



Government of the District of Columbia

Advisory Neighborhood Commission 6C

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September 22, 2020

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

Re: Union Station Expansion Project DEIS Comments

Dear Mr. Valenstein:

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

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

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

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

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

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

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

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

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

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

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

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

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

Solutions and Desired Outcomes

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

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

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

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

Inadequate Bicycle Facilities

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

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

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

Solutions and Desired Outcomes

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

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

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

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

Conclusion

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

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

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

On behalf of ANC 6C,



Karen Wirt
ANC 6C Chair

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