

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.