbound/228 outbound in the PM Peak. The FEIS also reiterates USRC's commitment to considering appropriate traffic control and pedestrian safety measures along First Street NE, including at the First Street ramp intersection in the planning/design phase of the project (Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #23).</p> <p>The project is not proposing to widen the east side sidewalk. Additional modifications to on-street parking and roadway alignment to facilitate sidewalk widening on First Street NE may be discussed with DDOT as part of the final planning/design phase of the project.</p>
DDOT Item 15	DDOT	5.9.1.1	Zoning, Land Use, Development	small typo: acronym for Production, Distribution, and Repair zone is "PDR"	Correction	The typo has been corrected in the FEIS.

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Comment ID	Agency	File or Chapter or Section	Line or Table or Figure Number	DDOT By-line Comments (Submitted with DDOT_0706)	Topic	Response
DDOT Item 16	DDOT	7	Mitigation, strategy #28	Specific timelines are needed for the delivery of these improvements. Please coordinate with DDOT to address this comment prior to the FEIS.	Traffic Mitigation	FRA coordinated with DDOT on this matter during the preparation of the FEIS, including review by DDOT of the Administrative Draft FEIS. Table 7-1 of the FEIS/Table 13-2 of the ROD specifies timeframes for the various measures defined in the table.
DDOT Item 17	DDOT	5.5.1.5	Loading	The document states that one additional loading area would be sufficient to meet a 75% increase in demand for loading dock slips. Where does that number come from? How much are the existing ones being used? Are they underused and is that impacting the relating percentage estimate?	Project - Loading	The number is an estimate approximately proportional to the increase in activities (retail and multimodal) at Union Station in the Preferred Alternative. The existing loading docks accommodate existing activities but would not be able to accommodate projected future operation, as explained in Section 2.4.1.4, <i>Support Services, Loading, Logistics</i> , of the FEIS.
DDOT Item 18	DDOT	5.5.3.5	Loading	Impacts of construction on loading will be significant. Has a location of a temporary facility to transfer and screen large loads into smaller loads been considered?	Project - Loading	As explained in the FEIS (Section 5.5.3.3, <i>Construction Impacts, Loading</i> ), a temporary transfer facility will be needed but a location has not yet been determined. Table 7-1 of the FEIS/Table 13-2 of the ROD Item #12 specifies that the Integrated Construction Transportation Management Plan prepared for the Project will identify an adequate interim transfer and screening location for use when the First Street Loading Dock would be closed and the new Second Street Loading Dock not yet operational.
DDOT Item 19	DDOT	Pg. 185, 7-7. 29	Mitigation and Commitments	DDOT's routing tool will not consider construction detours.	Construction - Mitigation	Noted.
DDOT Item 20	DDOT	7	Mitigation, strategy #12	Note that closures should be minimized, particularly for impacts to sidewalk and bike infrastructure such as the MBT, and District law requires Safe Accommodations (DCMR 24-3315).	Construction - Mitigation	Table 7-1 of the FEIS/Table 13-2 of the ROD Item #12 references the District's Safe Accommodations law.
DDOT Item 21	DDOT	7	Mitigation, strategy #15	As noted in DDOT's DEIS comments, DDOT finds that a significant overall reduction in traffic volumes will be necessary to reach a sustainable level. DDOT continues to predict that a major transit investment, such as a new WMATA tunnel, will be needed to achieve the additional passenger capacity to support a mode shift away from vehicle trips. DDOT agrees with the commitment for continued engagement with WMATA's planning effort on the determination of a Preferred Alternative that will support non-auto trips at WUS. DDOT also requests the Project Proponent continues to advocate for the planning, design, and implementation of this long-term project.	Traffic impacts	Noted.
DDOT Item 22	DDOT	7	Mitigation, strategy #18	Add language that USRC is responsible for implementation of the Bus Facility Operations Plan including the staffing and technology costs of deploying the dynamic management system.	Bus facility mitigation	Table 7-1 of the FEIS/Table 13-2 of the ROD Item #18a identifies USRC as the responsible party for the development of the bus facility operations plan.
DDOT Item 23	DDOT	7	Mitigation, strategy #19	Add language that USRC is responsible for implementation of any new curbside bus PUDO.	PUDO mitigation	Based on further review during the preparation of the FEIS, FRA anticipates that hop-on/hop-off operations will continue to be accommodated in front of the Station.
DDOT Item 24	DDOT	7	Mitigation, strategy #22, bullet 1	DDOT supports the inclusion of a pedestrian crossing study and pedestrian improvements at the front of the station. Please note that Columbus Circle is owned by NPS. Accordingly, please add NPS as an agency that USRC will coordinate with on any changes that impact Columbus Circle.	Pedestrian/Bicycle mitigation	While Columbus Plaza is under the jurisdiction of the National Park Service (NPS), the roadways serving the front of Union Station north of Columbus Plaza are part of the Station and managed by USRC. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #22a specifies that USRC will coordinate with NPS, as appropriate.
DDOT Item 25	DDOT	7	Mitigation, strategy #22, bullet 4	Clarify how LOS F intersections are defined. Will the determination be made based on the FEIS analysis or the Performance Monitoring Plan analysis?	Traffic mitigation	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #22c specifies that these intersections will be defined based on the analysis presented in the FEIS and confirmed through the Performance Monitoring Plan to be implemented under Item #28a.
DDOT Item 26	DDOT	7	Mitigation, strategy #23	Additional detail is needed. Specifically, a geography/limits of facilities eligible for consideration for upgrading must be identified. Additionally, a better definition is needed for what it means to upgrade facilities. Bicycle facility improvements should include raising facilities to sidewalk level, adding pre-cast concrete and poured in place concrete protection, and converting conventional bike lanes & intersections to protected facilities. Please coordinate with DDOT prior to the FEIS to address this comment.	Pedestrian/Bicycle mitigation	During the preparation of the FEIS, FRA coordinated with DDOT to define corridors within which improvements would be considered. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #23, specifies these corridors.

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DDOT Item 27	DDOT	7	Mitigation, strategy #25, bullet 1 and 2	Adjustments to this mitigation language are needed to ensure it has the desired intent of addressing bus overcrowding and delays. Center lanes should be used exclusively for transit buses, including boarding, alighting, and layover space. These exclusive uses will ensure bus service is not delayed by other traffic and meet bus operational needs.	Transit bus mitigation	Table 7-1 of the FEIS/Table 13-2 of the ROD Item #25a specifies that the middle lanes will be used for transit bus passenger boarding and alighting for Metrobus, Circulator, and hop-on/hop-off routes terminating or passing through the area in front of the station. VISSIM analysis conducted during the preparation of the FEIS (presented to DDOT on 08/29/23) indicates adequate operation.
DDOT Item 28	DDOT	7	Mitigation, strategy #25, bullet 4	Note any bus shelters and street furniture are subject to DDOT approval via public space permit.	Transit bus mitigation	Table 7-1 of the FEIS/Table 13-2 of the ROD Item #25d specifies that USRC will obtain all DDOT's approval for bus shelters and street furniture, as required.
DDOT Item 29	DDOT	7	Mitigation, strategy #25, bullet 5	Additional detail is needed. Specifically, a geography/limits must be identified for facilities eligible for implementation. Please coordinate with DDOT prior to the FEIS to address this comment.	Transit bus mitigation	During the preparation of the FEIS, FRA coordinated with DDOT to define corridors within which improvements would be considered. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #25e specifies these corridors.
DDOT Item 30	DDOT	7	Mitigation, strategy #28, 2nd bullet	DDOT considers the Performance Monitoring Plan to be a centerpiece of the Project's mitigation approach. This mitigation as proposed is too vague and needs to be more prescriptive and better defined. In particular, the Performance Monitoring Plan needs to establish: <ul style="list-style-type: none"> <li>- a frequency and duration of PMPs during and post-construction</li> <li>- identify performance targets throughout each phase of construction and post-construction, and define impacts</li> <li>- determine a framework for how specific mitigations are selected</li> <li>- identify a specific financial amount for mitigations</li> </ul> <p>All of the above considerations need to be commensurate with the expected multimodal impacts identified in the EIS. See Appendix D of the January 2022 DDOT CTR Guidelines for examples of how a PMP can be structured.  <a href="https://ddot.dc.gov/sites/default/files/dc/sites/ddot/CTR%20Guidance%20-%20January%202022%20Version%202.0.pdf">https://ddot.dc.gov/sites/default/files/dc/sites/ddot/CTR%20Guidance%20-%20January%202022%20Version%202.0.pdf</a>. <b>Please coordinate with DDOT prior to the FEIS to address this comment.</b></p> <p>Due to the PMP's importance, DDOT recommends making the PMP a standalone mitigation in the Table.</p>	Traffic mitigation	Table 7-1 of the FEIS/Table 13-2 of the ROD Item #28a includes a detailed, stand-alone measure for the development and implementation of a Performance Management Plan. The updated measure was presented to DDOT on 08/08/23.
DDOT Item 31	DDOT	7	Mitigation, strategy #29	As previously articulated, DDOT very strongly encourages the project to maximize opportunities to haul construction spoils on rail to minimize truck impacts to the surrounding neighborhoods and broader road network.	Construction - Spoil removal	Noted.
DDOT Item 32	DDOT	3	3.2.2.5	The sporadic use of the east and west ramps need to be better defined. Include a description of what happens to the pedestrian and bike traffic on the western ramp when it is used for vehicular circulation. An operational analysis of the use of these ramps for vehicular traffic needs to be included in the FEIS to identify the physical infrastructure, personnel, and management techniques to facilitate the safe and efficient use of the ramps.	Project - West ramp	A qualitative description of the multimodal operations associated with the sporadic use of the east and west ramps is provided in the FEIS, Section 5.5.3.1, <i>Direction Operational Impacts, Pedestrians and Bicycle Activity</i> . For NEPA purposes, quantitative analysis is not required for a sporadic condition. The other requested items will be addressed during the engineering and design phase of the Project.
DDOT Item 33	DDOT	7	Mitigation #19	<b>Coordinate with DDOT prior to FEIS</b> on locations for hop on/hop off buses. Identifying a satisfactory location is a responsibility of the Project Proponent. Private space is strongly preferred. Public space would require DDOT approval, and options are highly likely to have negative impacts (e.g. removal of parking) that have not been identified in the SDEIS and would require mitigations by the Project Proponent.	Hop off/on buses mitigation	Based on further review during the preparation of the FEIS, FRA anticipates that hop-on/hop-off operations will continue to be accommodated in front of the Station. VISSIM analysis conducted during the preparation of the FEIS (presented to DDOT on 08/29/23) indicates adequate operation. Table 7-1 of the FEIS/Table 13-2 of the ROD Item #19 provides for this to be confirmed as part of the PMP process (Item #28a) and future coordination, if needed.
DDOT Item 34	DDOT	3.3	Figure 3-1	The SDEIS is silent on the existing Bicycle Center. Please coordinate with DDOT prior to the FEIS to discuss this facility and its incorporation into the WUS project.	Pedestrian/Bicycle mitigation	Section F.8.1, <i>Front of WUS</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , of the FEIS clarifies that the former "Bikestation," currently unused, would be removed as part of the Project.



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Comment ID	Agency	File or Chapter or Section	Line or Table or Figure Number	DDOT By-line Comments (Submitted with DDOT_0706)	Topic	Response
DDOT Item 35	DDOT			Per DDOT's DEIS comments, to reach acceptable traffic movement on H Street Bridge with three signalized intersections, DDOT recommends a one-way circulation pattern on the internal service road network that restricts turns into and out of the SEP (and air rights development) to right-turns or through movements only. The final circulation network can be finalized during public space permitting, but these types of assumptions may help with managing traffic impacts.	Project - Circulation	DDOT's referenced previous comment was considered. FRA found that these specific circulation patterns do not make a substantial difference given that the performance of H Street in the Preferred Alternative is similar to what it would be in the other Action Alternatives where a one-way circulation pattern was assumed.  Table 7-2, Item #5, of the FEIS specifies the need to obtain public space permits for activities in the public right-of-way.
DDOT Item 36	DDOT			Per DDOT's DEIS comments, the internal service road network should meet certain standards for quality of service. These should include sufficient vehicle queue space (that does not spill onto H Street), drop-off zones, internal connections, and minimum 10-foot wide sidewalks.	Project - Street design	During the preparation of the FEIS, FRA modeled curbside activities along First Street NE, Second Street NE, and the H Street deck pick-up/drop-off areas using the VISSIM modeling software. The analysis (presented to DDOT on 08/29/23) indicated that demand on the deck would not spill back onto H Street. Internal service roads will be designed in accordance with applicable District's requirements and standards.
DDOT Item 37	DDOT			Per DDOT's DEIS comments, DDOT requests that the following be included to assess sensitivities to different circulation concepts: 1. Microsimulation analysis; 2. Multiple scenarios for internal circulation, particularly related to pick-up and drop-off; 3. Multiple demand scenarios to achieve an acceptable LOS; and 4. Modeling with the cycletrack maintained on the east side of 1st Street NE.	Traffic impacts	Per previous coordination with DDOT, during the preparation of the FEIS, FRA modeled curbside activities along First Street NE, Second Street NE, and the H Street deck pick-up/drop-off areas using the VISSIM modeling software. This modeling showed adequate operations at all modeled curbside locations. The FEIS also presents an updated Synchro analysis of traffic impacts that assumes a 25% reduction auto mode share consistent with the goal identified in move DC.  Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #20a through 28i, specifies multiple measures to minimize or mitigate traffic impacts, including the development and implementation of a Performance Monitoring Plan that will provide an empirical basis for future refinements of internal circulation patterns and pick-up/drop-off operations, as warranted.  As previously discussed with DDOT, the Preferred Alternative and all modeling maintain the existing cycle track on the east side of First Street NE.
DDOT Item 38	DDOT	S2	S-2	All loading is expected to be accommodated with head-in/head-out movements per the DDOT Design and Engineering Manual.	Project - Loading	Noted. Section F.2, <i>Loading</i> , of appendix F2, <i>Description of the Preferred Alternative</i> , clarifies that the new loading dock would accommodate head-in/head-out movements.
DDOT Item 39	DDOT	7	Table 7-1	There is no information regarding the timing of implementing the mitigations. Please add timing of mitigations prior to the FEIS. All non-construction related mitigations should all be installed prior to opening of the first phase of WUS. All construction related mitigations should be timed to align with the expected impact. Timing of mitigations is not included in Table 5-48 of Section 5 of Appendix C35 as previously indicated by the SEP team.	Mitigations	Table 7-1 of the FEIS/Table 13-2 of the ROD provides timeframes for the various mitigation measures.
DDOT Item 40	DDOT	5.5.1.12	General; Trip Generation and Circulation	As we have previously commented, the internal roadway and curb-cuts will be share-use by WUS and the third party air-right development, thus, the impact from both sources should be co-managed and mitigated together. As the project advances, the Project Proponents are expected to coordinate with the Air Rights Developer to maximize shared use of curb cuts, collective mitigations, and co-management of private transportation facilities.	Air rights development	During the engineering and design phase of the Project, USRC will coordinate with the private air rights developer about the design and management of shared spaces, as appropriate.
DDOT Item 41	DDOT	Appendix S2	S-10	The cost of constructing the G Street ramp must be covered by the Project Proponents.	Project cost	The G Street ramp is part of the Project and will be funded as part of the Project.
DDOT Item 42	DDOT	3.4	Table 3-3	Per DDOT's DEIS comments, the WUS project must be fully consistent with DDOT's H Street Bridge project.	H Street Bridge	The Station Expansion Project team coordinated with the H Street Bridge Replacement team from the inception of the H Street Bridge Replacement project to ensure consistency between both projects. Coordination will continue, as needed, through the engineering and design phase of the Project.

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Comment ID	Agency	File or Chapter or Section	Line or Table or Figure Number	DDOT By-line Comments (Submitted with DDOT_0706)	Topic	Response
DDOT Item 43	DDOT	Appendix S2	Figure S-2	<p>The new loading access will require a DDOT permit. DEM standards for loading access, including head-in/head out movements will be required.</p> <p>DDOT preference is for the loading access to align with Parker Street to reduce impacts to 2nd Street.</p> <p>Are there Burnham Wall impacts from this new driveway?</p>	Project - Loading	<p>Section F.2, <i>Loading</i>, of appendix F2, <i>Description of the Preferred Alternative</i>, clarifies that the new loading dock would accommodate head-in/head-out movements. Table 7-2, Item #5, specifies the need to obtain public space permits for activities in the public right-of-way.</p> <p>Impacts from the Project to the Burnham Wall were assessed as part of the impacts to the Union Station Historic Site, of which the historic portions of the Burnham Wall are an element (Appendix D1S, <i>Supplemental Assessment of Effects</i>, of the SDEIS, No. 49). Impacts would be minimized and mitigated in accordance with the terms of the Section 106 PA for the Project (Appendix F4 of the FEIS).</p>
DDOT Item 44	DDOT	Appendix S2	Figure S-6	<p>Clarify what happens to the existing west ramp. Is it demolished? Does the greenway re-use the ramp? Note that vehicular access to the old ramp will not be permitted due to the adjacent new west ramp.</p>	Project - West ramp	<p>The Project would demolish the existing west ramp and replace it with a bicycle and pedestrian ramp, as explained in Section F.8.1, <i>Front of WUS</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS.</p>
DDOT Item 45	DDOT	Appendix S2	Figure S-6	<p>Additional details needed to understand the east intersection's design relative to the adjacent driveway and H Street Bridge project.</p>	Project - H Street intersections	<p>Additional details are provided in Section F.5, <i>H Street Bridge Intersections and Deck-Level Circulation</i>, of Appendix F2, <i>Description on the Preferred Alternative</i>, of the FEIS.</p>
DDOT Item 46	DDOT	Appendix S2	Figure S-11	<p>What is the demand for the RT from the front of WUS to NB First Street? Can this movement be eliminated to simplify the intersection and reduce conflicts with the cycletrack?</p>	Pedestrian/Bicycle impacts	<p>The projected right turn volumes onto northbound First Street NE from the front of the station are approximately 25 vehicles per hour during both peak periods. This intersection is signalized to control both traffic and pedestrian/cyclist activity at this location, and right turn on red movements will be prohibited. The projected volumes represent a very low potential conflict with pedestrians and bicyclists at this location. This movement is needed to facilitate for-hire vehicle trip linkage between the front of WUS and the below-ground facility. Eliminating it would generate little benefits for cycle track users.</p>
DDOT Item 47	DDOT	Appendix S2	Figure S-12	<p>Impacts to the WMATA Red Line bridge are unclear. Will the bridge need to be rebuilt?</p>	Metrorail impacts	<p>Impacts to Metrorail are addressed in Section 5.5.3.1, <i>Direct Operational Impacts, Washington Metropolitan Area Transit Authority (WMATA) Metrorail</i>, of the FEIS. No physical impacts to the Red Line are anticipated. USRC will coordinate with WMATA as specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #16.</p>
DDOT Item 48	DDOT	Appendix S2	Figure S-12	<p>How will access to the REA garage and loading dock be accommodated?</p>	Project - Loading	<p>Access to the REA building and parking would be maintained. Access to the new loading dock would be from Second Street NE.</p>
DDOT Item 49	DDOT	7	Mitigation #27	<p>The SDEIS assumes about 50% of PUDO traffic will use the underground facility. Accessing the underground facility requires traversing some of the most congested intersections within the study area, which will likely result in vehicular traffic diverting to PUDO areas accessed via less congested intersections. PUDO operations needs to be included in the PMPs to ensure that actual PUDO behavior is aligned with the splits assumed in the SDEIS.</p>	Traffic mitigation	<p>Pick-up/drop-off activities will be addressed in the Performance Monitoring Plan (Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #28a).</p>
DDOT Item 50	DDOT	Env. Consequences, 5-62; Appendix S2, S-3 Page 8		<p>The federal law creating Union Station specifically preserved certain streets, including H Street NE, as public space. In the District, public space goes vertical to the center of the earth and into space. Altering those streets will require compliance with District law and regulation. Under District law to utilize any portion of the H Street, NE alignment for the H Street Concourse requires either a Partial street closure or a permit. Since the street is not closed, the land cannot be transferred or used through a "property transaction" and the FEIS must acknowledge and commit to the requirements for the Project's use of this space.</p> <p>Any use of the space must accommodate the H Street bridge including the need to access this space for ongoing bridge maintenance. A survey should be included to show in detail what portion of the H Street Concourse lies within the H Street, NE public space.</p> <p>Mitigation Section does not commit to working with DDOT on compliance with the necessary statutory requirements for the partial closures and/or dedication of public space.</p>	Public space impacts	<p>The FEIS was updated to replace the reference to a property transaction with the following (Section 5.9.3.1, <i>Direct Operational Impacts, Property Ownership, Land Acquisitions, and Displacements</i>):</p> <p>"The Preferred Alternative would require constructing the new H Street Concourse at the location of the existing H Street Tunnel. The tunnel is the former at-grade alignment of H Street NE between First and Second Streets NE, under the rail terminal. This section of H Street was walled off after the construction of the H Street Bridge. Based on a comment of DDOT on the SDEIS, construction of the H Street Concourse may require formally closing out this portion of H Street, in compliance with the District's Street and Alley Closing Procedures (Code of the District of Columbia, Title 9, Chapter 2), as applicable."</p> <p>Compliance with these procedures, if applicable, has been added to Table 7-2 in the FEIS. The need for access for bridge maintenance and survey will be addressed as part of the closure process.</p>

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Comment ID	Agency	File or Chapter or Section	Line or Table or Figure Number	DDOT By-line Comments (Submitted with DDOT_0706)	Topic	Response
DDOT Item 51	DDOT	Executive Summary ES.5		H Street Concourse - does not acknowledge what is currently public space. A survey is required to understand what the impacts will be to the public space.	Public space impacts	See response to preceding comment.
DDOT Item 52	DDOT	p.6		Connections to "H Street Bridge" would require Public Space committee approval.	Public space impacts	Public Space Committee review and approval is noted in Table 7-2, Item #28 of the FEIS.
DDOT Item 53	DDOT	p.6		Unclear how existing public space of H Street, NE will relate to "H Street Deck" and whether a dedication is planned to add it to public space (a defined term in the District) or whether what's intended is a public gathering space.	Public space impacts	The space is intended as a public gathering space or civic space, not a District Public Space. The FEIS was updated to remove the ambiguity.
DDOT Item 54	DDOT	E.S 6.2.2		Does not adequately discuss the adverse impacts to the historic L'Enfant Plan and specifically the proposed ramps and new intersections on the public streets surrounding Union Station. If the adverse effect is not discussed then mitigation is not proposed.	Cultural resources impacts	The Executive Summary of the SDEIS listed major impacts only, as noted in the introduction to Section 6.2, <i>Major Impacts of the Preferred Alternative</i> . Impacts to the L'Enfant Plan were described in Section 5.12, <i>Cultural Resources</i> , and Appendix D1S, <i>Supplemental Section 106 Assessment of Effects</i> .
DDOT Item 55	DDOT	E.S 6.2.2 Page 12		Mitigation Section does not commit to working with DDOT on compliance with the necessary statutory requirements for the partial closures and/or dedication of public space. The federal law creating Union Station specifically preserved certain streets and altering those streets will require compliance with District law and regulation.	Public space impacts	Compliance with these the District's Streets and Alley Closing Procedures was added to Table 7-2 of the FEIS (Item #5).
DDOT Item 56	DDOT	E.S. Page 16		Cultural resources - does not include mitigation and/or commitment to preserving street layout created by L'Enfant Plan.	Cultural resources impacts	The Executive Summary of the SDEIS listed only major impacts, as noted in the introduction to Section 6.2, <i>Major Impacts of the Preferred Alternative</i> . Impacts to the L'Enfant Plan were described in Section 5.12, <i>Cultural Resources</i> , and Appendix D1S, <i>Supplemental Section 106 Assessment of Effects and Section 106 Correspondence</i> .
DDOT Item 57	DDOT	Appendix S2, S-3 Page11		H Street Bridge is part of the H Street, NE public space and is commonly referred to as the overpass because it passes over the Amtrak rail yard. Connections to the public space, whether to the overpass, of historic H Street, NE passing under the rail yard require public space permits and must be approved by the Public Space Committee.	Public space impacts	See response to above comments.
DDOT Item 58	DDOT	Appendix S2,page 18		H Street Concourse would require either a public space permit or a partial street closure. The failure to discuss the requirements for use is a deficiency.	Public space impacts	See response to above comments.
DDOT Item 59	DDOT	Appendix S2, Page 22		Construction methods - does not discuss the precautions that will be taken to protect the H Street, NE overpass pilings.	Construction impacts	The Station Expansion Project team coordinated with the H Street Bridge Replacement team from the inception of the H Street Bridge Replacement project to ensure consistency between the two projects. Coordination will continue, as needed, through the engineering and design phase of the Project, including during construction planning.
DCOP Item 1	DCOP	5	5.9.2.1	Section 5.9.2.1 - Indirect Operational Impacts: Potential Federal Air Rights Development states that the Preferred Alternative "would have no indirect operational impacts on zoning, or development; property ownership..." Then in the next paragraph it goes on to describe how the Federal air rights would need to be rezoned and control or ownership of the property transferred. These could be couched as beneficial impacts, but they are impacts. OP requests clarification of the potential indirect operational impacts of the Federal air rights development.	Zoning impacts	The FEIS was amended to recognize a minor impact. As such impacts are not inherently adverse or beneficial, this impact is not characterized as adverse or beneficial.

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DCOP Item 2	DCOP	5	5.7.2	<p>Section 5.7.2 Indirect Operational Impacts should place greater emphasis on the beneficial aspects of the preferred alternative. The District's Comprehensive Plan notes that by accommodating urban growth and creating a highly livable city, the region would realize environmental benefits:</p> <ul style="list-style-type: none"> <li>a. Development is not spread out;</li> <li>b. The city is more walkable, bikeable, transit-able, and more attractive to residents; and</li> <li>c. Vehicle Miles Travelled (VMT) is minimized.</li> </ul> <p>The section indirectly mentions these benefits. OP would prefer that the benefits are elaborated on and the conclusion of "major adverse indirect operational impacts on CO2 emissions" reevaluated.</p>	GHG impacts	<p>The FEIS was revised to include additional language along the requested lines (Section 5.7.2, <i>Indirect Operational Impacts, Summary of Additional CO<sub>2</sub> Emission Estimates</i>). As explained in the SDEIS, in light of the District's carbon neutrality goal for 2045, FRA qualified any impact above zero additional CO<sub>2</sub> emissions as a major adverse impact in the SDEIS. Upon further review, given the very conservative character of the analysis, which does not reflect design features and operational approaches to avoid or minimize emissions that are not yet defined at this stage but are specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #33 and 34, FRA revised the intensity of the impact to moderate in the FEIS.</p>

# SDEIS Comments: Organizations

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Comment ID	Commenter	Item #	Comment	Topic	Response
Amtrak_0706	Amtrak	1	Amtrak appreciates FRA's efforts to incorporate the extensive range of public feedback received during the comment period for the Draft Environmental Impact Statement (DEIS) released June 2020, into a revised preferred alternative that reflects stakeholder goals. The preferred alternative identified in the SDEIS, Alternative F (Preferred Alternative), reflects not only Amtrak's previous comments that were made in regard to the DEIS but also the diverse stakeholder groups that continue to support improvements at WUS.	Preferred Alternative	Noted.
	Amtrak	2	We support the reduction in the total number of parking spaces in the Preferred Alternative. The SDEIS plans for between 400 and 550 parking spaces for long-term and short-term parking. WUS is ideally situated in the middle of the District of Columbia (DC) with multiple means of access, and Amtrak encourages our passengers to access our stations, especially in urban areas, via modes of transportation other than single occupancy private vehicles. The Commonwealth of Virginia, in partnership with Amtrak and others, is investing over \$3 billion in rail infrastructure over the next decade. Congestion pricing has recently been introduced on the highways in Northern Virginia in an effort to curtail use of automobiles within the region. The State of Maryland also continues to explore capacity and service improvements for their commuter rail services.	Project - Parking	Noted.
	Amtrak	3	The Preferred Alternative provides a location for bus and pick-up/drop-off facility which maximizes the use of the air rights for future development potential. This is an improvement from the previous alternative, however maintaining bus operations will be difficult during construction due to the east-west orientation and circulation of the bus traffic. FRA and project proponents should coordinate with DC to explore alternative locations for bus operations during construction of the SEP, as well as a permanent location for long term bus layovers.	Project - PUDO	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #21, specifies that USRC will work with the private air rights developer to build interim bus facilities as close as possible to an access point to the station and Metrorail, and with the best user amenities achievable. In the long term, the new bus facility would accommodate bus layovers.
	Amtrak	4	the SDEIS has a significant amount of mitigation measures that are attributed to the Project Sponsor, - USRC. Amtrak recommends the FRA engage with USRC, Amtrak, and other potential funding partners and stakeholders prior to Final Environmental Impact Statement (FEIS) issuance to ensure that the Project Sponsor has all the necessary resources, staffing and funding required for its success.	Mitigations	FRA identified USRC as the Project Sponsor in Spring 2023 and the process of mobilizing resources has begun. FRA will engage with USRC, Amtrak, and other potential funding partners and stakeholders to identify and plan for the necessary resources required to address the mitigation measures assigned to the Project Sponsor. An early step is the development of a <i>Union Station Expansion Project Delivery and Governance Study</i> by IDC, in partnership with the District of Columbia Government. IDC worked with an Advisory Group composed of representatives from USRC, Amtrak, the United States Department of Transportation, FRA, DCOP, and DDOT to guide the study ( <a href="https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf">https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf</a> , last accessed January 12, 2024). FRA is pleased to have participated in this study that can bring regional stakeholders together to support the expansion of Union Station. FRA will continue to support USRC in its role as Project Sponsor through Project development and implementation within the limits of FRA's responsibilities and authority.
	Amtrak	5	The SEP will result in the full reconstruction of all tracks and platforms located at WUS to be compliant with the Americans with Disabilities Act of 1990, as amended (ADA), as well as modern rail standards. This will not only create a more efficient and effective rail terminal but will also provide capacity increases to support the tremendous growth that is planned along Amtrak's NEC and National Network. While the overall number of tracks at WUS will be reduced, SEP will allow for more than double the number of rail passengers and trains that we experience today for both Amtrak and our commuter rail partners. By both lengthening and widening the platforms, operational efficiencies can be captured to accommodate more trains and quicker turn times. Amtrak is also in favor of the proposed Train Hall that would span all tracks and platforms complemented by a central spine, west concourse, and H Street concourse to allow for station users to flow through and access WUS in a more efficient manner.	Project - Rail planning	Noted.
	Amtrak	6	Amtrak in coordination with USRC is committed to advancing the delivery and implementation of new railroad infrastructure proposed by SEP. The design guidelines proposed by the PA are appropriate given the magnitude and complexity of SEP however to ensure continuity of design they must be consistent across all instruments related to delivering SEP, not just exclusive to the federal air rights. Additionally, the Preferred Alternative proposed by SEP requires consolidation of property ownership to facilitate project execution, FRA should give thought to providing a mechanism in the PA or other document to provide a pathway for resolution of property interests.	Air rights development	Noted. Property interests cannot be resolved by the Section 106 PA, which defines measures to minimize or mitigate adverse effects on historic properties. With regard to the Federal air rights, the specific mechanism of property transaction for the potential transfer and development of the Federal air rights, which could include a long-term lease or an exchange of property rights, will be determined as the Project advances.

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Comment ID	Commenter	Item #	Comment	Topic	Response
Greyhound_0627	Greg Cohen for Greyhound (Greyhound)	1	We had initially expressed serious concerns over early concepts that drastically reduced capacity for motor coaches, and didn't consider the potential for growth beyond 2040. However, we are pleased that the project team has now developed a preferred alternative that will accommodate 39 motor coaches on a typical day and 54 during peak holidays and events. We expect that the extra 15 overflow spaces will likely be needed as permanent spaces beyond 2024.	Project - Bus facility	Noted. Based on the demand analysis presented in Section 3, <i>Bus Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS, instances where the bus facility proper would not be able to accommodate all bus operations are anticipated to be infrequent. FRA does not anticipate that the 15 overflow spaces will be used permanently for bus service.  The conditions governing the use of the H Street deck space will be defined in the Operations Plan to be developed by USRC in coordination with the bus operators, as specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #18a.
	Greyhound	2	The day before the SDEIS was released, Greyhound learned of a number of commitments the project team has made for bus carriers. Some of the commitments made a detail between us and the study team were not presented in quite as much detail in the SDEIS. In our written testimony, we'll request some specific changes to the FEIS that match commitments as we understand them, emphasize some key points, and possibly being minor other adjustments. Assuming that those issues can be resolved, and that 54 bus slips will truly be available when needed, we will be offering our support for the project and be pleased to be counted among the proponents.	Project - Bus facility	Noted. FRA's response to the written comments are provided separately (see Buscarriers_0706).
BusCarriers_0706	Best Bust, Coach USA/Megabus.com, Greyhound, Peter Pan, Washington Deluxe, Flix Bus (WUSIBC)	1	While we would have preferred to see FRA endorse an alternative that maintains or increases the current number of bus slips (61) as we had originally requested, we support a compromise outlined in the preferred alternative, Alternative F, which commits to the inclusion of 54 bus slips on-site. The study team has committed to us that they "will make all 54 slips available when demand requires it" and prioritize keeping intercity buses within the main facility when excess demand exceeds capacity on the lower mezzanine level. Our support for this project is contingent on project sponsors keeping the commitment that the total number of bus slips will not be reduced below 54 as the project moves forward. While there are only 39 slips in the main facility and 15 on the deck level, we encourage FRA and USRC to avoid confusion in the FEIS by clearly stating throughout the final document that the selected alternative includes a total capacity of 54 slips, not 38-39.	Project - Bus facility	FRA supports, and USRC is committed to, providing space for bus parking as described in the SDEIS and FEIS. FRA notes that regarding the deck level, the commitment is to make the space in front of the train hall, normally used for PUDO operations, available to bus operators when needed, and that this space can accommodate up to 15 buses. It would not be an accurate description to refer to this space as bus slips similar to the 39 slips provided in the bus facility proper. In the FEIS, the Project is described as providing "peak capacity of 54 buses," with 39 slips in the bus facility and space for 15 buses on the H Street deck level.
	WUSIBC	2	Several other key commitments were made to us at the June 13th meeting, including: 1) An operations plan that is developed in coordination with bus carriers, DDOT, and the Mayor's Office of Special Events. This plan would develop the approach to gate management, safety and security systems planning, technology, special event management, electric charging or alternate fuels, peak intercity event management, and revenue/cost/fee allocation -- balancing facility needs and carrier economics. 2) Design coordination between the design team and the bus carriers, including amenities for passengers. 3) Trend monitoring, conducted by USRC, to regularly evaluate demand at WUS and in the District overall. 4) Building safety and accessibility into bus slip design, so that operators in all 54 slips can back up and turn safely and serve passengers with mobility challenges. 5) Working closely on the cost allocation approach with bus carriers, including developing a fair cost structure. 6) Addressing safety and security concerns by not permitting non-reserved bus services inside the future facility.  We ask that the above commitments be clearly stated in the FEIS. Of critical importance is the need to keep rent and other maintenance/operational costs that are passed on to bus companies down. The intercity bus mode is the most affordable mode of transportation, serving a large number of low-income passengers. Operating margins are typically very tight. Cost increases passed on to carriers should be limited to the greatest extent possible -- certainly at no more than general inflation (CPI).	Project - Bus facility	FRA understands that USRC as the Project Sponsor coordinated with the commenters on these issues during the preparation of the FEIS. Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #18a through 18c incorporate the commitments listed in the comment.  The comment about rent and maintenance/operational costs is noted. FRA believes that the EIS is not the appropriate place for specific future cost and cost increase commitments. At a high level, Item #18a notes the cost allocation will balance operational and maintenance needs and bus industry economics. FRA expects that specifics will be negotiated with USRC in the post NEPA phase.
	WUSIBC	3	We also ask that item #6 above (see previous comment) be much clearer and state unequivocally that unpaid, unreserved buses will not be allowed in the future facility. This is important for safety, security, and capacity reasons but also as a basic matter of fairness to operators that pay rent and fees for access and maintenance.	Project - Bus facility	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #18a specifies that the future Operations Plan will address the exclusion of non-reserved, non-paying bus service from the facility.

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Comment ID	Commenter	Item #	Comment	Topic	Response
	WUSIBC	4	In Appendix S2, section S.6, page 11, lines 135-143, there is a discussion of peak intercity and charter/tour demands. Lines 135-137 discount the possibility that the intercity bus demand will ever exceed the capacity of the main facility, while lines 137-139 discuss the possibility that charter/tour demands may exceed capacity. The conclusion is that the 15 slips on the PUDO deck level will only be needed as the result of charter/tour demand, and never as a result of intercity bus demand. Given the likelihood that the facility will outlast the design year and the lack of reliability of travel forecasts in general, it is unnecessary and potentially unhelpful to frame bus capacity shortages by type of service. We request clarification that the 15 slips on the PUDO deck level will be available as needed, regardless of whether the bus volume comes as a result of intercity buses or charter/tour bus peaks (or both).	Project - Bus facility	FRA notes that this comment appears to be in tension with Item #7 below, which requests that tour/charter buses be first to be moved to the H Street deck level space when demand exceeds the capacity of the bus facility. That tour/charter bus demand is identified as the source of such exceedance justifies their being first to be "relocated." It does not imply that only they would use the H Street deck level space or that this space would only be made available when tour/charter bus demand exceeds the capacity of the bus facility.  To address both comments in a consistent manner, the FEIS (Section F.6, <i>Bus Facility</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> ) indicates that Tour/charter buses would be first to be redirected to the deck level, but that intercity buses would also use it when needed.
	WUSIBC	5	Also, to make it clear that these slips will be available when needed, we request that the word "could" in line 140 be changed to "would". Similarly on page 16 of Appendix S-2, the word "could" should be changed to "would". Also, the word "infrequently" on page 16 should be removed because it is an unnecessary and subjective adjective that doesn't provide any real clarity to the reader of how often the PUDO deck would actually be needed for buses. For the same reason the clause ",which are anticipated to be infrequent," should be removed from S.6 page 11, line 139. Once the facility is in operation, it should not be an operational challenge for management or operators when the PUDO deck is needed for buses; rather it should be a well-tested arrangement with a smooth conversion of the space, as needed. By discounting the likelihood that this area will be needed more than "infrequently" for buses, planners could inadvertently lead facility managers to be unprepared or uncooperative when bus operators need them.	Project - Bus facility	The requested edit from "could" to "would" has been made in the FEIS. FRA disagrees that references to the infrequent use of the H Street deck space should be removed. Based on the demand analysis presented in Section 3, <i>Bus Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS, instances where the bus facility proper would not be able to accommodate all bus operations are in fact anticipated to be infrequent, though the number of times a year this would happen is not predictable with accuracy. Acknowledging this expectation in the EIS is of relevance to the concerns of other stakeholders, including the private air rights developer and neighborhood representatives, about the use of the H Street deck level space by buses. FRA also does not agree that it would encourage the facility's managers to be unprepared or uncooperative. The conditions governing the use of the H Street deck space will be defined in the Operations Plan to be developed by USRC in coordination with the bus operators (Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #18a).
	WUSIBC	6	In the main document, Chapter 3, Section 3.4 provides a detailed discussion on active / dynamic gate management for buses, noting briefly that such applications have not been successfully used in the US for intercity or charter/tour operations. While examples are provided for its use in other countries, our experience is that the results have been mixed. Bus operators currently using WUS have raised serious concerns regarding the use of active/dynamic management based on significant challenges with its implementation in Toronto, Canada, the higher cost of operation that would be passed on to operators, and concerns about gate confusion for customers and drivers. Our objections appear to have been recognized by the addition of Section 3.5.3 of the document, which discusses a "zonal" approach to slip assignment (page 37, line 810), noting that further study is needed. We support the zonal approach and encourage completion of any needed study so that this approach is clearly recommended in the FEIS. Yet language remains in Section 3.4.1 (page 28 lines 609-610), which states that "To manage peak demands, the facility would make use of the active, or dynamic, management." Given that the "zonal" approach has strong support from the operators and the dynamic approach is opposed by operators, we request that the FEIS not insist on stating active/dynamic management would be used, but rather simply leave it open as an operational possibility that could be considered if needed over the long-term.	Project - Bus facility	Facility operations will be determined by USRC in coordination with bus operators during the preparation of the bus facility's Operations Plan (Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #18a).  FEIS Section F.6, <i>Bus Facility</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , and Section 5.5.3.1, <i>Direct Operational Impacts, Intercity, Tour/Charter, and Sightseeing Buses</i> have been updated to state that FRA anticipates that on most days, a "zonal" approach to slip assignment would be used. A "dynamic management" approach may also be used on days of very high demand, if and as needed. Scheduled intercity and tour/charter bus service would be prioritized, with non-scheduled tour/charter service only accommodated as possible from a capacity, safety, and security standpoint.
	WUSIBC	7	we ask that the FEIS more clearly state that during peak periods, when demand in the main facility exceeds supply, charter/tour buses would be the first to be "bumped" up to the upper level, while intercity buses would be the last to be "bumped" up. We understand this to already be the planners' intention, but would like clarity on this point since the waiting and information area for intercity customers, including those making connections, will be in the primary bus area.	Project - Bus facility	See above response to Item #4.
Coach_0627	Dan Rodriguez for Coach USA and Megabus; also President of the Bus Association of New Jersey	1	Before the concrete is poured, we ask that we have a written commitment guaranteeing no fewer than 39 permanent and dedicated bus slips on the bus deck, with an additional 15 slips on the flag deck to accommodate increased demand during surge and peak times for authorized operators. We ask that this area be secured and overseen by Union Station personnel. When Union Station was established, it was intended to be an intermodal facility, providing equal access and opportunities for both buses and trains. We sincerely hope that this will continue to be the case, as millions of individuals who rely on our service will not settle for anything less.	Project - Bus facility	See responses to written Comments BusCarriers_0706 #1 and #2.



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Comment ID	Commenter	Item #	Comment	Topic	Response
ABA_0627	Brandon Buchanan for American Bus Association (ABA)	1	Looking at the alternatives, we believe that the plan needs at least 60 spaces for both inter-city bus travel, as well as tour bus as -- and other bus usage. We note that the research and the data included in the proposals does understate all other bus transportation, other than inter-city bus, as well as a massive amount of information being left out.	Project - Bus facility	The demand analysis underlying the size of the bus facility in the Preferred Alternative is documented in Section 3, <i>Bus Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS. Analysis indicated that the 39-slip bus facility, along with overflow space for 15 buses on the H Street deck level when needed, is sufficient to accommodate future demand of both intercity and tour/charter buses. The analysis is not limited to intercity buses. As is stated in Section 3.3.2.2, <i>Tour/Charter Bus Operations</i> , it assumes a 51% increase in tour/charter bus operations.
	ABA	2	Also, when you have projections of growth, looking at over 30 percent of growth, it seems unusual to have a proposal, then, that decreases the amount of available spaces that's not in line with the projected growth. And so, again, we'd love to see more spaces made available. D.C. has been promoting -- aggressively marketing bus parking here at Union Station since 2017, and the economic impact of those groups coming to the station to utilize its facilities that also take cars off the road to decrease congestion on our roadways. And to support inner-city transportation do provide a benefit to us overall. Overall, in general, the D.C. parking inventory has decreased since the original projections in 2016, and so we would love to support and enhance those few that we have.	Project - Bus facility	The demand analysis underlying the size of the bus facility in the Preferred Alternative is documented in Section 3, <i>Bus Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS. As stated in Section 3.3.2, <i>Future Growth</i> , a 49% growth in intercity bus service and 51% growth in charter/tour service is projected and accommodated in the bus facility. The new bus facility would be capable of accommodating this increased service with fewer slips than the existing facility because of (1) more efficient management and use of the space, and (2) its committed use by intercity and tour/charter buses as, unlike the existing practice, the facility would not be shared with other users.
	ABA	3	We would also note that motor coach industry is a avenue for environmental justice that this administration is currently endorsing. Most of our passengers come from underserved or underrepresented communities. And so we think that one -- way to provide essential transportation, not just to our traveling public, but to the public overall, including train passengers standing in as emergency train service providers, partnering with Amtrak -- on the Amtrak Throughway Program. Partnering with the airlines to provide bus bridges or even local transit, as well. And so we love that Union Station serves a dual role as a transportation hub and parking facility, but we also want to ensure that it continues to be a sustainable transportation solution and economic driver and a supporter of small, family-owned businesses, which many of our members are.	Project - Bus facility	FRA recognizes that bus providers provide transportation service to minority and low-income communities, as noted in 5.17.3.1, <i>Operational Impacts, Transportation, Intercity Buses</i> , of the FEIS. As previously noted, the demand analysis underlying the size of the bus facility in the Preferred Alternative and documented in Section 3, <i>Bus Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS, indicated that the 39-slip bus facility, along with overflow space for 15 buses on the H Street deck level when needed, is sufficient to accommodate future demand of both intercity and tour/charter buses. Additionally, FRA notes that minority and low-income passengers, as well as all bus operators, would directly benefit from the improved bus facility at Union Station, which would be a purpose-built facility fully integrated with the train hall and larger Station--
	ABA	4	We note that the plan did not really include accommodation for electronic -- or electric commercial motor vehicles, and we would love to see that incorporated into the revised proposal. Thank you for your time, and we look forward to supporting sustainability and helping Union Station grow.	Project - Bus facility	As noted in Section F.6, <i>Bus Facility</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , of the FEIS, the facility would provide infrastructure for bus electric charging. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #18b includes considering the accommodation of infrastructure supporting zero-emission vehicles, which may include accommodations for electric/zero emission commercial or alternative fuel vehicles. Specific decisions on the design and supporting infrastructure of the bus facility will be made during the engineering and design phase of the Project.

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Comment ID	Commenter	Item #	Comment	Topic	Response
ABA_0706	ABA	1	Although ABA is pleased FRA and the project sponsors developed a new Preferred Alternative (PA) in the SDEIS, referred to as Alternative Action F, ABA believes it still does not meet the District's needs in terms of bus/motorcoach services. The new PA does include bus facility integration, and appears to provide for more direct intermodal transfers between bus and rail operations. However, based on the number of slips identified, parking and service forecasts, the PA still does not sufficiently provide for both current and future intercity bus needs for the District. In previous comments, ABA and its local tourism partners made specific recommendations to FRA regarding bus parking. Bus parking is a major challenge for the District, as it is used not only by intercity scheduled service operators, but also sightseeing operations, commuter bus operations, downtown shuttle bus operations and charter bus operations. Adequate parking facilities for these various operations are necessary for an urban environment to ensure safe bus/motorcoach operations, reduction of climate damaging emissions, and facilitation of traffic flow, particularly as the number of urban street users has multiplied. As well, sufficient parking facilities support critical revenue generation, both for Union Station and the District. The USRC frequently notes the economic impact of motorcoach driven tourism is more than \$35 million annually, to Union Station. So, it is surprising the PA actually reduces Union Station bus vehicle parking, which will have a significant economic impact to its revenue stream. Further, Motorcoaches are responsible for an estimated \$810 million direct economic impact annually in the District of Columbia, and nearly 11,000 jobs. Many of the groups visiting Union Station for parking are charter operators, who are visiting on day trips, with their groups eating lunch or dinner within Union Station and then going on to their next stop location and returning to their origination point several hours away. For this reason, we note, in recent years USRC has increased its efforts to actively market the availability of parking slots for charter bus operators. Based on these facts, ABA does not believe the data relied upon in the SDEIS to support the PA is sound or accurately reflects the current of future parking needs for bus/motorcoach operations at Union Station.	Project - Bus facility	The demand analysis underlying the size of the bus facility in the Preferred Alternative is documented in Section 3, <i>Bus Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS. Analysis indicated that the 39-slip bus facility, along with overflow space for 15 buses on the H Street deck level when needed, is sufficient to accommodate future demand of both intercity and tour/charter buses. FRA and USRC coordinated with multiple bus operators during the development of the Preferred Alternative and the preparation of the SDEIS. The following operators submitted a comment on the SDEIS which, with some minor qualifications that have been addressed in the FEIS, is in support of the bus program provided for in the Preferred Alternative: Best Bus, Coach USA/Megabus.com, Greyhound, Peter Pan, Washington Deluxe, and Flix Bus. Additionally, in response to the comments from multiple tour guides and operators on the 2020 DEIS, FRA and the Project Proponents eliminated from the Preferred Alternative the 30-minute limit that was included in the 2020 DEIS Action Alternatives.
	ABA	2	we note the SDEIS does not take into account the reduction of motorcoach parking inventory elsewhere in the District, which increases the reliance and need for bus/motorcoach parking at Union Station. George Mason University and the Metropolitan Washington Council of Governments have concluded studies demonstrating that more than 1,000 private buses pass through the District of Columbia on a daily basis. This number increases to over 2,000 buses per day during the peak tourism season, February through June. Yet, over time the District's motorcoach parking inventory has declined from a high of almost 800 bus parking spaces throughout the city to now less than 500. While a few metered parking spaces have been added in recent years, the motorcoach parking inventory has decreased overall since 2016, and free parking has largely been eliminated. Further, less than half of this current inventory is close to drop-off points, convenient or easily accessible (10 minutes travel time or less) to the downtown core or the National Mall. Because bus/motorcoach parking demand is at a premium, locations like Union Station are essential to ensuring buses continue to visit. Washington needs safe places to park and drivers need time to rest, in-line with hours of service requirements. Union Station is perfectly positioned to fill this need. The Project must be considered holistically within the context of commercial motor vehicle operations within the entire District. We believe a dynamic management system at Union Station, per the PA, could be successfully implemented as a solution to the long-term problem of accessible, reservable parking for buses/motorcoaches operating in the downtown core. However, to be successful it must begin with a sufficient number of slips to manage appropriately.	Project - Bus facility	District-wide motorcoach parking is outside the scope of the Expansion Project and is not an element of the Purpose and Need for the Project.
	ABA	3	an updated annual study by DePaul's Chaddick Institute of intercity bus operations chronicles a significantly higher percentage of annual passenger growth in the fixed route intercity segment than that cited in the SDEIS. The SDEIS projects 27% growth between now and 2040, yet the Chaddick Institute chronicles, despite the pandemic, a near 25% year-over-year passenger growth in the 2021-2023 period. Even if conservatively estimated, using the more traditionally aligned 5-8% growth range annually, it would show a 75% growth curve by 2040.	Project - Bus facility	The Preferred Alternative's bus program was based on a review of a range of estimates of future bus demand and selection of the highest estimate. It assumed a growth of bus service at Union Station of approximately 49 percent for intercity buses and 51 percent for tour/charter bus operations relative to pre-pandemic conditions, as explained in Section 3.3, <i>Bus Facility Demand</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS.

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	ABA	4	Anecdotally, we also note that at least 5 new intercity fixed route carriers entered the market over the past 4 years, and it would be imprudent to assume there would not be others during the timeframe through 2040. New intercity motorcoach destinations originating from Washington, DC, have started to emerge, including the Southern and Central Virginia oriented (ROX and Virginia Breeze), Nashville (Napaway), new options to New York City (the Jet) and potential for others in the wings to emerge (e.g. Charlotte, Orlando, etc.). A study of intercity curbside permits requests over the past 4 years in Washington, D.C., would provide a good assessment of bus service growth in the region, and provide a basis for evaluating future growth and parking slip space need at Union Station. Consider for example, New York City, where they have seen a significant increase in curbside intercity permits, increasing from around 400 in 2019 to nearly 750 permitted spots now. This is an example of the explosive growth potential for motorcoach operations. We believe that a survey of permitted curbside spots over time could be a key indicator for future growth (if there is opportunity for expansion) at terminal facilities.	Project - Bus facility	The demand analysis underlying the size of the bus facility in the Preferred Alternative is documented in Section 3, <i>Bus Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS. Analysis indicated that the 39-slip bus facility, along with overflow space for 15 buses on the H Street deck level when needed, is sufficient to accommodate future demand of both intercity and tour/charter buses. FRA and USRC extensively coordinated with multiple bus operators during the development of the Preferred Alternative and the preparation of the SDEIS. The following operators submitted a comment on the SDEIS which, with some minor qualifications that have been addressed in the FEIS, is in support of the bus program provided for in the Preferred Alternative: Best Bus, Coach USA/Megabus.com, Greyhound, Peter Pan, Washington Deluxe, and Flix Bus.  District-wide bus planning is outside the scope of the Expansion Project and not an element of the Purpose and Need for the Project.
	ABA	5	Based on current operations and projections from publicly available data, we believe the PA does not provide sufficient parking facilities for bus/motorcoach needs serving the city, taking into account both scheduled and non-scheduled, public and private bus/motorcoach operations. ABA urges the sponsors to reconsider the PA and maintain and continue to provide for a minimum of 60 available bus/motorcoach slips to serve the needs of the District and beyond.	Project - Bus facility	The demand analysis underlying the size of the bus facility in the Preferred Alternative is documented in Section 3, <i>Bus Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS. Analysis indicated that the 39-slip bus facility, along with overflow space for 15 buses on the H Street deck level when needed, is sufficient to accommodate future demand of both intercity and tour/charter buses. FRA and USRC extensively coordinated with multiple bus operators during the development of the Preferred Alternative and the preparation of the SDEIS. The following operators submitted a comment on the SDEIS which, with some minor qualifications that have been addressed in the FEIS, is in support of the bus program provided for in the Preferred Alternative: Best Bus, Coach USA/Megabus.com, Greyhound, Peter Pan, Washington Deluxe, and Flix Bus.
	ABA	6	As the SDEIS is intended to evaluate the environmental impacts of a project, environmental sustainability should be accorded significant weight. Under this consideration, the environmental benefits provided by bus/motorcoach travel through a reduction in congestion and pollution, particularly in a congested urban area, should not be underestimated. Travel by “green modes,” particularly in light of current climate concerns, should be encouraged. Motorcoaches are the greenest and most efficient form of surface transportation.10 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 CO2 per passenger mile, as compared to 147 grams for Amtrak and 368 grams for cars. Motorcoach emissions and fuel economy are continuing to improve, particularly in light of the Environmental Protection Agency’s (EPA) on-going efforts through updates to emission requirements and the Greenhouse Gas Phase 3 rulemaking. These requirements have had a significant impact on new engines beginning in 2021, and will continue to do so for generations. These vehicles were designed to have a 24% or greater reduction in their already low CO2 emissions. Yet we note, neither the DEIS and the SDEIS addressed or took into account these various emission improvements or EPA requirements. Nor did the documents credit or acknowledge the bus/motorcoach operations for the pollution and congestion reduction benefits achieved by removing so many cars from the road. These calculations and environmental benefits should be both identified and incorporated into any final EIS.	Project - Bus facility	Section 5.7.3.2, <i>Indirect Operational Impacts, Mobile Source Emissions</i> , of the FEIS notes that by supporting intercity service to new markets and attracting riders who might otherwise drive, the Preferred Alternative would contribute to a reduction of CO <sub>2</sub> emissions from car traffic in the entire Northeast Corridor. The quantification of this reduction is outside the scope of the EIS analysis due to its geographic spread and the impossibility of determining how much of it can be attributed to the Project.  FRA research indicates that electric rail travel along the NEC produces the fewest CO <sub>2</sub> emissions among bus, car, airplane and rail, although traveling by bus was found to have substantially lower operational CO <sub>2</sub> emissions than either single occupancy vehicle or air travel: <a href="https://railroads.dot.gov/elibrary/carbon-dioxide-emissions-four-real-world-inter-city-passenger-trips-comparison-rail-air">https://railroads.dot.gov/elibrary/carbon-dioxide-emissions-four-real-world-inter-city-passenger-trips-comparison-rail-air</a> , last accessed January 12, 2024.

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	ABA	7	as previously mentioned, motorcoaches emit the lowest average amount of grams of CO2 per passenger mile of any mode including Amtrak, transit buses and single passenger vehicles. However, when there is insufficient parking available, forcing buses/motorcoaches to circulate the city streets in “creep mode” (roaming around the city streets at low speed), both traffic and the air quality of is negative effected. Buses operating in creep mode use more fuel (generally double) and emit at least 50% more nitrogen oxides (NOx) 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 pounds of excess NOx annually, for only one hour/day of circulating <sup>11</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 and improves safety. 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.	Project - Bus facility	The demand analysis underlying the size of the bus facility in the Preferred Alternative and documented in Section 3, <i>Bus Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS, indicated that the 39-slip bus facility, along with overflow space for 15 buses on the H Street deck level when needed, is sufficient to accommodate future demand of both intercity and tour/charter buses. FRA does not anticipate that the Preferred Alternative would result in buses having to circulate in "creep mode" due to insufficient capacity at Union Station.  FRA research indicates that electric rail travel along the NEC produces the fewest CO <sub>2</sub> emissions among bus, car, airplane and rail, although traveling by bus was found to have substantially lower operational CO <sub>2</sub> emissions than either single occupancy vehicle or air travel: <a href="https://railroads.dot.gov/elibrary/carbon-dioxide-emissions-four-real-world-inter-city-passenger-trips-comparison-rail-air">https://railroads.dot.gov/elibrary/carbon-dioxide-emissions-four-real-world-inter-city-passenger-trips-comparison-rail-air</a> , last accessed January 12, 2024.
	ABA	8	with the interest in zero emissions commercial vehicles and efforts to transition commercial fleet operations on an unprecedented timeline, we do not see similar reflections or acknowledgement of these types of operations integrated into the Project. We strongly recommend the SDEIS address this consideration. The current Administration recently published proposals encouraging adoption and incorporation of such technology into commercial fleet operations by 2040 if not earlier (EPA-HQ-OAR-2022-0985 – Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles—Phase 3). These vehicles are currently available for commercial purchase and are being steadily incorporated into an increasing number of fleet operations.	Project - Bus facility	As noted in Section F.6, <i>Bus Facility</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , of the FEIS, the facility would provide infrastructure for bus electric charging. Table 7-1 of the SDEIS/Table 13-2 of the ROD, Item #18b includes considering the accommodation of infrastructure supporting zero-emission vehicles, which may include accommodations for electric/zero emission commercial or alternative fuel vehicles. Specific decisions on the design and supporting infrastructure of the bus facility would be made during the engineering and design phase of the Project.
	ABA	9	Every motorcoach visiting Union Station contributes to the goal of improving the environment, whether by taking cars off the road and reducing congestion, or by improved air quality. ABA believes the SDEIS needs to take these benefits into account and encourage greater use of travel by bus/motorcoach by ensuring the final PA provides sufficient parking facilities.	Project - Bus facility	See above responses to Comments #6 to 8.
	ABA	10	Throughout the duration of this Administration, equitable access for the diverse populations throughout America has been a focus for a variety of initiatives including transportation. Following the publication of Executive Order No. 13985 (EO 13985), this has increasingly been put into practice through the policies encompassed in the Inflation Reduction Act (IRA), the Infrastructure Investment and Jobs Act (IIJA) as well the Bipartisan Infrastructure Law (BIL). A fundamental tenant included in each of these pieces of legislation is that transportation infrastructure has great potential to build community wealth and strong local economies and support long-time residents and businesses. We believe that the same holds true with Union Station. The passengers carried historically by fixed route intercity bus providers trend towards being predominantly drawn from underserved communities, including serving as the only form of interstate transportation to people residing in rural communities. Motorcoaches and intercity fixed route transportation have a place at Union Station. It provides an opportunity for the station to live up to the principles incorporated in EO 13985, but also to the principle of access for all that permeates throughout the federal government today. For example, although this is an FRA-led project, within the recently updated circular for joint development (FTA 7050.1B) from the Federal Transit Administration (FTA), it states that one of their major goals is to “enhance the effectiveness of public transportation and be related physically or functionally to public transportation, or establish new or enhanced coordination between public transportation and other transportation.” We hope that this project will embrace that ideal, especially since public transportation is included in the project plan and intercity buses often provide public transportation. Whether it is working under contract to public transit agencies, operating via a working relationship with Amtrak as Amtrak Thruway Service providers, standing in the shoes of the airlines/rail/transit in the case of a breakdown or providing a “bus bridge” shuttle or daily commuter bus service, motorcoaches participate as public transportation providers.	Environmental justice	FRA recognizes that bus providers provide transportation service to minority and low-income communities, as noted in 5.17.3.1, <i>Operational Impacts, Transportation, Intercity Buses</i> of the FEIS. The demand analysis underlying the size of the bus facility in the Preferred Alternative and documented in Section 3, <i>Bus Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS, indicated that the 39-slip bus facility, along with overflow space for 15 buses on the H Street deck level when needed, is sufficient to accommodate future demand of both intercity and tour/charter buses. Additionally, FRA notes that minority and low-income passengers, as well as all bus operators, would directly benefit from the improved bus facility at Union Station, which would be a purpose-built facility fully integrated with the train hall and larger Station. See also responses to Comments EPA_0706, Items #4 to 7.

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	ABA	11	We believe that in providing service to underserved communities, as evidenced by the recent expansion of service linking rural areas to Washington DC’s Downtown core through the Virginia Breeze, there is more opportunity for innovation that will emerge in the coming years. It’s with an eye towards this innovation that we ask the Project not to reduce the Union Station Bus Deck footprint below 60 spaces. Finally, we are confident that motorcoaches can spur economic development for underserved communities, bringing people to needed employment, spurring innovation and attracting tourist investment. We hope that this intermodal project will continue to encourage each of those ideals outlined in EO 13985 as well as continue to support small-family owned businesses in supporting motorcoach operations and growth.	Environmental justice	See response to Item #10 above.
	ABA	12	In closing, we have high hopes for a redesigned Union Station and would like it to serve as the crown jewel in facilitating future motorcoach passenger growth (as highlighted in the National Travel and Tourism Infrastructure Strategic Plan 2020-2024) and promoting intermodalism as well as public-private partnership. We do believe that the Project currently relies on bad data, ignores current growth trends, minimizes consideration of the environmental and economic benefits that the motorcoach industry provides, and potentially limits equitable access to all populations. The ABA supports a plan for Union Station that includes a Bus Deck with at least 60 slots for motorcoaches and an indoor passenger staging area immediately adjacent to the Bus Deck.	Bus facility	See responses to Comments #1 through 11 above.
CHRS_0706	Capitol Hill Restoration Society (CHRS)	1	The Capitol Hill Restoration Society (CHRS) responded to the December 2022 Draft Final Supplemental Assessment of Effects to Historic Properties Report (SAOE) in a letter dated February 6, 2023. In that letter we took exception to the determination of “no adverse effect” to the Capitol Hill Historic District (CHHD). We continue to believe there is a very high probability of adverse effects to this residential neighborhood by the Federal undertaking, especially regarding vehicular traffic at an expanded Union Station. AN6C and the National Trust expressed similar concerns. It is critical to understand that the blocks immediately East of Union Station are overwhelmingly residential in nature. Excessive traffic degrades the quality of life of a residential neighborhood in a fundamentally different way than areas dominated by commercial and institutional uses.	Section 106 (CHHD)	FRA's response to CHRS 2/6/23 comments on the draft SAOE were documented in the final SAOE, comment matrix, and determination of effect letter provided to all consulting parties on March 10, 2023. No further comments on the effect were received within 30 days from March 10, per 36 CFR § 800.5. While FRA determined the project would have no adverse effect on the CHHD under Section 106's criteria of adverse effect (36 CFR § 800.5), FRA reminds CHRS that the traffic impacts on streets in or adjacent to the CHHD were considered in the context of NEPA and measures to minimize and mitigate these impacts are identified in the FEIS, incorporated as enforceable commitments in the ROD (Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #28a through 28i), and incorporated in the Section 106 PA as an adverse effect avoidance measure.
	CHRS	2	The March 2023 SAOE retains a determination of “no adverse effect” to the CHHD despite the contrary assessment of several Consulting Parties. Section 2 “Description of the Preferred Alternative” (and Pages 17 - 21 in particular) describes vehicular circulation around the Station. Section 7.2 of the SAOE (Page 108-109) outlines the Avoidance, Minimization, and Mitigation Strategies. These sections acknowledge the high potential for an adverse effect to the CHHD due to induced traffic and some of the measures the Preferred Alternative proposes to minimize and mitigate these adverse effects. Nevertheless, the SAOE on Page 21 concludes that “the Preferred Alternative would result in traffic conditions within the Capitol Hill Historic District that are very similar to those that would occur even if the Project was not constructed.” It is impossible to justify that assessment. In addition to the massive Federal and private air rights projects, the 2012 Washington Union Terminal Master Plan envisions a tripling of passengers at WUS (Appendix A, Page 17).	Section 106 (CHHD)	The traffic impacts of the Preferred Alternative are analyzed in the SDEIS and FEIS as impacts on the transportation system in the context of NEPA. The FEIS identifies major adverse impacts and multiple measures to avoid, minimize, and mitigate these impacts (Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #28a through 28i).  In the context of Section 106, FRA found that the impacts on traffic would not cause an adverse effect on the CHHD under Section 106's criteria of adverse effect (36 CFR § 800.5): see the Response to CHRS's Item #1 above.
	CHRS	3	There is more than ample justification to warrant a determination of adverse effect to the Capitol Hill Historic District. We re-state our objection to a determination of “no adverse effect”. Lines 90 through 99 of the Draft Programmatic Agreement (PA) provide little assurance that neighborhood concerns will be given serious attention within a project of this magnitude.	Section 106 (CHHD)	Noted. See responses to CHRS's Comments #1 and 2 above.
	CHRS	4	We predict severe congestion along Second Street NE from the addition of a fourth PUDO activity. In the immediate area, PUDO activity for Kaiser Health, Logan School and Station House already have proved to be problematic. We also predict gridlock traffic conditions for the intersection of 3rd and H Streets, NE. At a minimum, the Project Sponsor should be required to engage real-time traffic management that employs GPS or similar navigation technology to direct traffic away from the residential neighborhood. The Programmatic Agreement promises to “coordinate” response to emerging traffic problems among the various involved agencies. However, there appears to be little commitment to traffic mitigation strategies. and no accountable party committed to take action to resolve potential congestion when it inevitably arises, both during and after construction.	Traffic impacts	FRA performed a microanalysis of curbside activity along Second Street NE during preparation of the FEIS using the VISSIM model. While the analysis did not indicate severe congestion, FRA recognizes that actual operations may differ. The SDEIS and FEIS also recognize challenged operational conditions at the intersection of H and Third Streets NE. The FEIS identifies measures to avoid, minimize, and mitigate such impacts: see Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #12, #27a through 27f, and #28a through 28i. The Section 106 PA incorporates Items #12 and #28a.

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Comment ID	Commenter	Item #	Comment	Topic	Response
	CHRS	5	We stress that Section 106 of the National Historic Preservation Act requires stakeholder consultation at all steps of the design process to mitigate adverse effects. The Programmatic Agreement needs to include a process for continued meaningful public oversight by interested parties, including the existing "Consulting Parties". We support the concerns of the Committee of 100 on the Federal City regarding Section 106.	Programmatic Agreement	Noted. The Section 106 PA (Appendix F4 of the FEIS) was updated to specify opportunities for involvement by the Section 106 Consulting Parties.
	CHRS	6	we wish to record once again our long-standing objection to restricting the EIS to the Federal undertaking with minimal attention to the H Street Bridge and the Federal and Akridge air rights projects. Had the Union Station project been designed as an integrated whole, a far more engaging project could have been achieved for the estimated \$8.8 billion cost of the Federal portion alone. For example, restoring H Street to its pre-1970s location below the rail yard would open tremendous design opportunities; construction and cost savings; as well as restore the urban fabric harmed by the bridge approaches. However, this was never given serious consideration. We believe that the Preferred Alternative F cannot be fully implemented as outlined without clear enforceable coordination and commitments from all involved parties.	Project - General	<p>Over the past several years, FRA has given CHRS's comments on this matter serious consideration. FRA has provided explanations in numerous consulting parties meetings and reports about why these projects are not subject to the Project's Section 106 review.</p> <p>The H Street Bridge Replacement project and the Akridge air rights development project are separate and independent from the Station Expansion Project; have separate owners; and are not subject to decisions by FRA or USRC.</p> <p>Through the design and construction phases of the Project, USRC will continue to coordinate, as appropriate, with the owners of these projects (DDOT and Akridge, respectively) to ensure their mutual compatibility and success.</p>
	CHRS	7	The placement of passenger waiting areas and related circulation below the rail yard is a sad counterpoint to the grand spaces of the historic station and runs counter to what has been done in numerous, modern European train stations. It is also likely to be a more costly solution. For the amount of money and effort required, we can and should do better.	Project - General	<p>The Station Expansion Project is the culmination of a collaborative multi-year planning process that is extensively documented in the appendices of the DEIS. The Project Area is significantly constrained both horizontally (as it is surrounded by urban neighborhoods on the east and west) and vertically (as much of the air rights above the rail terminal are privately owned and slated for development into a mixed-use neighborhood).</p> <p>Like all Action Alternatives considered, the Preferred Alternative incorporates provisions for daylighting of the new concourses by skylights at the deck level and waiting spaces for passengers.</p> <p>As noted in <b>Section 3.2.2.1, Refinement Process</b>, of the FEIS, NCPC and the Commission of Fine Arts (CFA) both expressed their support for the Preferred Alternative.</p>
CSG_0706	Coalition for Smarter Growth (CSG)	1	The revised SDEIS Preferred Alternative includes major improvements and we support the FRA including in the Final EIS: Right-sized parking located below-grade, modernized and efficient PUDO (Pick-up and Drop-Off), bus facility better integrated with minimized impacts to the street network, improved bicycle facilities, and fully-integrated urban design.	Preferred Alternative	Noted.
	CSG	2	Include run-through service for Virginia Railway Express (VRE): The SDEIS identifies future service "from" MARC's Penn Line "to" VRE's Fredericksburg and Manassas' lines, but should also explicitly include connecting run-through service for VRE. Providing a one-seat ride from Virginia into Maryland via VRE will further interconnect the region's economy and greatly enhance the quality of life of Virginia's commuters along the I-95 and I-66 corridors.	Project - Rail planning	<p>As is explained in Chapter 2, <i>Purpose and Need</i>, of the FEIS, supporting current and future long-term growth in rail service and operational needs is part of the Project's Purpose and Need. Accordingly, the Preferred Alternative would support future VRE operations, as planned for in VRE's adopted System Plan.</p> <p>In their comments on the SDEIS (VRE_0706, Item #1), VRE noted that " Platform and track plans and operational plans incorporated in the SEP Preferred Alternative provide for long-term VRE growth consistent with VRE's adopted System Plan."</p> <p>VRE also noted that "No VRE through-running trains to Maryland are assumed in VRE's adopted System Plan. VRE is currently analyzing future service markets; those analyses assume, however, that VRE-served regional travel needs between northern Virginia and Maryland destinations along the MARC Penn, Camden and/or Brunswick Lines through calendar 2030 at a minimum can be met by more closely coordinating VRE and MARC service at WUS in tandem with expanded concourses and other WUS improvements assumed in the Preferred Alternative."</p> <p>Decisions regarding future run-through service by VRE are outside the scope of the Station Expansion Project.</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
	CSG	3	Unify the federal and public air rights to ensure full delivery of public benefits: Successfully achieving air rights development is critical to maximizing rail and transit ridership, knitting the city back together in the area north of the station, creating a vibrant and dynamic community, enhancing the value of the station, and expanding the city's tax base. However, the SDEIS Preferred Alternative F lacks critical definition of responsibility and coordination between the private air rights developer Akridge, and the FRA-owned federal air rights development parcel, as specified in the SDEIS. This ambiguity and lack of ownership of the FRA's role in funding and coordinating the deck to support federal and air rights development raise questions about the overall viability of any development and significantly reduces the overall benefits that could be delivered by the SEP. Despite the promise of best-in-class urban design in the SDEIS's images and renderings of Preferred Alternative F, the FRA does not fully articulate or acknowledge the federal government's role in facilitating, funding, and coordinating air rights development. Specifically, it remains unclear what specific measures the FRA is undertaking to overcome the obstacles posed by the fragmented federal and private air rights, which could hinder the area's development.	Air rights development	FRA developed the Preferred Alternative in coordination with Akridge and looks forward to continued collaboration with Akridge to advance the Station Expansion Project and Akridge's development project. FRA supports the vision of commercial air rights development and open space that creates a vibrant neighborhood north of Washington Union Station. The Preferred Alternative is consistent with this vision. The specific mechanism of property transaction for the potential transfer and development of Federal air rights, which could include a long-term lease or an exchange of property rights, will be determined as the project advances.
	CSG	4	We also believe that the Final EIS should revise the No-Action Alternative. The current No-Action Alternative includes the development of private air rights but fails to consider the irreversible negative consequences of pursuing this development independently from the SEP. If the air rights development proceeds without the SEP, it will eliminate any opportunity to address the existing accessibility and safety concerns of the station or adequately meet the future rail capacity requirements, possibly rendering these issues unsolvable indefinitely.	No-Action Alternative	The No-Action Alternative impact analysis as presented in the 2020 DEIS and the FEIS does acknowledge that this alternative would have major adverse impacts on commuter and intercity railroads and intercity, tour/charter, and sightseeing buses. The 2020 DEIS and the FEIS also recognize that the No-Action Alternative would have adverse impacts on safety and security. Because the No-Action Alternative would not preclude some improvements to accessibility under separate projects, the 2020 DEIS and the FEIS find that there would be moderate beneficial direct operational impacts on accessibility, though improvement would be less than in the Preferred Alternative. These findings are consistent with the comment.  The Project is a separate action from the development of the private air rights, with independent value and utility. The Project would meet its Purpose and Need, and provide the associated public benefits associated with it, regardless of the development of the private air rights. Conversely, the private air rights could be developed without the Project. FRA has no authority of the private air rights development project or its impacts.
	CSG	5	Clarify and solidify USRC's role as Project Sponsor for effective delivery of the SEP: We applaud the FRA for designating USRC as the Project Sponsor of the SEP in the SDEIS. An empowered and well-resourced USRC will ensure there is a single point of authority for taking the SEP through the design and construction of this mega-project. However, to ensure USRC's success in this role, we encourage the FRA to define the Project Area authority that USRC will oversee for the design and construction and to identify the authorities and resources that the FRA and Amtrak will provide to support the effective delivery of the SEP. We believe that the FRA must take these steps to ensure that USRC has the necessary staffing and financial resources to implement the project expeditiously.	Project sponsor	The Project Area is shown in Section 1.3, <i>Project Area</i> , of the FEIS. FRA identified USRC as the Project Sponsor in Spring 2023 and the process of obtaining support and mobilizing resources has begun. An early step was the development of a Union Station Expansion Project Delivery and Governance Study by IDC, in partnership with the District of Columbia Government. IDC worked with an Advisory Group composed of representatives from USRC, Amtrak, the United States Department of Transportation, FRA, DCOP, and DDOT to identify delivery, financing, and governance mechanisms needed to realize the Project (see <a href="https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf">https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf</a> , last accessed January 12, 2024). FRA is pleased to have participated in this study that can bring regional stakeholders together to support the expansion of Union Station. FRA will continue to support USRC in its role as Project Sponsor through Project development and implementation within the limits of FRA's responsibilities and authority.
	CSG	6	the SDEIS highlights the need for regional investment in the SEP as a result of the reduced parking revenue to sustain USRC's operations. However, we believe that regardless of the implementation of the SEP, USRC is already unable to rely on parking revenues to sustain operations of the historic station. We encourage the FRA to broaden the rationale for USRC to identify new revenue sources for reasons beyond the loss of parking revenue, and the need for regional investment due to the benefits of expanded rail and bus service facilitated by the SEP.	Station revenue	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #43, was updated to read as follows:  USRC to identify new funding source sufficient, at a minimum, to ensure the continued preservation and maintenance of the historic Station building.
	CSG	7	We also hope that the project's anticipated timeline of 13 years can be streamlined and expedited to align with Virginia's historic passenger rail investments in the Transforming Rail in Virginia program, and to address the urgent need to slash greenhouse gas emissions from transportation.	Construction - schedule	Noted. Construction duration is an element considered as part of the Union Station Expansion Project Delivery and Governance Study and a detailed construction schedule will be developed during the engineering and design phase of the Project. FRA notes that it is in the interest of all parties involved to reduce the duration of the construction period as much as possible.
CTC_0706	Capital Trails Coalition (CTC)	1	We support Preferred Alternative F as the best design option to move forward and thank FRA for considering comments received through the public comment process.	Preferred Alternative	Noted.

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Comment ID	Commenter	Item #	Comment	Topic	Response
	CTC	2	Ensure Safe Accommodations for People Walking and Biking During Project Construction: The construction impacts to the First Street NE cycle track and the Metropolitan Branch Trail on Second Street, propose to close facilities for a combined period of more than five years during Phases 1 and 4. Though the DEIS claims that only a small portion of the eight-mile Metropolitan Branch Trail will be impacted, removing any continuity disrupts the seamless, low-stress option that a multi-use trail should provide to people walking and biking. Thousands of daily users rely on the Metropolitan Branch Trail as a direct route to get to Union Station or to pass by it along their planned route. Any proposed closure or detour of the Metropolitan Branch Trail or First Street Cycle track must provide safe accommodations for trail users that offers a comparable level of safety, as required by DC law and DDOT regulations.	Construction - Pedestrian/bicycle	Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #12, 17b, 24, 42c, 42d, and 51c, were updated to specify that construction-related closures will be conducted in compliance with the District's Safe Accommodations law.
	CTC	3	Upgrade the Metropolitan Branch Trail on the East Side: The regional Metropolitan Branch Trail, which will eventually connect trail users between Union Station and Silver Spring, Maryland and to trails and transit across the region, runs along both First Street, as an in-street protected bike lane, and on Second Street as a sidewalk-level multi-use trail. Since the trail is not yet fully built out, it does not offer seamless connections to the rest of the District's trails and the regional network. Notably, between G Street NE and K Street NE, the Second Street "trail" exists as a signed route on the sidewalk. Under Alternative F, this area is designated as a pickup, drop-off area on narrow sidewalks, but it does not appear to note the multi-use trail. The trail should be redesigned and rebuilt to modern multi-use trail standards from G to K Streets NE with appropriate design to reduce conflicts in front of the Second Street concourse entrance. At Columbus Circle, the Metropolitan Branch trail stops just short making useful connections at the bottom of the ramp at F Street near the existing Capital Bikeshare station. This sidewalk space should be redesigned to extend the multi-use trail to connect to Massachusetts Avenue.	Project - Pedestrian/Bicycle	Improvements to the Metropolitan Branch Trail are outside the scope of the Station Expansion Project.  Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #23 provide for the consideration during Project design of measures to minimize or mitigate potential conflicts between users of the First Street cycle track, pedestrians, and vehicles between Massachusetts Avenue and M Street NE. Item #23 also provides for the consideration of improvements on the east side of WUS, between Columbus Circle and F Street NE.
	CTC	4	Address conflicts at the First Street Loading Dock: Under the existing design, the First Street loading dock is located directly behind the two-way protected bike lane on First Street, which serves as a high-volume branch of the regional Metropolitan Branch Trail. Delivery trucks regularly park in or block the protected bike lane and sidewalk rather than use the loading dock, interrupting the otherwise safe, low-stress bicycle route for thousands of daily trail users. This obstruction forces people on bikes using the protected lanes to dismount, climb the curb, and enter the travel lane to get past the obstructing vehicle. This constant conflict puts the most vulnerable road users at risk, and persists as a daily structural reality of commercial operations under the current design. The protected bike lane/multi-use trail and loading dock should be redesigned to eliminate this conflict point, including by widening the bike lane and adding permanent, substantial mid-lane barriers to prevent entry by motor vehicles. As other loading docks are constructed, the loading docks with less likelihood of user conflict should be prioritized for daily activities.	Project - Pedestrian/Bicycle	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #23 provide for the consideration during Project design of measures to minimize or mitigate potential conflicts between users of the First Street cycle track, pedestrians, and vehicles between Massachusetts Avenue and M Street NE, including at the First Street Loading Dock.
	CTC	5	Create Seamless Bicycle Connections for Trail Users at Columbus Circle: The SDEIS notes that the front of Union Station will continue to be the main access point for pedestrians and bicyclists, yet, the proposed roadway reconfiguration is focused on automobile circulation. Not addressing the transportation needs of people on bikes and pedestrians would be a missed opportunity and would leave a permanent hole in DC's low stress bicycle network, leaving gaps in connections to local and regional trails. To access or traverse this space, people who bike need safe, protected infrastructure dedicated for bicycles. To mitigate this negative impact, we call on FRA to: <ul style="list-style-type: none"> <li>● Collaborate with DDOT to add a curb-separated protected bike lane on Massachusetts Ave between North Capitol Street to 2nd Street NE,</li> <li>● Collaborate with DDOT to add a direct, intuitive, and safe bike connection from the 1st Street NE protected bike lane to planned protected bike lanes on E Street NE and Louisiana Avenue, with elements of a protected intersection, and</li> <li>● Designate a two-way east-west bicycle connection north of the Union Station fountain to directly connect First Street and the F Street Metropolitan Branch Trail that avoids conflicts with vehicle traffic.</li> </ul>	Project - Pedestrian/Bicycle	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #23 provide for the consideration of improvements on the east side of WUS, between Columbus Circle and F Street NE.



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Comment ID	Commenter	Item #	Comment	Topic	Response
	CTC	6	Provide Secure, Longer-Term Bicycle Parking: The inclusion of secure, accessible bike parking within the station design will encourage more people to consider biking to Union Station. With the planned connections to the bicycle network, bicycling to an intercity train or bus will be convenient, but passengers will need a dependable, secure facility to leave their bicycle behind without concerns about theft. A secure bicycle parking facility should have controlled access, continuous monitoring by staff and video, and be accessible with a step-free, roll-in, access point from either First or Second Street. Additionally, an area should be designated for bicycle assembly/disassembly, including with tools (such as a fix-it stand) to support tourism by bicycle and train.	Project - Pedestrian/Bicycle	As noted in Section F.8, <i>Pedestrian and Bicycle Access</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , of the FEIS, bicycle storage facilities would be designed in accordance with DDOT's Bike Parking Guidance. The layout of the facilities and other specifics will be addressed during the design phase of the Project.
FC2_0627	Laura Miller Brooks (Federal City Council)	1	The Federal City Council applauds the work of the FRA, USRC, and Amtrak in revising the project design to address the concerns raised in 2020, as well as their commitment to public input. We are confident that the end result will be a project that benefits our communities and the nation as a whole, and now is the time to finish the environmental review process swiftly and with this Supplemental Draft EIS vision, finish the environmental review process by January 2024.	Project - General	Noted.
FC2_0705	Federal City Council (FC2)	1	The revised SDEIS Preferred Alternative includes major improvements and the FC2 supports the FRA including in the Final EIS (FEIS): Right-sized parking located below-grade, first-class intercity and charter bus facilities, modernized and efficient PUDO (Pick-up and Drop-Off), improved bicycle facilities, and fully-integrated urban design.	Project - General	Noted.
	FC2	2	Unify the federal and public air rights to ensure full delivery of public benefits: The SDEIS Preferred Alternative F presents numerous benefits that depend on a cohesive, unified air rights development. In particular, the central plaza connecting H Street to the new Train Hall is an essential urban place-making feature of the Preferred Alternative. FRA falls short in committing to unified control and ownership of all air rights (public and private) – this lack of commitment puts the presence of the entire air rights development at-risk. One primary owner/developer must plan and propose a cohesive, organized and viable air rights development plan that captures the economic development potential of one of the most important transit-oriented development sites in the mid-Atlantic. An SEP without the economic development and civic space contributions of a viable, unified air rights development is unacceptable. We ask that the FRA make a clear and affirmative commitment to the unified ownership and control of the air rights development parcels to ensure that the benefits and potential for the SEP are fully realized.	Air rights development	FRA developed the Preferred Alternative in coordination with Akridge and looks forward to continued collaboration with Akridge to advance the Station Expansion Project and Akridge's development project. FRA supports the vision of commercial air rights development and open space that creates a vibrant neighborhood north of Washington Union Station. The Preferred Alternative is consistent with this vision. The specific mechanism of property transaction for the potential transfer and development of Federal air rights, which could include a long-term lease or an exchange of property rights, will be determined as the project advances.
	FC2	3	We also believe that the Final EIS should revise the No-Action Alternative. The current No-Action Alternative involves the development of private air rights but fails to consider the irreversible negative consequences of pursuing this development independently from the SEP. If the air rights development proceeds without the SEP, it will eliminate any opportunity to address the existing accessibility and safety concerns of the station or adequately meet the future rail capacity requirements. This missed opportunity is likely to have long-lasting effects, possibly rendering these issues unsolvable indefinitely.	No-Action Alternative	<p>The No-Action Alternative impact analysis as presented in the 2020 DEIS and the FEIS does acknowledge that this alternative would have major adverse impacts on commuter and intercity railroads and intercity, tour/charter, and sightseeing buses. The 2020 DEIS and the FEIS also recognize that the No-Action Alternative would have adverse impacts on safety and security. Because the No-Action Alternative would not preclude some improvements to accessibility under separate projects, the 2020 DEIS and the FEIS find that there would be moderate beneficial direct operational impacts on accessibility, though improvement would be less than in the Preferred Alternative. These findings are consistent with the comment.</p> <p>The Station Expansion Project is a separate action from the development of the private air rights, with independent value and utility. The Station Expansion Project would meet its Purpose and Need, and provide the associated public benefits associated with it, regardless of the development of the private air rights. Conversely, the private air rights could be developed without the Project. FRA has no authority of the private air rights development project or its impacts.</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
	FC2	4	Clarify and solidify USRC's role as Project Sponsor for effective delivery of the SEP: We applaud the FRA for designating USRC as the Project Sponsor of the SEP in the SDEIS. An empowered and well-resourced USRC will ensure there is a single point of authority for taking the SEP through the design and construction of this mega-project. However, to ensure USRC's success in this role, we encourage the FRA to define the Project Area authority that USRC will oversee for the design and construction and to identify the authorities and resources that the FRA and Amtrak will provide to support the effective delivery of the SEP. We believe that the FRA must take these steps to ensure that USRC has the necessary staffing and financial resources to implement the project expeditiously.	Project sponsor	FRA identified USRC as the Project Sponsor in Spring 2023 and the process of mobilizing resources has begun. An early step is the development of a Union Station Expansion Project Delivery and Governance Study by IDC, in partnership with the District of Columbia Government. IDC worked with an Advisory Group composed of representatives from USRC, Amtrak, the United States Department of Transportation, FRA, DCOP, and DDOT to guide the study ( <a href="https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf">https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf</a> , last accessed January 12, 2024). FRA is pleased to have participated in this study that can bring regional stakeholders together to support the expansion of Union Station. FRA will continue to support USRC in its role as Project Sponsor through Project development and implementation within the limits of FRA's responsibilities and authority.  The Project Area is shown in Section 1.3, <i>Project Area</i> , of the FEIS.
	FC2	5	The SDEIS highlights the need for regional investment in the SEP as a result of the reduced parking revenue to sustain USRC's operations. However, FC2 believes that regardless of the implementation of the SEP, USRC is already unable to rely on parking revenues to sustain operations of the historic station. The FC2 encourages the FRA to broaden the rationale for USRC to identify new revenue sources, and the need for regional investment in the SEP, to be for reasons beyond the loss of parking revenue, including the project benefits delivered by expanded rail and bus service facilitated by the SEP.	Station revenue	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #43 specifies that USRC will identify new funding sources sufficient, at a minimum, to ensure the continued preservation and maintenance of the historic Station building.
GWP_0706	Greater Washington Partnership (GWP)	1	On behalf of the Greater Washington Partnership (the Partnership), I am writing to express my support for the Supplemental Draft Environmental Impact Statement, Draft Programmatic Agreement, and Draft Section 4(f) Evaluation (the SDEIS) for the Union Station Expansion Project. The Partnership commends the Federal Railroad Administration (FRA) for its commitment to addressing stakeholder concerns about the 2020 Draft EIS and for the agency's transparency throughout the process.	EIS- General	Noted.
	GWP	2	The Partnership applauds FRA's inclusion of right-sized parking facilities, improved bike and pedestrian access, a modernized and more efficient pick-up and drop-off area, world-class intercity bus facilities, and fully integrated urban design in the SDEIS to create a modern, urban transportation hub that will better connect our region, from Baltimore to Richmond, and drive economic competitiveness. The Partnership also encourages continued consideration on how to best incorporate through running for all MARC and VRE services to create a seamless regional rail system from Maryland through to Virginia.	Project-General	Noted.
NoMa BID_0706	NoMa Business Improvement District (BID)	1	The revised SDEIS Preferred Alternative includes major improvements we support the FRA including in the Final EIS: Right-sized parking located below-grade, modernized and efficient PUDO (Pick-up and Drop-Off), bus facility better integrated with minimized impacts to the street network, improved bicycle facilities, and fully-integrated urban design.	Preferred Alternative	Noted
	NoMA BID	2	Unify the federal and public air rights to ensure full delivery of public benefits: The SDEIS Preferred Alternative F presents numerous benefits that depend on a cohesive, unified air rights development. In particular, the central plaza connecting H Street to the new Train Hall is an essential urban place-making feature of the Preferred Alternative. FRA falls short in committing to unified control and ownership of all air rights (public and private) – this lack of commitment puts the presence of the entire air rights development at-risk. One primary owner/developer must plan and propose a cohesive, organized and viable air rights development plan that captures the economic development potential of one of the most important transit-oriented development sites in the mid-Atlantic. An SEP without the economic development and civic space contributions of a viable, unified air rights development is unacceptable. We ask that the FRA make a clear and affirmative commitment to the unified ownership and control of the air rights development parcels to ensure that the benefits and potential for the SEP are fully realized.	Air rights development	FRA developed the Preferred Alternative in coordination with Akridge and looks forward to continued collaboration with Akridge to advance the Station Expansion Project and Akridge's development project. FRA supports the vision of commercial air rights development and open space that creates a vibrant neighborhood north of Washington Union Station. The Preferred Alternative is consistent with this vision. The specific mechanism of property transaction for the potential transfer and development of Federal air rights, which could include a long-term lease or an exchange of property rights, will be determined as the project advances.

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Comment ID	Commenter	Item #	Comment	Topic	Response
	NoMA BID	3	We also believe that the Final EIS should revise the No-Action Alternative. The current No-Action Alternative involves the development of private air rights but fails to consider the irreversible negative consequences of pursuing this development independently from the SEP. If the air rights development proceeds without the SEP, it will eliminate any opportunity to address the existing accessibility and safety concerns of the station or adequately meet the future rail capacity requirements. This missed opportunity is likely to have long-lasting effects, possibly rendering these issues unsolvable indefinitely.	No-Action Alternative	The No-Action Alternative impact analysis as presented in the 2020 DEIS acknowledged that this alternative would have major adverse impacts on commuter and intercity railroads and intercity, tour/charter, and sightseeing buses. The 2020 DEIS also recognized that the No-Action Alternative would have adverse impacts on safety and security. Because the No-Action Alternative would not preclude some improvements to accessibility under separate and independent projects, the 2020 DEIS and the FEIS found that there would be moderate beneficial direct operational impacts on accessibility, though improvement would be less than in the Action Alternatives. These findings are consistent with the comment.
	NoMA BID	4	Clarify and solidify USRC's role as Project Sponsor for effective delivery of the SEP: We applaud the FRA for designating USRC as the Project Sponsor of the SEP in the SDEIS. An empowered and well-resourced USRC will ensure there is a single point of authority for taking the SEP through the design and construction of this mega-project. However, to ensure USRC's success in this role, we encourage the FRA to define the Project Area authority that USRC will oversee for the design and construction and to identify the authorities and resources that the FRA and Amtrak will provide to support the effective delivery of the SEP. We believe that the FRA must take these steps to ensure that USRC has the necessary staffing and financial resources to implement the project expeditiously.	Project sponsor	The Project Area is shown in Section 1.3, <i>Project Area</i> , of the FEIS. FRA identified USRC as the Project Sponsor in Spring 2023 and the process of obtaining support and mobilizing resources has begun. An early step is the development of a Union Station Expansion Project Delivery and Governance Study by IDC, in partnership with the District of Columbia Government. IDC worked with an Advisory Group composed of representatives from USRC, Amtrak, the United States Department of Transportation, FRA, DCOP, and DDOT to identify delivery, financing, and governance mechanisms needed to realize the Project (see <a href="https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf">https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf</a> , last accessed January 12, 2024). FRA is pleased to have participated in this study that can bring regional stakeholders together to support the expansion of Union Station. FRA will continue to support USRC in its role as Project Sponsor through Project development and implementation within the limits of FRA's responsibilities and authority.
	NoMA BID	5	The SDEIS highlights the need for regional investment in the SEP as a result of the reduced parking revenue to sustain USRC's operations. However, FC2 believes that regardless of the implementation of the SEP, USRC is already unable to rely on parking revenues to sustain operations of the historic station. The FC2 encourages the FRA to broaden the rationale for USRC to identify new revenue sources, and the need for regional investment in the SEP, to be for reasons beyond the loss of parking revenue, including the project benefits delivered by expanded rail and bus service facilitated by the SEP.	Station revenue	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #43, was updated to read as follows:  USRC to identify new funding source sufficient, at a minimum, to ensure the continued preservation and maintenance of the historic Station building.
NTHP_0706	National Trust for Historic Preservation (NTHP)	1	we would like to commend the FRA for the revisions that have been made to the plans for the proposed project since 2020, especially the modifications to the plans for parking and traffic circulation. The FRA has made significant changes to the plans that are directly responsive to the comments from the public and the other agencies involved in the review process.	Project-General	Noted.
	NTHP	2	Traffic Impacts on the Capital Hill Historic District: The SDEIS acknowledges that "Increased traffic volumes in the Preferred Alternative would result in a minor adverse direct operational impact on the Capitol Hill Historic District" (SDEIS at p. 5-96). But the SDEIS goes on to state that the traffic impact on the historic district will be negligible, for two primary reasons. One is the argument that the historic district is primarily significant for its architecture, and traffic doesn't adversely impact the architecture. Second is the argument that traffic is already terrible within the Capitol Hill Historic District. Id. at p. 5-97. We disagree with this rationale and these conclusions by the FRA. Future traffic impacts are by their nature difficult to predict. In our view, the appropriate response would be to develop a detailed monitoring protocol, and if construction traffic (or other traffic) reaches certain levels, then restrictions would be imposed that would help to reduce traffic through the historic district. In our view, the Section 106 PA would provide the ideal mechanism to develop and implement a binding monitoring commitment of this type. We urge the FRA to follow up and work with the consulting parties, including the Capitol Hill Restoration Society, to develop this as a binding mitigation measure (rather than merely a Whereas Clause), as discussed below.	Traffic impacts	The traffic impacts of the Preferred alternative are analyzed in the SDEIS and FEIS as impacts on the transportation system in the context of NEPA. The FEIS identifies major impacts and multiple measures to avoid, minimize, and mitigate these impacts (Table 7-1 of the FEIS/Table 13-2 of the ROD, Items 28a through 28i).  In the context of Section 106, FRA considered whether these traffic impacts would cause an adverse effect on the CHHD under Section 106's criteria of adverse effect (36 CFR § 800.5). FRA determined the project has no adverse effect to the CHHD under Section 106's criteria of adverse effect. FRA provided a determination of effect letter to all consulting parties on March 10, 2023. No further comments on the effect were received within 30 days from March 10, per 36 CFR § 800.5.  Measures to minimize and mitigate traffic impacts identified in the FEIS/ROD under NEPA (Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #12 and #28a) were incorporated in the Section 106 PA as adverse effect avoidance measures.

SDEIS Comments: Organizations

Comment ID	Commenter	Item #	Comment	Topic	Response
	NTHP	3	Importance of a Unified Plan for Air Rights Development: We share the concerns raised by David Tuchmann on behalf of Akridge during the consultation meeting on June 29, regarding the potential segmentation of the air rights development. The air rights development has a number of important benefits that are crucial to the economic and architectural success of the redevelopment project, but it also has the potential for adverse effects if not carefully planned and designed in a cohesive and unified manner that is compatible with the historic character of the surrounding area. Segmentation of the air rights development would increase the likelihood of adverse effects on historic properties, and would exponentially increase the risk that the benefits would not be achieved in the first place.	Air rights development	<p>As FRA explained at multiple consulting party meetings and in the DEIS and SDEIS, the Project is a separate action from the development of the private air rights, with independent value and utility. The Project would meet its Purpose and Need, and provide the associated public benefits associated with it, regardless of the development of the private air rights. Conversely, the private air rights could be developed without the Project. FRA has no authority of the private air rights development project or its impacts.</p> <p>FRA developed the Preferred Alternative in coordination with Akridge and looks forward to continued collaboration with Akridge to advance the Station Expansion Project and Akridge's development project. FRA supports the vision of commercial air rights development and open space that creates a vibrant neighborhood north of Washington Union Station. The Preferred Alternative is consistent with this vision. The specific mechanism of property transaction for the potential transfer and development of Federal air rights, which could include a long-term lease or an exchange of property rights, will be determined as the project advances.</p>
	NTHP	4	Avoid Simultaneous Record of Decision and Final EIS: The SDEIS states that the FRA intends to issue the Final EIS and the Record of Decision (ROD) simultaneously, rather than offering the public the opportunity to comment on the Final EIS, citing the FAST Act <sup>1</sup> as the basis for this proposed exclusion of public comment. (SDEIS, at xxi n.5.) <sup>2</sup> Given the magnitude and complexity of the redevelopment project, and the high level of interest by the public, we strongly recommend that the FRA defer the ROD by 45 days in order to receive and respond to public comments on the Final EIS. It has now been more than seven and a half years since the FRA first issued its Notice of Intent (NOI) to prepare an EIS for this project. 80 Fed. Reg. 68,380 (Nov. 4, 2015). The FAST Act had not even been enacted into law at the time of the NOI for this project. During the years that followed, public comments have helped to substantially shape and modify the plans for this project, in ways that have advanced its transportation goals while reducing its adverse effects. In the context of this timeline, an additional 30-45 days is minimal, and the FRA's attempt to foreclose any further public comment after July 6, 2023 is unreasonable. Not only was the FAST Act not an existing law at the time of the NOI in this case, but in our view, the circumstances under which the FAST Act calls for a "single document" combining the Final EIS and the ROD are not applicable here. The FAST Act states: <i>To the maximum extent practicable, the lead agency shall expeditiously develop a single document that consists of a final environmental impact statement and a record of decision, unless—(1) the final environmental impact statement makes substantial changes to the proposed action that are relevant to environmental or safety concerns; or (2) there is a significant new circumstance or information relevant to environmental concerns that bears on the proposed action or the impacts of the proposed action.</i> 49 U.S.C. § 304a(b). The ultimate resolution of many issues relevant to the impacts of the project is being postponed until after the Final EIS has been issued. These postponed issues regarding environmental concerns include, for example, the design of the project, the design and development plans for the air rights, the impacts of construction noise and vibration, and the monitoring and potential mitigation of traffic impacts, to name just a few. The comments submitted by the Committee of 100 on the Federal City also identify a number of additional unresolved issues ranging from outdated and unreliable projections of ridership to emissions and air quality impacts. In our view, all of these postponed and unresolved issues constitute "significant new . . . information relevant to environmental concerns that bears on the proposed action or the impacts of the proposed action." <i>Id.</i> Accordingly, even the FAST Act does not mandate a combined FEIS and ROD under these circumstances.	FEIS process	<p>FRA publicized its intent to issue a combined FEIS/ROD Pursuant to the Fixing America's Surface Transportation Act of 2015 (FAST Act) in the 2020 DEIS. Since then, this approach has been codified in 23 United States Code § 139 (n)(2).</p> <p>Relative to the SDEIS, the FEIS does not make substantial changes to the Project that are relevant to environmental or safety concerns; and there have been no significant new circumstance or information relevant to environmental concerns that bear on the proposed action or the impacts of the Project.</p> <p>Refer to the responses to the Committee of 100's comments below (Comment C100_0706) regarding the rail planning and air quality analysis. In particular, the rail planning assumptions informing the Project's track and platform plan align with the plans advanced in the DC to Richmond Southeast High Speed Rail project, Long Bridge Project, and Transforming Rail in Virginia.</p> <p>FRA notes that Amtrak developed the rail program documented in Appendix B of the DEIS and that both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item #3 and VRE_0706, Item #1).</p> <p>The commenter is correct that the resolution of many issues is being postponed until the post-NEPA phases of the Project. This is because it requires a more advanced development of Project engineering &amp; design and construction planning than has been achieved to date and is necessary for NEPA review. The steps to be taken and the measures to be implemented to avoid, minimize, or mitigate impacts are specified in Table 7-1 of the FEIS/Table 13-2 of the ROD. Such measures are enforceable commitments that will be implemented by USRC.</p>
WABA_0706	Washington Area Bicyclist Association (WABA)	1	On behalf of the Washington Area Bicyclist Association (WABA) and our 6,000 members in the Washington Region, I am pleased to write with enthusiastic support for Preferred Alternative F for the Washington Union Station Expansion Project as outlined in the Supplemental Draft Environmental Impact Statement.	Preferred Alternative	Noted.

SDEIS Comments: Organizations

Comment ID	Commenter	Item #	Comment	Topic	Response
	WABA	2	<p>Must Provide Safe Accommodations for First St Cycletrack and Met Branch Trail: Chapter 5.13.3 (p. 5-104) details construction impacts to the First Street NE cycle track and the Met Branch Trail on Second Street, proposing to close facilities for a combined 5+ years during Phases 1 and 4. The DEIS notes that only a small portion of the eight-mile Metropolitan Branch Trail will be impacted. Yet, like removing a 1-foot section of a mile-long pipe, dismantling one block in a regional multi-use trail is extremely disruptive to the thousands of daily users who rely on the trail for a safe, direct route. Any proposed closure or detour of the Met Branch Trail or First Street Cycletrack must provide a safe accommodation for trail users that offers a comparable level of safety, as required by DC law and DDOT regulations. While we understand that construction necessarily must occur to modify these facilities, closure and detour to an alternate street are a course of absolute last resort. We welcome a collaborative discussion on options for safe accommodations on First St NE. Safety of vulnerable road users around this construction site must be the first priority throughout this construction project.</p>	Construction - Pedestrian/ Bicycle	<p>As explained in Section 5.5.3.3, <i>Construction Impacts, Bicycles</i>, of the FEIS, the First Street cycle track and the Metropolitan Branch Trail would not be closed at the same time and closures are anticipated to be needed for only a portion of each phase (Phase 1 for the trail and Phase 4 for the cycle track.)</p> <p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #12, 17b, 24, 42c, 42d, and 51c were updated to specify that construction-related closures will be conducted in compliance with the District's Safe Accommodations law.</p>
	WABA	3	<p>Mitigate Bicycle Conflicts at the First St. Loading Dock: Under the existing design, the First Street two-way protected bike lane, a high-volume branch of the regional Metropolitan Branch Trail, runs directly in front of the First Street loading dock. Delivery trucks persistently park in or blocking the protected bike lane and sidewalk rather than use the loading dock, interrupting the otherwise safe, low-stress bicycle route for thousands of daily trail users. This forces bicyclists to dismount, climb the curb, and enter the travel lane to continue on. This constant conflict puts the most vulnerable road users at risk, and persists as a daily structural reality of commercial operations under the current design. It should be mitigated as part of the station redesign. As a mitigation, the protected bike lane and loading dock should be redesigned to eliminate this conflict, including widening the bike lane and adding permanent, substantial mid-lane barriers to prevent entry by vehicles. As other loading docks are brought online, other loading docks should be prioritized for daily activities.</p>	Pedestrian/ Bicycle - Mitigation	<p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #23 provides for the consideration during Project design of measures to minimize or mitigate potential conflicts between users of the First Street cycle track, pedestrians, and vehicles between Massachusetts Avenue and M Street NE, including at the First Street Loading Dock.</p>
	WABA	4	<p>Provide Secure, Longer term Bicycle Parking: We appreciate the inclusion of multiple locations for short term bicycle parking within the station design. With planned connections to the bicycle network, bicycling to an intercity train or bus will be convenient, but passengers need a dependable, secure facility to leave their bicycle behind without concerns about theft. A secure bicycle parking facility should have controlled access, continuous monitoring by staff and video, and be accessible with a step-free, roll-in, access point from either First or Second Street. Additionally, an area should be designated for bicycle assembly/disassembly, including tools (e.g. a fix-it stand) to support tourism by bicycle and train.</p>	Project - Pedestrian/ Bicycle	<p>As noted in Section F.8, <i>Pedestrian and Bicycle Access</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS, bicycle storage facilities would be designed in accordance with DDOT's Bike Parking Guidance. The layout of the facilities and other specifics will be addressed during the design phase of the Project.</p>
	WABA	5	<p>Upgrade the First St. Protected Bike Lane: The two-way protected bike lane on First Street NE was first installed in 2013 as an extension to the Metropolitan Branch Trail. While appropriate for the time, it was largely retrofitted into an existing street design and does not meet modern standards for bike lane width or buffer width. The current design will not accommodate expected future user volumes and should be upgraded. The 2-way protected bike lane should be widened to 12' (6' each way), at least a 3' buffer, and a permanent, durable barrier from traffic. Eliminating the existing west side on-street parking provides the needed width.</p> <p>The proposed First St. NE garage entry/exit will cross the protected bike lane, creating four new conflict points from turns in and out of the garage – a significant negative impact to safety. To mitigate this conflict, minimize the garage entry width to 22' and use no greater than 15' curb radius to encourage slow turns in/out of the garage and to maximize visibility. At garage entrances, repurpose some of the proposed west side pickup-drop-off zone to bend the sidewalk and bike lane out away from the wall and garage entrance to increase visibility of approaching bicyclists and pedestrians.</p>	Project - Pedestrian/ Bicycle	<p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #23 provides for the consideration during Project design of measures to minimize or mitigate potential conflicts between users of the First Street cycle track, pedestrians, and vehicles between Massachusetts Avenue and M Street NE, including at the First Street Loading Dock.</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
	WABA	6	<p>Create Seamless Bicycle Circulation and Connections at Columbus Circle: The SDEIS notes that the front of Union Station will remain the main access point for pedestrians and bicyclists, yet, the proposed roadway reconfiguration is entirely oriented towards automobile and pedestrian circulation, not bicycles. Moving ahead with this design would be a missed opportunity for bicycle access to the station and leave a permanent hole in DC's bicycle network. To access or traverse this space, people who bike need safe, protected lanes, dedicated for bicycles. To mitigate this negative impact:</p> <ul style="list-style-type: none"> <li>● Collaborate with DDOT to add a curb-separated protected bike lane on Massachusetts Ave between North Capitol St to 2nd St NE,</li> <li>● Collaborate with DDOT to add a direct, intuitive, safe bike connection from the 1st St. NE protected bike lane to planned protected bike lanes on E St. NE and Louisiana Ave, with elements of a protected intersections, and</li> <li>● Designate a 2-way east-west bicycle connection north of the Union Station fountain to directly connect First Street and the F Street Met Branch Trail that avoids conflicts with vehicle traffic.</li> </ul>	Project - Pedestrian/ Bicycle	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #23 provides for the consideration of improvements on the east side of WUS, between Columbus Circle and F Street NE.
	WABA	7	<p>Upgrade the Metropolitan Branch Trail on the East Side: The regional Metropolitan Branch Trail runs along both First Street, as an in-street protected bike lane, and on Second Street as a sidewalk-level multi-use trail. The trail is not yet fully built out and does not offer seamless connections to the rest of the network. Between G Street NE and K Street NE, the Second street trail is merely a signed route on the sidewalk. Under alternative F, this area is designated as a pickup, drop-off area on narrow sidewalks, but does not appear to note the multi-use trail. The trail should be redesigned, widened, and rebuilt to modern multi-use trail standards from G to K Streets NE with appropriate design to reduce conflicts in front of the Second Street concourse entrance. At Columbus Circle, the Met Branch trail stops just short of making useful connections at the bottom of the ramp at F Street near the existing Capital Bikeshare station. This sidewalk space should be redesigned to extend the multi-use trail up the hill to connect to Massachusetts Ave.</p>	Project - Pedestrian/ Bicycle	<p>Improvements to the Metropolitan Branch Trail are outside the scope of the Station Expansion Project.</p> <p>Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #23 provides for the consideration during Project design of measures to minimize or mitigate potential conflicts between users of the First Street cycle track, pedestrians, and vehicles between Massachusetts Avenue and M Street NE. Item #23 also provides for the consideration of improvements on the east side of WUS, between Columbus Circle and F Street NE.</p>
C100_0706	Committee of 100 (C100)	1	<p>The Committee of 100 and others submitted comments to the FRA critical of how rail operations were treated in the 2020 DEIS.2 The FRA did not respond to those comments and now, over three years later, the FRA proposes to not respond to those comments until after this proceeding is concluded and both the Final Environmental Impact Statement (FEIS) and the Record of Decision (ROD) are issued. Under such procedures, neither the C100 nor others will have an opportunity to respond to how their comments concerning the 2020 DEIS or this SDEIS will be treated in the Final Environmental Impact Statement. The Committee of 100 strongly recommends that the Final Environmental Impact Statement needs to comprehensively address these concerns We respectfully request that the FRA provide a period of 60 days after issue of the FEIS to allow comments on the FEIS and then allow sufficient time for the FRA to fully respond to those comments in its Record of Decision (ROD) so that the FRA may validly certify, as required by Council on Environmental Quality's National Environmental Policy Act regulations, in the ROD that it considered all of the alternatives, information, and analyses, and objections submitted by public commenters for consideration by the lead and cooperating agencies in developing the FEIS.</p>	FEIS process	<p>NEPA regulations and procedures direct that responses to comments on a DEIS be provided in the FEIS/ROD, including when a SDEIS is prepared. Consistent with 40 CFR § 1500.3(b)(4), FRA has considered all of the alternatives, information, analyses, and objections submitted by public commenters, including States, Tribal, and local governments, organizations, individuals, and other stakeholders in developing the EIS for the Station Expansion Project. NEPA regulations do not require further public review of, and comments on, the FEIS.</p> <p>FRA publicized its intent to issue a combined FEIS/ROD pursuant to the Fixing America's Surface Transportation Act of 2015 (FAST Act) in the 2020 DEIS. Since then, this approach has been codified in 23 United States Code § 139 (n)(2). Relative to the SDEIS, the FEIS does not make substantial changes to the proposed action that are relevant to environmental or safety concerns; and there have been no significant new circumstance or information relevant to environmental concerns that bear on the proposed action or the impacts of the proposed action.</p>

SDEIS Comments: Organizations

Comment ID	Commenter	Item #	Comment	Topic	Response
	C100	2	<p>Data on which DEIS and thus the SDEIS are Based are Significantly Outdated: The DEIS references the source documents it relied on in several sections. But those source documents were prepared as early as 2013 and last accessed by the FRA in 2017 and not reviewed by FRA in preparing the SDEIS. The DEIS' conclusions and, thus, the SDEIS' conclusions are therefore outdated. The DEIS ignores three different plans for the rail system south of Union Station that will affect Union Station operations in the years encompassed by this EIS:</p> <ol style="list-style-type: none"> <li>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) will build, own and operate the new two-track Long Bridge river-crossing as well as substantial CSX trackage in Virginia.</li> <li>2. The Long Bridge FEIS plans to add a fourth track between the Long Bridge and 12th Street SW (FEIS issued September 2, 2020).</li> <li>3. The L'Enfant Station Expansion Plan will add a fourth track between 12th Street and the entrance to the First Street Tunnel. It is projected to be completed in 2029.</li> </ol> <p>These three plans will result in the long-sought separation of passenger and freight rail operation south of Union Station. This momentous change in rail operations 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 SDEIS. In fact, the 2020 DEIS not only ignores that change in operation but states the contrary – that passenger and commuter rail operations south of Union Station will continue to be controlled by CSX (Appendix B, page 23): <i>The 2040 simulation retains operating variability for trains arriving from the south, given assumed continued ownership and dispatch by freight railroads in the future.</i> [emphasis added]. This description of rail operations 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 (Long Bridge FEIS, page 1-7) and the VRE L'Enfant Station expansion by 2029. All three projects will be in service during the 14 years required for the Union Station expansion and must be taken into account in plans for the Union Station Expansion.</p>	Project - Rail planning	<p>The rail planning assumptions informing the Project's track and platform plan align with the plans advanced in the DC to Richmond Southeast High Speed Rail project, Long Bridge Project, and Transforming Rail in Virginia (which the referenced agreement with CSX and the VRE L'Enfant Plaza Station expansion are components of). These plans are still current. In this respect, FRA notes that Amtrak developed the rail program documented in Appendix B of the DEIS and that both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item #3 and VRE_0706, Item #1).</p> <p>FRA also notes that CSX will continue to control dispatching in the future. The commenter appears to have misinterpreted this statement and read it as ignoring the changes associated with Transforming Rail in Virginia.</p> <p>With regard to operations during the construction of the Project, in response to comments from VRE and MTA, Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #13a was updated to specify that Amtrak will coordinate with MARC, VRE, and USRC to (1) refine construction-period operating plans as appropriate (including further modeling if needed) to ensure that construction-period travel demand is reasonably accommodated and (2) identify feasible solutions to reasonably accommodate operators' layover, storage, and inspection needs during the construction period. Outcomes will be incorporated into the Integrated Construction Transportation Management Plan.</p>
	C100	3	<p>Passenger Rail Assumptions Are Understated: A foundational element of the Union Station expansion must be anticipating and responding to predicted growth in passenger and commuter rail traffic over the next 17 years and beyond. Accurately forecasting that increase is critical. The estimates of the number of trains found on pages 24-25, Appendix A3, [<i>Final Concept Development and Evaluation Report</i>], 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 documented data. Such appears not the case in the 2020 DEIS and by incorporation, the SDEIS. (1) Some are thinly sourced, if at all. (2) Those estimates provided are derived from varying projection dates—Amtrak's numbers are derived from <i>Operating Plans for 2030+</i> (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, [<i>Terminal Infrastructure Report</i>] are apparently based on the estimates presented in Appendix A3. However, the 2020 DEIS does not explain how they were determined. 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. 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.</p>	Project - Rail planning	<p>The numbers in Appendix A3 and those in Appendix B of the DEIS are not derived from each other. Appendix B shows updated numbers relative to those in Appendix A3 and these numbers are the basis for Project rail planning and the train volumes presented in the DEIS, SDEIS, and FEIS. The commenter is not correct regarding Table 7-1 of Appendix B. That table, in addition to numbers from the 2030+ operating plan, shows 2040 numbers based on NEC Future for Amtrak, MARC, and VRE. The NEC Future volumes are those shown in the SDEIS and FEIS, for instance in Table 5-11 of Section 5.5.2.1, <i>Direct Operational Impacts, Commuter and Intercity Railroads</i>, of the FEIS and, in more detail, in Tables 5-10, 5-15, and 5-18 of Appendix C3S of the SDEIS.</p> <p>FRA also notes that Amtrak developed the rail program documented in Appendix B of the DEIS and that both VRE and MTA commented on the SDEIS and stated that the rail program meets their future needs (see MTA_0630, Item 3 and VRE_0706, Item 1).</p>

SDEIS Comments: Organizations

Comment ID	Commenter	Item #	Comment	Topic	Response
	C100	4	Separation of Passenger and Freight Rail Is Not Acknowledged: 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 DC rail operations south of Union Stations, and like DC's 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, one entering and one exiting the rail stations. The contrast is clear: DC's First Street tunnels now carry a total of about 6 trains per peak hour, under the control and scheduling of CSX, 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. This passenger-only operation south of Union Station would allow an eight-fold increase in passenger and commuter rail traffic south of Union Station. It is essential to account for this capacity increase in planning the expansion of Union Station to accommodate trains arriving from and serving the south.	Project - Rail planning	The rail planning assumptions informing the Project's track and platform plan align with the plans advanced in the DC to Richmond Southeast High Speed Rail project, Long Bridge Project, and Transforming Rail in Virginia. FRA notes that Amtrak developed the rail program documented in Appendix B of the DEIS and that both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item 3 and VRE_0706, Item 1).
	C100	5	The Assumed Trackage is Inadequate for Projected Growth: Because of the significant under-projections based on outdated assumptions and information, the DEIS Preferred Alternative assumes too few tracks – a total of 19 revenue tracks. Union Station originally had a total of 33 revenue tracks. The DEIS' Preferred Alternative would provide only 19 revenue tracks. 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 are obstructed by 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. A key unaddressed issue in the plans, but must the platforms be as wide as 30 to 35 feet? Even Amtrak's Union Station Master Plan issued eleven years ago called for more tracks -- 22 -- and estimated that by 2030 those 22 tracks would be at capacity. Amtrak's Union Station Master Plan was issued in 2012. But by now, eleven 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. The State of Virginia and VRE have recently acquired over 100 miles of CSX track, and will pay for, own and control the new Long Bridge Potomac River rail crossing, construct a new fourth track in SW and thru-run its trains through Union Station into Maryland. Likewise, MARC plans to run its trains into Virginia.	Project - Rail planning	<p>The rail planning assumptions informing the Project's track and platform plan align with the plans advanced in the DC to Richmond Southeast High Speed Rail project, Long Bridge Project, and Transforming Rail in Virginia. FRA notes that Amtrak developed the rail program documented in Appendix B of the DEIS and that both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item 3 and VRE_0706, Item 1).</p> <p>The new tracks and platforms would accommodate increased service because they would support simultaneous boarding of trains; quicker turnaround times for trains; and potential double berthing.</p> <p>Platform width is driven by the following operational goals and physical constraints: a) meeting current standards of accessibility, including ADA standards; b) providing sufficient space for increased circulation to allow larger trains to turn around more quickly, thereby increasing the capacity of the rail terminal and c) physical constraints associated with infrastructure above and below the rail terminal. Final platform width would be determined during the Project's engineering and design phase.</p> <p>The 2012 Master Plan does not reflect current planning assumptions and does not provide a valid point of comparison with the Project.</p>



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Comment ID	Commenter	Item #	Comment	Topic	Response
	C100	6	<p>Thru-Running Commuter Trains are Not Given Priority: For a number of years, MARC and VRE discussed the benefits of thru-running VRE trains to Maryland and MARC trains to Virginia. The Metropolitan Washington Council of Governments, Transportation Planning Board (TPB) issued a 2020 report prepared by Foursquare,19 that run-through rail service would have a positive impact on the labor pool by expanding access both for businesses and employees 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. 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. The DEIS and the SDEIS pay little attention to the critical thru-running commuter trains issue 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.</p> <p>The DEIS assumes that only 8 of the MARC's 57 daily Penn Line trains will thru run to Virginia, and that no trains from MARC's Brunswick or Camden Lines will thru run. The reason for not including trains from the Brunswick and Camden Lines is apparently because the DEIS does not assume any modification of the Brunswick and Camden line tracks coming into Union Station. Only the Penn Line has direct access to the First Street Tunnel. The connecting thru-running tracks are practically inaccessible to MARC's Brunswick Line and to a lesser extent, the MARC Camden Line because of the current track configuration. For Brunswick and Camden Line trains to access the 1st Street Tunnel, trains must traverse the entirety of Union Station's "throat" from west to east over multiple interlockings.</p> <p>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. Reconfiguration not only could permit Brunswick and Camden trains to thru-run to Virginia, but also would allow VRE trains to thru-run to substantial parts of Maryland. Because the Camden and Brunswick lines are owned by CSX, catenaries are prohibited, and the MARC trains on those lines use diesel locomotives. VRE will likely not convert from diesel to electric locomotives for some time. Thus, in terms of thru-running, the Brunswick and Camden trains could thru-run to Virginia and VRE could thru-run to serve College Park, Silver Spring, Rockville, Frederick, and farther west.</p>	Project - Rail planning	<p>As is explained in Chapter 2, <i>Purpose and Need</i>, of the FEIS, supporting current and future long-term growth in rail service and operational needs is part of the Project's Purpose and Need. Accordingly, the Preferred Alternative would support future MARC and VRE operations, as planned for in their respective system plans. The project would enable MARC Penn Line run-through service which is the line with the most future run-through service demand.</p> <p>In their comments on the SDEIS (VRE_0706, Item #1), VRE noted that "No VRE through-running trains to Maryland are assumed in VRE's adopted System Plan. VRE is currently analyzing future service markets; those analyses assume, however, that VRE-served regional travel needs between northern Virginia and Maryland destinations along the MARC Penn, Camden and/or Brunswick Lines through calendar 2030 at a minimum can be met by more closely coordinating VRE and MARC service at WUS in tandem with expanded concourses and other WUS improvements assumed in the Preferred Alternative."</p> <p>FRA notes that Amtrak developed the rail program documented in Appendix B of the DEIS and that both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item #3 and VRE_0706, Item #1).</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
	C100	7	<p>Planned Passenger Rail South of Union Station is Not Accounted For: 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-foot platforms for future Acela HSR service (including future growth). 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-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 does take into account operational efficiencies and more frequent train service for passenger and commuter trains operating north, on the Northeast Corridor. 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 recognize those efficiencies for tracks south of Union Station.</p> <p>The Committee of 100 (as is likely the entire East Coast) is keenly interested in higher-speed, high-performance rail south of Union Station – not Acela high speed -- but higher speed than is now available south of Union Station. The C100 recognizes that Acela high speed is not possible south of Union Station in the foreseeable future, in large part because of the expense of electrification, the cost of new rolling stock, the need for curve and realignment improvements and other track improvements, the need to provide by-passes to avoid conflicts with freight operations, and other track upgrades. But with the recent actions of the state of Virginia and VRE to acquire over 100 miles of CSX tracks and build, own, and control a new Potomac River rail bridge, the track upgrades to accommodate higher-performance higher-speed rail will be practicable in the future and must be anticipated. And the higher speed can be achieved with the new Siemens ALC-42E dual powered locomotives that Amtrak will acquire for use on the NE Corridor (see subpart I) – they will provide the higher speed rolling stock. Thus, higher speed rail will be possible and likely south of Union Station in the future. The Committee of 100 is concerned that plans for the expansion of Union Station, and the SDEIS, fail to address how this higher-speed high-performance rail south of Union Station will be accommodated in the track and platform configurations within Union Station.</p>	Project - Rail planning	<p>The rail planning assumptions informing the Project's track and platform plan align with the plans advanced in the DC to Richmond Southeast High Speed Rail project, Long Bridge Project, and Transforming Rail in Virginia. These plans are still current. In this respect, FRA notes that Amtrak developed the rail program documented in Appendix B of the DEIS and that both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item #3 and VRE_0706, Item #1).</p> <p>FRA also notes that the referenced 2012 Master Plan does not reflect current planning assumptions and does not provide a valid point of comparison with the Project.</p>
	C100	8	How the No-Action emission levels were obtained is not explained.	Air quality	An evaluation of the air quality impacts of the No-Action Alternative was presented in Section 5.6, <i>Air Quality</i> , of the DEIS and is in Section 5.6.2, <i>Impacts of the No-Action Alternative</i> , of the FEIS. The assessment is based on No-Action operations at Union Station. The No-Action Alternative was not repeated in the SDEIS.
	C100	9	This incremental increase is combined with the estimated emissions that will occur during the 14 years of construction. In the case of NOx, this results in 97.9 tpy. Because this total is below the de minimis level of 100, the SDEIS concludes that the Preferred Alternative would not cause any violation of the NAAQS. Arithmetically this is correct, but it is the total of direct and indirect NOx emissions area caused by the Federal action that must be considered: for NOx this would be 65.8 tpy for the Preferred Alternative from Table 6.1 plus the 62.7 tpy for the Construction emissions from Table 6-4, amounting to 128.5 tpy. This would exceed the NAAQ threshold level of 100 tpy - the de minimis air quality threshold for NOx would be exceeded.	Air quality	The analysis presented in the SDEIS and FEIS is correct. The analysis is intended to determine the air emissions attributable to the Preferred Alternative. This is appropriately determined by subtracting total emissions in the No-Action Alternative from total emissions in the Preferred Alternative because the difference is what would be specifically caused by the Preferred Alternative. Total operational emissions were estimated to be 65.8 tons per year but only 32.5 tons per year are attributable to the Preferred Alternative (see Table 5-20 of the SDEIS). The <i>de minimis</i> threshold applies only to the emissions caused by the Project, not to total emissions. As shown in SDEIS Table 5-24, combined construction and operational annual emissions would remain below the <i>de minimis</i> .
	C100	10	Harmful Diesel Emission From Switching Operations are Ignored	Air quality	The air quality analysis takes into account all emissions associated with rail operations in the Project Area attributable to the Project, including emissions associated with switching. This is clarified in Section, 5.6.1, <i>Methodology, Mobile Source</i> , of the FEIS.
	C100	11	C100 concurs with the SDEIS Appendix Section 7.5.2.5's note that, "In this context, any net increase in CO2 emissions would be a major adverse impact." Accordingly, C100 supports the FRA's proposal that the USRC prepare a Life Cycle Assessment of the project's total GHG emissions and identify measures and strategies to reduce energy consumption and associated GHG as much as possible, using measures described in Section 8.7 and as appropriate, other such measures.	GHG emissions	Noted

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	C100	12	It should be remembered that, to build the Air rights development, a deck is needed above the rail tracks. Supporting the deck requires multiple support columns, the placement of which requires a defined configuration of rail tracks. In turn, the configuration of the new rail tracks requires the design and construction of the Union Station Expansion. In other words, unless there is a Union Station Expansion, there can be no Air Rights development.	Air rights development	The Station Expansion Project is a separate action from the development of the private air rights, with independent value and utility. The Project would meet its Purpose and Need, and provide the associated public benefits associated with it, regardless of the development of the air rights. Conversely, the private air rights could be developed without the Project.
	C100	13	Diesel Emissions Under the Proposed Deck are Not Accounted For. SUMMARY: comment is concerned with diesel exhaust from the decked train terminal into the air rights development and the neighborhood.	Air quality	As indicated in Appendix A5c, <i>Action Alternatives Refinement Report</i> , Appendix B: <i>Station Infrastructure Concept</i> , pp. 20 ff., approaches to the ventilation of the tracks were considered early in the planning process. They will be further addressed during the engineering and design of the process. As stated in Section 5.6.3.1, <i>Direct Operational Impacts</i> , of the FEIS, FRA anticipates that ventilation fans would be used to exhaust air from the tracks and platforms and the below-ground facility and maintain good ambient air quality in those areas. Eight fan plants would be installed on the roofs of the air rights buildings (two between G Street and G Place NE; two between G Place and H Street NE; two north of H Street NE; and two just south of K Street NE). Because the fan plants would be ventilating pollutants from mobile sources, their emissions are accounted for in the mesoscale analysis of indirect impacts. Because of their location on the roofs of buildings, direct impacts on ambient air quality (which specifically refers to the portion of the atmosphere to which the general public has access outside of buildings) would be negligible.  The EIS reflects early Project concepts. Ventilation systems will be fully designed during the engineering and design phase of the Project.
	C100	14	Inadequate Revenue for Union Station Operations is Not Recognized: SUMMARY: comment is concerned about revenue to support WUS operations during construction when parking is closed and states a plan is needed for how to provide an alternative to parking revenue for USRC to continue to operate and maintain Union Station during the 14-year period the expansion is underway. Since the USRC is designated the Project Manager for the 14-year expansion – will the payment to USRC for serving as Project Manager also include a payment for USRC’s management and operation of Union Station?	Station revenue	The SDEIS and FEIS recognize the adverse impacts on Station revenue from the reduction in parking capacity. FRA further notes that parking revenue would be totally unavailable only during Phase 4 of construction (approximately 4 years 3 months), as explained in Section 5.14.3.3, <i>Construction Impacts, Washington Union Station Revenue</i> , of the FEIS. . Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #43, commits USRC to seeking new funding sources sufficient to ensure, at a minimum, the continued preservation and maintenance of the historic Station building.  FRA identified USRC as the Project Sponsor in Spring 2023 and the process of obtaining support and mobilizing resources has begun. An early step is the development of a Union Station Expansion Project Delivery and Governance Study by IDC, in partnership with the District of Columbia Government. IDC worked with an Advisory Group composed of representatives from USRC, Amtrak, the United States Department of Transportation, FRA, DCOP, and DDOT to identify delivery, financing, and governance mechanisms needed to realize the Project (see <a href="https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf">https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf</a> , last accessed January 12, 2024).
	C100	15	Washington Metropolitan Area Transit Authority (WMATA) Metrorail: Metrorail ridership during peak hours is already significant, with platform crowding during peak periods. The analysis projects that by 2040 demand for Metrorail service will exceed capacity during both the AM and PM peaks, causing even more crowding. The new concourses will improve horizontal circulation, but vertical circulation could become a major problem. Mitigation measure No. 14, Table 7-1, proposes a new WMATA Station Access and Capacity Study to identify necessary improvements not developed by the Concourse Modernization Project. The Committee of 100 would encourage this study be done concurrently with the design for the Concourse Modernization Project to save time and money and to prevent problems in hampering vertical circulation created by the concourse modernization. The next mitigation item, No. 15, refers to USRC engaging with WMATA about the proposed new core line, referred to as “Blue-Orange-Silver.” Nothing is explained about this, but according to news reports, this new tunnel would bring Metro’s Blue, Orange, and Silver lines to service Union Station. If this project proves viable, it will take many years and several billion dollars to build. The potential alignment for this new tunnel will need to account for and avoid the deep pile foundations (at least 150 feet) required for the new station concourses.	Mitigation - Metrorail	Impacts to Metrorail are described in Section 5.5.3.1, <i>Direct Operational Impacts, Washington Metropolitan Area Transit Authority (WMATA) Metrorail</i> of the FEIS.  Table 7-1 of the FEIS/Table 13-2 of the ROD, Items 14a through 15b specify updated mitigation measures with respect to WMATA Metrorail, including coordination to maintain compatibility between the Project and a potential construction of a new Metrorail tunnel and station as an outcome of the Blue-Orange-Silver Capacity & Reliability Study.

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	C100	16	DC Streetcar: This section is confusing. Section 5.5.1.3 of the SDEIS states that the “Preferred Alternative would increase the passenger volumes <i>departing</i> from WUS by 361 in the westbound direction in the AM peak, and 44 in the PM peak.” But the Streetcar terminates at Union Station on the H Street Bridge just east of the existing parking garage. Is there a westbound <i>departure</i> demand to be met? The Streetcar can only move eastward from Union Station. [Italics added]	Transportation - DC Streetcar	As noted in footnote 43 of the referenced section of the SDEIS, the impact analysis for impacts to DC Streetcar operations assumes an extension of the existing line in both the eastbound and the westbound directions. Although the District has indefinitely postponed extending the Streetcar line to the west, it is assumed that by 2040, an equivalent transit line would be in place between WUS and Georgetown. References to a westbound Streetcar direction are to this equivalent line.
	C100	17	Bicycles: The overview of comments from the 2020 DEIS, Section 3.1, stated that improved pedestrian and bicycle connectivity would be an important part of a successful design. The four locations proposed for secured and covered bicycle parking (totaling 900 spaces), shown in Figure S-12, with two Capital Bikeshare stations (totaling 100 spaces) should satisfy those comments. Bicycle ramps, some shared with pedestrians, will provide additional connections from the front of the station to the deck levels and H Street. A large Bikeshare station on the east side of Columbus Circle, along the road to F Street, is not mentioned in the SDEIS. Will part of it remain after a pick up and drop off area for two vehicles is added?	Project - Pedestrian/ Bicycle	The reference to a pick-up and drop-off area on the west side of F Street in Section S.9.2, <i>Front of WUS</i> , of Appendix S2, <i>Description of the Preferred Alternative</i> , of the SDEIS was in error and has been deleted from the FEIS. The existing bikeshare station would not be displaced by the Project .
	C100	18	The results are presented in Figure 5-2 and Table 5-17. However, Table 5-17, the Summary of Traffic Impacts, is incomplete. Figure 5-2, the Levels of Service at Peak Hour, is a map of the area that shows the LOS for most of the intersections in the immediate neighborhood out to North Capitol Street and New York Avenue NE. Eleven intersections are omitted from the summary table without explanation, although they all have LOS of A, B or C. For example, Intersection Number 11 appears to be the ramp down to the underground parking but is not identified in the text. All of the intersections shown in Figure 5-2 should be listed in Table 5-17.	Traffic impacts	The referenced Figure 5-2 showed LOS at all study intersections to provide an overview of traffic conditions in the Preferred Alternative.  To focus the analysis on impacted intersections, Table 5-17 specifically identified the intersections that would experience a major adverse impact in the Preferred Alternative under one of the three criteria used for the impact analysis.  For clarity, the FEIS has been revised to provide additional tables specifically showing LOS impacts (Table 5-30), delay impacts (Table 5-31), and queueing impacts (Table 5-32). Note that, as explained in the FEIS, in coordination with DDOT, the traffic impact analysis was updated to reflect a reduction in automobile mode share consistent with the goals of <i>Move DC</i> .
	C100	19	Automobile and Bus Traffic: For city and commuter buses, some delays are expected to increase. The analysis shows that even though ridership is expected to increase, many city and commuter buses are estimated to continue operating under capacity. However, eight Metrobus routes would be over capacity, and overcrowding would get worse. With the additional traffic and increased delays, monitoring and adjusting intersection signal timing will become even more important. As part of the intersection analysis that will be done as the project progresses, will the DDOT analyses consider Flexible Progressive Systems to manage the traffic signals at intersections along the major roads near Union Station?	Transportation - Transit buses	Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #28a through 28i, specify measures to avoid, minimize, or mitigate traffic impacts, which USRC will work with DDOT to design and implement.
	C100	20	Historic Preservation Plans are Insufficiently Developed: Key to the Section 106 process is consultation with stakeholders. Although in this case consultation has been taking place for several years, because of the very conceptual nature of the expansion proposal, that consultation to determine the impact on historic properties and to mitigate adverse effects has only been able to be focused upon extremely general function and massing studies. A series of white box building and function envelopes on a diagram, therefore, are the only technical documents that consulting parties have been able to comment upon. Design, however, which is an integral part of evaluating the actual effects to a historic property, has not even been developed yet and is, instead, deferred to the Programmatic Agreement for “signatories” to consult upon at a future date.	Historic preservation	Development of a PA that outlines a continued consultation process to develop design guidelines, and a continued design review for the Project to ensure adverse effects continue to be avoided, minimized, or mitigated is appropriate for the Project, and in accordance with 36 CFR § 800.14(b).  Areas for consulting party participation, including during design review, have been reviewed and the draft PA updated accordingly. The final PA is available in the FEIS as Appendix F4.
	C100	21	Broaden Stakeholder Consultation: While we understand the need to defer consultation on design, we strongly object to this being limited only to the signatories of the Programmatic Agreement. Integral to the Section 106 process is stakeholder consultation. Reserving the right to comment upon the design only to signatories, therefore, does not in any way meet the spirit of meaningful consultation required under Section 106. This Programmatic Agreement should be altered to include stakeholder/consulting party participation throughout the design process.	Historic preservation	Areas for consulting party participation, including during design review, have been reviewed and the draft PA updated accordingly. The final PA is available in the FEIS as Appendix F4.

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Comment ID	Commenter	Item #	Comment	Topic	Response
	C100	22	Broaden Stakeholder Consultation: Mitigating adverse effects to historic properties is also a requirement of Section 106. The form that mitigation can take is essentially infinite – it can include a wide variety of strategies. Proposed in the Programmatic Agreement is, however, rather mundane mitigation including photo documentation, architectural salvage, and signage. In our view, given the potential adverse effects, mitigation should take a more direct form and include strategies to improve the historic station itself. The State Historic Preservation Office (SHPO) has suggested, for example, restoring natural light to the skylights in the historic concourse, improving the east and west terminations of the current retail concourse, or restoring the historic fountains in Columbus Plaza. All of these measures are much more meaningful and more directly would account for and properly mitigate adverse effects to the historic station. These more direct mitigation strategies, in our view, take on even more meaning given the current state of affairs at the historic station. The consultation process began in what amounts to essentially a different era. Pre-COVID, the historic station house was a vibrant, albeit exceedingly retail enterprise. Today, countless storefronts and restaurant spaces are empty and the “landlord” has filed bankruptcy. We are concerned that this expansion project, which would substantially expand foot traffic to the rear of the station into a new structure, will exacerbate a decrease in use and foot-traffic to the historic station that needs to be examined now as an additional new adverse effect.	Historic preservation	FRA has reviewed SHPO's comments for additional mitigation measures. The Project does not include restoration plans for the historic passenger concourse. However, design is still at a very early stage. The text of the PA has been updated to stipulate that “The Design Review will also address potential interior alterations to any historic portion of WUS, including, but not limited to, the remnants of the original plaster cornice on the south wall of the Claytor Concourse and potential changes to the historic passenger concourse, including the potential restoration of its skylights and potential improvements to its east and west elevations, which were altered due to the removal of sections of the concourse in the 1970s.” (Stipulation VI.A.3.d). The executed PA is in Appendix F4 of the FEIS.  Restoration of Columbus Plaza is not part of the Project and is outside FRA's purview, as it is owned and managed by NPS on behalf of the Federal Government.
VHSR VTA_0622	Virginians for High Speed Rail/Virginia Transit Association (VHSR VTA)	1	The expansion of Washington Union Station (WUS) represents a project of national significance, and a project of great importance for the Commonwealth of Virginia. For this reason, VHSR and VTA 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 Greater Washington's three airports combined.	Project - General	Noted.
	VHSR VTA	2	The projected growth in both Amtrak and VRE service levels and accompanying ridership are important factors in the preferred alternative, and these increases in service are vital to ensuring that the Commonwealth's Transforming Rail in Virginia program is a success. While we fully appreciate the complexities of finalizing the multi-state and multi-agency agreements that will be necessary to accommodate future run-through commuter rail service as articulated in the SDEIS, we continue to request that the final EIS plan for, or more clearly articulate, the future capability of run-through VRE service. While future service “from” MARC's Penn Line “to” VRE's Fredericksburg and Manassas' lines is fantastic, the reverse is also true. Connecting Virginia, Maryland, and the entire Capital Region with a one-seat ride from Virginia into Maryland via VRE will also greatly enhance the quality of life of Virginia's commuters along the I-95 and I-66 corridors.	Project - Rail planning	The Station Expansion Project supports future VRE operations and is consistent with VRE's adopted System Plan. In their comments on the SDEIS (VRE_0706, Item #1), VRE noted that " Platform and track plans and operational plans incorporated in the SEP Preferred Alternative provide for long-term VRE growth consistent with VRE's adopted System Plan."  VRE also noted that "No VRE through-running trains to Maryland are assumed in VRE's adopted System Plan. VRE is currently analyzing future service markets; those analyses assume, however, that VRE-served regional travel needs between northern Virginia and Maryland destinations along the MARC Penn, Camden and/or Brunswick Lines through calendar 2030 at a minimum can be met by more closely coordinating VRE and MARC service at WUS in tandem with expanded concourses and other WUS improvements assumed in the Preferred Alternative."
	VHSR VTA	3	Lastly, we hope that the project's anticipated timeline of 13 years might be streamlined and expedited to better align with the Commonwealth's historic passenger rail investments included in our Transforming Rail in Virginia program.	Construction - schedule	The construction timeframe specified in the SDEIS and the FEIS is based on current assumptions and information. Construction durations will be refined as part of the construction planning during the design phase of the Project.

# SDEIS Comments: Private Parties

SDEIS Comments: Private Parties

Comment ID	Commenter	Item #	Comment	Topic	Response
PI_0513	Ennis Parker	1	<p>My main concern is the lack of variety, popularity and quality of the shops and restaurants in the station. I think the station needs more diverse and high-quality options for shopping and dining that can appeal to different tastes and preferences. Some examples of shops and restaurants that I would like to see in the station are:</p> <ul style="list-style-type: none"> <li>• A nice and modern bar and grill that serves burgers, sandwiches, salads, and drinks</li> <li>• Better coffee shops that offer specialty coffee, tea, pastries, and snacks</li> <li>• A nice sit down restaurant that serves American or international cuisine</li> </ul> <p>I think these types of shops and restaurants could make the station more lively and enjoyable. They could also attract more customers and generate more revenue for the station.</p> <p>I also think that the station could learn from some successful examples of other stations or markets in New York, such as Grand Central Terminal or Chelsea market. These places have a variety of food vendors, shops, and events that create a vibrant and cultural atmosphere. They also have a lot of historical and architectural significance that adds to their charm, much as the Union station building does.</p>	Project - Retail	As stated in Section 3.5, <i>Description of the Preferred Alternative</i> , of the FEIS, the Preferred Alternative would add approximately 64,000 square feet of new retail space to Union Station. The exact retail program for the expanded station would be defined at a later date by the entity managing retail at Union Station, consistent with market conditions.
PI_0514	Gregory Dunn Osborn	1	I am concerned that the preferred alternative lacks a viable means to generate revenue to offset the loss of revenue from parking at WUS. I worry that the preferred alternative's considerable scope introduces new risks that would further accelerate WUS's already-perilous retail situation, such as noise, vibration and the closure of public areas. I worry that WUS will be forced to levy higher costs on its users to offset losses from parking, construction, and debt finance, making WUS less appealing for me to use.	Station revenue	<p>To compensate for the loss in parking revenue, Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #43 specifies that USRC will identify new funding sources sufficient, at a minimum, to ensure the continued preservation and maintenance of the historic Station.</p> <p>FRA identified USRC as the Project Sponsor in Spring 2023 and the process of obtaining support and mobilizing resources has begun. An early step is the development of a Union Station Expansion Project Delivery and Governance Study by IDC, in partnership with the District of Columbia Government. IDC worked with an Advisory Group composed of representatives from USRC, Amtrak, the United States Department of Transportation, FRA, DCOP, and DDOT to identify delivery, financing, and governance mechanisms needed to realize the Project (see <a href="https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf">https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf</a>, last accessed January 12, 2024).</p>
	Gregory Dunn Osborn	2	I hope to use WUS for many years to come, and I commend the team's thorough work on the station's future. However, I think the history of installing new rail infrastructure in Manhattan demonstrates that building around active railways is simply hard, expensive, and not cost competitive to simply doing nothing. If -- despite record commercial vacancy rates in the city -- we'd like to install new retail/bikeshare/bus loading facilities, surely there are cheaper places to build them than on top of the northeast corridor?	Project - General	The Purpose and Need for the Project is described in Section 2.3, <i>Purpose and Need Statement</i> , of the FEIS. It includes facilitating intermodal travel as well as sustaining WUS's economic viability. Bicycle and bus facilities, and the additional retail space included in the Preferred Alternative are needed to meet these elements of the Purpose and Need.
PI_0515_001	Jake Lighter	1	I do not believe that the project as currently conceived is justified for the current DC Metro needs. The project runs off of increased passenger rail projections which were conducted pre-Covid and pre-rise of remote work/teleworking (I cannot find data for 2022, but see below for data for 2021 for the NE Corridor). It is specious and deceptive to use numbers from prior projections that do not currently support justification. The DC Metro has many more pressing needs (such as decreasing bus and metro wait times) to prioritize a project with billions in funding that does not change, substantially, the transit realities of daily DC commuters.	Project - Rail planning	<p>As is explained in Chapter 2, <i>Purpose and Need</i>, of the FEIS, supporting current and future long-term growth in rail service and operational needs is just one aspect of the Project's purpose. The Project also is intended to achieve compliance with the ADA and emergency egress requirements; facilitate intermodal travel; provide a positive customer experience; enhance integration with the adjacent neighborhoods, businesses, and planned land uses; sustain WUS's economic viability; and support continued preservation and use of the historic station building.</p> <p>Planning for the rail component of the Project is based on the long-term rail planning presented in the NEC FUTURE study and the various rail operators' future operating plans, which are still current. FRA recognizes that the pandemic has resulted in a reduction in ridership on all rail services in 2020-2023; however, current trends are positive (see for instance <a href="https://media.amtrak.com/2022/11/amtrak-fiscal-year-2022-the-beginning-of-a-new-era-of-rail/">https://media.amtrak.com/2022/11/amtrak-fiscal-year-2022-the-beginning-of-a-new-era-of-rail/</a>, last accessed January 12, 2024, and <a href="https://vapassengerrailauthority.org/amtrak-virginia-sets-another-ridership-record-in-april/">https://vapassengerrailauthority.org/amtrak-virginia-sets-another-ridership-record-in-april/</a>, last accessed January 12, 2024).</p> <p>FRA notes that Amtrak developed the rail program documented in Appendix B of the DEIS and that both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item 3 and VRE_0706, Item 1).</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
PI_0515_002	Izzy Gholl	1	I feel very strongly about preserving the outside pillars and main hall historic structure. The facade of Union Station is what greets people as they come and go from DC and is one of my most beloved views. I look forward to the renovation, but i hope we can keep the historic and grand nature of the building in tact.	Historic station	Noted. As is explained in Chapter 2, <i>Purpose and Need</i> , of the FEIS, supporting the continued preservation and use of the historic station building is part of the Purpose and Need for the Project.
PI_0517_001	Sean Gilliam	1	After reviewing the documents related to parking at the renovated Union Station I have a grave concern I believe is being overlooked. There are numerous Amtrak employees who utilize the current parking garage as monthly parkers, or intermittent users that I feel are not being accounted for. Conductors, Engineers, Station Employees, On Board Services, Mechanical, Clerks, and many others are among the users of the garage. Amtrak provides no parking in the station area to Craft employees, only to Management employees at a garage on 2nd St NE. It appears the writers of this document are failing to account for these employees and their needs so that trains are able to move. Amtrak presently only makes parking available to Craft employees two miles away from the station at the Ivy City facility. Although a Shuttle is provided, this "service" can take 30-45 minutes each way to make the trek to and from the station. Suggesting that employees should use transit is also not an option. Many times when employees come and go Transit is shut down, or impractical to use. Employees have limited rest periods as it is, ensuring that there is appropriate parking facilities available for them is paramount in my opinion.	Project - Parking	The basis for the Preferred Alternative's bus program is presented in Section 3, <i>Bus Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS. As one of the Project Proponents, Amtrak participated in the development of the Preferred Alternative and confirmed their support of the reduction in the total number of parking spaces in their comments on the SDEIS (see Amtrak_0706). Arrangements for Amtrak employee parking is a matter internal to Amtrak that is outside the scope of the Project.
PI_0517_002	Hannah Follweiler	1	I'm here to write that I support the new plan released within the last week. One concern I still have is about the length of time it will take for this project to complete. I understand that is it a long process and there are many different elements to the project as well as multiple stakeholders. But as someone who knows our climate is changing rapidly I feel it is irresponsible for this project to take this long. An updated station would make it more attractive for people to take the bus or train to other parts of the country. We can't wait until 2040's or 2050's.	Construction - Schedule	FRA's evaluation of the Project under NEPA is an important first step in moving the Project forward. Following FRA's decision at the conclusion of the NEPA process, USRC will pursue and identify funding sources to continue the planning, design, and construction of the project. The ultimate time frame for the construction of the Project will depend on these post-NEPA steps. Currently, the Project is estimated to be completed as described in the FEIS. Construction durations will be refined as part of the construction planning during the engineering and design phase of the Project.
PI_0521	Jazmin Pilar	1	Today when I was walking through the station, I was curious about the open storefronts/restaurants and some of the walls linking these spaces and wondering what collaborations or initiatives are in place to optimize these spaces? One thing I've recently noticed and appreciated more at airports is a focus on local history and art/art installation (e.g., Austin, Memphis, San Francisco, etc.) and I wonder if there's any planning or interest in curating temporary exhibitions or a way to honor public history? If you have any upcoming committees or efforts to explore these types of efforts, please let me know. This is a very exciting project and I look forward to the future of this space.	Project - Retail	Programming for the existing retail space and other public areas of Union Station is outside the scope of the Project and the EIS.
PI_0614_001	Louise Brodnitz	1	I urge you to give greater weight to accommodating buses on ALL sides of this redevelopment. Many people, especially as we age, will prefer bus to metro. Expanding the pool of bus users, and making it as easy as possible for them, will ensure that all are equally well-served.  1. Please require that all new development along H street be required to directly address, welcome and accommodate pedestrian access from buses and streetcars. 2. Provide a pedestrian connection (elevator and stairs) from North Capitol Street to the H Street overpass. As it currently stands, there is no connection whatsoever for pedestrians to access the H Street buses. 3. Make all bus connections minimal and effortless, so that adjacencies that appear on a map (such as item 2) are accessible in reality. 4. Make bus travel to and around Union Station as pleasant and seamless as the trains, and should work for DC residents coming from all directions by bus.	Project - Transit access	The Purpose and Need for the Project is described in Section 2.3, <i>Purpose and Need Statement</i> , of the FEIS and includes facilitating intermodal travel. As explained in Section F.9.2, <i>Front of WUS</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , of the FEIS, in the Preferred Alternative, the two middle lanes of Columbus Circle in front of Union Station would be used for transit bus pick-ups and drop-offs, bringing buses closer to the Station than is currently the case. Headhouses on H Street would also facilitate access to Union Station for bus passengers along the H Street corridor. Section 5.5.3.1, <i>Direct Operational Impacts, City and Commuter Buses</i> , of the FEIS describes the anticipated impacts of the Preferred Alternative on the operation of city buses. As explained there, while there would be minor adverse impacts due to overcrowding and delays, these impacts would be partially offset by the Preferred Alternative's relocation of some city bus routes to the front of WUS and by planned bus priority projects in the District.  Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #25a through 25f specify measures that USRC will implement to address adverse impacts in coordination with DDOT and WMATA.
PI_0614_002	Karthik Balasubramanian	1	Union Station should be a WMATA + circulator bus hub as well. Silver Spring station has 2 levels of WMATA + RideOn connection. This is what we should be seeing in the new Union Station as well, because it will allow MANY more people to come to Union Station without a car.	Project - Transit access	The Purpose and Need for the Project is described in Section 2.3, <i>Purpose and Need Statement</i> , of the FEIS and includes facilitating intermodal travel. As described in Appendix F2, <i>Description of the Preferred Alternative</i> , of the FEIS, the Preferred Alternative incorporates numerous elements that will facilitate access to Union Station by non-auto modes, including new pedestrian access points; parking for approximately 900 bicycles; and transit bus stops in front of the Station.



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Comment ID	Commenter	Item #	Comment	Topic	Response
PI_0616_001	Ashton Rohmer	1	First, there should be *no* parking spaces at Union Station. While I appreciate the 77% reduction compared to current parking availability, there are other pioneering train hubs (like NY Penn Station and Chicago Union Station) that have no parking but instead direct people to nearby privately-owned parking facilities (which are also available around Washington Union Station). Union Station is arguably one of the most transit-connected places in the country, plus it features access to bicycling, pedestrian, and scooter infrastructure. The space that's dedicated to parking will not only detract from those networks and induce demand, but it will add unnecessary construction costs and use square footage that could be dedicated to other uses that center the needs of people, not cars (such as housing, retail, and community gathering spots). Moreover, there should be no rental car operator at Union Station - we do not need to inject more cars (which will increase congestion, air pollution, and other negative externalities) into the heart of our city.	Project - Access	The Purpose and Need for the Project, described in Section 2.3, <i>Purpose and Need Statement</i> , of the FEIS, includes facilitating intermodal travel. As explained in Section 3.1.1, <i>Identification of Project Elements</i> , parking is one of eight Project elements or components of the multimodal station. Alternatives providing no parking at all would not meet the Project's Purpose and Need. Some parking is needed for Union Station to function as a multimodal transportation facility. The basis for the Preferred Alternative's parking program is presented in Section 1, <i>Parking Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS. The below-grade facility would also be used for pick-up/drop-off activity, not only parking, and it would not use space that would otherwise be available for housing or community uses.
	Ashton Rohmer	2	Furthermore, we need to have more and better facilities and services in and around Union Station for active and public transit modes. Plentiful bikeshare docks should be front and center (rather than relegated to the side of the building where people have to hunt for them). Safe, secure, affordable, and plentiful (personal) bike parking should be easily accessible (see bike garages in the Netherlands for inspiration - also see Oonee for a great solution). Wayfinding should be improved for cyclers, pedestrians, and public transit users alike.	Project - Pedestrian/ Bicycle	Section F.8, <i>Pedestrian and Bicycle Access</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , of the FEIS describes the bicycle facilities that would be provided in the Preferred Alternative, including approximately 100 bikeshare spots. USRC will coordinate with DDOT regarding the location of the new bikeshare spots based on space availability and proximity to the Station's entrances. The Preferred Alternative also includes parking for approximately 900 bicycles. Bicycle storage will be designed during the post-NEPA phases of the Project consistent with DDOT's <i>Bike Parking Guide</i> . Appropriate signage and wayfinding will also be developed in the design phase of the Project.
	Ashton Rohmer	3	Infrastructure in and around Columbus Circle should be redesigned to prioritize the safety and comfort of non-car road users. Taxis should be directed to the back of the building.	Project - Taxis	The changes that would be made to the front of the station are described in Sections F.8.1, (for pedestrian and bicycle access) and F.9.2 (for pick-up/drop-off activity) of Appendix F2, <i>Description of the Preferred Alternative</i> , of the FEIS. While the Preferred Alternative provides for taxi access to the front of the Station, approximately half of all pick-ups and drop-offs, including by taxis, are anticipated to take place in the below-ground facility.
	Ashton Rohmer	4	Union Station should be a WMATA + circulator bus hub such that transit connections are the easiest modes to access and are visible and featured prominently. (As a point of comparison, even Silver Spring is showing us up - their Metro station has 2 levels of WMATA + RideOn connections...this is what we should be seeing in the new Union Station as well, because it will allow MANY more people to come to Union Station without a car.)	Project - Transit access	The Purpose and Need for the Project is described in Section 2.3, <i>Purpose and Need Statement</i> , of the FEIS, and includes facilitating intermodal travel. As described in Appendix F2, <i>Description of the Preferred Alternative</i> , of the FEIS, the Preferred Alternative incorporates numerous elements that will facilitate access to Union Station by non-auto modes, including new pedestrian access points; parking for approximately 900 bicycles; and transit bus stop in front of the Station.
	Ashton Rohmer	5	To sum it up - design creates culture, and right now the current design perpetuates car culture. We need a design that cultivates active and public transportation culture by making those the most convenient modes available. When public health minded property managers want to encourage people to take the stairs instead of an elevator, they make the stairs the first thing people see, design them to be beautiful and accessible, and tuck elevators in an inconvenient location. We should use the same principle in reimagining Union Station...especially since the new Union Station isn't really that reimagined if it is primarily designed for cars.	Project - Accessibility	The Purpose and Need for the Project, described in Section 2.3, <i>Purpose and Need Statement</i> , of the FEIS, includes facilitating intermodal travel and achieving compliance with the ADA. The Project will provide accessible and ADA-compliant access for all users.
	Ashton Rohmer	6	I'm waiting for DC to have visionary leaders about at least ONE transit-related feature of our built environment, and unfortunately the current plan doesn't make the cut. What would being a visionary look like? Fundamentally shifting how we think about mobility to deprioritize dangerous, emissions spouting cars and to make active and public transit modes the most accessible, visible, and supported ways to get around. This is a once-in-a-generation opportunity to be a national leader in transit and if we want to meet our Vision Zero, climate change, and public health goals, we need to have a lot more courage to prioritize our most vulnerable - yet most sustainable - road users.	Project - General	Noted.

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PI_0616_002	Gene Hunt	1	Council Member Charles Allen (Ward 6) support's significantly fewer parking spaces at the proposed Union Station development. I completely disagree. We do not need people parking cars in our neighborhood as they visit retail shops or they wait for late trains to arrive to pick up guests. People don't take bikes to go on a train. Please make parking easy and accessible with charging stations to support EV green initiatives.	Project - Parking	The basis for the Preferred Alternative's parking program is presented in Section 1, <i>Parking Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS. The Preferred Alternative, including its reduced parking program, was developed in response to comments from multiple agencies, organizations, and members of the public on the parking element of the Action Alternatives presented in the 2020 DEIS. The anticipated impacts of the Preferred Alternative on parking are described in Section 5.5.3.1, <i>Direct Operational Impacts, Vehicular Parking and Rental Cars</i> , and Section 5.5.3.3, <i>Construction Impacts, Vehicular Parking and Rental Cars</i> , of the FEIS. As noted in Section 5.5.3.1, it is anticipated that the limitation of parking supply at Union Station would create an incentive for Station users to use different modes to reach the station; in some cases, they could also drive to a different station, such as New Carrollton, Maryland. As further noted in Section 5.5.3.3, most streets within a quarter mile of the Station are residential parking permit areas, two-hour parking areas, or monitored parking areas on Architect of the Capitol property, limiting the availability of nearby street parking to Station users. As noted in Section F.7, <i>Parking</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , provisions for electric vehicle charging would be made in the parking facility.
PI_0618	Xavier Domenico	1	I am writing in support of the project, more specifically in support for decrease in parking for private vehicles. I hope to see guidance in that the new terminal is designed in a manner compatible with the historic WUS building- much like Moynihan Train Hall in New York City.	Project - Parking	Noted. As is explained in Chapter 2, <i>Purpose and Need</i> , of the FEIS, supporting the continued preservation and use of the historic Station building is one of the Project's purposes. Potential impacts from the Project on historic properties, including the historic Station building, are described in FEIS Section 5.12, <i>Cultural Resources</i> and SDEIS Appendix D1S, <i>Supplemental Assessment of Effects and Section 106 Correspondence</i> . Measures to minimize and mitigate adverse effects are specified in the Section 106 PA included in the FEIS as Appendix F4.
PI_0627_001	G. Sullivan	1	Where is seating inside Union Station	Project - Public accommodations	The detailed design of the new circulation and waiting spaces at Union Station, including seating areas, will be determined during the Project's design phase.
	G. Sullivan	2	Pickup + drop off - how many lanes? (1 or 2 will not work)	Project - PUDO	The pick-up/drop-off facilities included in the Preferred Alternative are described in Section F.9, <i>Pick-up and Drop-off Areas</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , of the SDEIS. There would be five separate pick-up/drop-off areas.
	G. Sullivan	3	environment - dust = noise, what time can construction start/and end	Construction impacts	The noise impacts from constructing the Project are described in Section 5.10.3.3, <i>Construction Impacts</i> , of the FEIS. As stated in Section 5.10.3.3, it is anticipated that construction would occur in two 10-hour shifts, for a total of 20 hours a day. Work would be conducted 6 days a week. Therefore, it would include work outside Monday-Saturday from 7 AM to 7PM and as such require a permit from the District of Columbia, as indicated in Table 7-2, Items #20 of the FEIS. Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #37a and 37b specify how noise impacts will be minimized and mitigated through the preparation and implementation of a <i>Construction Noise and Vibration Control Plan</i> . The plan would include a public engagement program specifying measures that would be implemented to inform neighbors and other relevant parties of anticipated noisy activities, noise or vibration level exceedances, and measures to be taken to remedy these exceedances.
	G. Sullivan	4	Is anyone signing off on the project actually live in the area.	Project - General	Since the inception of the EIS process, FRA conducted extensive coordination with multiple local stakeholders, as described in Chapter 8, <i>Public Involvement and Agency Coordination</i> , of the FEIS.
	G. Sullivan	5	What will happen to the hopscotch art work on the H St. Bridge?	H Street Bridge	The replacement of the H Street Bridge is a separate and independent project from the Station Expansion Project. It is managed by DDOT. DDOT is responsible for addressing any issues related to the artwork on the H Street Bridge.
	G. Sullivan	6	Parking: will it be affordable?	Project - Parking	Details about the management of the future parking facility are outside the scope of the Project and EIS.
	G. Sullivan	7	Buses: Will still share Union Stations? Will there be a separate entrance? Now area for bus riders is too small.	Project - Transit buses	The bus facility included in the Preferred Alternative is described in Section F.6, <i>Bus Facility</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , of the FEIS. This facility would be integrated into the overbuild deck and it would directly open onto the train hall's lower mezzanine, where waiting areas, information displays, and other bus passenger amenities would be located. This would result in a substantial improvement in passenger experience relative to existing conditions.

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Comment ID	Commenter	Item #	Comment	Topic	Response
	G. Sullivan	8	Taxi: should not have their own space. Causes too much of a back up and gas emissions from idling waiting.	Project - Taxis	The Purpose and Need for the Project, described in FEIS Section 2.3, <i>Purpose and Need Statement</i> , includes facilitating intermodal travel. As explained in Section 3.1.1, <i>Identification of Project Elements</i> , for-hire vehicles (which include taxis) are one of eight Project elements, or components of the multimodal Station. Preventing access by taxi would not meet the Project Purpose and Need. As described in Section F.9, <i>Pick-up and Drop-off Areas</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , of the FEIS, taxi access to the station would be maintained in the front of the Station and would also occur in the new below-ground facility, which is anticipated to accommodate approximately half of all pick-ups and drop-offs at the Station, including by taxis.
	G. Sullivan	9	Noise: Will it be dulled with new Union Station or will it be louder?	Noise impacts	The noise impacts of the Preferred Alternative are described in Section 5.10.3, <i>Impacts of the Preferred Alternative</i> , of the FEIS. Noise levels (including from train operations) were modeled at 164 locations around Union Station. At most locations, noise levels would be typical of a dense urban setting. Compared to the No-Action Alternative, the Preferred Alternative would have some beneficial impacts to noise in locations closest to the rail terminal due to changes in structural design. Overall, out of the 164 modeled locations, only 14 locations are predicted to have changes in noise levels that would be generally perceptible. The noise impacts at the 14 locations are considered moderate impacts, and do not reach the "severe impact" category established under the FTA's Transit Noise and Vibration Impact Assessment Manual, which is the criterion used for the noise impact assessment.
	G. Sullivan	10	Environment: you will be digging down for parking along this area when homes are being renovated they are being told they can not dig down due to the environmental concerns. How are you solving this issue? Where will the construction debris/trash/etc. be dumped?	Ground water impacts	The potential impacts of the Project on groundwater are described in Section 5.3.3, <i>Impacts of the Preferred Alternative</i> , of the FEIS. Table 7-1 of the FEIS/Table 13-2 of the ROD, items #2a and 2b identify measures to avoid, minimize, or mitigate these impacts. The Project would be implemented in compliance with applicable District laws and regulations. Applicable permits would be obtained prior to the start of construction. Construction debris would be disposed of as described in 5.4.3.3, <i>Construction Impacts</i> , of the FEIS.
	G. Sullivan	11	Traffic: Will buses be rerouted? Will streets around Union Station be closed?	Construction impacts- Transportation	The impacts of the Preferred Alternative on transit buses and traffic are described in Section 5.5.3, <i>Impacts of the Preferred Alternative</i> , of the FEIS. No street would be permanently closed. Construction of the Preferred Alternative would require temporary road closures, especially along G Street NE between North Capitol Street and First Street NE; First Street NE, between Columbus Circle and K Street; and Second Street NE, between Massachusetts Avenue and K Street, to accommodate construction traffic in and out of the construction site. Road closures would generally last from 5 to 6 minutes on average and no more than 20 minutes. During those times, traffic may temporarily move to other streets such as H Street, K Street, 4th Street NE, and North Capitol Street.
PI_0627_002	Anonymous	1	I support the Union Station Expansion Project on one condition and that is that project leaders hire a diverse work force.	Project - General	Noted. Hiring decisions will be made by the construction contractors in compliance with applicable District of Columbia and Federal laws and regulations. They are outside the scope of the EIS.
PI_0702	Kevin Moore	1	I propose that the Washington Union Station expansion includes a provision for a dedicated Track for Private Car use (non Amtrak, non MARC, or Class One Railroad fleet).	Project - Rail planning	The impacts of the Preferred Alternative on private rail cars are described in Section 5.5.3.1, <i>Direct Operational Impacts, Commuter and Intercity Railroads</i> , of the FEIS, which states that "under the reconfiguration of the rail terminal in the Preferred Alternative, Amtrak has identified space for eight private train cars to be stored at a time. Therefore, private car storage could continue." Specific decisions regarding storage conditions and movements would be made during the design phase of the Project.
PI_0706_001	James A. Smailes	1	Appendix S2 Figure S-10 (page 12) shows the ramps to and from the Below-Ground Facility on G Street NE. But the figure does not show the existing off-street parking on the south side of G Street NE. These metered spaces are on the sidewalk and take up much of the block. There are a lot of spaces and, although it's understandable they would not being available during construction, will those spaces return after construction of the ramps?	Project - Parking access	The spaces would be eliminated to allow for the construction of the new ramp within the existing right-of-way. This has been clarified in the FEIS (Section F.7, <i>Parking</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , of the FEIS).

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Comment ID	Commenter	Item #	Comment	Topic	Response
	James A. Smailes	2	Appendix S2 Figure S-11 (page 13) – The revised intersection for traffic leaving the front of WUS shows four lanes on the west with two lanes turning right: one to enter First Street (to be made One Way) and the second turning westward onto Massachusetts Ave NE, all bound by new, expanded pedestrian plazas. I like this and it should make both pedestrian and vehicle traffic flow more smoothly and safely. However, this past year I have become much more observant of the construction of bicycle and roadway “improvements”, or efforts to “calm” traffic. Too often I have seen roadway lanes narrowed to 10 feet with redesigned intersections that actually make it more difficult for traffic to make turns, or curves made too sharp in an attempt to slow traffic. But then, several months later, I’ve seen DDOT crews out fixing the mistakes, making the corners less sharp, or removing traffic islands entirely. I would just like to stress the need for care when designing these expanded pedestrian plazas. The traffic lanes must be wide enough to enable merging before the intersection, allow for ease of turning movements, and avoid creating obstacles that could hinder turning movements.	Project - Circulation	Noted.
	James A. Smailes	3	Appendix S2 Figure S-13 (page 16) – The figure shows a large pedestrian island on the eastern approach to separate the left and right turn traffic flows from Massachusetts Avenue NE. There is cross hatching on both sides of the island that defines the size of the lanes. But the crosshatching is not explained in the figure legend. What are these crosshatched areas? Are they paint, or rumble strips? Hopefully, no one will suggest the white channelization posts that have been used far too often. The lanes should not be too restricted since a large volume of traffic will be entering the circle and drivers will need space to merge with the traffic coming from the east. On the east side of the station, the text explains that the approach to turn onto F Street will be unchanged except for the installation of two pick-up and drop-off spaces for use by WUS tenants. But it doesn’t say what is there now. It is a large Bikeshare facility on the west side of the street. Will all of that space be given over for the two pick-up and drop-off spaces? Or will some Bikeshare stalls remain? If so, this Bikeshare facility is not mentioned in the write up on Bicycles in other parts of the SDEIS. This location should be marked on the figure. Also, as one bears right to enter that road and before the new crosswalk, there are two pick-up and drop-off spaces on the right for the Thurgood Marshall Building to the east. Although not part of this project, these spaces exist and should be marked as well since they are used now by people going to, and coming from, the station and will continue to be used in the future. Finally, making the approach on Columbus Circle three lanes has been needed for a long time and should be done as soon as practicable.	Project/PUDO	Figure S-13 has been revised in the FEIS (as Figure F-13 of Appendix F2, <i>Description of the Preferred Alternative</i> ) to identify the referenced cross hatching. The exact design of these areas will be determined during the engineering and design phase of the Project .  The reference to two new pick-up and drop-off spaces noted by the commenter was in error and has been deleted from the FEIS. No such spaces are included in the Preferred Alternative.  The two existing pick-up and drop-off spots associated with the Thurgood Marshall Building are visible on the figure as a small layby area. They are not labelled to avoid the impression that they are part of the Project.
	James A. Smailes	4	Appendix S2 Figure S-14 (page 17)– The Street on the upper left of the figure should be labeled K Street NE, not I Street NE. On the west side of First Street NE from K Street NE southward, the travel lane is defined by a solid white edge line, creating a long length of empty curb which is currently marked No Parking. Perhaps it was used by bicycles before? Regardless, with the completion of the Bicycle Greenway on the east side of the street, DDOT should consider allowing this length of curb to be used for parking.	Correction	Figure S-14 has been corrected in the FEIS (as Figure F-14 of Appendix F2, <i>Description of the Preferred Alternative</i> ). Potential changes to the west side of First Street south of K Street will be considered during the engineering and design phase of the Project, in coordination with DDOT.

SDEIS Comments: Private Parties

Comment ID	Commenter	Item #	Comment	Topic	Response
PI_0706	Bruce W. Hain	1	If you're going from 33 tracks down to 19, while shortening the platform length significantly owing to some unexplained exigency of building a SECOND main concourse completely at odds with the existing architecture, then you've climbing the rails. I'm not opposed to contrasting contemporary style with tradition: it has been the most successful means to expand and modify properties that need it, when undertaken in a sober way, but the "Train Hall" is dimensionally gargantuan viewed against the original concourse, and screams it's belittlement through its indulgence in thematic material otherwise graceful, but in this case insulting to the original. Everything is Bigger, Better, Airier, with so much more light, glass and breathing room! A better option, if you want a few wider platforms, is to take away some of the single tracks, and go from 33 down to 30, not 19. The longest platforms were intended to allow two 1750' trains and two 1500' ones, on the tunnel tracks. that should be preserved, and the two sharp curves on the tunnel track platforms removed. They are some kind of appeal for more money to waste, f but not included in the original design. True, the existing concourse has not aged well, but it's operating with a handicap, as some of the geniuses who worked on the last revamp seem to have found it undesirable. Why else would they chop off the ends?	Project - Train hall	<p>As noted in Section 2.2.3, <i>Tracks and Platforms</i>, of the FEIS, Union Station currently operates with 23 tracks.</p> <p>The Purpose and Need for the Project, described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS, includes facilitating intermodal travel and providing a positive customer experience. As explained in Section 3.1.1, <i>Identification of Project Elements</i>, of the FEIS, the train hall is one of eight Project elements, or components of the multimodal Station. The renderings included in the SDEIS and FEIS are conceptual in nature and for illustrative purposes only. Specific design elements, including materials, will be determined during the engineering and design phase of the Project.</p> <p>The rail terminal component of the Project was developed by Amtrak through a process documented in Appendix B of the DEIS. The rail planning assumptions informing the Project's track and platform plan align with the plans advanced in the DC to Richmond Southeast High Speed Rail project, Long Bridge Project, and Transforming Rail in Virginia. Amtrak developed the rail program documented in Appendix B of the DEIS and both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item 3 and VRE_0706, Item 1).</p>
	Bruce W. Hain	2	Any re-do of Washington Union station must be constrained within reasonable dimensions; it cannot be used as a springboard to catapult an exorbitant rent roll, especially if every time there's a turn-around, or a virus, the transit critical house catches on fire. Where once this station had the finest indoor mall property in the world, by revenue and every other measure - and by far - it all cascaded in the space of a few months. How much worse will it be, if the mall property is expanded two fold? Is that not what Amtrak and the FRA have in mind?	Project - Retail	The Purpose and Need for the Project, described in FEIS Section 2.3, <i>Purpose and Need Statement</i> , includes providing a positive customer experience and sustaining Union Station's economic viability. As explained in Section 3.1.1, <i>Identification of Project Elements</i> , concourses and retail are one of eight Project elements, or components of the multimodal Station, that support the Purpose and Need.
	Bruce W. Hain	3	As a practical matter, this expansion - which actually entails diminution of the rail infrastructure's usefulness and versatility, and thereby its fitness for the future - must be curtailed. Because, the only reason the Amtrak and the FRA want so much development on top, is to lock in their denigrating modifications at track level, so that (again) they are etched in stone and steel of practical permanence. The three commodious entrance portals at either side, on the front of the concourse, were designed to allow quick access to the platforms for dashing commuters wanting to bypass an extended trek through the crowded station. They were designed as a boon to passengers arriving on foot, and for both environmental and aesthetic reasons the Concourse must be restored. I'm not sure about Chicago windows all the way around at either end, but they might look nice with a long banquette continuing past the corners. I'm sure a very beautiful and up-to-date treatment for the ends can be had, perhaps with more glass to set off the clocks if it should be decided to retain them.	Project - General	<p>The Preferred Alternative supports the Purpose and Need for the Project, described in Section 2.3, <i>Purpose and Need Statement</i>, of the FEIS. The Purpose and Need includes supporting current and future long-term growth in rail service and operational needs; achieving compliance with the ADA and emergency egress requirements; facilitating intermodal travel; providing a positive customer experience; enhancing integration with the adjacent neighborhoods, businesses, and planned land uses; sustaining Union Station's economic viability; and supporting the continued preservation and use of the historic station building.</p> <p>The renderings included in the SDEIS and FEIS are conceptual in nature and for illustrative purposes only. Specific design decisions will be made during the engineering and design phase of the Project.</p>
	Bruce W. Hain	4	But what happened at the waiting room-concourse roof interface? Someone decided they were so in need of more glorious airborne light that they decided to truncate the giant arch lunettes of the waiting room to achieve it: so the lunettes on the front of the building extend lower than the ones up against the ineptly modified roof of the concourse - as a sort of snoot cock to Burnham I suppose. Obviously, the symmetry of the Waiting Rooms upper windows must be restored, Now.	Project - General	Specific design decisions will be made during the engineering and design phase of the Project.
	Bruce W. Hain	5	I find it very improbable that the side entrances at H Street will attract many passengers or visitors, as the SDEIS so insistently advocates. Who wouldn't just approach from the front and walk down the platform if they had the choice? Also, something to avoid is more subterranean halls of lengthy proportions, as the board of the NY MTA has so bitterly insisted about while denigrating the very pleasant modifications made at Penn Station in the '90s incessantly... with crummy results, and no tenants, at about two billion dollars so far, with no appreciable benefit.	Project - Pedestrian/ Bicycle	The Station Expansion Project is the outcome of a multi-year planning process that is extensively documented in the appendices of the DEIS. FRA notes that the Project Area is significantly constrained both horizontally (as it is surrounded by urban neighborhoods on the east and west) and vertically (as much of the air rights above the rail terminal are owned by a private entity that intends to develop these air rights into a mixed-use neighborhood). Entrances on H Street are anticipated to accommodate Station users who travel on foot, bicycle, or transit to or from the areas north of Union Station.

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Comment ID	Commenter	Item #	Comment	Topic	Response
	Bruce W. Hain	6	Certainly H-Street is an eyesore, and it should run UNDER the tracks. But Permanente as already made Herculean efforts to beautify the inconvenient interface of the new building. So get your "basics" - exigencies - worked out first, and don't lie in the papers that you can produce an even moderately pleasant set of side entrances there without rebuilding the bridge. The grade is too steep. The bridge is a relic. Get rid of it. Bury it. THEN set about making your plans for investing in development and developers.	H Street Bridge	The replacement of the H Street Bridge is a separate and independent project from the Station Expansion Project. It is managed by DDOT. DDOT is responsible for addressing any issues related to the bridge replacement project.
	Bruce W. Hain	7	Amtrak has shown through many of their actions that They prefer "AmShack" - regardless of any inconvenience to the public, or the practical inefficiencies of track configurations that their preferred locations often entail. See: Penn Station, Grand Central, Albany, Schenectady, Utica, Rochester, Buffalo, St. Louis (probably our second-greatest station still surviving, but it's blocked!) Cincinnati, Columbus, Springfield, Dayton, Detroit, Kansas City, Joplin, Birmingham, two in Milwaukee, Frank Lloyd Wright's Madison, South Bend, and 3rd & Townsend in San Francisco to name a few. Please! DON'T LET THEM DO THAT AGAIN.	Project - General	The Station Expansion Project is the outcome of a multi-year planning process that is extensively documented in the appendices of the DEIS. Amtrak participated in the planning as one of two Project Proponents, along with USRC, the Project Sponsor.
Akridge_0620	Matthew J. Klein (Akridge)	1	<p>SUMMARY OF COMMENT: FRA should clearly state that the Preferred Alternative depends on a unification and exchange of private and federal air rights. Please note that Akridge is not asking FRA for a binding commitment at this time, but rather only to clarify that the Preferred Alternative depends on a unification and exchange of those development rights occurring. As part of the development of the new Preferred Alternative, Akridge agreed to advance and support this Alternative provided that the excess federal air rights property would be exchanged with Akridge in return for use of its property. Akridge has frequently communicated to FRA that in order for the SEP to achieve the public benefits desired by stakeholders, all air rights development must be planned and executed under unified ownership. Without such consolidated control, the viability of all air rights development is at risk. FRA recognizes that private air rights owned by Akridge are required to accommodate the Preferred Alternative and recognizes too that federal air rights would be available for transfer and development. However, the document describes such transfer as "potential," and does not explicitly state that an exchange of air rights with Akridge and unified development is an essential prerequisite for the SDEIS Preferred Alternative to move forward. The SDEIS also references a large inventory of substantial public benefits which arise in the SEP only as a direct result of a viable, unified air rights development plan (e.g. a naturally-lit bus facility directly integrated with the Train Hall; extensive sky lighting). Akridge is confident that FRA would agree that the public benefits described in the SDEIS are not achievable absent such an integrated plan.</p> <p>In short, Akridge has and continues to support the SDEIS Preferred Alternative provided that the FRA demonstrates its intention to consolidate control of the air rights development through a property exchange. So that we may continue what we believe has been a constructive engagement with FRA, we ask that FRA eliminate the ambiguity that its SDEIS has created on the property exchange and development issue.</p> <p>Further, the SDEIS states that the adverse impact resulting from the removal of 2.9 acres from Akridge's property is "minor" because the coordination between FRA and Akridge in the development of the Preferred Alternative results in "ensuring that, although sizable, the reduction would not preclude developing the remaining air rights" (SDEIS at 5-62). Stated differently, this passage claims that independent development of the federal and private air rights parcels is feasible and acceptable to Akridge. This statement is clearly incorrect as Akridge has frequently conveyed to FRA that separate development is not feasible and certainly not acceptable to Akridge. Given that absent unified ownership, all air rights development is infeasible, property impacts of an independent development scenario would be among the most "major" impacts assessed in the EIS, and the benefits described above would not be realized.</p>	Air rights development/ Property impacts	<p>FRA developed the Preferred Alternative in coordination with Akridge and looks forward to continued collaboration with Akridge to advance the Station Expansion Project and Akridge's development project. FRA supports the vision of commercial air rights development and open space that creates a vibrant neighborhood north of Washington Union Station. The Preferred Alternative reflects this vision. The specific mechanism of property transaction for the potential transfer and development of Federal air rights, which could include a long term lease or an exchange of property rights, will be determined as the project advances.</p> <p>The SDEIS and FEIS recognize that the Preferred Alternative requires using approximately 2.9 acres of the private air rights above the rail terminal. The FEIS acknowledges the commenter's contention that this would be a major adverse impact on the private air rights property and has revised the impact intensity finding accordingly.</p> <p>FRA notes that this is not a new impact, as the extent of the property need remains the same in the FEIS as it was in the SDEIS. Like the SDEIS, Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #36, mandates that USRC ensure that the acquisition of the privately owned air rights needed to construct the Project is conducted in accordance with the applicable provisions of the Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended.</p> <p>During that process, FRA anticipates that a formal valuation of the property impact will be developed and that appropriate compensation will be determined. FRA expects that the benefits of enabling a unified development of the air rights above the rail terminal will be considered, as appropriate, during the valuation and compensation process.</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
Akridge_0706	David Tuchmann for Akridge (Akridge)	1	Akridge supports the selection of Alternative F, provided that the Final EIS (FEIS) and/or Record of Decision (ROD) includes an unequivocal statement that implementation of this Alternative requires a consolidation of air rights development ownership and control under one entity. With the unification of such ownership and control, this Alternative provides a solid framework for a world-class transportation facility and the complementary sustainable, transit-oriented, urban development (Burnham Place) planned by Akridge. Absent a commitment in the FEIS which directs the SEP sponsor, the Union Station Redevelopment Corporation (USRC), to pursue acquisition of the private air rights required for the SEP in exchange for excess federal air rights that would be productively used by Akridge, the magnitude of adverse impacts of the federal undertaking described in the SDEIS would be severely understated.	Air rights development/ Property impacts	See response to Comments from Akridge_0620 above.
	Akridge	2	Akridge recommends that the FEIS and Record of Decision (ROD) make clear that a unification effectuated by an exchange of private and federally-owned air rights will be required for implementation of the Preferred Alternative F. If FRA concludes the station owner or the project sponsor will require new or additional permissions or authorizations to carry out these actions, such permissions or authorizations should be described in the Final EIS and/or ROD. If final documentation does not include a clear expression about an exchange of air rights and the permissions or authorizations on which such an exchange (or like form of property transfer) would be planned to occur, Akridge will conclude, and other interested parties will likely conclude, that the development of air rights and related open spaces in accordance with the concepts shown in the Preferred Alternative will not occur.	Air rights development/ Property impacts	See response to Comments from Akridge_0620 above.  FRA also notes that development of a civic space north of the Station is not part of the Project's Purpose and Need or an element of the Project. The Preferred Alternative defines a "Visual Access Zone," free of Project elements between H Street and the train hall; and a "Daylight Access Zone," also mostly free of Project elements but within which skylights would be installed to provide the new station concourse underneath with natural light. The private air rights developer would be responsible for the construction of the space, consistent with the terms of the covenant covering the property.
	Akridge	3	In 2021 Akridge agreed to collaborate with the FRA to resolve the concerns raised by the initial DEIS. During this time, Akridge communicated to FRA that in order for the SEP to achieve the public benefits desired by stakeholders, such an exchange of federal air rights with Akridge must be incorporated into the Preferred Alternative plan and all air rights development must be planned and executed under unified control. In spite of this robust record of multi-year communication between Akridge and FRA, the SDEIS does not identify an intent by the FRA to unify air rights development via a property exchange. In fact, the SDEIS disappointingly appears to do the opposite. In numerous places (SDEIS at XIV, 5-62, 5-136 and 7-11, Appendix C3S at 9-4, 9-13 and 18-13) the document presents as a 'default' implementation strategy the direction that USRC acquire 2.9 acres from Akridge for "just compensation," and that FRA will then decide whether or not to dispose of its excess air rights – to Akridge or to any other party. In Consulting Parties Meeting #15 (June 29, 2023), FRA representatives further rendered ambiguous the unification of air rights development by stating that FRA was exploring if FRA possesses "the authorities" to dispose of its air rights, which Akridge believes it clearly does (and "authority" was never previously raised as a concern by FRA in discussions with Akridge).	Air rights development/ Property impacts	See response to Comments from Akridge_0620 above.
	Akridge	4	Further, the SDEIS also confusingly notes that the federal air rights could be developed by the federal government. If FRA believes there is a viable scenario under which FRA (or a third party other than Akridge) can develop the federal air rights, that was not plainly stated in the SDEIS, and we assume it is not FRA's intent. That should be clarified in the FEIS and ROD, which should eliminate any ambiguity on this point.	Project - Federal air rights	At this time, FRA cannot preclude or commit to any specific mechanism through which the Federal air rights would be developed.
	Akridge	5	Development of the remaining private air rights and the excess federal rights by a party other than Akridge is not feasible. The SDEIS states that the adverse impact resulting from the removal of 2.9 acres from Akridge's property is "minor" because the coordination between FRA and Akridge in the development of the Preferred Alternative results in "ensuring that, although sizable, the reduction would not preclude developing the remaining air rights" (SDEIS at 5-62). Stated differently, this passage claims that independent development of the federal and private air rights parcels is feasible and acceptable to Akridge. This statement is clearly incorrect as Akridge has frequently conveyed to FRA that separate development is not feasible and certainly not acceptable to Akridge. Given that absent unified development, all air rights development is infeasible, property impacts of an independent development scenario would be among the most "major" impacts assessed in the EIS, and the benefits described above would not be realized.	Air rights development/ Property impacts	See response to Comments from Akridge_0620 above.

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	Akridge	6	The SDEIS references a large inventory of substantial public benefits which arise in the SEP only as a direct result of a viable, unified air rights development plan. The FEIS should make clear that these benefits can only be achieved through unified development of the air rights and a related exchange with Akridge. The FRA has extensively engaged with many other stakeholders to refine the Preferred Alternative to mitigate or avoid adverse impacts. In these cases, specific programmatic changes have been made and planning and design alternatives foreclosed. These changes or mitigations, including the size and location of the bus and PUDO facilities, accommodation of tour and charter buses, bicycle facilities, and vehicular circulation, were made during the course of developing the revised Preferred Alternative, and are now documented in the SDEIS as core, required elements.	Project - General	See response to Comments from Akridge_0620 above.
	Akridge	7	Akridge submits that the feasibility of air rights development and the creation of a central civic space, with functional connections from H Street to the Train Hall, are similarly core elements of the Preferred Alternative and priorities for DC SHPO in the 106 Programmatic Agreement. Akridge may take responsibility for design and implementation of the central civic space, as the SDEIS states. However, FRA and USRC are the parties responsible under the current regulatory regime for ensuring any federal property required for such purposes will be unified with private air rights property to enable such a space to exist. However, while the SDEIS reflects the advantages of relying on a unified air rights development strategy in order to achieve project benefits and minimize impacts, it also creates uncertainty by reflecting FRA's desire to maintain optionality and flexibility regarding the use of its air rights. The FEIS should eliminate any doubts about development of the air rights by making clear, as we believe FRA intends, that property unification and an exchange be ensured so that Alternative F's benefits and mitigations are made achievable.	Civic space	See response to Comments from Akridge_0620 above.  FRA notes that while it supports the development of a central civic space and made provisions in the Preferred Alternative not to preclude its construction by the developer of the private air rights through the definition of a Visual Access Zone and Daylight Access Zone, the civic space is not a component of the Project's Purpose and Need or an element of the Project. The elements of the Projects are listed in Section 3.1.1, <i>Identification of Project Elements</i> , of the FEIS. They include the historic station, tracks and platforms, bus facility, train hall, parking, concourse and retail, for-hire vehicles, and bicycle and pedestrian access. The Preferred Alternative incorporates these elements and would meet the Purpose and Need of the Project without the civic space. The private air rights developer is responsible for the construction of the space, consistent with the terms of the covenant covering the property.
	Akridge	8	<i>Recommended Changes:</i> <ul style="list-style-type: none"> <li>Clearly state in the FEIS/ROD that achievement of the Preferred Alternative will require a unification and exchange of air rights, and stipulate that the station owner and project sponsor will pursue these actions. If the station owner or project sponsor requires additional permissions or authorizations to effectuate these actions, the ROD should describe these requirements and an intention to procure them.</li> <li>Correct the misrepresentation of Akridge's position regarding the viability of an independent development (SDEIS at 5-62). A "major" land use impact can be avoided only if the FEIS includes clear commitments per the above bullet.</li> <li>Reference air rights unification and property exchange in the Programmatic Agreement</li> </ul>	Property impacts	See above responses.
	Akridge	9	USRC Requires Expansive New Resources and Authorities: The SDEIS assigns hundreds of new responsibilities, mitigation measures, stipulations, and requirements to USRC. In order to effectively fulfill these roles and commitments, USRC will require near term funding to support the hiring of new staff and execution of planning and design efforts. <i>Recommendation</i> <ul style="list-style-type: none"> <li>As the owner of Union Station, USDOT/ FRA should commit in the FEIS and/or ROD to lead the process of identifying and securing this near term funding from Congress. Without such a commitment, consulting parties and other stakeholders will be justifiably concerned about the feasibility of USRC's ability, as the project sponsor, to fulfill the commitments detailed in the SDEIS.</li> </ul>	Project sponsor	FRA identified USRC as the Project Sponsor in Spring 2023 and the process of obtaining support and mobilizing resources has begun. An early step is the development of a Union Station Expansion Project Delivery and Governance Study by IDC, in partnership with the District of Columbia Government. IDC worked with an Advisory Group composed of representatives from USRC, Amtrak, the United States Department of Transportation, FRA, DCOP, and DDOT to identify delivery, financing, and governance mechanisms needed to realize the Project (see <a href="https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf">https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf</a> , last accessed January 12, 2024).  FRA is pleased to have participated in this study that can bring regional stakeholders together to support the expansion of Union Station. FRA will continue to support USRC in its role as Project Sponsor through Project development and implementation within the limits of its responsibilities and authority.



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	Akridge	10	<p>the SDEIS does not acknowledge or document the impacts to Akridge’s property associated with the Alternative [F]. Some of these impacts include:</p> <ul style="list-style-type: none"> <li>•Lost Development Opportunity                             <ul style="list-style-type: none"> <li>o Elevating the air rights deck an additional 10+ feet to accommodate the bus facility. This concession eliminated a full floor of any potential air rights buildings in a large area south of H Street and eliminated potential air rights parking and service areas</li> <li>o Shifting air rights buildings north to accommodate an east-west train hall and bus facility eliminated potential building sites in locations with the most valuable views of the Capitol Building</li> <li>o Station element configurations (including the bus facility) require suboptimal locations and reductions in size of air rights loading and parking, thereby increasing management costs and reducing user convenience</li> </ul> </li> <li>•Circulation                             <ul style="list-style-type: none"> <li>o The train hall PUDO area (including when used temporarily for bus functions) will have significant negative visual, pedestrian safety, acoustic, and air quality impacts on the air rights</li> <li>o Assigning station PUDO and bus functions to the east service road severely limits the use of this road for any private air rights functions</li> <li>o Temporary use of the central road for shuttle buses will displace air rights vehicular uses, leading to operational accommodations and compromises</li> </ul> </li> <li>•Central Space                             <ul style="list-style-type: none"> <li>o The head houses fronting H Street provide beneficial and important station access points for the neighborhood and air rights, but potential impacts to the air rights remain if the massing and design of these features is incompatible with air rights buildings.</li> <li>o Skylights above the concourse and bus facility will obstruct deck level pedestrian and vehicular circulation and sight lines to building frontage</li> </ul> </li> <li>•Rail                             <ul style="list-style-type: none"> <li>o Track configuration imposes a rigid structural grid on the air rights with little opportunity for modification to accommodate varying building types and functions.</li> </ul> </li> <li>•Train Hall                             <ul style="list-style-type: none"> <li>o The largest feature of the SEP will have major positive and potentially adverse impacts on the air rights. Its scale, character, quality, materials, access points, interior program and amenities, and types and locations of vertical circulation elements will all directly impact the value of the air rights development</li> </ul> </li> </ul>	Air rights development/ Property impacts	<p>The SDEIS and FEIS recognize that the Preferred Alternative requires using approximately 2.9 acres of the private air rights above the rail terminal. The FEIS acknowledges the commenter's contention that this would be a major adverse impact on the private air rights property and has revised the impact intensity finding accordingly.</p> <p>FRA notes that this is not a new impact, as the extent of the property need remains the same in the FEIS as it was in the SDEIS. Like the SDEIS, Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #36, mandates that USRC ensure that the acquisition of the privately owned air rights needed to construct the Project is conducted in accordance with the applicable provisions of the Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended.</p>
	Akridge	11	<p>In addition, numerous technical components of the combined SEP and air rights will have to undergo further study and refinement during the post-NEPA implementation process, including structural systems, track and bus facility ventilation, emergency power, storm water management, utilities infrastructure, and rail noise and vibration. Without intensive coordination, these technical components may negatively impact air rights project viability, and the quality of urban design and architecture.</p> <p><i>Recommendations:</i> To avoid or minimize the impacts above, we recommend the FEIS include:</p> <ul style="list-style-type: none"> <li>•Commitment to a unification and exchange of property as described above in Section 1. A property exchange would minimize these impacts. Please note that attempting to compensate Akridge for the use of its property by means other than an exchange of development rights would not minimize or avoid these impacts.</li> <li>•USRC to develop a plan post-FEIS for ongoing project design and engineering that includes coordination, collaboration, document sharing, and schedule alignment with the private air rights developer for elements shared or which have impacts between the SEP and the air rights, including open space, architectural, technical, and transportation components as applicable.</li> <li>•Include pedestrian entrances on the east and west facades of the train hall.</li> <li>•Design guidelines and review processes developed for either the SEP or any air rights development should recognize that relationships between and among a) SEP elements, b) air rights elements, and c) existing conditions and resources should all be considered cohesively to maximize public and project benefits.</li> </ul>	Property impacts	<p>Regarding the first recommendation, see responses above.</p> <p>FRA notes that compensation in accordance with Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended, as referenced in Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #36, would appropriately mitigate the unavoidable impacts on private property.</p> <p>For the second recommendation, see response to Item #16 below.</p> <p>With regard to the third recommendation, the process to establish design guidelines has been addressed in the context of the Section 106 process and the PA (Appendix F4 of the FEIS, Stipulation VI.A.2), with opportunities for Akridge's input as a Section 106 Consulting Party.</p>

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	Akridge	12	<p>Growth in any single transportation use or development program that is out of balance with overall available transportation resources and infrastructure, or any specific use that relies too heavily on any one or two particular transportation modes, has the potential to disrupt the viability and function of other uses at or adjacent to Union Station. The SDEIS estimates and predicts that several street intersections in the station area will be over capacity, and that the Metro Red Line Station will also be over capacity by 2040.</p> <p>Inadequate capacity for critical transit services or failures at key intersections near the air rights development would have significant negative impacts on future building occupants and on the value of the development.</p> <p><i>Recommendations: Multi-modal Facilities Data Collection</i></p> <p>The SDEIS identifies several multi-modal elements that will require ongoing study and management during the SEP's construction and operation. Recognizing that planning assumptions and mode splits utilized in the SDEIS are estimates, and actual mobility patterns will change over time, on-going multimodal data collection should be part of required mitigations for the SEP. This effort would entail collecting capacity and demand information for each transportation mode at WUS, including daily and peak hour ridership, and peak hour vehicle trip counts. Continuing and periodic data collection will be critical to minimizing impacts and managing ongoing, additional investments in infrastructure in and around the station. Addressing multi-modal choke points or failures will only be possible with robust and period data collection.</p> <ul style="list-style-type: none"> <li>•Specifically, USRC should develop a transportation performance monitoring plan (PMP), including a detailed methodology for collecting multi-modal data and reporting guidelines. The data collection should include daily and peak hour ridership for each transit mode, peak hour vehicle, pedestrian, and bicycle counts, and peak hour queues at critical PUDO locations (including the train hall, Columbus Circle, First Street, Second Street, and below-grade).</li> <li>•Data collection should occur on a sufficient number of days to identify seasonal, weekly, daily, and hourly fluctuations. Any anomalies such as special events and construction or other disruptions should be identified in the PMP.</li> <li>•The plan should include, where necessary, safeguards for ensuring privacy of proprietary information such as ridership numbers of individual private transportation companies, and other private or proprietary information that may be gathered.</li> <li>• USRC should facilitate the collection of usage data and forecasts on a periodic basis from the facility's transportation service providers (i.e., Amtrak, MARC, VRE, Metrorail, Metrobus, intercity and tour bus, Streetcar, FHV, parking, and rental car facilities, bikeshare, bike storage and rental). Where possible each provider should provide origin and destination data.</li> </ul>	Transportation impacts	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #28a provides for the development of a robust multimodal Performance Monitoring Plan consistent with DDOT's Comprehensive Transportation Review (CTR) guidelines for Performance Monitoring. This measure was developed in coordination with DDOT. The data collection process included in the plan is generally consistent with the commenter's recommendations.

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	Akridge	13	<p>Multi-modal and destination facilities (i.e., airports, rail stations, stadiums and concert venues) around the country have routinely failed to efficiently and safely accommodate PUDO activities. Reasons for these failures include inadequately or poorly located program areas, insufficient investment in best practice research and planning, insufficient data availability to enable planning, and insufficient advanced coordination with private operators (Uber, Lyft, etc.). At WUS, a comprehensive plan for all the PUDO facilities will be critical to ensure their success. This includes the train hall PUDO which has the potential to have functional and aesthetic impacts on the air rights.</p> <p><i>Recommendations: Deck Level Vehicular Circulation Planning</i></p> <p>Use of the east and west service roads for bus and station PUDO has the potential to limit capacity available for air rights needs, as evident in the traffic modeling results for the east and west road intersections with H Street. The traffic analysis in the SDEIS identifies potential long-term capacity problems at the east and west station PUDO and bus facility access roads where they intersect with H Street. Since these roads are shared with the air rights, and are currently located either partially or completely within air rights property, Akridge believes that a process for long-term management of traffic impacts at these intersections should be required. Additionally, an effective management plan for use of the public roadways for PUDO (such as First and Second Streets) is essential to limit congestion around the station and the private air rights development and promote safety for more vulnerable road users such as pedestrians and bicyclists.</p> <ul style="list-style-type: none"> <li>•Specifically, USRC should develop a plan for integrated management of all station PUDO facilities, with a goal of balancing facility use so as not to create congestion and back-up at the two large above-ground facilities at Columbus Circle and the Train Hall. The PUDO management plan should include dedicated PUDO zones, active management, changeable signage, use incentives, and restrictions on PUDO types causing congestion at any one location.</li> <li>•Ongoing measurement of the PUDO queues at the Train Hall, Columbus Circle, and First and Second Streets should be included in the PMP.</li> <li>• USRC to limit overflow events (where buses utilize the Train Hall PUDO loop and/or the central road (shuttle bus only) to a maximum of 10 times annually. Uses beyond ten times would require engagement and approval by key stakeholders including the air rights owner.</li> </ul>	Transportation impacts	<p>Measures to address potential congestion associated with pick-up/drop-off activities are identified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #27a through 27f.</p> <p>As stated in Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #18a through 18c, USRC will work with the bus carriers, DDOT, and the Mayor's Office of Special Events to develop a <i>Bus Facility Operations Plans</i> that will address how peak traffic is managed, including the use of the H Street deck level PUDO space for overflow from the bus facility. The measure was revised from the SDEIS to add that "The private air rights developer will be given the opportunity to comment on the draft plan" (Item #18a).</p> <p>Prior to the development of the plan, it is not possible to commit to a minimum number of days during which the overflow space would be used. However, as noted in the FEIS, FRA expects this to be infrequent and minimized as much as possible consistent with the operational needs of bus carriers.</p>
	Akridge	14	<p>Akridge supports the Preferred Alternative's approach to prioritizing pedestrian and bicycle circulation on the east and west ramps connecting the H Street deck level with Columbus Circle and the station.</p> <p><i>Recommendations: Pedestrian and Bicycle Planning</i></p> <p>Akridge believes that additional pedestrian and bicycle connections should be explored to provide further active transportation benefits for the SEP and air rights development, particularly north of H Street. Improved connectivity from H Street to bicycle facilities on K Street, First Street, and/or Second Street should be explored further.</p> <ul style="list-style-type: none"> <li>•USRC should work with DDOT and the private air rights developer to explore the feasibility of additional pedestrian and bicycle connections to one or more of K Street, First Street, and Second Streets, NE, at the north end of the air rights, which likely will require some joint use facilities at the potential utilities building on the REA site, or potentially through portions of the rail terminal.</li> <li>• USRC should work with DDOT and the private air rights developer to ensure the existing and planned bicycle networks (through and around the station and air rights development), bike sharing station locations, and public and private bicycle storage locations are holistically planned and implemented.</li> </ul>	Project - Pedestrian/Bicycle Access	<p>Section F.8, <i>Pedestrian and Bicycle Access</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS describes the pedestrian and bicycle improvements included in the Preferred Alternative.</p> <p>Section Table 7-1, Items #22a through 23 identify measures to avoid, minimize, or mitigate adverse impacts on pedestrian and bicycle activity that USRC will implement in coordination with DDOT.</p>

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	Akridge	15	<p>The schedule and phasing sequence proposed for Alternative F have severely negative impacts on the private air rights project, as well as on Union Station users and the neighborhoods surrounding the station. Most of the impacts identified in the SDEIS relate to noise and vibration, as well as dust and construction traffic. However, an analysis of potential impacts on the viability of the air rights project is not provided, and economic impacts on the air rights are not identified or quantified. Other economic impacts to neighboring businesses and properties may occur from an extended construction duration, and are similarly not examined.</p>	Construction impacts	<p>Section 5.9.3.3, <i>Construction Impacts</i>, of the FEIS was updated to note a likely impact from the construction of the Project on the private air rights through constraints on the development schedule. However, as explained in the FEIS, it is not possible to quantify this impact, as there are no specific plans or schedules for the private air rights development in the No-Action Alternative against which the effects of the Preferred Alternative could be measured.</p> <p>Construction impacts on the local community, including businesses, are addressed qualitatively in Section 5.14.3.3, <i>Construction Impacts, Community Disruption and Other Social Benefits or Impacts of the FEIS</i>. Adverse impacts are anticipated to be moderate for the reasons stated in that section.</p>
	Akridge	16	<p>The construction phasing and methods of construction identified in the 2020 DEIS (which we assume remain similar to those proposed for Alternative F), pose the following challenges for the air rights development:</p> <ul style="list-style-type: none"> <li>•Overall Project Construction Duration. The proposed 13 year overall duration for construction would prevent the air rights buildings from commencing construction for nearly nine years from initiation of SEP construction. With funding for each proposed phase unlikely to be continuous, the proposed plan could yield the first air rights building delivery 15 or more years from now. Neither the 2020 DEIS nor the 2023 SDEIS identifies precedent terminal infrastructure projects necessary to begin construction of the SEP. These projects along with potential delays accounting for the reconstruction of the H Street Bridge could push construction commencement out several years further.</li> <li>•Construction methodology. The four phase methodology includes phase lines which are not conducive to delivering air rights buildings, and this methodology also requires waiting for the very end of the project to open some of the most important SEP facilities (bus station, First Street Concourse, MARC track improvements). While potentially feasible, the location of a temporary bus facility on the deck would pose considerable impacts to the air rights development. To address these significant construction impacts, Akridge recommends: <ul style="list-style-type: none"> <li>• USRC to undertake a construction implementation study (and subsequent studies as necessary) to identify means for mitigation of construction impacts and shortening of construction timelines, with coordination and collaboration with the private air rights developer and Amtrak. Such a study should be required as a post-FEIS mitigation measure, as opposed to a pre-FEIS requirement so as not to unduly delay completion of the NEPA process. Goals of this study should include: <ul style="list-style-type: none"> <li>o Commence preparation work and the first phase of the SEP at the earliest possible date</li> <li>o Build the SEP in as few years as possible</li> <li>o Deliver high-value and strategic SEP project elements earlier within SEP construction</li> <li>o Commence air rights vertical construction within the fewest number of years of the SEP construction start feasible</li> <li>o Provide new tracks and platforms in accordance with enhanced rail operations, including early delivery of needed improvements such as ADA-compliant, low-level run-through platforms</li> <li>o Reduce project costs through shortened construction durations and other means</li> <li>o Minimize construction-based risks (cost escalation, change orders, schedule delays, safety risks)</li> <li>o Optimize the durations and types of disruptions to deliver the greatest amount of public benefit most quickly</li> <li>o Reduce noise, inconvenience and disruptions in the areas surrounding the station</li> </ul> </li> <li>• Study scope to accomplish these goals should include: <ul style="list-style-type: none"> <li>o Greater use of temporary track work, use of off-site real estate for staging and lay-down, alternative work sequencing, hybrid excavation concepts combining both open cut and top-down excavation techniques, and other measures</li> <li>o Analysis of integrated construction approaches for the air rights and station projects combined</li> <li>o Immediate steps for collection of additional required data or determination of existing conditions including below-grade conditions</li> <li>o Investigation of alternate locations in which temporary parking and/or bus facilities can be provided</li> <li>o Exploration of greater use of work trains instead of dump trucks</li> </ul> </li> </ul> </li> </ul>	Construction phasing	<p>Noted. FRA identified USRC as the Project Sponsor in Spring 2023 and planning for Project delivery has begun. An early step in this process is the development of a Union Station Expansion Project Delivery and Governance Study by IDC, in partnership with the District of Columbia Government. IDC worked with an Advisory Group composed of representatives from USRC, Amtrak, the United States Department of Transportation, FRA, DCOP, and DDOT to identify delivery, financing, and governance mechanisms needed to realize the Project (see <a href="https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf">https://www.federalcitycouncil.org/wp-content/uploads/2023/05/IDC-Press-Release-Union-Station-Expansion-Project-Delivery-and-Governance-Study-1.pdf</a>, last accessed January 12, 2024).</p> <p>Construction methods and durations are elements considered as part of the Union Station Expansion Project Delivery and Governance Study. Specific construction strategies and schedules will be developed during the engineering and design phase of the Project.</p>

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Comment ID	Commenter	Item #	Comment	Topic	Response
PI_0628_001	Jake Lighter	1	I would like to address the ridership projections being used in part as a justification for the seeming necessity of the proposed \$8.8 billion dollar renovation project for Union Station. The projections used 2019 as a ridership baseline, and have as far as I can tell, not been altered to reflect ridership and projected travel conditions for the projected year of 2040. The pre pandemic projections were stated on page 39 of the SDEIS as follows for increased projections and 2019 to 2040. A 95% increase in ridership for Amtrak 150% increase in ridership from Marc and a 250% increase in ridership for VRE. I'd like now to state the current numbers on ridership for these lines. In 2019, the Amtrak Northeast Corridor had a ridership of 12,525,602 and in 2022, had a ridership of 9,235,694, putting ridership at about 74% of 2019. In 2019, Marc had total ridership of 8,976,927, and in 2022 had a ridership of 2,816,561, putting ridership at about 31% of 2019. Finally, in 2019, VRE had a total ridership of 4,475,529 and in 2022 had a ridership of 1,166,830 putting ridership at about 25% in 2019. This means that not only are the pre pandemic projections, but it's a severe doubt, and it's an open question of whether ridership will be able to return to levels they were in 2019 by 2040. Much less consider whether they will have the triple digit increases projected for the proposed renovation project. With conditions such as increased work from home and corporate cutbacks in business travel, I believe it is necessary for the project to receive new projections for 2040. And is it offensive to the US voter in the meeting of knowledge and democracy directed by civilian discourse to use these projections as justification for multibillion dollar mega project after a multi-year pandemic that completely upended the realities of travel, it should be obvious that projections based on pre pandemic numbers are no longer accurate. I hope the more honest and accurate projections can be prepared for this project so that DC residents can have genuine conversation on what the justifications for this project are and why we should be throwing sums for a station, which is not in dire ill repair when there are far more pressing transit needs in the metro area. Thank you.	Project - Rail planning	<p>As is explained in Chapter 2, <i>Purpose and Need</i>, of the FEIS, supporting current and future long-term growth in rail service and operational needs is just one aspect of the Project's purpose. The Project also is intended to achieve compliance with the ADA and emergency egress requirements; facilitate intermodal travel; provide a positive customer experience; enhance integration with the adjacent neighborhoods, businesses, and planned land uses; sustain WUS's economic viability; and support continued preservation and use of the historic station building.</p> <p>Planning for the rail component of the Project is based on the long-term rail planning presented in the NEC FUTURE study and the various rail operators' future operating plans. FRA recognizes that the pandemic has resulted in a reduction in ridership on all rail services in 2020-2023; however, current trends are positive (see for instance <a href="https://media.amtrak.com/2022/11/amtrak-fiscal-year-2022-the-beginning-of-a-new-era-of-rail/">https://media.amtrak.com/2022/11/amtrak-fiscal-year-2022-the-beginning-of-a-new-era-of-rail/</a>, last accessed January 12, 2024, and <a href="https://vapassengerrailauthority.org/amtrak-virginia-sets-another-ridership-record-in-april/">https://vapassengerrailauthority.org/amtrak-virginia-sets-another-ridership-record-in-april/</a>, last accessed January 12, 2024).</p> <p>Amtrak developed the rail program documented in Appendix B of the DEIS and that both VRE and MTA commented on the SDEIS and stated that the rail program does meet their future needs (see MTA_0630, Item 3 and VRE_0706, Item 1).</p>
PI_0628_002	Lisa Turner	1	I would only hope that you that I didn't hear whether the historic Hall is being preserved. I hope that it is because it's absolutely beautiful. I'd look at it every time that I'm there. Even if I'm just walking through to catch train or a bus.	Historic station	The Station Expansion Project will preserve the historic Station building. As is explained in Chapter 2, <i>Purpose and Need</i> , of the FEIS, supporting the continued preservation and use of the historic Station building is one of the Project's purposes. Potential impacts from the Project to historic properties, including the historic Station building, are described in Section 5.12.3, <i>Impacts of the Preferred Alternative</i> , of the FEIS and in SDEIS Appendix D1S, <i>Supplemental Assessment of Effects and Section 106 Correspondence</i> . Measures to minimize and mitigate adverse effects are specified in the Section 106 PA included in the FEIS as Appendix F4.
	Lisa Turner	2	The second comment that I wanted to make is, when I first moved to this area nearly 30 years ago, Union Station was for some of us a destination, there was a movie theater in there, there was a lot of robust shopping. And over time, it did not take very long for it to kind of go downhill. There were, I think, some issues in the movie theater, there were some acts of violence and things like that. And people stopped going there really to shop, and to do things like that. So I do hope that there will be some degree of shops and places where people may want to make Union Station a destination again, not just a place to walk through just to catch a train or a bus, which is what it's become for us lately.	Project - Public Accommodations	As stated in Section 3.5, <i>Description of the Preferred Alternative</i> , of the FEIS, the Preferred Alternative would add approximately 64,000 square feet of new retail space to Union Station. The exact retail program will be defined at a later date by the entity managing Union Station, consistent with market conditions.
PI_0628_003	Ken Jarboe	1	I am very concerned about the design of the drop off and pickup locations. The supplemental says that it is being centralized at the parking garage, yet, they're going to allow pickup and drop off in front of the station. And apparently somewhere around H Street. I am concerned that this proliferation of pickup and drop off sites will just add to greater confusion. And frankly, you know, some of us remember the redesign of Columbus Circle that was supposed to take care of the traffic problems, but it essentially created gridlock in front of the station. And I'm hoping that the new plans will relieve that. there's nothing more unsightly than a large parking lot in front of this historic building.	Project - PUDO	<p>As explained in Section F.9, <i>Pick-up and Drop-off Areas</i>, of Appendix F2, <i>Description of the Preferred Alternative</i>, of the FEIS, the below-ground facility is expected to handle approximately half of all pick-up and drop-off activity at Union Station. Pick-up and drop-off would continue in front of the Station as well, consistent with the role of the historic Station building as a grand gateway to the nation's capital. Pick-up and drop-off would also be allowed on the H Street deck level, which would provide more direct access to the bus facility (just below). Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #27a through 27f, specify measures that USRC would implement to ensure the efficient operation of the various pick-up and drop-off areas.</p> <p>FRA conducted micro modeling of operations in front of the Station during the preparation of the FEIS using the VISSIM model. Based on the modeling, operations in front of the Station are expected to be acceptable.</p>

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PI_0627_003	Gail Sullivan	1	One of my concerns is the building of the garage underneath, and the reason I'm saying this is because living in the neighborhood, we've been told we can build up but we can't build down because of environmental issues. So -- and we're talking in this area, so I find it strange that you've been given permission to dig a hole but as a homebuilder, we can't dig a hole. We can only add a story.	Groundwater impacts	The potential impacts of the Project on groundwater are described in Section 5.3.3, <i>Impacts of the Preferred Alternative</i> , of the FEIS. Table 7-1 of the FEIS/Table 13-2 of the ROD, item #2a and 2b identify measures to avoid, minimize, or mitigate these impacts. The Project would be implemented in compliance with applicable District laws and regulations. Applicable permits would be obtained prior to the start of construction. Construction debris would be disposed of as described in 5.4.3.3, <i>Construction Impacts</i> , of the FEIS.
	Gail Sullivan	2	when construction does start, will it start at 8:00 and end at 5:00? Will it be on the weekends? I've heard nothing in any presentation as to your time frame for when it will be starting. Because then you're affecting the neighborhood.	Construction schedule	The noise impacts from constructing the Project are described in Section 5.10.3.3, <i>Construction Impacts</i> , of the FEIS. As stated in Section 5.10.3.3, it is anticipated that construction would occur in two 10-hour shifts, for a total of 20 hours a day. Work would be conducted 6 days a week. Therefore, it would include work outside Monday-Saturday from 7 AM to 7PM and, as such, require a permit from the District of Columbia, as indicated in Table 7-2, Items #20 of the FEIS.
	Gail Sullivan	3	Also, it's a lot of artwork on the H Street Bridge. What will happen to that? You know, will that be preserved the way you're going to preserve most of Union Station? Will the H Street Bridge artwork -- because a lot of people, you know, gave money for that.	H Street Bridge	The replacement of the H Street Bridge is a separate and independent project from the Station Expansion Project. It is managed by DDOT. DDOT is responsible for addressing any issues related to the artwork on the H Street Bridge.
	Gail Sullivan	4	And will streets be closed? You know, during the different phases, will -- and when they're -- if they're closed while you're building that, the streets getting --for construction to get there,	Construction impacts	As explained in Section 5.5.3.3, <i>Construction Impacts, Vehicular Traffic</i> , of the FEIS, construction of the Preferred Alternative would require temporary road closures, especially along G Street NE between North Capitol Street and First Street NE; First Street NE, between Columbus Circle and K Street; and Second Street NE, between Massachusetts Avenue and K Street, to accommodate construction traffic in and out of the construction site. Road closures would generally last from 5 to 6 minutes on average and no more than 20 minutes. During those times, traffic may temporarily move to other streets such as H Street, K Street, 4th Street NE, and North Capitol Street.
	Gail Sullivan	5	what effect will the heavy equipment, which I'm assuming you're going to need, will have on our streets?. You know, I see now where heavy construction takes place and then the streets afterwards are horrible. There are big ditches, you know. They're -- I mean, there are things -- I'm just -- so when you're talking about the environment, are you talking about the infrastructure surrounding the area where you'll be doing? Because you have to go through that infrastructure to get to where you're going to do your building.	Construction impacts	Any damage to public streets around Union Station from construction would be minimized and repaired per District of Columbia requirements. Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #12 specifies that USRC will prepare an <i>Integrated Construction Transportation Management Plan</i> that will ensure that the contractor avoid, minimize, or mitigate impacts from construction on all transportation modes in each phase of construction and contain procedures to enforce, monitor, and evaluate the measures taken as well as ensure consistency with District requirements for managing construction impacts. Among other things, the plan will identify ways to avoid impacts of truck traffic on residential streets.
	Gail Sullivan	6	So that part and when I think of the noise now, will it be noise reduction built into what you're doing? Because we've got noise now. I mean, I can hear the trains when I'm sitting in my living room.	Noise impacts	The noise impacts of the Preferred Alternative are described in Section 5.10.3, <i>Impacts of the Preferred Alternative</i> , of the FEIS. Noise levels (including from train operations) were modeled at 164 locations around Union Station. At most locations, noise levels would be typical of a dense urban setting. Compared to the No-Action Alternative, the Preferred Alternative would have some beneficial impacts on noise in locations closest to the rail terminal due to changes in structural design. Overall, out of the 164 modeled locations, only 14 locations are predicted to experience changes in noise levels that would be generally perceptible. The noise impacts at the 14 locations are moderate impacts that would not reach the "severe impact" category established under the FTA's Transit Noise and Vibration Impact Assessment Manual, which is the criterion used for the noise assessment.
	Gail Sullivan	7	So when you're adding more things and putting all the cupboards in, and will our sightlines with this new piece of the construction, will it block our sightlines, you know, when we want to see the Capitol or anything? Will any of our sightlines be blocked?	Visual impacts	The Preferred Alternative's impacts on views and viewsheds (including the U.S. Capitol) during construction and operation are analyzed in Section 5.11.3, <i>Impacts of the Preferred Alternative</i> , of the FEIS. Twenty-eight views and viewsheds were analyzed. There would be negligible adverse direct operational visual impacts on two views (K Street NW, looking east and Columbus Circle Drive, east side).
	Gail Sullivan	8	when we say parking, is it 24-hour parking? Is it weekly parking? You know, how long can you park once you put your car in there and you get on the train?	Project - Parking	The basis for the Preferred Alternative's parking program is presented in Section 1, <i>Parking Program</i> , of Appendix F1, <i>Multimodal Refinement Report</i> , of the FEIS. The parking facility would accommodate both short- and long-term parking. Monthly parking would no longer be offered. The exact distribution of parking spaces between these uses as well as the detailed operation of the parking facility will be determined at a later stage of the Project.

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	Gail Sullivan	9	And, of course, seating. I looked at all your pictures over there. I didn't see a chair in Union Station, so where would people sit? I know when I went to New York and I went in the train -- there was not a chair there. It was no place to sit. So in the new Union Station, are you taking the seating out? Where will people sit when you do your revising here and making it look better? Will I have benches that I can sit in, because if my train is not leaving right now, people are standing up? So when you build the new ones, will they be standing? That's it.	Project - Public accommodations	The drawings and renderings presented in the SDEIS and FEIS are conceptual in nature and provided for illustrative purposes only. The detailed designed of the new public spaces at Union Station will be determined during the Project's design phase.
PI_0627_004	Chase Matthew	1	One of the key statements of need in the Environmental Impact Statement relates to the boarding, fluidity, and capacity of Amtrak trains. My concern is that if Amtrak does not change their boarding procedures, it won't matter how large, beautiful, airy, et cetera, the train concourse is because Amtrak will continue to follow their existing procedure of having people line up in enormous lines 10 to 15 minutes before a train boards, everyone rushing across the concourse when they figure out what track the Northeast Regional will be on, the SCELTA (phonetic), et cetera. I am especially concerned about this because after investing over 8 billion dollars in Moynihan Train Hall in New York, the same procedure is being used as at the old Penn Station. So the beautiful train hall is filled with people lining up and enormous lines, which is not an efficient use of space, and it's not the way trains are boarded in almost any first-world country outside of the United States. So I want to comment and ensure that the FRA and Amtrak are able to collaborate and design a space where either the Amtrak boarding procedures can be modified to make a more efficient use of the space, or the procedures can be changed to hopefully maximize the fluidity of the new train concourse and train movements.	Project - Rail planning	Boarding procedures of trains at Union Station, including Amtrak trains, are outside of the scope of the Project and the EIS. Future boarding procedures would be determined by Amtrak and USRC based on operational requirements and security needs.
PI_0627_005	Ra Amin	1	what work hours will be requested for the project? not only the work hours, you know, Monday through Friday, but will there --will the project request weekend hours, like Saturday hours? And also holiday permitting hours, you know, especially those off holidays and, like, Presidents' Day, MLK Day, some of those other days that a majority of communities will have off. But a lot of times we find out that projects, especially large projects, request to work on those days, but that also impacts community greatly, especially when you want to use that day as a day of rest or a day of family.	Construction schedule	The noise impacts from constructing the Project are described in Section 5.10.3.3, <i>Construction Impacts</i> , of the FEIS. As stated in Section 5.10.3.3, it is anticipated that construction would occur in two 10-hour shifts, for a total of 20 hours a day. Work would be conducted 6 days a week. Therefore, it would include work outside Monday-Saturday from 7 AM to 7PM and, as such, require a permit from the District of Columbia, as indicated in Table 7-2, Items #20 of the FEIS.

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Document	Section	Page/Line	Classification	Akridge By-line Comments (Submitted with Akridge_0706)	Topic	Response
SDEIS	ES.5	Page v 79-81	Correction	Our understanding is that no trains, or portions of trains, would be located inside the train hall.	Project-Train hall	Based on current conceptual plans, while tracks and platforms would be separated from the circulation spaces of the train hall, the structure's roof would extend over the southern end of the stub-end tracks, as described in the SDEIS and FEIS.
SDEIS	3.1	Page 3-3 Note 14	Correction	Akridge air rights start 70'-80' above sea level, not "above the tracks" as stated	Factual correction	This has been corrected in the FEIS.
SDEIS	3.3	Page 3-12 Line 315-320	Correction	Akridge's program for the air rights shows 2.7M total (private air rights and federal property); Out of the 2.7M, approx. 2.2M are private air rights and approx. 500,000 are federal SF. Akridge's program for hotel totals 385,000 SF (not 608,000 SF) with a total of 453 keys (253 south of H Street and 200 north of H Street)	Air rights development	The amount of assumed hotel use has been revised in the FEIS and, where applicable, analyses have been revised accordingly. The correction did not result in substantively different impact findings.
SDEIS	5.5.1.1	Page 5-20 Line 867-871	Clarification	Per operations modeling in previous DEIS appendixes Akridge understands that private rail cars will not be allowed in the terminal during its reconstruction.	Construction impacts - Rail	The referenced text addresses operational impacts. It is correct that based on current assumption, no space would be available for private rail cars during construction. Section 5.5.3.3, <i>Construction Impacts, Commuter and Intercity Rail</i> , of the FEIS has been revised to clarify this impact.
SDEIS	5.5.1.4	Page 5-23 Line 936-940	Recommendation	Add to mitigation measures that USRC to incorporate measures to ensure that regular PUDO traffic normally accommodated at the train hall can be effectively diverted to the below-ground PUDO facility during the identified special events occurring 5 to 10 days a year. Measures should include a goal that station PUDO traffic does not divert onto the air rights streets and disrupt air rights resident, tenant, loading, and emergency vehicle circulation.	Mitigation - PUDO	Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #18a, provides for the preparation of a <i>Bus Facility Operations Plan</i> that will address, among others, the management of special events in the District to minimize impacts to adjacent streets, including the streets of the private air rights development.
SDEIS	5.5.1.6	Page 5-24 Line 984-986	Comment	Akridge's belief is that the below grade PUDO facility is expected to significantly improve pedestrian conditions at street level by removing high traffic volume from immediately adjacent to the station	Project - PUDO	Noted.
SDEIS	5.5.1.6	Page 5-24 Line 989-991	Recommendation	Pedestrian access should also be provided on the east side of WUS, either at the existing retail concourse, the historic headhouse, or at the new train hall	Project - Pedestrian/Bicycle	As described in Section F.8, <i>Pedestrian and Bicycle Access</i> , of Appendix F2, <i>Description of the Preferred Alternative</i> , on the east side, the Preferred Alternative provides new pedestrian access to the H Street Concourse. It has also been clarified that pedestrian access would be provided at the east end of the train hall (Section F.4, <i>Train Hall</i> ). Access through the historic Station building would remain available.
SDEIS	5.5.1.9	Page 5-28 Line 1080-1082	Comment	Akridge and DCOP studies noted availability of up to 5000 off-site parking spaces. These could be available for use during construction, or similar to air travel, could provide long-term parking for passengers using parking search apps (as is likely already occurring at Union Station).	Construction - Parking	Noted.



SDEIS Comments: Private Parties

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SDEIS	5.8	Page 5-55 Line 1711-1713	Clarification	The analysis apparently does not include comparative estimates for vehicular travel replaced by increased use of bus and rail (reducing carbon emissions), and also take into account an estimate of greening the grid and transformation to an electrified vehicle fleet, in assessing energy use? The SDEIS shows adverse impacts on energy resources, but does it account for these major changes that will occur by project completion? Clarification of the estimates that were used in the assessment for these items would assist in future studies of GHG impacts.	GHG impacts	<p>The quantitative estimates of CO<sub>2</sub> emissions presented in the SDEIS and FEIS are conservative, as they do not incorporate the long-term reduction in emissions that would result from the greater availability and use of rail travel along the Northeast Corridor due to the Project and corresponding reductions in global GHG emissions from automobile traffic. The SDEIS and FEIS addressed this qualitatively. The FEIS (Section 5.7.3.2) notes that “modal shift from car to rail along the Northeast Corridor in the Preferred Alternative can be anticipated to result in a reduction of GHG emissions from automobiles. The U.S. National Blueprint for Transportation Decarbonization notes that the transportation sector as the largest source of greenhouse gas emissions in the United States and identifies as one of three key strategies the need to improve efficiency by expanding affordable, efficient, and reliable options like public transportation and rail. Additionally, in 2022, Amtrak adopted a Net Zero Strategy with a net-zero emissions goal for 2045, which can be anticipated to have reduced emissions from train operations by 2040. Resulting reductions in GHG emissions would partially or wholly offset local GHG emissions associated with traffic at WUS in the Preferred Alternative.”</p> <p>The analysis does not assume any measures that would reduce energy consumption at Union Station. The FEIS/ROD defines measures that will be developed and implemented during Project design, construction, and operation to minimize emissions (see Table 7-1 of the FEIS/Table 13-2 of the ROD, Items #31a through 34).</p>
SDEIS	5.9.1.3	Page 5-64 Line 1874-1878	Comment	Beneficial impacts will be enhanced/ensured if station spaces have useful, neighborhood serving retail and if the station is used for circulation between neighborhoods and does not become a barrier separating neighborhoods.	Land use impacts	Noted. As stated in the SDEIS in the text cited by the comment (Section 5.9.1.3, <i>Consistency with Local and Regional Plans</i> ), the Preferred Alternative would support and advance the goal of enhancing connections between areas to the east and west of the station and contribute to knitting together neighborhoods currently divided by the rail terminal.
SDEIS	5.12.1.2	Page 5-94 Line 2372-2376	Comment	The Preferred Alternative would have a moderate or even major beneficial visual impact on First Street, NE, with removal of the upper and non-original portion of the Burnham wall between the historic station and H Street. This would allow the original Burnham Wall in this location to be restored to its original height and configuration, or very close to the same. This result, along with the proposed setbacks from First Street, NE for new buildings in the federal air rights, would potentially result in a net beneficial physical impact to the Burnham Wall and station setting.	Visual impacts	The beneficial impact to First Street is noted in Section 5.12.3.1, <i>Direct Operational Impacts, Visual Impacts</i> , of the FEIS in the context of the L'Enfant Plan. Impacts to the Burnham Wall are considered as part of effects to the Washington Union Station Historic Site (Appendix D1S, <i>Supplemental Assessment of Effects and Section 106 Correspondence</i> , No. 49) of the SDEIS.
SDEIS	5.12.2	Page 5-97 Line 2502-2523	Comment	A number of factors can determine whether there will be a moderate adverse visual impact of the Federal air rights on the U.S. Capitol Dome viewshed, including the massing and character of the federal air rights buildings, and the material, reflectivity, variety, scale and arrangement of the buildings. The simple metric of visible/not visible should not be the singular defining definition of impacts, when the factors noted here are at least as determinative of impacts, if not more so. With appropriate design, the potential may exist that the Federal air rights could have a minor or moderate beneficial visual impact compared to the existing parking garage north of the historic station building.	Visual impacts	As noted in Section 5.11.3, <i>Methodology</i> , of the DEIS and Section 11.4, <i>Methodology</i> , of Appendix C3 of the DEIS, the lack of information on materials and other specific design elements at this early stage of planning is the reason for the approach to visual impacts focusing on massing and allowable zoning volumes. In the SDEIS and FEIS, the approach was refined by incorporating specific assumptions on mass, height, and setbacks. However, specific design elements remain undefined. FRA recognizes that the resulting analysis is conservative and that future design decisions may reduce anticipated impacts or result in beneficial impacts.
SDEIS	6.6.3.2	Page 6-9 3889-3890	Comment	FRA should determine and state in the FEIS if the location of the access portal in the western wall providing access to and from below-grade parking is in the original Burnham Wall or in a portion that was reconstructed when the power plant was demolished.	Cultural resources impacts	The access portal would be in the reconstructed portion of the Burnham Wall.
SDEIS	7.1	Page 7-3 Table 7-1 No. 13	Clarification	The determination of rescheduling or cancellation is unclear in terms of their frequencies and durations; whether one type of cancellation vs another may have greater or lesser impacts. The FEIS should clarify that schedules and cancelations offer potential flexibility for construction phasing and the impacts of any particular one of these can be minor or major	Construction impacts - Rail	Estimates of the number of cancellations are provided in Table 5-34 of the FEIS. The FEIS notes that impacts would vary by phase.

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Appendix C3aS	Supplemental Visual Assessment	General	Recommendation	Akridge suggests adding a qualifying note within the SDEIS Appendix C3aS stating that the private air- rights massing shown for the purposes of the Aesthetics and Visual Quality was provided by Akridge as indicative and illustrative of only one potential air rights massing scenario.	Visual impacts	A note to this effect has been added to Section 5.11.1, <i>Methodology</i> , of the FEIS.
Appendix C3aS	Supplemental Visual Assessment	View 1	Comment	Akridge appreciates the note that “the aesthetic and visual impact changes as one approaches WUS.” From many vantage points, views are framed and obscured by buildings, trees and other stationary streetscape features. One conclusion is clear, when approaching the historic station from the south – from First St NE, Delaware Ave NE, and Louisiana Ave NE – a large expanse of the façade and vaulted roof of the historic station is only revealed when approaching close to Columbus Circle. From this in-close proximity, the air rights behind the Washington Union Station are largely, if not completely, obscured by the historic station’s grand façade (with the air rights massing in Alternative F, visibility of the air rights from within or on the edges of Columbus Circle would occur only at its far east and west ends, where a view of the side of Union Station can be seen). The Preferred Alternative, which places SEP program within the southernmost areas of existing private air rights, effectively pushes private air rights development significantly further north, thereby decreasing air rights visibility from south of the historic station compared to the no-action alternative.	Visual impacts	Noted.
Appendix C3S	1.7	Page 1-12 Line 249	Correction	The table shown is incorrect. Private air rights square footages are shown with the Federal Air Rights Development square footage.	Air rights development	Noted. This was a typographical error. Correct square footages were used in the SDEIS and FEIS analyses.
Appendix C3S	5.4.1.1	Page 5-10 Line 967	Correction	Akridge’s program for hotel totals 385,000 SF (not 608,000 SF) with a total of 453 keys (253 south of H Street and 200 north of H Street)	Air rights development	The amount of assumed hotel use has been revised in the FEIS and, where applicable, analyses have been revised accordingly. The correction did not result in substantively different impact findings.
Appendix C3S	5.5.1.4	Page 5-30 Line 1364-1370	Comment	Akridge is concerned that extended use beyond 5 to 10 times annually could impact circulation for the air rights. There needs to be additional considerations including but not limited to intersection function and pedestrian flow. A system will need to be established for future negotiation/prevention of expansion of this proposed use.	Project - intercity buses	As stated in Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #18a, USRC will work with the bus carriers, DDOT, and the Mayor's Office of Special Events to develop a <i>Bus Facility Operations Plan</i> that will address how peak periods will be managed, including the use of the H Street deck level pick-up and drop-off space for overflow from the bus facility. The measure specifies that the private air rights developer will have the opportunity to comment on the draft plan.  Prior to the development of the plan, it is not possible to commit to a minimum number of days during which the overflow space would be used. However, as noted in the FEIS, FRA expects it to be infrequent and minimized as much as possible consistent with the operational needs of bus carriers.
Appendix C3S	5.5.1.12	Page 5-44 Line 1698-1702	Recommendation	Recommend for USRC to work with the air rights developer on traffic modeling and planning for H Street intersection mitigation measures.	Project - H Street intersection	This is specified in Table 7-1 of the SDEIS/Table 13-2 of the ROD, Item #28d.
Appendix C3S	NA	Page 5-71 Table 5-48	Recommendation	Add note that the H Street bus stops need to be coordinated with Akridge due to limited sidewalk space, security elements, and potential bicycle infrastructure needed in these areas.	Project - Transit buses	Any bus shelter on H Street would be sited in coordination with WMATA and DDOT (Table 7-1 of the SDEIS/Table 13-2 of the ROD, Item #25c) and approved by DDOT. FRA anticipates that DDOT will engage the private air rights developer as part of this process, as appropriate.
Appendix C3S	NA	Page 5-72 Table 5-48	Recommendation	Verify that MPD and DPW would have adequate staffing for long term enforcement of PUDO zones on First Street and Second Street.	Project - PUDO	This will be addressed as part of the coordination specified in Table 7-1 of the FEIS/Table 13-2 of the ROD, Item #27b.
Appendix S1	1.1	Page 2 Line 31-34	Comment	Akridge concurs with the FRA program of approximately 500 spaces on one-level below grade.	Project - Parking	Noted.

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Appendix S2	NA	General	Comment	Akridge understands that the SDEIS, as a document describing and assessing the environmental impacts of the Station Expansion Project, is necessarily focused on the proposed public project and is largely silent on surrounding urban design and private air-right integration. As Akridge has emphasized throughout the EIS process, the whole should be greater than the sum of its parts, with the parts including SEP, Columbus Circle, the historic station, the surrounding city and private air rights.	Air rights development	Noted.

