

The Committee of 100

on the Federal City



September 28, 2020

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

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Dear Mr. Valenstein,

We are pleased to provide the following comments on the Washington Union Station DEIS.

We thank you for the opportunity to comment and look forward to working with you throughout this process. Please contact Monte Edwards at monte.edwards@verizon.net or Erik Hein at erikmhein@gmail.com if you have specific questions or other concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kirby Vining".

Kirby Vining, Chair
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Cc: Phil Mendelson
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Andrew Lewis
Rebecca Miller
Betsy Merritt
Drury Tallent

945 G Street, N.W.
Washington, D.C. 20001
202.681.0225
www.committeeof100.net
info@committeeof100.net

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Comments Concerning the Union Station Draft Environmental Impact Statement (Released June 12, 2020)

September 28, 2020

The Union Station Draft Environmental Impact Statement (DEIS) proposes an expansion plan that will cost between 5.8 and 7.5 billion dollars¹ and require 11 to 14 years to build². The plan focuses on bus and automobile parking, station concourses, platforms and retail. But the plan does not adequately address Union Station’s role as a train station. The expansion plan needs to be substantially revised to address that deficiency.

Union Station is first and foremost a train station—a critical piece of the nation’s transportation infrastructure and an indispensable asset to help our region solve our transportation challenges: *vehicle congestion and parking caused by automobile commuters*. Two-thirds of the daily trips to and from the District are by car, leading to congestion and costly travel delays, compromised air quality and increased carbon emissions.

Commuter and passenger rail are essential in providing pragmatic alternatives to automobile commuting. 213 passenger trains pass through, depart, or arrive in the District on a typical weekday³, resulting in many economic and social benefits for the District.

- In FY 2015, Amtrak’s headquarters at Union Station employed 235 DC residents with wages totaling over \$18.5 million. Amtrak also spent \$24.2 million on goods and services in DC during that same year.
- VRE and MARC carry commuters who add a combined \$1.64 billion to the District economy each year.⁴

¹ DEIS, Executive Summary, page ES-34.

² *Id.*, page ES-1.

³ *DC Rail Plan*, page 3-34

https://ddot.dc.gov/sites/default/files/dc/sites/ddot/page_content/attachments/DC%20SRP%20FinalReport.pdf.

⁴ *Id.*, pages 3-70 thru 3-71.

Summary Recommendations

Because of outdated assumptions and projections, the Preferred Alternative fails to provide adequate trackage and adjustments to trackage to meet known needs even within the Draft Environmental Impact Statement timeframe. The DEIS falls short of meeting the needs of rail passengers and the project stakeholders. The Committee of 100 on the Federal City has repeatedly emphasized that rail transportation must be prioritized in any plan for the proposed Union Station Expansion Project. Major changes are needed in the DEIS to accomplish this. As explained in these comments, the Preferred Alternative and DEIS need to be revised to:

- Take into account the increased number of trains that will operate south of Union Station within the planning horizon of this expansion project due to separation of passenger and freight rail operations south of Union Station and the ability to electrify the passenger tracks south of Union Station.
- Update the trackage required to accommodate a much larger number of trains than the projections in this DEIS.
- Take into account the need for high-speed rail south of Union Station.
- Take into account VRE thru-running to Maryland and MARC thru-running to Virginia.
- Revise the trackage configuration to accommodate high-speed rail south of Union Station and electrification of the tracks south of Union Station.
- Reduce the size of the proposed parking garage to accommodate only the needs of Union Station.
- Address the need for an income stream for USRC during the proposed construction timeframe when the parking garage will not provide that income.

Erroneous Assumptions and Projections

The rail network that uses Union Station is operationally and physically fragmented among several service providers and owners. Likewise, the planning is fragmented, with three different plans for the rail system south of Union Station that will affect Union Station operations in the years encompassed by this DEIS:⁵

1. The plan that resulted from the December 2019 Agreement between CSX and the Commonwealth of Virginia that the Virginia Department of Rail and Public Transportation (DRPT) would build, own and operate the new two-track Long Bridge river-crossing as well as substantial CSX trackage in Virginia.⁶

⁵ These plans or projects do not address the need for a fourth rail track between 3rd and 2nd Streets, SW, the entrance to the First Street rail tunnel. Apparently this was not accomplished as a part of the Virginia Avenue Tunnel project and has been overlooked in the L'Enfant Station Expansion plans. Four tracks are essential from the Long Bridge to the First Street Tunnel to separate freight and passenger operational controls by providing two tracks for freight and two tracks for passenger rail.

⁶ The Long Bridge EIS ROD states at page 2-1: "It is anticipated that the Project will become the responsibility of the new Virginia Passenger Rail Authority, which formed on July 1, 2020, once

2. The Long Bridge FEIS plan to add a fourth track between the Long Bridge and 12th Street SW (FEIS issued September 2, 2020) that designates DRPT as Project Sponsor, responsible for designing and constructing the Project as presented in the Long Bridge FEIS.

3. The L’Enfant Station Expansion Plan will add a fourth track between 12th Street and 3rd Street, SW. It is projected to be completed in 2029⁷.

These three plans will result in separation of passenger and freight rail operation south of Union Station. This momentous change in rail operation will transform our rail system into a more modern, efficient and inclusive rail network that will better serve the DC region and the East Coast rail network. But this dramatic change in rail operations is completely ignored in the Union Station DEIS. In fact the DEIS clearly states the contrary – that passenger and commuter rail operations south of Union Station will continue to be controlled by CSX (Appendix B, page 23):

The 2040 simulation retains operating variability for trains arriving from the south, given assumed continued ownership and dispatch by freight railroads in the future. [emphasis added]

This assumption is wrong and the planning projections that result from it grossly understate the number of trains that will operate south of Union Station. The Virginia/DRPT and Long Bridge expansion projects are projected to be completed in five years (FEIS, page 1-7) and the VRE L’Enfant Station expansion by 2029. All three projects will be in service before the 11-14 years required for the Union Station expansion and must be taken into account in plans for the Union Station Expansion.

The Benefits of Separating Passenger and Freight Rail

The plans and projects now in progress to separate passenger from freight rail operations south of Union Station will allow a very large increase in the number and frequency of passenger trains because they can operate faster and be spaced more closely if passenger and freight operations are not intermixed and controlled by CSX as is now the case on these SW tracks.

New York City’s Penn Station illustrates the benefits of separating passenger from freight operations. The track arrangement for Penn Station is similar to our rail operations south of Union Stations, and like our First Street rail tunnels, is served by two tunnels (the North River Tunnels) under the Hudson River. In both cases, there are two tunnels with one rail track in each tunnel. The contrast is clear: DC’s 1st Street tunnels carry a total of

that body has the staff capable of administering the Project. Should there be a change in Project sponsorship, the new Project Sponsor will assume DRPT’s responsibilities.”

⁷ The L’Enfant Station Expansion was originally planned for completion in 2023 (Long Bridge DEIS, page 3-16), but the completion date has been extended to 2029.

about 6 trains per peak hour under the control and scheduling of CSX⁸, whereas NYC's North River Tunnels accommodate up to 24 trains per hour in each direction, a total of 48 trains in a peak hour, requiring very precise scheduling and control. Achieving this configuration south of Union Station would allow a substantial increase in passenger and commuter rail traffic south of Union Station.

Passenger Rail Projections Are Not Credible

A foundational element of the Union Station DEIS is anticipating and responding to predicted growth in passenger and commuter rail traffic over the next 20 years. Forecasting accurately that increase is critical. The estimates of number of trains found on pages 24-25, Appendix A3 [*Final Concept Development and Evaluation Report*] are broken out among Service Providers (Amtrak, MARC, VRE) and further between Peak Hours and Full Day Totals. These projections are critical—underlying most every future physical and service decision covered by this important document. These numbers must be credible and based on documentable data. Such appears not the case in the DEIS. 1) Some are thinly sourced, if at all. 2) Those estimates provided are derived from varying projection dates—Amtrak's numbers are derived from *Operating Plans for 2030+* (which purports to project to 2039); MARC projections are based on data applicable only through 2029; and **no** documentable projections for VRE are cited whatsoever. 3) Projections cited in Table 7-1 of Appendix B [*Terminal Infrastructure Report*] are apparently based on the estimates presented in Appendix A3. However, the DEIS does not explain how they were arrived at. Is there an algorithm that is not disclosed in the DEIS? The Table 7-1 projections appear low. There is no logical progression from the projections in Appendix A3 to the projections in Table 7-1 of Appendix B. It is widely understood that MARC, VRE, and Amtrak each plan for significant increases in the number of trains at Washington Union Station over the next 20 years. The DEIS's numbers must be credible, well sourced, and within the same time frame. They are not.

The DEIS Proposes Too Few Rail Tracks

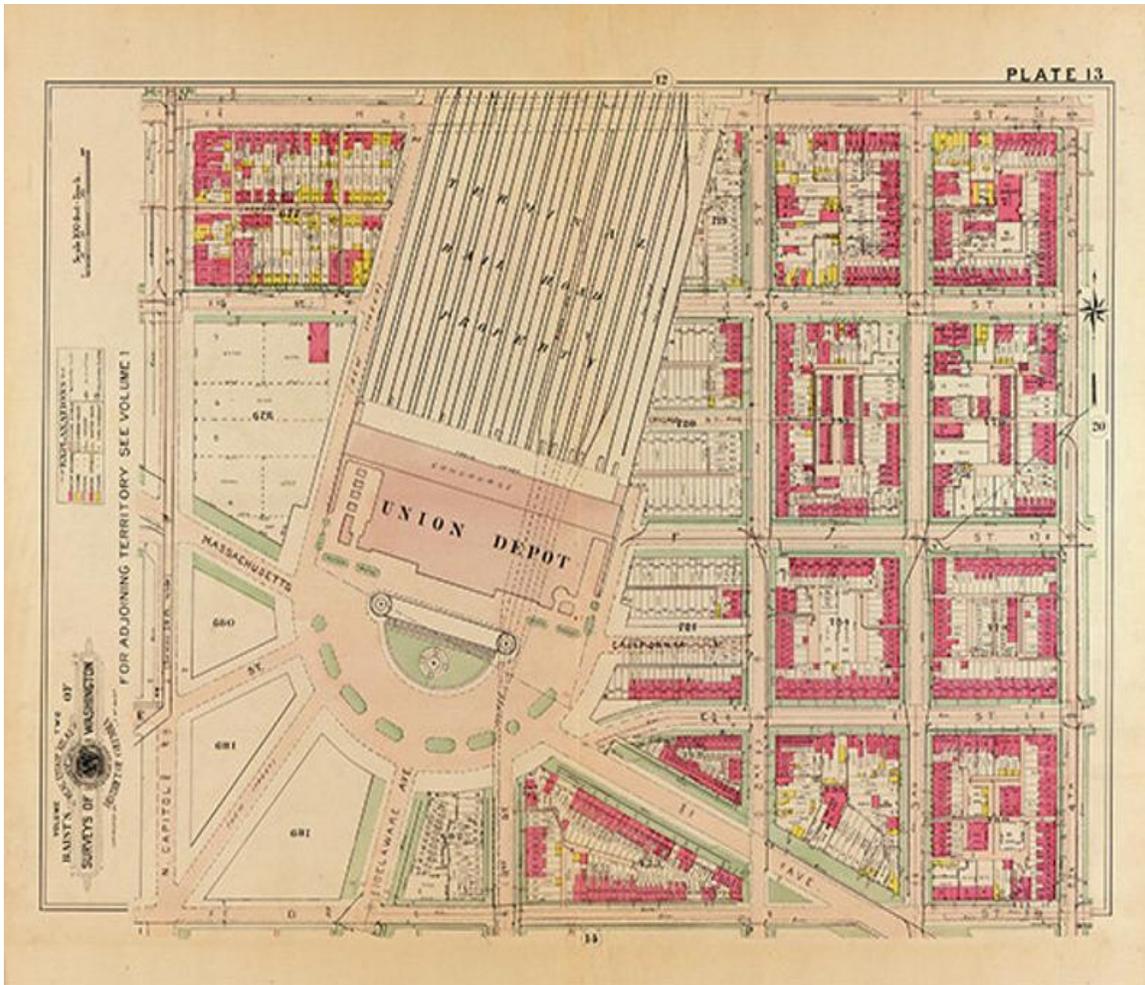
Because of the significant under projections based on outdated assumptions and information, the DEIS' Preferred Alternative proposes too few tracks.

Union Station originally had a total of 33 revenue tracks:⁹

- 24 stub-end tracks ran north of Union Station on the upper level;
- 9 run-through tracks on the lower level; and
- 2 non-revenue tracks that terminate on the lower level that are labeled “mail tracks.”¹⁰

⁸ As of 2016, during morning and afternoon peaks 6 passenger trains per hour depart or arrive at Union Station for points south. *DC Rail Plan*, page 3-35.

⁹ *Union Station Historic Preservation Application*, page 8, dated 2012, jointly sponsored by C100 and DC Preservation League.



Today, Union Station has 23 tracks, 20 of which are revenue producing:

- 14 stub-end tracks, located on the upper level;
- 6 run-through tracks on the lower level; and
- 3 other tracks exist, but they are used for storage and “pooling”.¹¹

¹⁰ DEIS page 2-5, Section, 2.2.3. But, according to Appendix A-3, page 23: “The Lower Level has nine (9) tracks, of which only six (6) are currently used for revenue service. ... Tracks 22 and 29 are through tracks without usable platform faces used by trains to travel through the station without loading/unloading passengers; Tracks 23 to 28 are used in revenue service to load and unload passengers, and Track 30 is a Stub End storage track used for midday storage and to switch locomotives.”

¹¹ DEIS page 2-5, Section, 2.2.3. But, according to Appendix A-3, page 23: “The Lower Level has nine (9) tracks, of which only six (6) are currently used for revenue service. ... Tracks 22 and 29 are through tracks without usable platform faces used by trains to travel through the station without loading/unloading passengers; Tracks 23 to 28 are used in revenue service to load and unload passengers, and Track 30 is a Stub End storage track used for midday storage and to switch locomotives.”

The DEIS proposes to provide only 19 revenue tracks:

- 12 stub-end tracks serving rail operations north of Union Station; and
- 7 run-through tracks.¹²

The reduced number of tracks is, in large measure, determined by the much wider platforms that are proposed. All of the current platforms are less than 20-feet wide, and many have columns supporting the parking garage or the H Street Bridge. Widening the platforms to accommodate capacity growth and safety standards requires realigning and re-spacing the station tracks that reduces the number of revenue tracks¹³ A key unaddressed issue in the plans: *Must the platforms be as wide as 30 to 35'6"?*¹⁴

Even Amtrak's July 25, 2012 *Union Station Master Plan* issued eight years ago called for more tracks and estimated that by 2030 those tracks would be at capacity. The plan called for:

- 12 west-side stub tracks (page 13);
- 8 east-side run-through tracks under the 1st Street tunnel to points south would have to be reconstructed;
- 2 new run-through tracks (p. 4 and 10) that by 2030 were estimated to be at capacity; and
- 6 - 9 new additional below grade tracks after 2030 to serve new rail operations north of Union Station.¹⁵

The DEIS eliminated all the below grade options: the 2 new run-thru tracks and the 6-9 additional tracks proposed to accommodate new rail service.¹⁶

¹² DEIS, page 3-3, section 3.1.1.2.

¹³ 2012 *Union Station Expansion Plan*, page 3.

¹⁴ DEIS, Appendix A-3a, pages 128-189.

¹⁵ 2012 *Union Station Master Plan*, page 13: "Demand for rail services will rise to the level where the practical capacity of these facilities is reached. This could happen as early as 2030, depending on the pace of growth and investment in overall rail system capacity. To provide for this future capacity the Master Plan allows for the development of a new lower level of tracks and platforms in a zone beneath the west side stub tracks that can be excavated to create six additional station tracks (or up to nine if needed for additional capacity)."

* * *

The lower track level would be connected to the Northeast Corridor main line by means of a bored tunnel from Union Station northeast to the vicinity of the Anacostia River."

¹⁶ DEIS, page ES-9: "The nine eliminated preliminary concepts included below-grade tracks [the 2012 Union Station Master Plan proposed these below-grade tracks would be located in the area below the west-side stub tracks] that Amtrak determined it did not need to meet its operational requirements."

Amtrak's *Union Station Master Plan* was issued in 2012. But now, eight years later, Amtrak, VRE and MARC have developed expansion plans that would greatly increase the number of trains and the number of rail passengers using Union Station, including plans for high speed rail south of Union Station.¹⁷ The state of Virginia and VRE have approved funding to acquire over 100 miles of CSX track, pay for, own and control the new Long Bridge Potomac River rail crossing, and thru-run its trains through Union Station into Maryland. In addition, MARC plans to run its trains into Virginia.¹⁸

The DEIS references the source documents it relied on in several sections.¹⁹ But those source documents were prepared as early as 2013 and last accessed by FRA in 2017. Perhaps that is the reason that the DEIS reaches its outdated planning conclusions.

High Speed Rail, but Only North of Union Station

The upper-level stub-end tracks (Tracks 7-20) are used by MARC and by Amtrak's Acela Express, Northeast Regional, Vermonter, and Capitol Limited trains (DEIS, Chapter 2, page 2-5). The DEIS states that at least four (4) tracks must have 1200' platforms for future Acela HSR service for future growth.²⁰

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-

¹⁷ The Record of Decision for *Southeast High Speed Rail Washington, DC to Richmond Virginia*, issued September 5, 2019. Note that while the DC to Richmond High Speed rail plan included Washington, DC in its title, it in fact ended at the south end of the Long Bridge and did not address the Long Bridge or how to get to Union Station. (http://dc2rvrvarail.com/files/3115/6803/2848/DC2RVA_ROD_05Sept2019.pdf).

The Long Bridge FEIS resolves that discontinuity. On the Virginia side, the new two-track bridge would "tie into the four tracks at RO Interlocking proposed by the concurrent DC to Richmond Southeast High Speed Rail (DC2RVA) project." (ROD at page 2-7). This high-speed rail plan for Virginia is connected to the SW tracks that serve Union Station, but high-speed rail south of Union Station is assumed to not exist in the Union Station DEIS.

¹⁸ High speed rail south of Union Station will be further enhanced by the recent announcement to extend high speed rail from Richmond to Raleigh. <https://www.usnews.com/news/best-states/virginia/articles/2020-09-21/grant-to-help-north-carolina-buy-rail-for-high-speed-service>.

¹⁹ Federal Railroad Administration. 2017. *NEC FUTURE Tier I Final Environmental Impact Statement*. http://www.necfuture.com/tier1_eis/feis/. Accessed June 6, 2017.
Virginia Railway Express. 2014. *System Plan 2040*. <http://www.vre.org/vre/assets/File/2040%20Sys%20Plan%20VRE%20finaltech%20memo%20combined.pdf>. Accessed June 6, 2017.
Maryland Transit Administration. 2013. *MARC Growth and Improvement Plan Update: 2013 to 2050*. https://mta.maryland.gov/sites/default/files/mgip_update_2013-09-13.pdf. Accessed June 6, 2017.

²⁰ Appendix A-3, page 24.

performance high-speed rail service to Virginia, North Carolina, and the Southeastern United States.” High speed rail south of Union Station is not discussed or even acknowledged in the DEIS nor does it address efficiencies and greatly increased numbers of passenger and commuter trains that will result from separating passenger and freight operations south of Union Station, but it takes into account operational efficiencies and more frequent train service for passenger and commuter trains arriving from the north on the Northeast corridor.²¹ The DEIS recognizes the efficiencies of controlling the rail tracks north of Union station for passenger operations (rather than inter-mixed passenger/freight operations) but does not for tracks south of Union Station.

Thru-running of MARC and VRE

For a number of years, MARC and VRE discussed the benefits of thru-running VRE trains to Maryland and MARC trains to Virginia.²² The Metropolitan Washington Council of Governments Transportation Planning Board (TPB) recently issued a report prepared by Foursquare²³ stating that run-through rail service would have a positive impact on the labor pool by expanding access both for businesses and employees²⁴ 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.²⁵ 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.²⁶

²¹ DEIS Appendix B, page 23: “The 2040 simulation retains operating variability for trains arriving from the south, given assumed continued ownership and dispatch by freight railroads in the future. In contrast, the 2040 simulation assumes much more reliable operation for trains arriving from the north, given the significant NEC reliability investments represented by NEC FUTURE.” [emphasis added].

²² In May 2014 MARC and VRE announced they are planning a true regional rail partnership to thru-run MARC to L’Enfant Station and on to Virginia and to extend VRE from Union Station into Maryland. <http://www.nbcwashington.com/news/local/MARC-VRE-Discuss-Regional-Rail-Partnership-259457971.html>.

²³ *Market Assessment and Technical Considerations for VRE-MARC Run-Through Service in the National Capital Region*, Foursquare Integrated Transportation Planning, June 2020.

²⁴ Nearly three-quarters of the District’s workforce commutes from outside the District while one-third of the District’s residents reverse commute to jobs outside the District (DC State Rail Plan, page 4-2).

²⁵ Foursquare Report, page 13.

²⁶ *Id.*, page 42.

The DEIS pays little attention to thru-running that will greatly increase the number of trains going through Union Station and reduce the need for MARC and VRE to find mid-day parking for their trains until they are needed for the evening rush-hour. It assumes that no VRE trains will thru-run when, in fact, VRE trains currently thru-run through Union Station to reach the Ivy City train yard where they are parked during mid-day, until their return to service for the afternoon/evening commute back to Virginia. VRE awaits only an agreement with Amtrak and MARC to thru-run to Maryland, and once that is accomplished, the VRE ridership using Union Station will increase substantially.

The DEIS assumes that only 8 of the MARC's 57 daily Penn line trains will thru-run to Virginia,²⁷ but no trains from MARC's Brunswick or Camden line will thru-run. The reason for not including trains from the Brunswick and Camden Lines is apparently because the FEIS does not propose any modification of the Brunswick and Camden line tracks coming into Union Station. Only the Penn Line has direct access to the 1st Street tunnel where the connecting thru-running tracks are practically inaccessible to MARC's Brunswick Line and to a lesser extent, the MARC Camden Line. For Brunswick and Camden Line trains to access the 1st Street tunnel, trains must traverse the entirety of Union Station's "throat" from east to west over multiple interlockings:



²⁷ Eight MARC trains is the same number used for the early Long Bridge expansion studies that FRA adopts for this Union Station FEIS with no discussion or analysis.

The Committee of 100 recommends that the DEIS be expanded to evaluate how to reconfigure the Brunswick and Camden tracks so they can access the First Street Tunnel. This not only affects the ability of Brunswick and Camden trains to thru-run to Virginia, but also affects VRE’s ability to thru-run to a substantial part of Maryland.

The Benefits of Electrification

Currently, CSX requires that trains traveling south of Union Station and using the Long Bridge use diesel locomotives because the overhead wires for electric locomotives would interfere with tall freight loads. This is the reason for the long lay-over at Union Station of Amtrak thru-trains—the required change of locomotives.²⁸ 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.²⁹

As the Long Bridge FEIS explains at page 1-10:

[The addition of a fourth track] provides sufficient capacity for freight trains to pass through the Corridor unimpeded by passenger trains during peak passenger train hours.

This will mean that the time-consuming change of locomotives will no longer be required. Thus, thru-running MARC and VRE trains, as well as Amtrak regional trains, can move through Union Station much more quickly.

DEIS Parking Garage Plans are not Supported

The DEIS is proposing 1,575 parking spaces (Alternative A-C, Preferred Alternative, Appendix A6, page 3), consisting of 6 levels of parking in a 10-story building, at a height of 130 feet above the H Street Bridge, at approximately the same location as the existing garage. This would be a huge structure, towering over Union Station³⁰ and contrary to the

²⁸ FEIS, Appendix B, page 26: “Trains operating immediately south of the WUS utilize diesel-powered locomotives. Electric locomotives entering WUS whose route continues southbound must be switched from an electric to a diesel locomotive power at WUS, and vice-versa.”

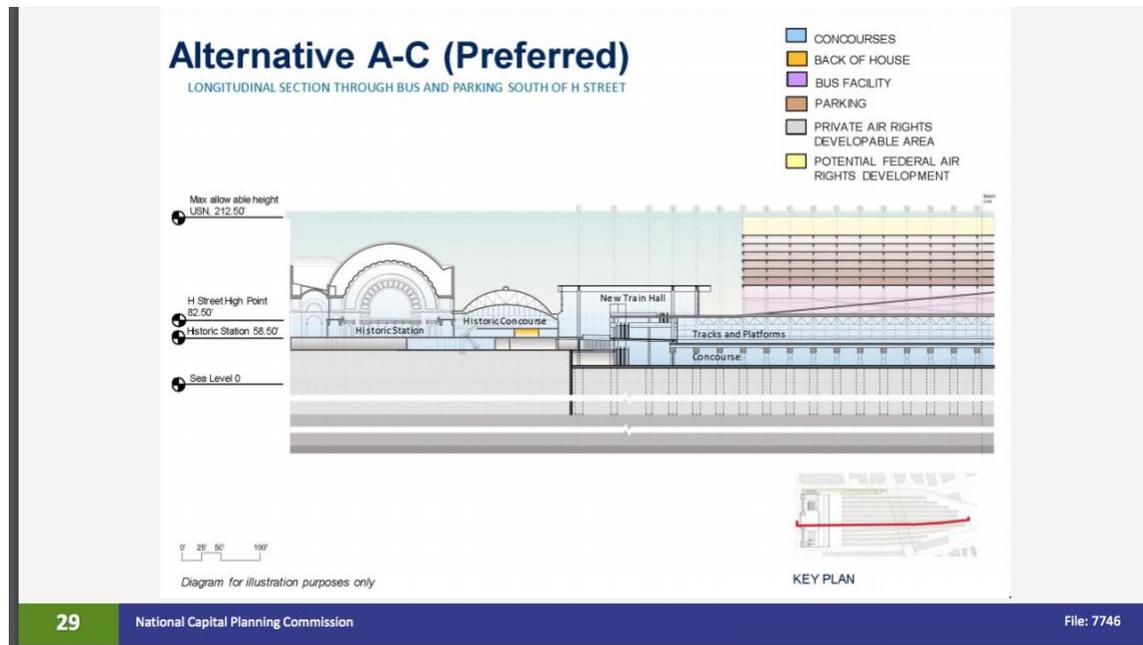
²⁹ The Long Bridge FEIS explains that:

“The existing railroad right-of-way is owned by CSXT. Action Alternative A [the preferred alternative] would require CSXT to commit a significant portion of its right-of-way to new tracks and ancillary structures, which would be used primarily for passenger operation.” (page 1-21). “The Long Bridge Project has been designed so as not to preclude electrification. Any future electrification in this location would use the lowest profile equipment available at the time. Based on industry trends, it is expected that the required clearance would be lower than required for current equipment.” (Appendix D4, pp. 14-15).

³⁰ NCPC expressed concerns about height and massing similar to DC’s concerns when the DC Zoning Commission approved the air rights development. At page 4 of its January 9, 2020 Commission Action, NCPC:

Requests the applicant prepare elevations and renderings to show how the height and mass of the alternatives will look from key viewsheds, including from the U.S. Capitol building, the

DEIS assumption that it would be subject to USN Zoning. In the first place, this is federal property, not subject to DC Zoning— zoning would be determined by the National Capitol Planning Commission (NCPC), and even if NCPC were to apply DC’s USN Zoning³¹, the proposed 130-foot garage height would be in violation of the 90-foot height limitation for air-rights structures adjacent to the Union Station historic building.³²



The Commission on Fine Arts (CFA),³³ the National Capital Planning Commission,³⁴ Amtrak,³⁵ the DC Office of Planning and DDOT³⁶ have challenged the DEIS parking proposal as excessive.

National Mall, Delaware Avenue, and 1st Street, NE. The renderings should also include the massing of any private development permitted in the USN zone.

³¹ Page 2 of the July 9, 2020 NCPC Information Presentation explained: NCPC reviews projects on federal land in the District of Columbia in-lieu of local zoning approval. In this instance, the historic Union Station and existing parking garage and bus facilities are located on federal land. Absent a zoning code, the Commission looks to the Comprehensive Plan to guide its decision making.

³² DC Municipal Code §11-305.1(c) and (d).

³³ On November 21, 2019, FRA and the Proponents presented the Preferred Alternative to CFA at an informational meeting. In a letter dated November 27, 2019, CFA expressed concern about the planning assumptions underlying the parking element and the volume represented by the combined bus and parking facilities. Therefore, CFA requested that FRA and the Proponents reconsider the above-ground parking element of the Project in order to develop a more “appropriately sized and sympathetically configured massing.”

³⁴ FRA submitted the Preferred Alternative to NCPC for conceptual review at the Commission’s January 9, 2020 hearing. The commissioners expressed concerns about the massing of an above-

The present parking garage consists of 2,200 parking spaces, located on four levels. Existing contracts established in the 1980s with the station’s retail operator call for 1,575 spaces—the exact number the DEIS proposes in the Preferred Alternative. These contracts will require renegotiation to address removal of the current garage that will be the initial step in reconfiguring the tracks and building the new deck. The FRA and USRC should employ modern parking parameters where each land use is assessed for parking demands in a new agreement with the station retail operator. **The C100 recommends that the EIS adopt the parking space estimating criteria the DC Office of Planning and DDOT have employed that reflects modern urban design and parking parameters.**

To justify the excessive 2040 parking requirement that FRA is projecting, the DEIS employed two inappropriate approaches:

1. Observed Demand-Based.

Cars that were in the garage more than 24 hours were assumed to be using Amtrak or intercity bus service. This number of 1,178 cars was then adjusted to 2040 based on the Amtrak growth factor of 95%, then reduced by 10% for people switching from cars to public transportation. The result was a parking requirement of 2,687 parking spaces for 2040.

2. Survey-Based.

This was based on an April 2015 - March 2016 Amtrak customer satisfaction survey that was interpreted to mean that 8%³⁷ of the passengers arriving or departing from Union Station accessed the Station by private vehicles, requiring 656 parking spaces. But because on average, they stayed 1.87 days, the DEIS uses a figure of 1,226 spaces-per-day, again adjusted to 2040 based on the Amtrak growth factor of 95%,

ground parking facility. The Commissioners approved the following language regarding the parking program:

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

³⁵ On January 7, 2020, Amtrak explained that parking for its passenger operations at WUS “is not essential to Amtrak’s operation of intercity passenger rail” and that “Amtrak does not support any entity building a parking garage specifically to support Amtrak passengers.”

³⁶ In an April 30, 2020 letter to FRA, DC Office of Planning and DDOT presented the District’s policy preferences for parking at WUS and a proposed 295 parking spaces.

³⁷ In its January 7, 2020 memorandum to FRA, Amtrak stated that the proportion of Amtrak passengers driving and parking at WUS had declined from 8 percent in 2015/2016 to 4 percent in December 2019 and that it did not support any parking for Amtrak passengers.

then reduced by 10% for people switching from cars to public transportation. The result was a parking requirement of 2,512 parking spaces for 2040.

The bases for those projections are deeply flawed. The starting point was the customer satisfaction survey in which only about 0.2% of the passengers responded to the survey.³⁸ In addition to the statistical significance of using only a 0.2% sample for the projection, there is no basis for the 8% figure for the Amtrak passengers that purportedly use the parking garage. Amtrak's January 7, 2020 memorandum to FRA explained that the percentage of Amtrak passengers driving and parking at WUS had declined from 8 percent in 2015/2016 to 4 percent in December 2019 and that Amtrak did not support any parking for Amtrak passengers.

Apparently recognizing the inadequacies of its "statistical" computations, the DEIS seeks to compare Union Station's parking need to the needs of shopping centers. Page 6 of Appendix A6 states:

WUS competes with urban retail centers throughout the region such as Chinatown, Georgetown, and Fashion Centre at Pentagon City, suggesting that its peers are urban hubs that have parking available and that the retail at WUS relies in part on the parking capacity.

But that comparison ignores Union Station's primary role of providing rail service and multimodal transportation connectivity for the National Capital Region. Nonetheless, the DEIS concludes at page 11:

Using 2040 projections for Amtrak ridership growth and the average Amtrak drive and park demand of 8 percent... the projection signals a demand for approximately 2,700 parking spaces.

* * *

FRA and USRC therefore considered statutory direction, legal agreements, and possible shifts in demand over time, and identified 1,600 spaces as the planning number for spaces at WUS, which is the amount reasonably required under USRC lease terms with some additional spaces added for flexibility.

But the 8 percent has no meaning when making a projection for 2040, since Amtrak has explained it needs no parking for 2040.³⁹ The statistical significance of the survey and practical basis for the adjustments are both questionable, but the most significant factor is what is ignored in coming up with the projection of 1,575 required parking spaces. Footnote 1, page 7, Appendix A6 states:

³⁸ Page 8, table 1.4 shows that 4,654 responded from the 2,462,747 passengers boarding, representing 0.18%. Page 9, table 1.5 shows that 5,448 responded from the 2,474,601 passengers arriving, representing 0.22%.

³⁹ See fn 38, above: Amtrak's January 7 memorandum to FRA stating it needs no parking at Union Station.

Cars in the garage for more than five hours, but less than one day, were assumed to be monthly parkers or other daily parkers associated with a 9-to-5-office use pattern and were not incorporated in the estimate. [emphasis added]

Although ignored in the DEIS, monthly parkers are currently the major users of the parking garage. The Capitol Hill neighborhood will be harmed by adverse traffic congestion on the local roadways near Union Station with an oversized parking garage for the use of monthly parkers from near-by office buildings, whose peak entry and exit times would be during rush hour, the same time rail commuters are arriving and leaving. The community already anticipates having to contend with the increased traffic from the Akridge air-rights development that plans to provide 1,320 parking spaces as a part of its development (DEIS Chapter 3 –Alternatives, page 3-43).

Union Station Needs an Alternative to Parking Income

Monthly parkers provide the majority of the income for the operations, maintenance and historic preservation of Union Station. Parking revenue sustains the Station's economic viability and supports USRC's continued preservation and use of the historic building (Appendix A6, pages 2-3):

Parking at WUS provides more than 70 percent of USRC's operating revenue. It supports station retail, office, and event uses, which facilitate the operation of the station as part of the retail lease agreement and contribute to WUS's civic role as a vibrant public space and visitor destination.

Parking revenue is used for the preservation and rehabilitation of the historic station building. As a major reliable source of revenue, parking is needed for the continuation of station preservation and operation activities.

The NCPC July 9, 2020 information presentation states on page 8:

[T]he number of monthly parkers has been growing over time. In 2017, the facility provided space for 536 monthly parkers on Level 3. These parkers were not included in the assessment of the long-term parkers. As of December 2019, FRA and USRC indicated there were a total of 1,390 monthly parkers in the garage.

The 2014 Audit Report concerning Union Station, prepared by DOT's Office of Inspector General explained that (page 2):

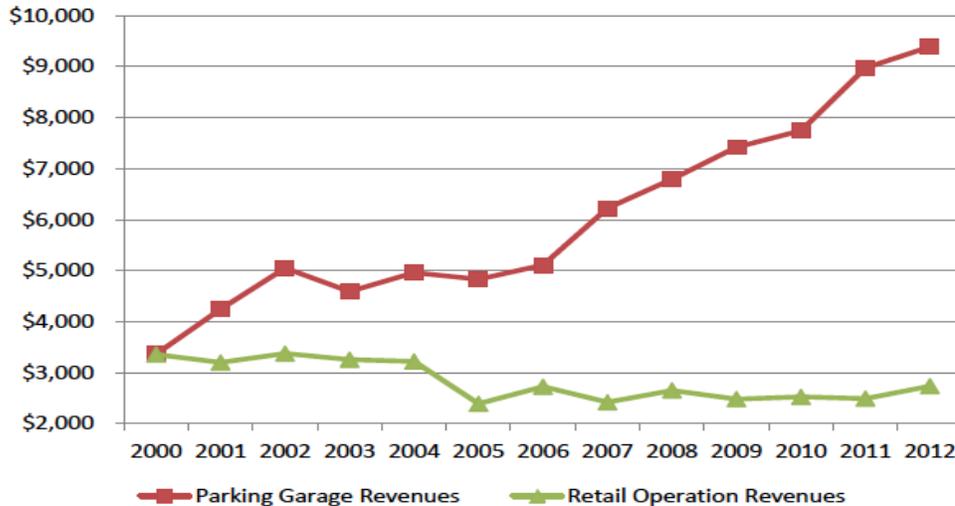
DOT and FRA have relied on USRC to effectively manage Union Station. However, USRC has not adequately planned for Union Station's future.

And the principal reason for this inadequacy is the fact that USRC has relied primarily on revenue from the parking garage to support its operation (Audit Report, page 10):

While revenues from garage operations have increased, revenues from commercial operations have decreased over the past few years. Specifically, between fiscal years

2000 and 2012, parking revenues increased from \$3.4 million to \$9.4 million, while commercial operations revenues decreased from \$3.4 million to \$2.7 million (see Figure 1).

Figure 1. Parking and Retail Revenues for Fiscal Years 2000 Through 2012, in thousands of dollars



Currently, approximately 210,000 square feet of leased retail space provides a source of revenue for USRC to fund Union Station operations, maintenance and preservation activities (DEIS Chapter C -*Purpose and Need*, page 2-14). “Current retail rents in WUS range from approximately \$75 to \$125 per square foot” (Appendix C – *Supporting Retail Information for Concept Development*, page C-3). This would indicate retail rental income of over \$20 million, but only something less than \$3 million has been made available to USRC.

The economics of this arrangement raise important questions:

- Why does USRC receive so little from its lease to Ashkenazy Acquisition Corporation, the company that manages the retail leases?
- Why do we now have benches in the East Hall and no restaurant in the Presidential Waiting Room?
- Why is the revenue from retail operations received by USRC so low?

The C100 appreciates the need for USRC to have a reliable source of income for its operations, maintenance and historic preservation activities, but building a parking garage whose primary purpose is to provide that income is not reasonable. In the near term, no parking revenue will be available once the parking garage is demolished and for several years thereafter during the period of track realignment and deck construction. For the 11-14 year construction period, the budget for the expansion project should contain a specific payment to USRC to compensate for the lost parking revenue.

A plan is needed for how to provide an alternative to parking revenue after the expansion of Union Station is complete. It may be time to investigate:

- Charging train operators for use of the station as airports charge airlines.
- A charge added to train tickets as a passenger ticket “tax”.

In the future, parking revenue will be reduced once a smaller garage is built, but there will be about 80,000 square feet of new retail space that is estimated to produce \$8.2 - 10.1 million annually (Appendix C – *Supporting Retail Information for Concept Development*, page C-10). Will USRC be able to use that for its operation, maintenance and historic preservation or will it be necessary to negotiate a new master lease with Ashkenazy Acquisition Corporation?

Conclusion

The rail projects now in progress south of Union Station are projected to be completed well within the 2040 time horizon of this project. Those projects, together with thru-running of commuter trains, electrification of the tracks south of Union Station and providing for high-speed rail south of Union Station will greatly increase the number of trains that will need to access Union Station.

Substantial revisions to the Preferred Alternative and the DEIS are required to adequately provide for these increases in future rail operation.

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Comments Concerning the Impacts to Historic Properties Under Section 106

On behalf of the Committee of 100 on the Federal City, thank you for the opportunity to comment upon the Draft Environmental Impact Statement (DEIS) for the proposed expansion project for Union Station. The comments below are focused upon the impacts to the historic station itself, and are meant to inform the Section 106 consultation process. As an iconic and significant work of architecture by Daniel Burnham, as a prominent feature in view of the United States Capitol building, and as one of the busiest transit points in the United States, we are keenly aware of the challenges that must be addressed and the priorities that must be balanced in planning for Union Station's expansion. From a historic preservation perspective, we believe there are four general principles which must be considered:

- The classical and symmetrical Beaux-Arts design of Union Station calls for a design that respects and complements these significant features
- Users should be able to still experience the historic station as a train station
- The impacts of any expansion on the surrounding historic neighborhood should be minimized
- The impacts to the historic station itself should be minimized

The classical and symmetrical Beaux-Arts design of Union Station calls for a design that respects and complements these significant features

The substantial parking and bus-staging structure proposed in preferred alternative A-C results in an asymmetrical view of the Northern façade of the historic station, and the height creates an intrusion in the primary front elevation of the station. It also inappropriately uses what will be pedestrian-level frontage for parking. The current parking program proposal of 1,600 spaces, which many have criticized as oversized, and a lack of a designated Pick-Up-Drop-Off (PUDO) space have put unreasonable design constraints upon the project that adversely affect the historic station. A reduced parking program, preferably one underground, would enable a reconfiguration of space to permit better civic and pedestrian use and experience at ground level.

By reducing the pressure on the parking program the massing of that structure could be reduced and the asymmetry between the proposed federal and the private development projects balanced. This would improve the view of the north side of the historic station between the two campaigns, and improve the adverse effect (we disagree with a no adverse effect determination on the north side) to the historic station that the development presents. A reduced height will also minimize effects visible from the front of the station. Given the highly ordered and symmetrical architecture of the historic station, given the expectation that the north end will be a new primary approach to the station, it is essential that FRA's expansion project and the private air rights development achieve a harmonious and similarly symmetrical design. To help achieve this, we would like to see a partnership between FRA and Akridge to establish some basic cohesive design guidelines and principles.

Users should be able to still experience the historic station as a train station

While the east/west alignment of the proposed new train hall makes good sense, it is very unclear how this addition will integrate with the historic station, or what functions will take place there. Given its great size, the new entrance to the North, and a new concourse proposed for H Street, we are concerned that the historic station itself runs the risk of functioning as nothing more than a shopping mall or a grand foyer to a completely new station. The proposed H Street concourse itself is a terrible substitute – a subterranean space below the railyard and far removed from the station is more akin to New York Penn Station. As a space considered to be universally a complete design failure, this should not be a goal.

The impacts of any expansion on the surrounding historic neighborhood should be minimized

We disagree with FRA's determination that increased traffic only has the *potential* to cause adverse effects to the neighboring Capitol Hill Historic District. The preferred alternative will clearly force increased traffic into the historic Capitol Hill neighborhood by, for example, sending all buses east on H Street NE directly into the neighborhood – instead of giving them an opportunity to travel west towards North Capitol Street. The impact on the setting, feeling and association of the historic district will be clearly adversely affected. As such, more study needs to be given to the impact of the increase in heavy traffic in the historic district, and strategies to avoid or mitigate should be employed. The only thing offered in the DEIS is a signage program, when the problem actually lies with the design itself.

The impacts to the historic station itself should be minimized

At this stage, with only functional massing to consider, it is extremely difficult to consider overall what effects the project will have on the historic station. We are very concerned that decisions made now will lead to both foreseen and unforeseen effects. As a Programmatic Agreement is negotiated as a part of this process to establish a process for evaluating effects to the historic station as design elements proceed, ongoing consultation with stakeholders must be robust and a set of design principles agreed to. Again, we encourage the development of design principles in conjunction with Akridge to assure both the expansion project and the private development work in harmony with each other as well as with the historic station itself.

Thank you for the opportunity or submit these comments on the DEIS.

Sincerely,



Kirby Vining, Chair, Committee of 100 on the Federal City