



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, NCP, 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.