District of Columbia Office of Planning

MEMORANDUM

To: David Valenstein
Senior Advisor, Federal Railroad Administration

From: Andrew Trueblood
Director

Date: September 28, 2020

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

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

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

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

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

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

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

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

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

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

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

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

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

ATTACHMENTS:

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

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

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

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

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

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

District of Columbia Office of Planning

STATEMENT FROM THE DIRECTOR

August 28, 2020

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

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

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

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

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

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

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

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

> ***Policy T-2.2.4: Union Station Expansion***
> Ensure that expansion and modernization of Union Station supports its role as a major, intermodal, transit-focused transportation center. Changes to Union Station should improve intermodal connections and amenities; facilitate connections with local transportation infrastructure with an emphasis on transit, pedestrian and bicycle mobility; enhance integration with adjacent neighborhoods; minimize private and for-hire vehicle trips; reduce on-site parking; and provide a continued high quality of life for District residents and visitors.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

This disconnect, among the Project's proposed retention of 1981 parking assumptions, the 2040 horizon year, and the Project's 100-year lifespan, clearly highlight the need to focus on a future for Union Station that accounts for the mobility needs of the 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.

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

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

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

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

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

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

6. Mitigation Measures to Address Congestion and Construction Impacts

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

Mitigation to Address Congestion

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

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

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

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

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

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

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

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

Mitigations to Address Construction Impacts

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
15	3	3.4.7.1 Summary Description	3-82	1725-1728	Potential Development of Federal Air Rights: The Federal air rights not needed for the new bus and parking facilities would be available for potential future transfer and development. The potentially developable envelope would encompass approximately 380,000 GSF.	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: ...**380,000 GFA, based on an assumption of rezoning the property from PDR-3 to USN**. *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.*
16	3	3.4.7.4 Bus Facility	3-85	1779-1781	Buses would exit the facility via a dedicated ramp directly onto H Street NE similar to the existing configuration. Only right turns would be possible.	There needs to be more flexibility in the future alternatives in the FEIS if right turns are only being provided at this location. Alternatives should show how intercity buses could access H Street heading west, which would allow for the possibility of different routes out of the District.
17	3	3.4.7.7 Pick-up and Drop-off Areas	3-87	1815-1816	Additionally, the second level of the bus facility could potentially be used for for-hire and private pick-up and drop-off activities if not needed for buses.	OP supports the inclusion of an on site inter-city bus facility as part of the project. There should also be a dedicated pick-up-drop-off facility integrated into the alternative, not included as a possibility. The impacts of this facility need to be analyzed and understood, and included in the FEIS.
18	3	3.5.7.2 Bus	3-94	1985-1987	At that time, in all Action Alternatives except Alternative C, East Option, temporary off-site bus facilities or loading zones would be needed, as provided by the District of Columbia, to help maintain operations.	The District has not committed to and does not anticipate having sole responsibility for proving an off-site bus facility. This narrative should be updated to note that one will need to be identified and its impacts assessed, but the reference to the District' providing a facility should be removed.
19	4	4.3.1 Regulatory Context and Guidance	4-6	108 - 114	District policies, regulations, and guidance that may pertain to water resources include:	Add Sustainable DC and the Comprehensive Plan as relevant District policy guidance.
20	4	4.4.1 Solid Waste and Hazardous Materials	4-13	243 - 266	District policies, regulations, and guidance that may pertain to solid waste and hazardous materials include:	Add Sustainable DC and the Comprehensive Plan as relevant District policy guidance.
21	4	4.5.2 Study Area	4-18	410-412	The Regional Study Area is the Metropolitan Washington Council of Governments (MWCOG) area of jurisdiction. MWCOG includes local Metropolitan Planning Organizations (MPO) in Maryland, the District, and Virginia.	Modify this text to reflect that MWCOG is the local MPO and that it includes local jurisdictions in Maryland, the District and Virginia.

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22	4	4.7.1 Regulatory Context and Guidance	4-42	904 - 906	District policies, regulations and guidance that pertain to GHG and resilience include:	Add D.C. Law 22-257. Clean Energy DC Omnibus Amendment Act of 2018
23	4	4.8.1 Regulatory Context and Guidance	4-45	969-971	District policies, regulations, and guidance that may pertain to energy resources include:	Include Sustainable DC, Clean Energy DC, and the 2018 Clean Energy Omnibus Act
24	4	4.9.1 Regulatory Context and Guidance	4-48	1012	NA	Update the list of applicable plans to include the District's Downtown East Framework Plan, Ward 5 Works, Florida Avenue Market Small Area Plan to provide a complete list of associated guidance.
25	4	Land Use, Zoning, and Local and Regional Planning	4-51	null	Figure 4-10. Local Study Area Land Uses	It is unclear what the land use base is for this map. The title needs to be updated with its relevant source, e.g. If it is Local Zoning, it is unclear if the map is based on current zoning, existing use, or the FLUM.
26	4	4.9.4.1 Land Use, Zoning, and Local and Regional Planning	4-52	1073-1074	Atlas District/H Street Corridor: The corridor is bounded by 2nd Street NE to the 1073 west…	Revise text for technical accuracy, as follows: Atlas District/H Street Corridor: The corridor, **for the purpose of this EIS**, is bounded by 2nd Street NE to the 1073 west…
27	4	4.9.4.1 Land Use, Zoning, and Local and Regional Planning	4-52	1081-1082	The corridor also has several Planned Urban Developments where specific land use proposals can be accommodated.	Revise text for technical accuracy, as follows: The corridor also has several Planned **unit** Developments where specific **development** proposals **are approved by the District's Zoning Commission.**
28	4	4.9.4.1 Land Use, Zoning, and Local and Regional Planning	4-52	Footnote	Planned Urban Developments can be implemented throughout the District.	Revise text for technical accuracy, as follows: Planned ~~Urban~~ **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	4.9.4.1 Land Use, Zoning, and Local and Regional Planning	4-52	1083	This neighborhood is bounded by...	Revise text for technical accuracy, as follows: This neighborhood, **for the purpose of this EIS**, is bounded by...
30	4	4.9.4.1 Land Use, Zoning, and Local and Regional Planning	4-52	1083-1092	NA	A reference to the NoMa BID is needed as there is narrative around the Mount Vernon Triangle the text references the CID.

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

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39	4	hitectural Histori	4-82 through 4-84	Table 4-15	Table 4-15 Cultural Resources within the Area of Potential Effect	Please confirm, and update the table if needed, that the information listed in the table is accurate and comprehensive, we note two examples have issues: - The Railway Express (REA) Building is pending DC landmark and National Register Eligible - The City Post Office (Postal Museum) is listed in the DC Inventory, but also eligible for listing in the National Register. Double checking the status of each resource may be warranted - especially for resources that are adversely affected.
40	4	hitectural Histori	4-85	1513-1520	Description of WUS Historic Site	Modify the text to recognize that the First Street Tunnel which passes underneath Union Station is also a contributing element of the WUS Historic Site and that the WUS Expansion Project may have effects on this historic feature as well as the headhouse and related features in the rail yard.
41	4	4.13.1 Regulatory Context and Guidance	4-86	1553-1554	NCPC and District of Columbia Parks and Recreation (DCPR), Comprehensive Plan for the National Capital (2011);	This reference needs to be updated to accurately reflect the Comprehensive Plan for the District of Columbia. The Comprehensive Plan for the National Capital is a unified plan comprised of two components - the District Elements and the Federal Elements. The District Elements are authored by OP, including the Parks, Recreation and Open Space element of the Comprehensive Plan. NCPC authors the Federal Elements including the Parks and Open Space element. DPR and NCPC also collaborate and are responsible for Capital Space.
42	4	4.13.1 Regulatory Context and Guidance	4-86	1549	Relevant Federal and District policies, regulations, and guidance include:	This list should include DCMR Title 24: Public Space and Safety. Part of the District's right-of-way set aside as landscaped "parking" is legally part of the District's park and open space system. Its effect is to create a park-like character on all residential streets, which may relevant for some public space around Union Station. The List should also include the NoMA Small Area Plan that has specific recommendations for the Metropolitan Bike Trail as well as Downtown East Re-Urbanization Strategy that has recommendations for connectivity and open space networks to the west of the station. There are other District documents (DDOT) related to the bike trail that should be listed here.
43	4	4.13.2 Study Area	4-88	Figure 4-28	Parks and Recreation Ares, Study Area	Update the park sites on this map as the information displayed is no longer correct. Many changes have happened in the area that should be reflected on this map including: Plans for the Plaza at Story Park Development which have changed significantly reducing the size of this space and should be assessed to determine if it should still be included on this list. NoMa also has plans for the NoMa Meander (shared alley spaces) that should be listed here, if this is to include all significant proposed outdoor spaces. NoMa has also created a small park on 2nd (or 3rd) Street that should be added to this inventory. "Public Parking" along city streets should also be considered as a park resource that will have views impacted. NoMa Parks foundation has also completed the Swampoodle Park. Each of these locations should be assessed to determine if they should be reflected as parks in the Study Area.
44	4	4.14.1 Regulatory Context and Guidance	4-90	Lines 1567 through 1573	The following are District regulations and guidance pertaining to social and economic 1568 conditions that are most relevant to the Project. DC Code 8-109.01 – 8.109.12, Subchapter V: Environmental Impact Statements; 1570 □ DC Workforce Investment Council, Workforce Innovation and Opportunity Act 2016-2020 Unified State Plan; 118 1571 and 1572 □ DC Office of the Deputy Mayor for Planning and Economic Development, DC's Economic Strategy: Strategy Report.	Modify this section to include The Comprehensive Plan for the National Capital in the list of regulatory guidance. Additionally, the Plan is also referenced in the subsequent section.

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

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

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56	4	4.17.3 Methodology	4-109	1902-1919	The data source used to identify minority populations was the 2010 Census. Minority populations were considered at the block level. The CEQ guidance threshold of 50 percent was used as an indicator of minority population requiring consideration. The data source for identifying low-income populations was the ACS five-year average data for 2011 to 2015 and HHS poverty guidelines. Due to high median income in the District, households below 150 percent of the HHS poverty guidelines were considered low-income. Low-income populations were considered at the block group level. A threshold of 27 percent was used to identify concentrations of low-income residents requiring environmental justice consideration. Due to the rapid demographic change at WUS since 2010, additional data sources were used to confirm the location of minority and low-income populations. For Census blocks where the minority population was below the threshold, the presence of places of worship with predominantly minority congregations was used to determine whether distinct environmental justice populations may exist. Distinct low-income populations were confirmed through mapping the locations of low-income housing units. Populations in Census blocks without housing units were considered homeless if confirmed through newspaper articles or field observations.	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. 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. 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.
57	4	4.17.3 Methodology	4-109	1912-1913	Due to the rapid demographic change at WUS since 2010, additional data sources were used to confirm the location of minority and low-income populations.	Revise the narrative to say: 'due to the rapid demographic change **<u>in the area surrounding</u>** WUS' as WUS did not experience demographic change.
58	4	Figure 4-36	4-114	Figure	NA	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.
59	5	3.4.3 Alternative	5-27	457-458	Groundwater withdrawal has the potential to cause soil settlement in the vicinity of the withdrawal. Due to lack of information, the extent of the area that could be affected cannot be determined at this time.	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.
60	5	5.3.6 Avoidance, Minimization and Mitigation Evaluation	5-45	858-862	Project Proponents to ensure that stormwater management features, including green infrastructure practices such as rainwater collection and reuse, green roofs, and bioretention facilities, are included in Project design as appropriate to manage post-construction stormwater flows in accordance with DOEE's Stormwater Management Guidebook.	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.

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

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66	5	5.5.4.7 Alternative A-C (Preferred Alternative)	5-175	Figure 5-20: Key Transportation Elements, Alternative A-C	NA	OP appreciates the distributed pick-up-drop-off (PUDO) locations that FRA has included in many of its alternatives, intended to lessen the traffic impact on any one location. However, there continues to be a risk of queuing on District roadways from some of the PUDO locations. Therefore, OP encourages FRA to examine if a purpose-built PUDO facility, that in addition to the distributed facilities, could alleviate some of the traffic impacts and improve the ability of intercity travelers to connect with for-hire vehicles. OP is flexible as to the location of such a facility and encourages FRA to examine both above- and below-ground options. OP would expect to see such a facility explicitly integrated into the design of the alternatives so its impacts, including safe ingress and egress, can be analyzed. It will also be important to understand the effects of the facility on the surrounding transportation network, including impacts to pedestrian and cyclist comfort and safety.
67	5	5.5.4.7 Alternative A-C (Preferred Alternative)	5-178	2320	Adjacent to the north-south train hall on the deck level…..	Confirm if the narrative here is correct. OP's understanding is that the train hall in Alternative A-C is east-west.
68	5	5.5.4.7 Alternative A-C (Preferred Alternative)	5-181	Figure 5-21: Deck Level Circulation (All Movements), Alternative A-C	NA	More flexibility is needed in the FEIS Project Alternatives in order to accommodate future turning movement needs, site circulation, and to adjust for potential changes in demand. The following elements should be improved in the FEIS to address the negative impacts of the current design of Preferred Alternative A-C: • The four closely spaced signalized intersections on the H Street Bridge; • The restriction that buses can only make an eastbound right turn from the bus facility; • The offset western intersection on H Street NE, which would require complex signal phasing; and • The limited internal storage for vehicle queuing.
69	5	5.4.4.7 Alternative A-C (Preferred Alternative)	5-255	464-476	All Action Alternatives would have: No direct operational impacts because no Action Alternatives would create sources of CO2 emissions in the Project Area. Negligible indirect operational impacts, because CO2 emissions from energy consumption or vehicular and rail traffic would be small, amounting to 1 percent or less of both the District's 2017 CO2e emissions and its 2032 emission target. Negligible construction impacts, as the highest level of annual emissions (during Phase 4 if only trucks are used to remove excavation spoils) would amount to 1 percent or less of both the District's 2017 CO2e emissions and its 2032 emission target.	OP disagrees that a 1 percent impact on the District's 2032 emissions target is a negligible impact for a single project. FRA should update is analysis to more appropriately characterize the Project's significant impact on citywide emissions in the FEIS, and include mitigation measures to off set this significant impact.
70	5	5.8.4.1 No-Action Alternative	5-261	59-63	The additional electrical load from the private air-rights development may require a new substation. The new substation is likely to increase the electrical load on the local distribution system and could result in other necessary upgrades to ensure stable and reliable delivery of electricity to local customers. Such upgrades are typical for development project of that size.	A net-zero energy strategy should be considered and discussed in the FEIS, particularly for the development potential of the Federal air rights. The District's building energy codes, which are updated every three years, will soon be updated to require that all new buildings achieve net-zero energy use or better.
71	5	5.8.6 Avoidance, Minimization and Mitigation Evaluation	5-274-275	305-313	5.8.6 Avoidance, Minimization, and Mitigation Evaluation	Overall, the project proposal is carbon positive, which is directly in conflict with the District's carbon neutrality goals. The overall increase in energy use compared to existing uses may be defined as 'minor', but that baseline is soon to be antiquated relative to new development projects in the District. FRA should include tools and mitigation measures in the FEIS that will offset the carbon impact of the Preferred Alternative.

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

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80	5	5.9.4.2 Alternative A	5-285	233-240 (including bottom page reference 7)	Because of its relatively modest size and location on top of a bus facility and parking facility, with no opportunity for direct access from the street level, it is assumed for the purposes of this DEIS that the space would be used for additional parking. This would be a beneficial impact because it would contribute to supporting WUS operations by making use of potentially developable space that otherwise would remain unproductive in a manner consistent with surrounding land uses. This beneficial impact would be minor because such a development would not be fully consistent with DCOP's Future Land Use Map, which shows mixed-use development with residential, retail, and office space at this location.	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. Comments on the FLUM (Carry Forward for All Alternatives) The characterization of the FLUM is incorrect, it is not OP's FLUM it is the District's. Update the text to reflect this. 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.
81	5	5.9.4.6 Alternative E	5-304	729-735	Relative to existing conditions, Alternative E would have major adverse indirect operational impacts on zoning. This is because the height of the potential Federal air-rights development would exceed what the existing PDR-3 zoning allows. Other impacts of Alternative E on land use, property ownership, and plans would be the same relative to existing conditions as they would be relative to the No-Action Alternative. These impacts would result from features of Alternative E or the Study Area that would not change with the baseline.	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.

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82	5	5.11.3 Methodology	5-378	11 - 34	This section summarizes the methodology for evaluating the impacts of the alternatives on aesthetics and visual quality. Appendix C3, Washington Union Station Expansion Project Environmental Consequences Technical Report, Section 11.4, Methodology, provides a description of the analysis methodology. A summary is below. The assessment of impacts on aesthetics and visual quality was conducted based on 22 significant street views and six culturally significant viewsheds with views toward the Project Area, for a total of 28 views as shown in Figure 5-57 (viewsheds A, C, and D contain one view each and viewshed B containing three views). To assess the visual impacts of the alternatives, visual simulations were developed by superimposing building volumes onto photographs of the 28 views. These simulations convey building mass, height, and setback. Building volumes reflect the anticipated size of the Project elements or maximum allowable zoning volumes. They do not incorporate specific design elements, which are not known at this time. The simulations can be found in Appendix C3a, Washington Union Station Expansion Project Aesthetics and Visual Quality: Visual Assessment.	There is not enough consideration given to the quality of the future Station's urban design and its surroundings. Greater emphasis should be placed on the following: • 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.
83	5	5.11.3 Methodology	5-380	Figure 5-57	The assessment of impacts on aesthetics and visual quality was conducted based on 22 16 significant street views and six culturally significant viewsheds with views toward the Project 17 Area, for a total of 28 views as shown in Figure 5-57 (viewsheds A, C, and D contain one view 18 each and viewshed B containing three views).	Include the significant views of Union Station from New York Avenue (in addition to the one shown) east of the railroad tracks in this section. Analysis of this viewshed will be important as the addition to Union Station is on the back of the station, and the elevation of New York Avenue allows for a view where the additional will be most visible.
84	5	5.11.4.1 No-Action Alternative	5-382	Table 5-121	Relative to existing conditions, the No-Action Alternative would result in direct operational impacts on 21 out of 28 views, as shown in Table 5-121	The view from New York Avenue east of the railroad tracks should be included as part of this assessment as the view would be most impacted by the proposed Air Rights development.
85	5	5.11.4.1 No-Action Alternative	5-384	Table 5-122	Moderate Adverse - 1 - H Street Bridge (#28)	The view from New York Avenue east of the railroad tracks should be included as part of this assessment as the view would be most impacted by the proposed Air Rights development.
86	5	5.11.4.2 Alternative A	5-384	NA	Alternative A	The view from New York Avenue east of the railroad tracks should be included as part of this assessment as the view would be most impacted by the proposed Air Rights development.
87	5	5.11.4.3 Alternative B	5-387	NA	Alternative B	The view from New York Avenue east of the railroad tracks should be included as part of this assessment as the view would be most impacted by the proposed Air Rights development.
88	5	5.11.4.4 Alternative C	5-389	NA	Alternative C	The view from New York Avenue east of the railroad tracks should be included as part of this assessment as the view would be most impacted by the proposed Air Rights development.
89	5	5.11.4.5 Alternative D	5-391	NA	Alternative D	The view from New York Avenue east of the railroad tracks should be included as part of this assessment as the view would be most impacted by the proposed Air Rights development.
90	5	5.11.4.6 Alternative E	5-393	NA	Alternative E	The view from New York Avenue east of the railroad tracks should be included as part of this assessment as the view would be most impacted by the proposed Air Rights development.
91	5	5.11.4.7 Alternative A-C (Preferred Alternative)	5-395	NA	Alternative A-C (Preferred Alternative)	The view from New York Avenue east of the railroad tracks should be included as part of this assessment as the view would be most impacted by the proposed Air Rights development.

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92	5	5.11.5 Comparison of Alternatives	5-399	Table 5-140	Comparison of Impacts, Aesthetics and Visual Quality	The view from New York Avenue east of the railroad tracks should be included as part of this assessment as the view would be most impacted by the proposed Air Rights development.
93	5	5.11 Aesthetics and Visual Quality	Entire Section	Mitigation	NA	Mitigation for impacted views should include aesthetic improvements to railroad bridges over K, L, and M streets and Florida Avenue wherever possible.
94	5	5.12.3 Methodology	5-403	51-53	Definition of adverse effect	The following section should be revised to be consistent with Section 106 regulations in the following manner: "An adverse effect is an effect that would alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for listing in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling and association."
95	5	5.12.3.1 Operational Impacts	5-404	72	negligible, minor, or adverse impact under NEPA	Update the narrative to read as moderate was left off the types of adverse impacts that are considered: "negligible, minor or **moderate** adverse impact under NEPA"
96	5	5.12.3.2 Construction Impacts	5-406	110-113	Assessment of noise and vibration impacts used the FTA thresholds applicable to construction noise and vibration. Steps to evaluate potential construction impacts to cultural resources included: identifying what physical construction effects may occur; potential visual impacts to cultural resources or visual character due to construction activities; and indirect impacts of noise and vibration.	The text should be updated to reflect the potential indirect impacts construction may have on congestion, specifically resulting from "temporary" road closures (which could be closed for long periods given the extensive construction schedules).
97	5	5.12.4.2 Alternative A	5-412	Table 5-145 (erroneously labeled 5-4151)	Major Adverse Impacts of Alternative A	The list is not exhaustive. Additional adverse impacts associated with Alt A should be added to the list, these include but are not necessarily be limited to, the visibility of the parking garage from the north (i.e. parking garages do not contribute to civic space); the loss of views to WUS from the central north-south oriented concourse; etc. This comment carries forward to the additional adverse impacts which may also result for other similar alternatives.
98	5	5.12.4.2 Alternative A	5-415	Table 5-148	Potential Adverse Effects on WUS, WUS Historic Site and REA Building	It is unreasonable from a Section 106 perspective to describe an 11-year construction schedule as anything but major adverse on the WUS Historic Site - especially when considering that it involves reconstruction of every track, removal of every historic umbrella shed etc. Similarly, the visual effects (e.g. fencing, construction equipment, temporary road closures etc.) of such a long period of construction would very likely result in major adverse effects on the WUS and REA Building. This significant impact should be recognized in the FEIS, and its impacts addressed and mitigated. This comment is applicable across all alternatives.
99	5	5.12.4.3 Alternative B	5-421	Table 5-151	Potential Adverse Effect on WUS, WUS Historic Site and REA Building	It is unreasonable from a Section 106 perspective to describe an 14-year construction schedule as anything but major adverse on the WUS Historic Site - especially when considering that it involves reconstruction of every track, removal of every historic umbrella shed etc. Similarly, the visual effects (e.g. fencing, construction equipment, temporary road closures etc.) of such a long period of construction would very likely result in major adverse effects on the WUS and REA Building. This significant impact should be recognized in the FEIS, and its impacts addressed and mitigated. This comment is applicable across all alternatives.

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100	5	5.12.4.4 Alternative C	5-422	329	Visual Impacts of Alt C (East & West Option)	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.
101	5	5.12.4.4 Alternative C	5-427	Table 5-156	Comparison of Alt C Operational Visual Impacts on Cultural Resources Relative to the No-Action Alternative and Existing Conditions	Union Station should be integrated and evaluated in this table. Not including Union Station suggests there is no potential for adverse effects. Perhaps it has something to do with it being relative to no-action and existing conditions but it seems unlikely that there is no potential for adverse effects on WUS in either scenario.
102	5	5.12.4.5 Alternative D	5-433	Table 5-160	Comparison of Alt D Operational Visual Impacts....	Union Station should be integrated and evaluated in this table. Not including Union Station suggests there is no potential for adverse effects. Perhaps it has something to do with it being relative to no-action and existing conditions but it seems unlikely that there is no potential for adverse effects on WUS in either scenario.
103	5	5.12.6 Alternative E	5-442 & 443	628-647	Avoidance, Minimization and Mitigation Evaluation	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.
104	5	5.13 Parks and Recreation Areas	5-444	Entire Section	Impact Analysis	Landscaped "Public Parking" should be added as a park and recreation resource assessed for impacts, as they provide park-like amenities for the area.
105	5	5.13 Parks and Recreation Areas	5-444	Entire Section	Impact Analysis	The impact of increased trips on Columbus Plaza and other parks and open space resources in the area should be assessed in the FEIS.
106	5	5.14.4.1 No-Action Alternative	5-462	166-173	The H Street Bridge replacement would have the most impact, as it would make travel between the east and west sides of the Local Study Area more difficult during the construction period. DDOT would likely implement measures to minimize this impact. The private air-rights development construction would likely require temporary sidewalk and roadway closures along First Street NE (north of H Street) and 2nd Street NE and generate construction vehicle traffic along those streets. No sufficient information is available to assess the intensity and duration of those impacts but they would be those typical of medium- to large-scale urban construction projects.	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.

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

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114	5	5.14.4.4 Alternative C	5-478	562-566	The development of the remaining Federal air rights as approximately 952,600 square feet of office space, as is assumed for the purposes of the impact analysis, would have a beneficial impact on WUS revenue through the lease of the space (or other mechanism through which development would be achieved). This impact cannot be quantified at this time but it would at least partially offset the loss of revenue from the reduction in parking capacity.	The revenue generated by the potential land use development program for Union Station should be included in the analysis for the FEIS. Without including this revenue, the benefit cost is skewed in favor of parking as a revenue source.
115	5	5.14.4.5 Alternative D	5-483	698-699	This impact cannot be quantified at this time but it would at least partially offset the loss of revenue from the reduction in parking capacity.	The revenue generated by the potential land use development program for the site should be included in the analysis for the FEIS. Without including this revenue, the benefit cost is skewed in favor of parking as a revenue source.
116	5	5.14.4.7 Alternative A-C (Preferred Alternative)	5-490	828-830	This order-of- magnitude estimate does not account for the fact that decreasing the total number of spaces may increase the revenue generated by each space due to reduced supply and steady or increasing demand.	FRA should reassess the revenue it assumes parking at the station will command in the FEIS. Its asserted premium value should be accounted for, and if it is this alternative is unlikely to have a significantly negative impact on WUS revenue.
117	5	5.14.4.7 Alternative A-C (Preferred Alternative)	5-490	835-838	Altogether, Alternative A-C would cause a net loss in revenue for WUS. The loss would be a moderate adverse impact because all parking, which is the main source of income for WUS, would continue to generate revenue while the permanent loss of retail, if it occurs, would likely be small.	The proposed project design and improvements should maximize the investments proposed, which collectively will serve the District for the next 100 years and beyond. The DEIS's focus on preserving legacy revenue streams, especially for more than a thousand spaces of private automobile parking, weakens the proposal in several important ways, which include the following: • 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.
118	5	5.14.4.7 Alternative A-C (Preferred Alternative)	5-491	860-861	This impact cannot be quantified at this time but it would at least partially offset the loss of revenue from the reduction in parking capacity.	An analysis of parking price sensitivity at WUS should be integrated into the FEIS. We believe this analysis would indicate the extent to which modified pricing could mitigate revenue losses generated from further reductions in parking spaces in the project. It is not clear that a negative impact is likely to be caused to WUS revenue. Preceding discussion for this alternative indicates that a price premium for parking at this high-value location may be able to offset revenue lost due to the reduced number of parking spaces after construction. The addition of revenue generating office indicates that WUS is likely to experience a beneficial impact to its revenue under this alternative.
119	5	5.14.5 Comparison of Alternatives	5-493	909-914	Among the Action Alternatives, the primary differentiator would be the employment and economic impacts from construction, which would be a function of cost and duration. Taking both factors into account, Alternatives B and E would support the most jobs and Alternatives A and A-C the fewest, with Alternatives C and D in the middle. Similarly, Alternatives B and E would generate the greatest total economic output and Alternatives A and A-C the smallest, with Alternative C and D generating a little more than Alternatives A and A-C.	The FEIS should include a more detailed analysis of employment generated by construction and use of air rights office developments be incorporated in these assessments. Given that some alternatives include large office developments exceeding 600,000 square feet in the federal air rights, these buildings could house thousands of employees and should be detailed more thoroughly.

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

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

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

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

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

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

Comment No.	DEIS Chapter	DEIS Section	DEIS Page Nos.	DEIS Line Nos.	DEIS Text	DC Office of Planning Comment
151	7	Mitigation Measure 29	NA	NA	Proponents to coordinate with DDOT on transportation demand management, for-hire, and transit strategies to reduce the total number of 2040 trips by 20%.	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.
152	7	Mitigation Measure 29	NA	NA	Proponents to work with DDOT to identify solutions out of a toolbox of traffic mitigation approaches, including, but not limited to, regular monitoring activities, turn restrictions, alternative intersection phasing, lane reassignment, parking restrictions, and street pattern changes, at the most severely impacted intersections in the study area. Proponents to coordinate with DDOT and WMATA on opportunities to achieve greater core transit capacity through additional lines or services, in order to accommodate a greater mode shift from vehicles to transit.	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: • Enhanced bus infrastructure including priority treatments such as bus lanes and transit signal priority; • Bus stop infrastructure; • Charging and other supportive infrastructure for electric and alternative fuel buses; and • Wayfinding and physical connections to facilitate intermodal transfers and incentivize transit bus use over for-hire vehicles.
153	7	Mitigation Measure 34	NA	NA	Greenhouse Gas Emissions and Resilience (see also Energy Resources and Air Quality)	The reduction of vehicle trips, private, drop off and parking should also be recommended as a way to reduce greenhouse gas emissions and resilience. Transportation is one of the largest contributors to these areas, mode shift to less impactful forms of transportation should be identified.
154	Appendix A6	1.3.2.3 Parking Program Policy	11 of 12	NA	Such a program would be consistent with USRC's 99- year lease agreement with Union Station Investco (USI), which manages WUS retail.	The reference to the lease agreement should be struck from this location and should not dictate terms of this project. Moreover, it seems implausible that the lease agreement would not be renegotiated as part of the impacts associated with project construction.
155	Appendix A6	2.2.4 Conclusion	21 of 22	NA	FRA and the Proponents' 2017 decision to reduce the parking program below the estimated 2040 demand level of 2,730 as well as below the existing parking capacity of 2,450 is consistent with the District's policy goal. This determination is reflected in the DEIS Action Alternatives, each of which is grounded in data and analysis and greatly reduces the existing WUS parking capacity despite significant projected increases in activity at WUS over the next 20 years and beyond.	The parking program still represents a significant amount of parking at a highly multimodal location. The District would argue that while 1,600 spaces is a reduction from an excessive projected need of 2,730, it is still in excess of what is needed to support the station and in fact will detract from its urban context and historical nature.
156	Appendix A6	2.2.4 Conclusion	21 of 22	NA	FRA considers the provision of adequate parking as an important factor to attract passengers to the Federally owned station and provide different modes of access for station users.	The 295 spaces recommended by the District is an adequate number to meet WUS needs. The 1,600 spaces included in the Preferred alternative is an excessive amount of space dedicated to storing private vehicles in a multimodal urban area. The FEIS should reflect 295 spaces.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Office of the Directors

June 19, 2020

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

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

Dear Mr. Valenstein,

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

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

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

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

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

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

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

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

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

Sincerely,

Andrew Trueblood
Director
District of Columbia Office of Planning

Jeff Marootian
Director
District of Columbia Department of Transportation

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

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

MEMORANDUM

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

From: Andrew Trueblood
Director, Office of Planning

Jeff Marootian
Director, Department of Transportation

Date: June 3, 2020

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

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National Capital Planning Commission Request

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

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

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

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

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

WUS Expansion Project Parking Working Group

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

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

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

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

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

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

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

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

District Policies Supporting Reduced Parking for Union Station

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

> *Policy T-1.1.8: Minimize Off-Street Parking*
> An increase in vehicle parking has been shown to add vehicle trips to the transportation network. In light of this, excessive off-street vehicle parking should be discouraged.

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

> *Policy T-2.2.4: Union Station Expansion*
> Ensure that expansion and modernization of Union Station supports its role as a major, intermodal, transit-focused transportation center. Changes to Union Station should improve intermodal connections and amenities; facilitate connections with local transportation infrastructure with an emphasis on transit, pedestrian and bicycle mobility; enhance integration with adjacent neighborhoods; minimize private and for-hire vehicle trips; reduce on-site parking; and provide a continued high quality of life for District residents and visitors.

District Parking Recommendations

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

Land Use

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

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

Retail Uses

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

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

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

[3] District Department of Transportation, Guidance for Comprehensive Transportation Review, Version 1.0, June 2019

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

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

Office Uses

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

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

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

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

Intercity Travel Supportive Parking

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

Long-Term Parking

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

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

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

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

2. OP conducted background research (see Attachment 5) on urban train stations similar to WUS that do not provide long-term parking at all, including New York's Penn Station and Chicago's Union Station. Additionally, Philadelphia's 30th Street Station is drastically reducing its parking supply and providing an intermodal bus facility as part of its redevelopment.

3. Within the Washington Metropolitan Region, there are significant parking options for travelers at appropriate locations that are more auto-oriented. These include Prince George's County's New Carrollton Garage, which provides over 1,000 parking spaces including long term parking and is regionally accessible via I-495, as well as the BWI Airport Rail Station Garage, which provides over 3,000 parking spaces. Also, there are many existing, underutilized parking garages within walking distance in the area surrounding WUS that, given market demand, could adapt to provide private overnight parking.

4. Recent rider surveys conducted by Amtrak for their passengers indicate a continued decline in utilization of long-term parking by Amtrak riders (see Attachment 6). At the start of the EIS process, approximately eight percent of Amtrak riders self-reported that they parked at the station. The most recent Amtrak survey of riders, from January to March 2020, indicated that only three percent of riders drove to Union Station and parked as their means of access to the Station. This significant decrease in parking demand is also being observed at our regional airports, which have seen parking demand drop by up to 44 percent in the last two years[6]. Union Station is colloquially referred to as the region's fourth airport, as it handles 37 million visitors (including passengers) annually – a number substantially higher than the number of passengers served by any one of the region's three airports, which each serve between 20 and 22 million passengers annually[7].

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

[7] https://plandc.dc.gov/sites/default/files/dc/sites/op/page_content/attachments/Chapter%204_Public_Review_Draft_Transportation_Oct2019.pdf

Short-Term

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

Accessible Parking

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

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

District Recommended Parking Program for Union Station

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

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

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

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

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

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

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

Table 1: District Proposed Parking for Union Station

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

District Position on For Hire Vehicle Uses

Pick Up Drop Off (PUDO)

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

1. With a decrease in the number of parking spaces, DDOT would expect a higher number of pick-up and drop-off trips. This number would be split between private vehicles (family and friends) and for-hire vehicles.
    - The private vehicle drop-off and pick-up would result in approximately double the number of vehicle trips as a parking trip. For example, a private vehicle would enter the station to drop off a passenger, then exit the station to return to the driver's origin. If the passenger were to drive themselves to park, they would have only one trip to enter the station.
    - The District and USRC can and should take actions to increase the internal capture rate[9] for for-hire vehicles; with the goal that every for-hire drop-off trip becomes a for-hire pick-up trip.

2. The number of for-hire vehicle trips assumed in the DEIS for 2040 is already high in all of the build alternatives and will likely contribute to significant congestion on the roadway network. For context, the number of for-hire trips is expected to be 10 to 13 times greater than the number of trips generated by parking in the Preferred Project Alternative A-C[10]. To decrease this impact, the District and the project proponents can do several things:
    - Enact policies and management strategies to increase the internal capture rate for for-hire vehicles;
    - Provide distributed loading for for-hire and pick-up and drop-off vehicles around the Union Station site to minimize impacts at any one location and on adjacent neighborhoods; and
    - Include in the preferred alternative a dedicated high capacity facility for for-hire vehicles to increase efficiency and concentrate many of the for-hire trips.

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

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

[10] Numbers are based on trip generation figures provided by FRA to DDOT earlier in transportation analysis process.

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

Acknowledgements/Next Steps

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

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

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

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

ATTACHMENTS

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

National Capital Planning Commission

Commission Action

January 9, 2020

PROJECT
Washington Union Station Expansion Project
Union Station
50 Massachusetts Avenue, NE
Washington, DC

SUBMITTED BY
United States Department of Transportation
Federal Railroad Administration

REVIEW AUTHORITY
Federal Projects in the District
per 40 U.S.C. § 8722(b)(1) and (d)

NCPC FILE NUMBER
7746

NCPC MAP FILE NUMBER
1.11(38.00)45049

APPLICANT'S REQUEST
Approval of comments on concept plans

ACTION TAKEN
Approved comments on concept plans

The Commission:

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

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

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

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

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

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

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

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

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

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

Regarding the transportation facilities:

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

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

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

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

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

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

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

Regarding the parking facilities:

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

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

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

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

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

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

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

Regarding historic preservation and urban design:

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

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

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

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

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

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

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

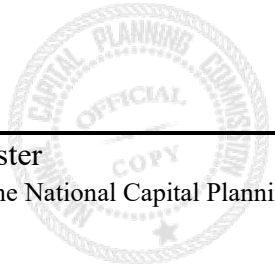
Requests the applicant prepare elevations and renderings to show how the height and mass of the alternatives will look from key viewsheds, including from the U.S. Capitol building, the National Mall, Delaware Avenue, and 1st Street, NE. The renderings should also include the massing of any private development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

Regarding further coordination:

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

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

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



Julia A. Koster
Secretary to the National Capital Planning Commission

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

Parking Matrix (District Numbers)

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

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

FHV Facility	PUDO (driver does not leave vehicle)									The number of for-hire vehicle trips assumed in the DEIS is already high in all of the build alternatives and will likely contribute to significant congestion on the roadway network. To decrease this impact, the District and the project proponents can do several things: - Enact policies and management strategies to increase the internal capture rate for for-hire vehicles; - Provide distributed loading for for-hire and pick-up and drop-off vehicles around the Union Station site to minimize impacts at any one location; and - Include in the preferred alternative a dedicated high capacity facility for-hire vehicle to increase efficiency and concentrate many of the for-hire trips.
	Rental Cars (which operate very differently than parking)									The District does not feel the inclusion of a traditional rental car facility is appropriate for Union Station, unless there is data to support that the facility is needed to intercity travelers. Without such data, it would be more appropriate for a rental car facility to locate in the surrounding area to serve residents.

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

I. District of Columbia Comprehensive Plan Parking Policies

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

Policy T-1.1.8: Minimize Off-Street Parking

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

Policy T-1.2.3: Discouraging Auto-Oriented Uses

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

Policy T-3.2.1: Parking Duration in Commercial Areas

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

Action T-3.2.A: Short-Term Parking

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

Action T-3.2.C: Curbside Management Techniques

Revise curbside management and on-street parking policies to:

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

Action T-3.2.D: Unbundle Parking Cost

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

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

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

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

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

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

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

1.3.2 Appropriate Level of Vehicle Parking

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

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

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

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

Table 2 | DDOT-Preferred Vehicle Parking Rates

Land Use		Less than ¼ Mile from Metrorail	¼ to ½ Mile from Metrorail OR Less than ¼ Mile from Priority Transit**	½ to 1 Mile from Metrorail	More than 1 Mile from Metrorail
Residential *(spaces/unit)*	**DDOT:** ZR16 Min-Max:	**0.30 or less** 0.17* - 0.67	**0.40 or less** 0.17* - 0.67	**0.50 or less** 0.33 – 0.67	**0.60 or less** 0.33 – 0.67
Office *(spaces/1,000 GSF)*	**DDOT:** ZR16 Min-Max:	**0.40 or less** 0.25* - 1.00	**0.50 or less** 0.25* - 1.00	**0.65 or less** 0.50 – 1.00	**0.85 or less** 0.50 – 1.00
Hotel *(spaces/1,000 GSF)*	**DDOT:** ZR16 Min-Max:	**0.40 or less** 0.25* - 1.00	**0.45 or less** 0.25* - 1.00	**0.60 or less** 0.50 – 1.00	**0.75 or less** 0.50 – 1.00
Retail *** *(spaces/1,000 GSF)*	**DDOT:** ZR16 Min-Max:	**1.00 or less** 0.67* - 2.66	**1.25 or less** 0.67* - 2.66	**1.60 or less** 1.33 – 2.66	**2.00 or less** 1.33 – 2.66
Other Uses	**DDOT:** ZR16 Min-Max:	**75% of § 701.5 or less** 50% - 200% of § 701.5*	**90% of § 701.5 or less** 50% - 200% of § 701.5*	**120% of § 701.5 or less** 100% - 200% of § 701.5	**150% of § 701.5 or less** 100% - 200% of § 701.5

Notes:
* There is no vehicle parking requirement in Downtown "D" and several other zones. DDOT strongly encourages Applicants to provide no on-site vehicle parking where allowable by zoning.
** Priority transit includes the H Street Streetcar, Streetcar Benning Road Extension, DC Circulator, and Priority Corridor Network Metrobus Routes defined by zoning in DCMR 11, Subtitle C § 702.1(c).
*** Retail rates can be used for either standalone buildings or first floor users of mixed-use projects. The Retail category also includes a wide range of related uses such as fast casual restaurant, bank, drinking establishment, pet grooming, coffee shop, grocery, etc.

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

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

Memorandum

To: David Valenstein; Beverley Swaim-Staley

CC: David Handera; Daniel Sporik; Kevin Forma; Bradley Decker

From: Gretchen Kostura

Date: January 7, 2020

Re: Amtrak Parking for the Washington Union Station Expansion Project

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

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

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

National Railroad Passenger Corporation
1 Massachusetts Avenue, NW
Washington, DC 20001

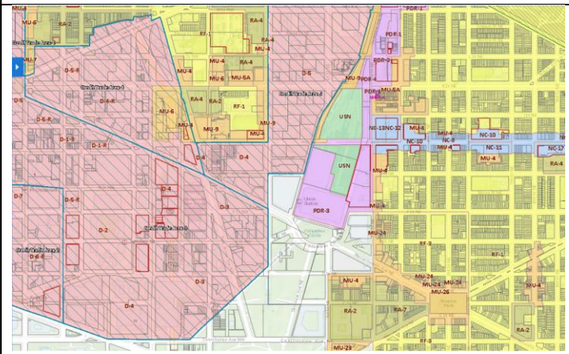
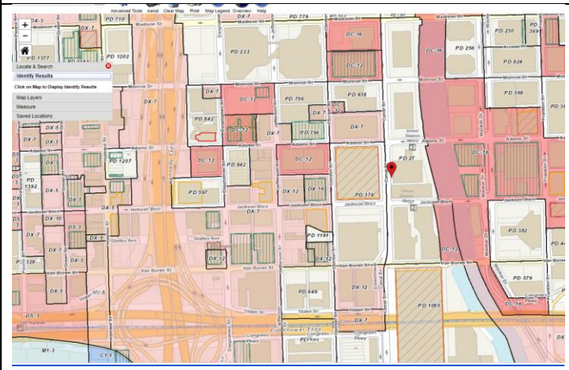
We do not believe the EIS process needs to be stalled or postponed as this refinement work can move in parallel to the current process with the current numbers serving as a stress test for the Project.

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

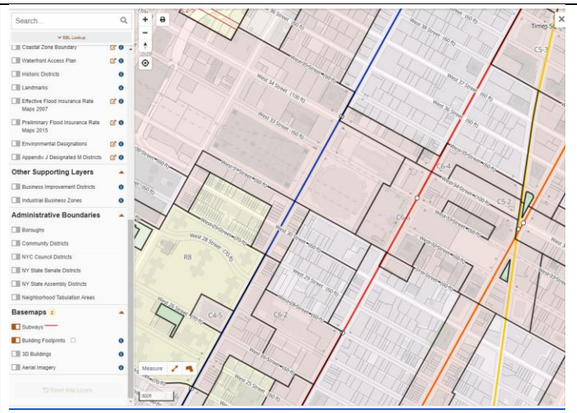
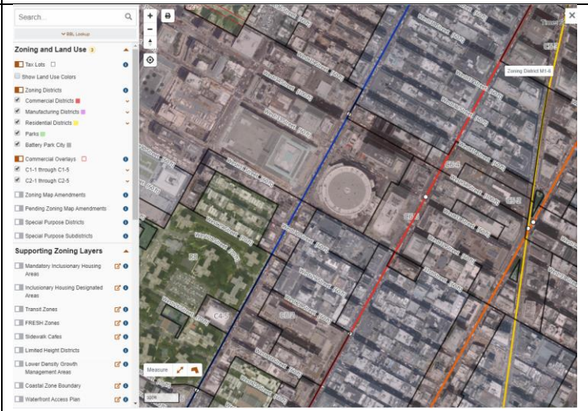
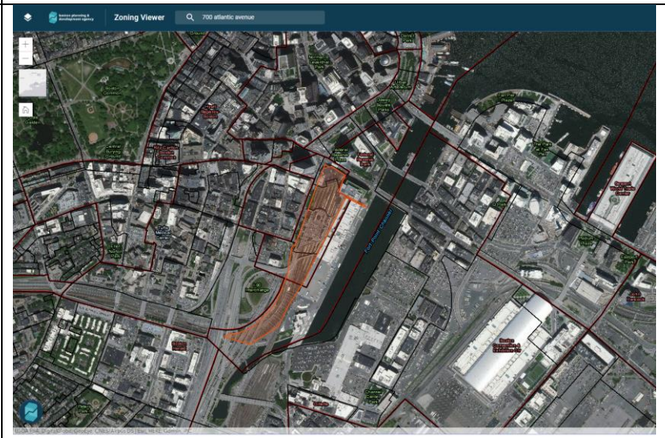
[1] Daily Amtrak ridership is approximately 16,000. It can be assumed that Union Station is the origin station for half those riders and 8% of those riders are parking at the Station given our survey results from 2017. Note that the most recent survey of passengers in December 2019, only 4% of riders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

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

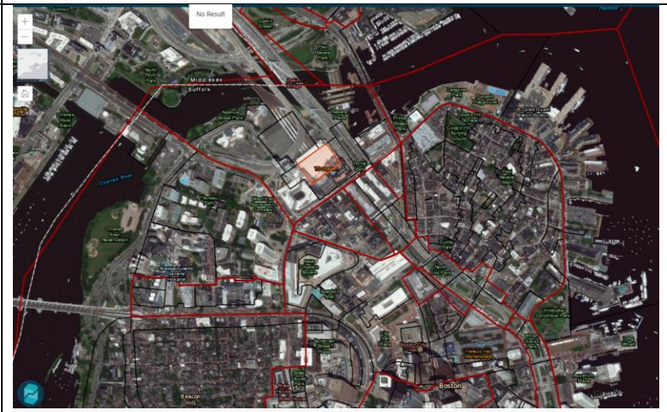
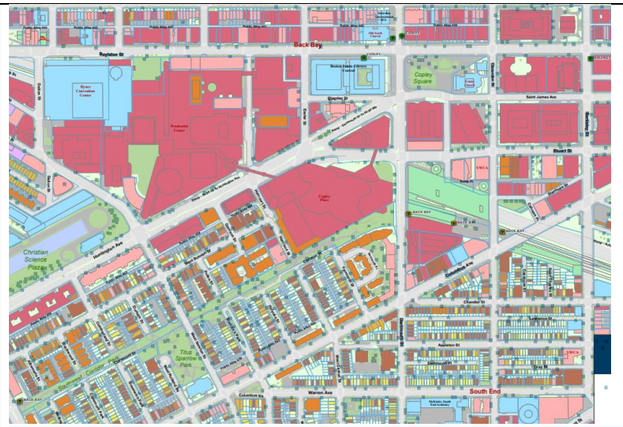
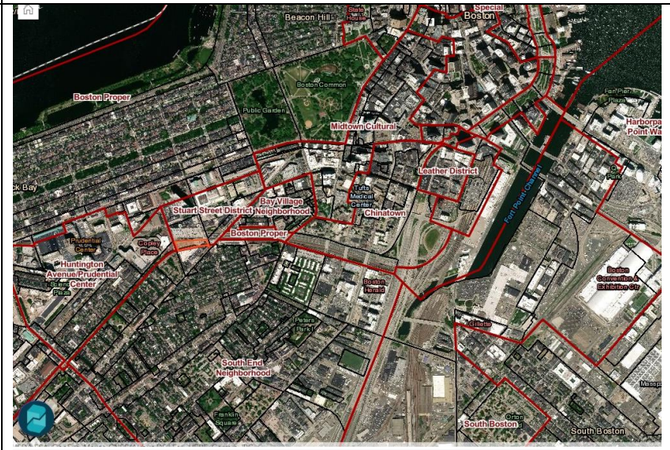
Attachment 5: Research on Comparative Stations (Working Document)
District of Columbia Report-Back to NCPC re: Appropriate Parking Numbers for the Washington Union Station Expansion Project, June 3, 2020

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

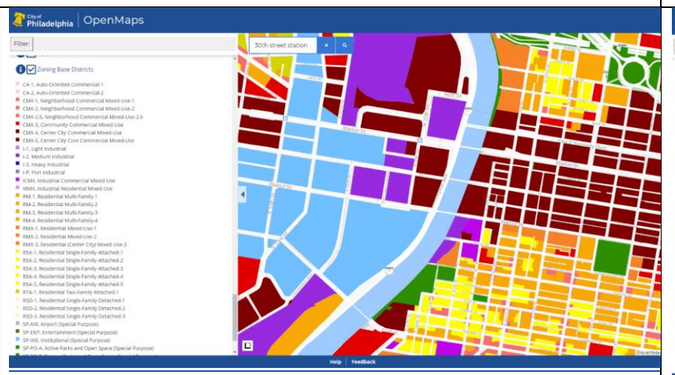
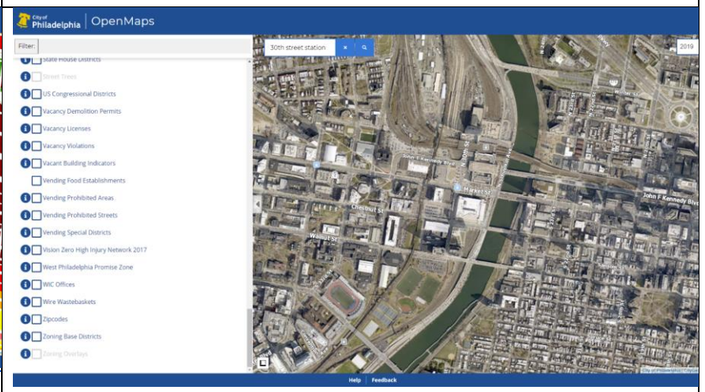
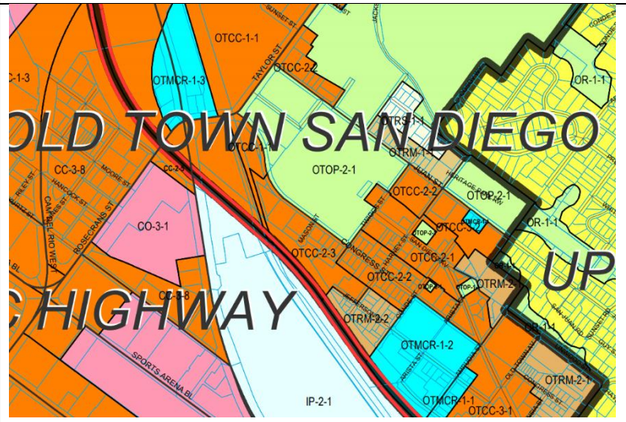
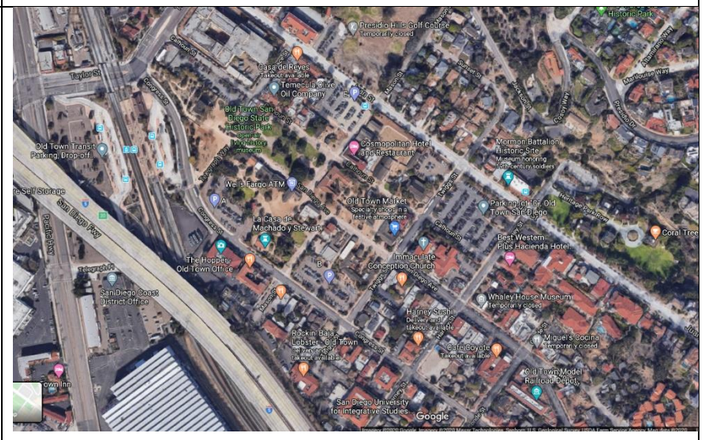
[1] Not all parking at and associated with these stations is dedicated to intercity travelers. Parking data was gathered between February and April of 2020.
[2] **https://www.amtrak.com/state-fact-sheets**

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

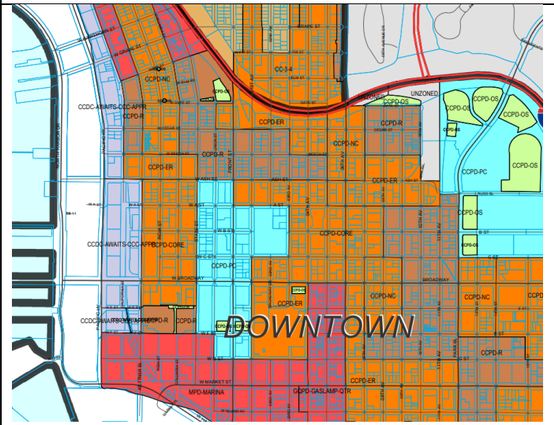
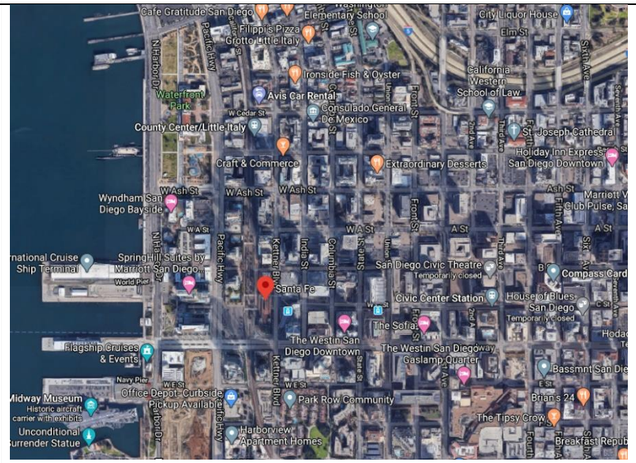
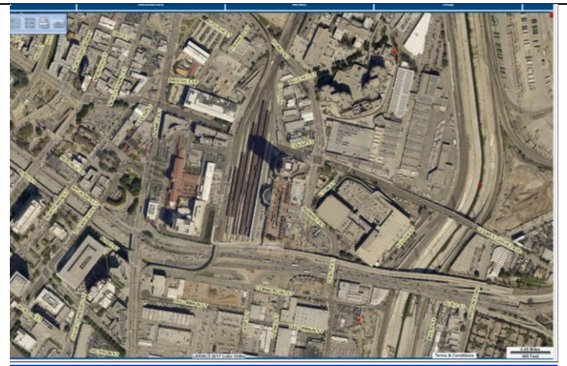
Attachment 5: OP-DDOT Report to NCPC re. Appropriate Parking Numbers for the Washington Union Station Expansion Project (June 3, 2020)

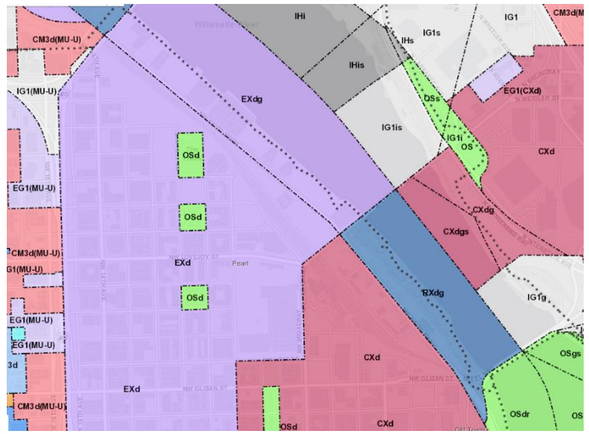
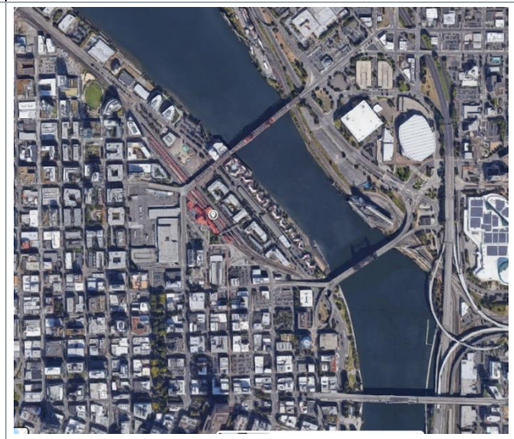
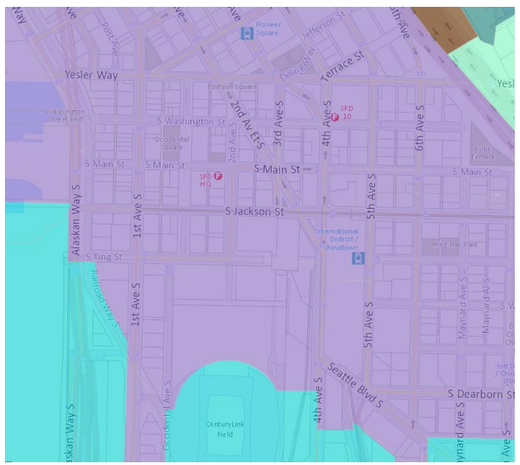
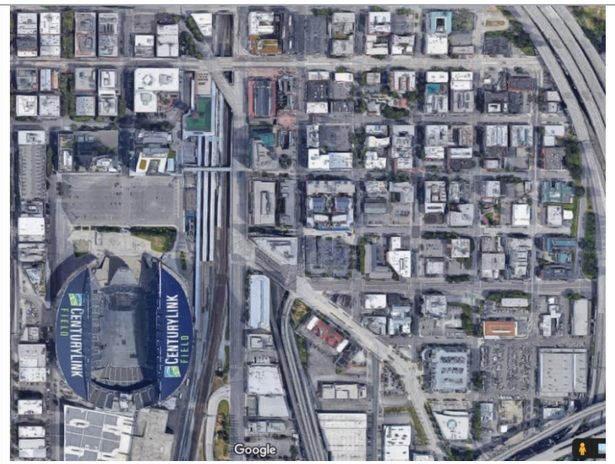
Location	Existing Station Associated Parking[1]	Development plans and associated parking	Relationship to the city	Amtrak Riders (Yearly FY18)[2]	Station's Zoning Context	Station's Built Form Context
Boston – North Station	1275 spaces; 38 accessible spaces https://www.mbta.com/stops/place-north Limited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

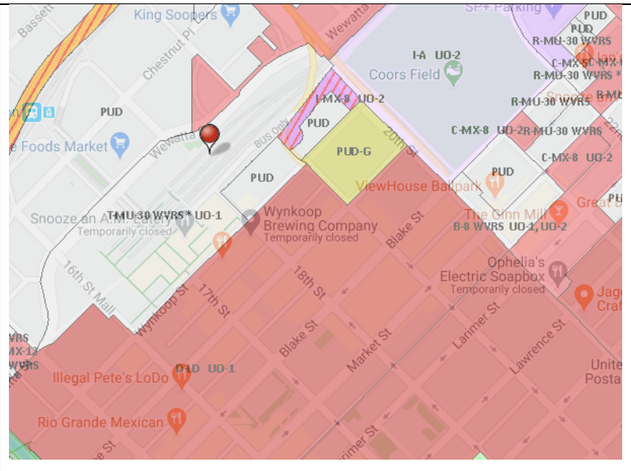
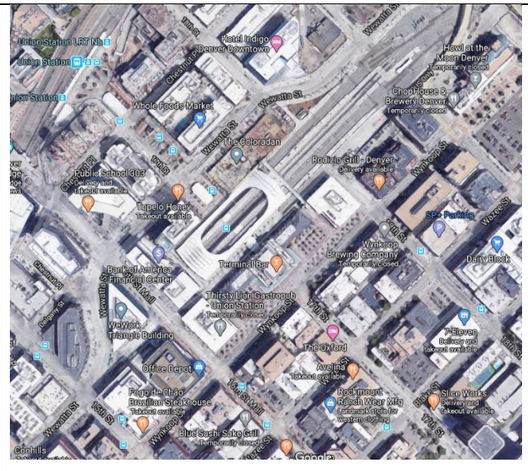
Attachment 5: OP-DDOT Report to NCPC re. Appropriate Parking Numbers for the Washington Union Station Expansion Project (June 3, 2020)

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

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

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

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

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

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

Attachment 6: Amtrak Rider Survey
District of Columbia Report-Back to NCPC re: Appropriate Parking Numbers for the Washington Union Station Expansion Project, June 3, 2020

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

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

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

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

District of Columbia Office of Planning

Office of the Director

April 30, 2020

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

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

Dear Mr. Valenstein:

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

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

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

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

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

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

Table 1: District Proposed Parking for Union Station

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

Source: District Office of Planning, District Department of Transportation[1]

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

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

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

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

[1] The numbers recommended herein were developed in collaboration with the District Department of Transportation (DDOT) and represent the District's recommended parking numbers for the Union Station Expansion Project.

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

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

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

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

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

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

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

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

Sincerely,

Andrew Trueblood

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