

Note: At the January 9, 2020 meeting, the Commission amended the recommendations proposed in this EDR. The Commission Action reflects the Commission’s approved comments on concept plans.



Executive Director’s Recommendation

Commission Meeting: January 9, 2020

PROJECT Washington Union Station Expansion Project 50 Massachusetts Avenue, NE Washington, DC	NCPC FILE NUMBER 7746
	NCPC MAP FILE NUMBER 1.11(38.00)45049
SUBMITTED BY United States Department of Transportation Federal Railroad Administration	APPLICANT’S REQUEST Approval of comments on concept plans
REVIEW AUTHORITY Federal Projects in the District per 40 U.S.C. § 8722(b)(1) and (d)	PROPOSED ACTION Approve comments on concept plans
	ACTION ITEM TYPE Staff Presentation

PROJECT SUMMARY

The Federal Railroad Administration (FRA) has submitted concept plans for the proposed Washington Union Station Expansion Project, which includes the historic Union Station building located at 50 Massachusetts Avenue, NE, in Washington, DC. The Union Station Redevelopment Corporation (USRC), in coordination with the National Railroad Passenger Corporation (Amtrak), has proposed expanding and modernizing the multimodal transportation facilities at Washington Union Station. FRA is currently preparing a Draft Environmental Impact Statement (DEIS) in compliance with the National Environmental Policy Act (NEPA) to evaluate the proposed project. NCPC is a cooperating agency as part of the project to satisfy the Commission’s own NEPA compliance requirements because of its approval over projects on federal land. The historic station, existing parking structure, and bus facilities are located on federal (FRA) land.

The project purpose includes: supporting current and future growth in rail service; complying with accessibility and emergency egress requirements; facilitating intermodal travel; providing a positive customer experience; enhancing integration with surrounding uses; sustaining the station’s economic viability; and supporting the continued preservation and use of the historic station building. The project is needed to improve rail capacity, reliability, safety, efficiency, accessibility, and security, for both current and future long-term railroad operations at this historic station. The *Comprehensive Plan for the National Capital* clearly states the importance of developing and maintaining a multi-modal regional transportation system that meets the travel needs of residents, workers, and visitors.

The applicant has developed six project alternatives, and the project proponents have identified one preferred alternative in the submission. The project is still in the planning phase, and therefore the alternatives are shown as general diagrams identifying the general placement and configuration of facilities. The DEIS is anticipated to be released in spring 2020. At that time, detailed analysis

of the alternatives will be provided to identify any potential impacts. As this concept review stage, the Commission is reviewing the project from generally consistency with the Comprehensive Plan, understanding the differences between the proposed alternatives, and identifying issues to be addressed prior to the next review. Commission comments as part of the concept review will assist staff in reviewing and providing comments on the DEIS, as well as future project development.

KEY INFORMATION

- Washington Union Station is located in central Washington, DC and is a hub for multimodal transportation in the region, and includes Amtrak, Maryland Area Regional Commuter (MARC), and Virginia Railway Express (VRE) rail service, along with intercity buses, and the busiest Metro station in the WMATA system, serving the Red Line.
- Local bus, tour bus, taxi, rideshare and bicycle services also use the station and the surrounding site. The H Street-Benning Streetcar station is located on the Hopscotch Bridge which passes over the railyard.
- Washington Union Station is the second busiest station in the Amtrak network, with approximately 85-90 trains daily in 2018. This includes the high-speed Acela Express and Northeast Regional service. Amtrak controls the tracks at the station.
- The station sees about 40 million visitors each year. Amtrak, MARC, and VRE operate over 200 daily train movements at the station. The project proponents are anticipating significant growth through 2040.
- The terminal was designed by Daniel Burnham, a member of the McMillan Commission, and completed in 1908. It was placed on the National Register of Historic Places in 1969. The station was renovated in 1988 and includes over 150 stores and a food court. Restoration work was also completed in the main hall.
- The site today includes the historic train station, historic concourse, bus facility, and parking garage which are owned by FRA. The Union Station Redevelopment Corporation (USRC) oversees the station operations and maintenance.
- In 1981, Congress passed the Union Station Redevelopment Act in an effort to preserve the historic integrity of the station while advancing its purpose as a regional transportation hub and destination. The act resulted in the founding of USRC in 1983, established to represent the best interests of the station.
- The District Department of Transportation (DDOT) owns and maintains the H Street (Hopscotch) Bridge, which will be reconstructed in the near future.
- The National Park Service maintains jurisdiction of Columbus Circle which is located in front of the historic station.
- WMATA controls the Red Line right of way and the Metro station.
- The air rights located east of the parking garage and north of the station are owned by Akridge, a private developer. The air rights were created as a result of the disposition of federally-owned air rights above the railroad infrastructure for development purposes. Akridge won the public auction, and has proposed a mixed-use development named "Burnham Place." The private air rights have a Union Station North (USN) zoning designation.

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- FRA is preparing an Environmental Statement (EIS) pursuant to the National Environmental Policy Act (NEPA) to evaluate alternatives for the proposed expansion. NCPC is a cooperating agency. The DEIS is anticipated to be released in spring 2020.
 - USRC and Amtrak are the project proponents for the expansion project.
 - FRA is the lead federal agency leading the Section 106 consultation process pursuant to the National Historic Preservation Act (NHPA). Seven consulting parties' meetings have been held to date. A Memorandum of Agreement (MOA) or Programmatic Agreement (PA) will be executed to document the mitigation measures agreed upon during the consultation process resulting from any anticipated adverse effects. NCPC will be a signatory on the agreement document.

RECOMMENDATION

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 parking revenues comprise 70 percent of USRC funding which supports preservation of the station, maintaining the station as a multimodal transportation center, and enhancing 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.

A majority of the spaces appear to be used by monthly pass holders whereas the use of the garage for daily retail or rail users appears 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 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.

PROJECT REVIEW TIMELINE

Previous actions	<p>2008 – Final approval of perimeter security project at Union Station</p> <p>2011 – Commission comments on zoning text and map amendment for Union Station North zone</p> <p>2014 – Final approval of Union Station Metro access and capacity Improvements</p> <p>2017 – Information Presentation on Expansion Project</p>
Remaining actions (anticipated)	<ul style="list-style-type: none">- Review of Draft EIS- Review of proposed site and building plans- Review of private development through Zoning Commission referral

PROJECT ANALYSIS

Executive Summary

The primary goal of project is to supporting current and future growth in rail service and to support multimodal connectivity for Washington, DC and the National Capital Region well into the 21st Century. 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 for visitors. At the same time, the station is a critical transportation hub for residents and workers. Policy language in the proposed 2019 federal Transportation Element further expresses support for the expansion of high speed and high capacity passenger rail to improve inter-city connectivity across the eastern United States, with Washington Union Station as a regional hub. Given the station's important role and function, staff therefore recommends the **Commission support 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.**

Analysis

Background

Washington Union Station is located at the confluence of Massachusetts, Louisiana and Delaware Avenues, NE, just north of the US Capitol and National Mall. Designed by Daniel Burnham, a member of the McMillan Commission, Union Station was completed in 1908. It was placed on the National Register of Historic Places in 1969, and is the central hub for rail transportation in Washington DC. Union Station is described in the McMillan Plan as “the grand gateway to the capital” the style of which “should be equally as dignified as that of the public buildings themselves.” The station continues to represent and evoke the social, planning, and architectural history of the McMillan Plan, and serves as an important transportation hub for the city and region today.

The site today includes the historic station and the bus facility and parking garage which are located on federal land, and maintained by USRC. The track facilities are controlled by Amtrak. To the north, DDOT owns and maintains the H Street (Hopscotch) Bridge. The bridge crosses the tracks and includes a streetcar stop. DDOT anticipate the bridge will be reconstructed in the near future. To the south, the National Park Service maintains jurisdiction of Columbus Circle which is located in front of the historic station. WMATA controls the Red Line right of way and the Metro station which runs along the west side of the station. The Union Station Redevelopment Corporation (USRC) oversees the station operations and maintenance. Parking revenues comprise 70 percent of USRC funding, to supports preserving the historic station, maintaining the station as a multimodal transportation center, and enhancing the retail and amenities within the station.

The site has changes in topography and the historic Burnham wall is a significant barrier on the west side of the site. Many features are above or below the adjacent grade, requiring the site to be considered in a three-dimensional way. The railway infrastructure, as well as the surrounding street network, also limit access points to the site. The surrounding blocks are generally built-out or in development. And as noted previously, a number of different owners and jurisdictions control the area. Together, these issues create a number of challenges when planning for future expansion.

NCPC has reviewed several projects related to Union Station. These include perimeter security (2008) and Metro Station access and capacity enhancements (2014). The Commission also provided comments to the District of Columbia Zoning Commission regarding the Union Station North (USN) zoning district. Established in 2011, this zoning designation applies to approximately 14-acres of air rights located above the railroad infrastructure behind historic Union Station and adjacent to the H Street bridge, otherwise known as the Hopscotch Bridge. The air rights were created as a result of the disposition of federally owned air rights above the railroad infrastructure behind Union Station for development purposes. Akridge won the public auction for the air rights, and has proposed a mixed-use development named "Burnham Place." NCPC will review referrals from the Zoning Commission for comments regarding any proposed development within the USN zone adjacent to the station.

Proposed Project

The proposed project seeks to expand and modernize the multimodal transportation facilities at Washington Union Station. It considers the expected increase in rail traffic throughout the northeast due to future expansion and growth through 2040. The applicant has indicated that many station facilities are currently at or exceed their capacity, and with additional growth in rail service expected, improvements are necessary to address these issues. The current passenger facilities, including platforms, waiting areas and customer support services are not adequate to serve existing or projected future passenger demand for Amtrak, commuter rail, and other rail services. In addition, the user experience in the platform and waiting areas needs to be modernized.

Therefore, the purpose of the project is to support current and future long-term growth in rail service and operational needs; achieve compliance with the Americans with Disabilities Act (ADA) and emergency egress requirements; facilitate intermodal travel; provide a positive customer experience; enhance integration with the adjacent neighborhoods, businesses, and planned land uses; sustain the Station's economic viability; and support continued preservation and use of the historic station building. The project is needed to improve rail capacity, reliability, safety, efficiency, accessibility, and security, for both current and future long-term railroad operations at this historic station.

The major project components include reconfiguration of the station tracks, a new train hall, bus facilities, and parking facilities. The proposed realignment and placement of the station tracks is foundational to the design and configuration of other project elements. Other major project components include new concourses and rail support spaces. Pedestrian and bicycle access improvements and improved pick-up/drop-off areas for vehicles are also proposed. All the action alternatives also propose approximately 1,575 parking spaces, which is reduced from the 2,200

striped spaces that exist today. All the action alternatives also include changes to the configuration and operation of the traffic lanes in front of Union Station. These changes would generally occur within the existing curbs so as to not impact the plaza area. It is anticipated that hop-on/hop-off buses would move to another location, and taxis would continue to use the north lanes along the front of the station.

Overview of the Alternatives

The applicant has developed six project alternatives, and the project proponents have identified one preferred alternative has been identified as part of the submission. These will be analyzed in the DEIS. The alternatives all include the elements previous mentioned, but generally vary in regards to the location of the parking facilities, the location of the bus facility and the orientation of the train hall:

- *Alternative A* includes a “T-shaped” train hall that stretches from H Street to the existing station. A bus facility with parking garage above is located northwest of the station, in approximately its current location. The facilities would be accessed from H Street.
- *Alternative B* includes a similar “T-shaped” train hall and the bus facility would be located in approximately the same location as exists today. However, in this alternative, the parking would be located on two levels beneath the rail terminal. Bus access would be from H Street, while parking would be accessed from K Street. The area above the bus facility could be available for future development.
- *Alternative C* has “east” and “west” options. Both options include an east-west train hall just north of the existing station building, and a bus pick-up/drop-off area located between the train hall and the existing station. Some limited parking would be located in an underground level. In the “east” option, the bus facility and parking would be located between H Street and K Street along the eastern side of the rail terminal. Bus and above-ground parking access would be via H Street and access to the underground parking via K Street. An “access zone” between H Street and the new train hall, centered on the historic station building, could include station access and a visual connection to the train hall, as well as daylighting features for a concourse below. In the “west” option, the elements are similar except the bus facility and above-ground parking would be located along the western edge of the rail terminal, north of H Street.
- *Alternative D* also includes an east-west train hall north of the existing station. The bus facility would consist of an additional level above the train hall at an upper level accessed from H Street with an access road. The facility would wrap around a central skylight feature. Parking would be accommodated through a garage at the far north end of the site, accessed from H Street, and one underground level accessed from K Street. Like Alternative C, an access zone connecting the train hall to H Street would also be identified.
- *Alternative E* includes the same bus configuration as Alternative D but all parking would be located underground. This option also includes a proposed access zone between the train hall and H Street.
- *Alternative “A-C”* is the applicant’s preferred alternative. This alternative includes an east-west train hall that will be daylit and which encloses the new main passenger concourse.

The bus facility would be located in approximately its current location, with a new parking garage located above. An access zone for pedestrian circulation and skylights is also proposed between H Street and the train hall.

The applicant has indicated that Alternative "A-C" is the 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.

Analysis

Washington Union Station is first and foremost a major rail hub with critical connectivity to other forms of transportation, both locally and regionally. Through 2040, the project proponents are anticipating significant growth in rail service, which necessitates planning for that expanded service. The current rail yard, passenger facilities, including platforms, waiting areas and customer support services are not adequate to serve existing or projected future passenger demand for Amtrak, commuter rail, and other rail services. Therefore, the realignment and placement of the station tracks is foundational to the project, and the other transportation components (bus facility, train hall and concourses) help support the multimodal functionality of the facility.

Station and Transportation Facilities

Overall, staff supports reconfiguring the train platforms to create greater efficiency, and improve accessibility. Wider platforms, along with improved lighting, will also enhance the user experience. The addition of four new concourse, (two north-south and two east-west) will also improve pedestrian movement and connectivity throughout the station. In particular, the addition of a new concourse level with pedestrian entrances at 1st Street and 2nd Street will greatly improve station access from the adjacent neighborhoods to the west and east. Today, for example, residents traveling from the NoMa area have to walk some distance south to the Metro entrance or the front of the station. The new H Street concourse will shorten the walk by two blocks. Likewise, a new entrance on 2nd Street will provide a direct connection to the H Street/Near Northeast neighborhood.

As described previously, the project also proposes a new train hall. This new train hall will cover a new concourse to replace the existing concourse. The purpose of the hall is to create a large open space with daylighting. Staff finds a new train hall will also improve the visitor experience by creating a more welcoming space for gathering and orientation. Further, staff supports an east-west train hall that helps provides a large, gracious entry to the track platforms, and that creates a setback or buffer between the historic train station and any taller development located to the north.

Above grade, additional access is necessary from the top of the H Street Bridge. Today, the experience of walking from H Street and the streetcar stop into the station is not particularly enjoyable. Pedestrian must pass by and through the bus parking area, where passengers may be

waiting, and through a ticket stand area before descending some steps into the current concourse area. The path includes wayfinding but is still not particularly intuitive. As such, staff 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. When combined with vehicular access, this could also help relieve demand for drop-offs at the front of the station.

As part of the project, the existing bus facility will be replaced. The facility supports intercity and regional bus service, and allows for connection to both trains and Metro. As such, there are two considerations regarding planning for bus service: first is identifying a location that promotes easy intermodal connectivity for passengers; and secondly, allows for buses to enter and exist the facility in the most efficient manner possible. Regarding passenger connectivity, staff 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.

Regarding bus access and movement, splitting bus waiting and loading/drop-off areas appears challenging as this introduces additional trips for buses across the site. A single location for waiting and pickup/drop-off avoids this issue. H Street is the current access point for bus service today, and it is a commercial street and is more directly linked to other regional highways. H Street will likely remain the primary access for bus service, in lieu of K Street or other surrounding streets that may be more residential in nature.

Staff notes the traffic impacts of the proposed alternatives were not a part of this submission, but will be included as part of the impacts analysis within the DEIS. As all the alternatives propose changes to the circulation in and around the site, continued coordination with DDOT will be necessary. Therefore, staff recommends the **Commission request 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.**

Parking Facilities

Parking can have both visual impacts due to the size and scale of any parking structure, but also transportation impacts on the street network. As part of all of the action alternatives, the parking is proposed to be reduced by approximately one-third, from 2,220 striped spaces today to 1,575 proposed spaces. This includes approximately 600 spaces for retail, 900 flexible spaces for general use, and 75 spaces for rental cars. Staff has researched other rail stations within the Northeast corridor, and found that parking amounts for similar stations can vary. Philadelphia's 30th Street Station has about 2,000 spaces, while Boston's North Station has about 1,275 spaces. New York City's Penn and Grand Central Station each did not appear to have parking on-site, although significant parking is available in surrounding buildings.

In this case, it is clear that some parking is necessary to accommodate those travelers who may need to park at station. Rental car parking will also be provided, but is relatively minimal as proposed. However, additional information is necessary to understand what the right amount of parking should be for the station, and when it will be necessary over the build-out of the project.

Currently, the garage has an average utilization rate over 80 percent. A majority of the spaces appear to be used by monthly pass holders whereas the use of the garage for daily retail or rail users appears less. As of December 2019, there were a total of 1,390 monthly parkers in the garage. 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. The proposed 2019 federal Transportation Element of the Comprehensive Plan states that 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. Given this, staff recommends the **Commission request the applicant 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.**

Regarding location, staff finds parking placement likely is more flexible than other aspects of the project program. The applicant has explored opportunities for off-site parking, and has found them challenging as many sites are privately owned. The few public sites considered, such as the Smithsonian's Postal Museum would raise historic preservation and other issues (2017 *Washington Union Station Concept Screening Report*). Parking beneath Columbus Circle and on Architect of the Capitol (AOC) land was also dismissed. While placing the parking underground would be ideal, the complexity and depth of the existing rail and utility infrastructure appears challenging due to constructability and cost. Further, it is unclear at this time how much parking is proposed as part of the private air rights development. Coordination among both pools of parking may be helpful.

Urban Design

Overall, the applicant seeks to enhance the functionality of the Union Station, and the proposed action alternatives generally do not directly alter the historic station building itself. However, the proposed development behind the station, including any parking structure or other buildings, should consider the setting of the historic building and the critical views from the National Mall, U.S. Capitol, and other viewsheds. Today, Union Station creates an important terminus to several viewsheds, including Delaware and Louisiana Avenues. The mass of the existing parking garage is also particularly visible along 1st Street, NE. Any future above-grade facilities, including any parking, should be sensitively-designed. As noted previously, staff therefore 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, to help mitigate the impacts of the new development. Therefore, staff recommends the **Commission request 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.**

North of the station building, staff supports the provision of a pedestrian access corridor between the top of the H Street Bridge and the upper train hall to create a new way to access the station from the H Street-Benning Streetcar Station. As described previously, this corridor could facilitate

pedestrian flows and potentially allow for a new pick-up/drop-off area. This “access zone” could also extend vertically to allow for air and light down to the deck level. Skylights could be provided to daylight the tracks below. The access zone would also set up symmetrical development envelopes behind the historic station building, which may mitigate any impacts to critical views. Because the access zone crosses property lines, it would require coordination with adjacent private development.

The Urban Design Element of the Comprehensive Plan states that activated uses, such as retail or other commercial enterprises, be provided at the ground level to help enhance the pedestrian experience. As such, staff recommends that active ground floor uses, such as retail, be incorporated to support pedestrian activity, particularly where they might face any future private development. This will depend on their location, but as with the existing bus and garage facility, an exposed structure is not particularly attractive or conducive to a quality urban experience. Staff 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. Therefore, staff recommends the **Commission 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.**

Other Coordination

Finally, given the complexity of the project and the site, additional coordination should continue as the project advances. In particular, staff recommends the **Commission request the applicant coordinate with the Washington Metropolitan Area Transit Authority regarding the proposed improvements and proposed new entry to the Metrorail station along 1st Street, NE. In addition, the applicant should also coordinate with District Department of Energy and Environment regarding stormwater management and other environmental issues related to the site. And finally, as noted previously, it will be helpful to understand the phasing of construction for the project. As such, the applicant should also provide a phasing plan that describes the timing and implementation of each project component as part of the next review.**

CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

Comprehensive Plan for the National Capital

Staff analyzed the project using guidance in the Comprehensive Plan, particularly those policies related to the Transportation, Urban Design, Federal Environment, and Historic Preservation Elements. Applicable policies include increasing the utilization of passenger rail service in the Northeast Corridor and points south and west to serve Washington’s Union Station, reinforcing its status as a Capital Gateway that announces entry into the capital city. The comments of this report are intended to support conformance with those policies.

National Historic Preservation Act

FRA and NCPC each have a responsibility to comply with Section 106 of the National Historic Preservation Act. FRA is serving as lead agency for the Section 106 consultation. FRA anticipates a memorandum of agreement (MOA) or programmatic agreement (PA) will be executed to document the agreed-upon mitigation measures related to adverse effects to historic resources. NCPC will be a signatory to that document after it is developed.

Seven consulting parties' meetings have been held to date. Comments from community members, primarily from the Capitol Hill neighborhood, have focused on the project design and potential impacts of traffic on adjacent streets. Other comments from the DC SHPO have emphasized that any potential vertical development behind the station building should have a symmetric massing to help mitigate any impacts to the station's backdrop and setting. As noted previously, the applicant has suggested the use of an open "access zone" could help define these envelopes.

Representatives of Akridge, as the air-rights owner have also participated and provided comments. They have raised concerns about the location and configuration of the bus and parking facility, the character of the public realm, and how the project will contribute to or coordinate with their future mixed-use development. Other comments have noted the impacts to private development in the alternatives. A copy of the Akridge comments are attached to this report.

National Environmental Policy Act

FRA and NCPC each have responsibility to comply with the National Environmental Policy Act (NEPA). FRA is lead federal agency, and NCPC is a cooperating agency. FRA is currently preparing a draft environmental impact statement (DEIS), which is anticipated to be released in spring 2020.

CONSULTATION

Coordinating Committee

The Committee reviewed the project at their December 18, 2019 meeting and forwarded the proposed comments on concept plans to the Commission with the statement that the proposal has been coordinated with all participating agencies except the Department of Energy and Environment (DOEE). Other participating agencies included the District Office of Planning, the District of Columbia State Historic Preservation Officer (DC SHPO), the National Park Service, and the Washington Metropolitan Area Transit Authority (WMATA).

DOEE stated that the lead design managers should meet with their Air Quality, Land Remediation, Underground Storage Tank, and Stormwater divisions to determine the extent of environmental impacts. SHPO is coordinating on this project conditioned upon completion of Section 106. DC

OP noted that they are in support of the preferred alternative but are requesting more information about the appropriate parking levels. WMATA is coordinated with the understanding that they need more information on the impact of the project on the Metro station's First Street entrance.

U.S. Commission of Fine Arts

The U.S. Commission of Fine Arts (CFA) heard an information presentation for the proposed project at their November 21, 2019 meeting. A copy of their comment letter is attached.

ONLINE REFERENCE

The FRA project site can be found at:

<https://railroads.dot.gov/current-environmental-reviews/washington-union-station-expansion-project/washington-union-station>

The following supporting documents for this project are available online at www.ncpc.gov:

- Project Summary
- Submission Package

Prepared by Matthew Flis
1/03/2019

ATTACHMENTS

- Project Summary
- Commission of Fine Arts letter
- Akridge comments

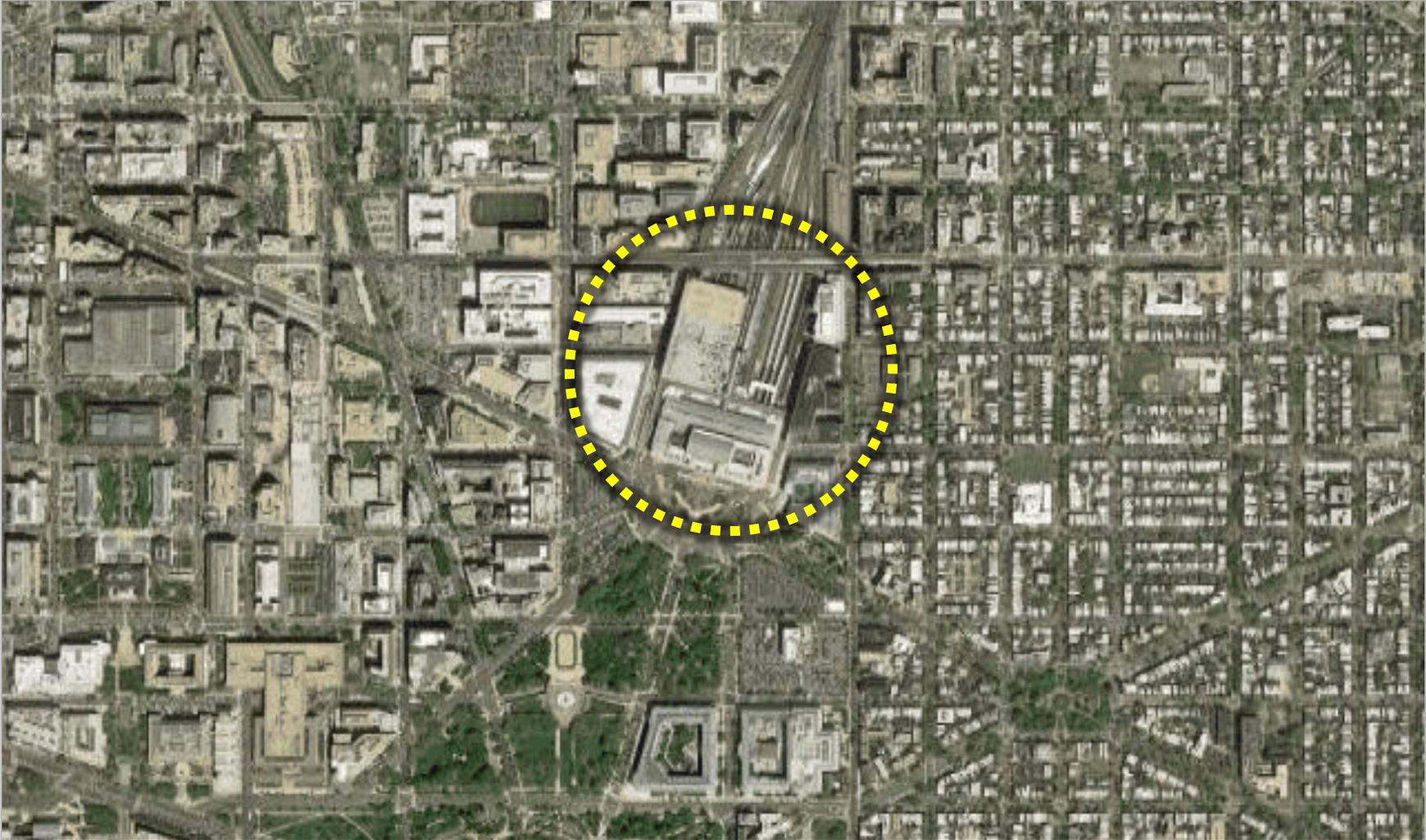
Washington Union Station Expansion Project

50 Massachusetts Avenue, NE, Washington DC

Approval of Comments on Concept Plans

United States Department of Transportation

Site Location



Location Map

Project Overview

Federal Railroad Administration (FRA)

Owner of Washington Union Station (WUS), Lead Federal Agency for National Environmental Policy Act (NEPA) and Section 106 process

Union Station Redevelopment Corporation (USRC)

Project Proponent - Nonprofit station complex landlord and public steward

Amtrak

Project Proponent - Intercity and commuter rail track and platform operator

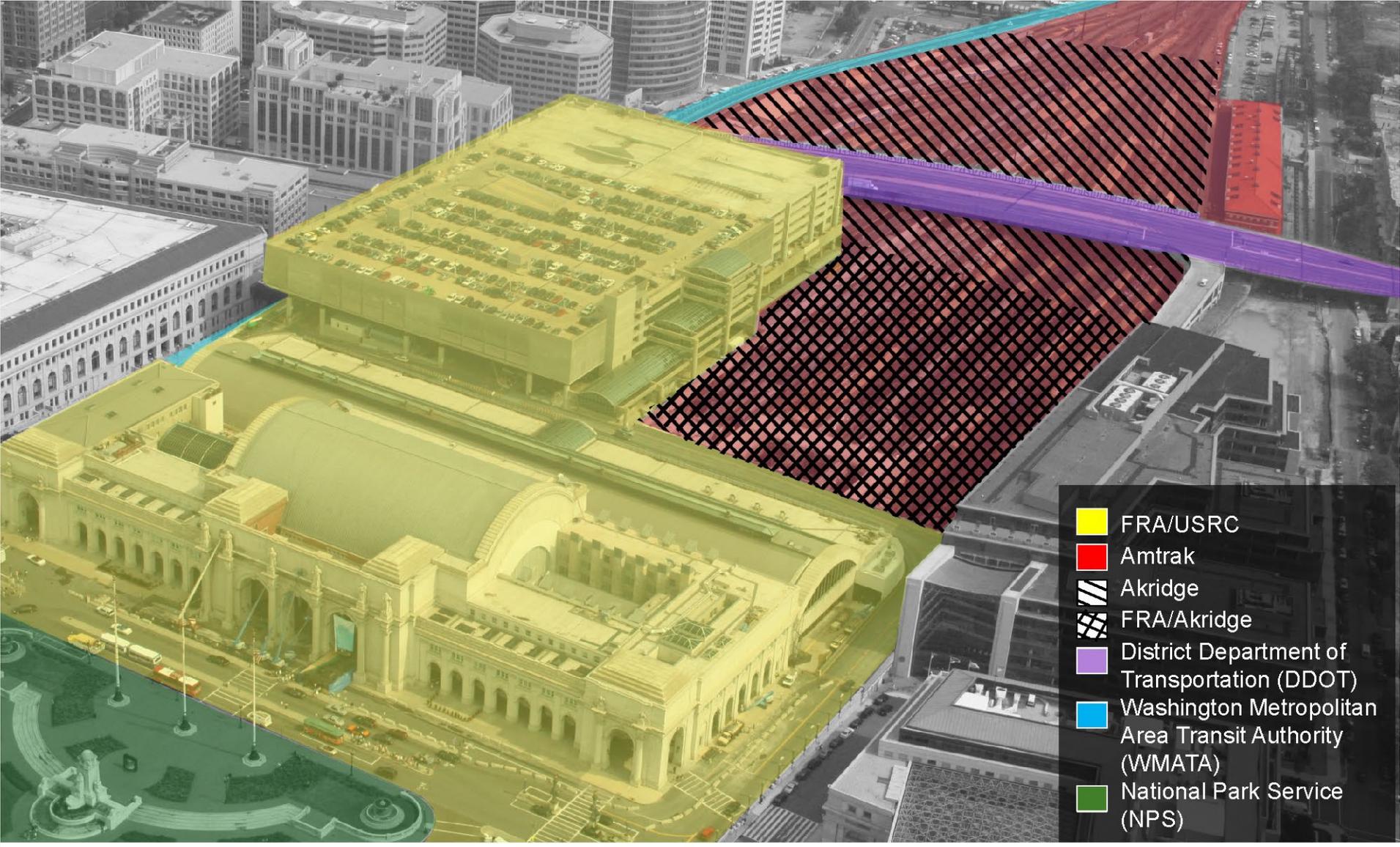
Cooperating Agencies

NCPC, NPS, FTA, and DDOT

Consultant Team

- Beyer Blinder Belle, Prime Consultant, Urban Design, Historic Preservation
- Grimshaw – Lead Designer, Architect
- VHB – NEPA and Multimodal Transportation
- Arup – Lead Engineer

Station Ownership & Jurisdictions



Project Purpose and Need



Railroad Growth
and Capacity



ADA, Safety,
and Security



Intermodal
Travel



Customer
Experience



Neighborhood /
Land Use
Integration

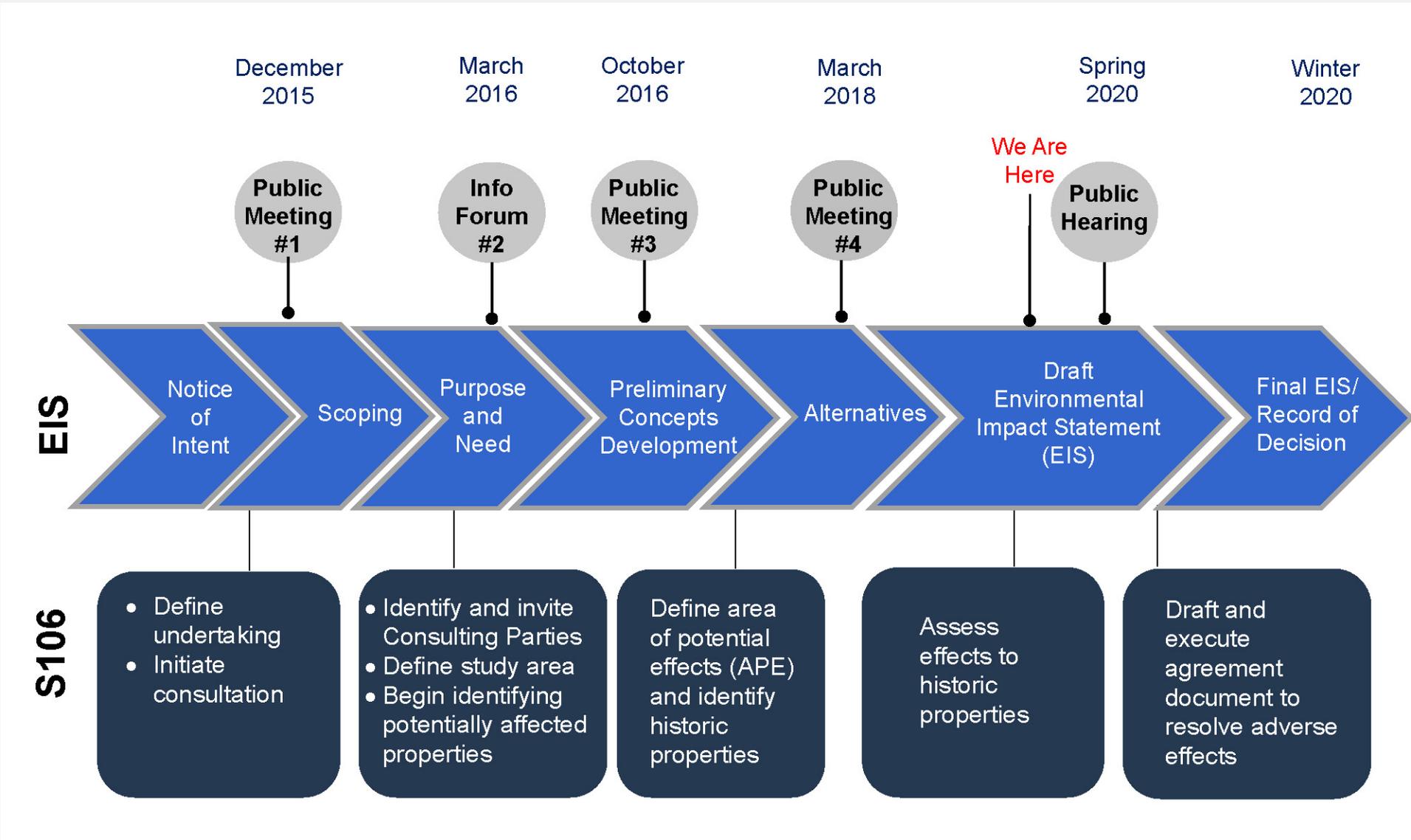


Station's
Economic
Viability



Station
Preservation

Process Overview



Project Alternatives Overview



Station Expansion Project Alternatives

Components of No Action Alternative

An aerial photograph of a city, likely Washington D.C., showing a large, ornate building with a dome, a river, and various urban structures. The image is faded and serves as a background for the text boxes.

Historic Station Preservation

Planned / Ongoing Station Improvement
Projects

Local Transportation Projects, including
H Street Bridge Replacement and
Streetcar

Approved Local Development Projects

Private Air-Rights Development

Components of Action Alternatives

ELEMENTS SHARED IN ALL ACTION ALTERNATIVES

RAIL

CONCOURSES

BIKE & PED ACCESS

TAXI & SHARED RIDE

HISTORIC STATION

ELEMENTS THAT VARY IN ACTION ALTERNATIVES

TRAIN HALL

BUS FACILITY

PARKING

Action Alternatives Overview

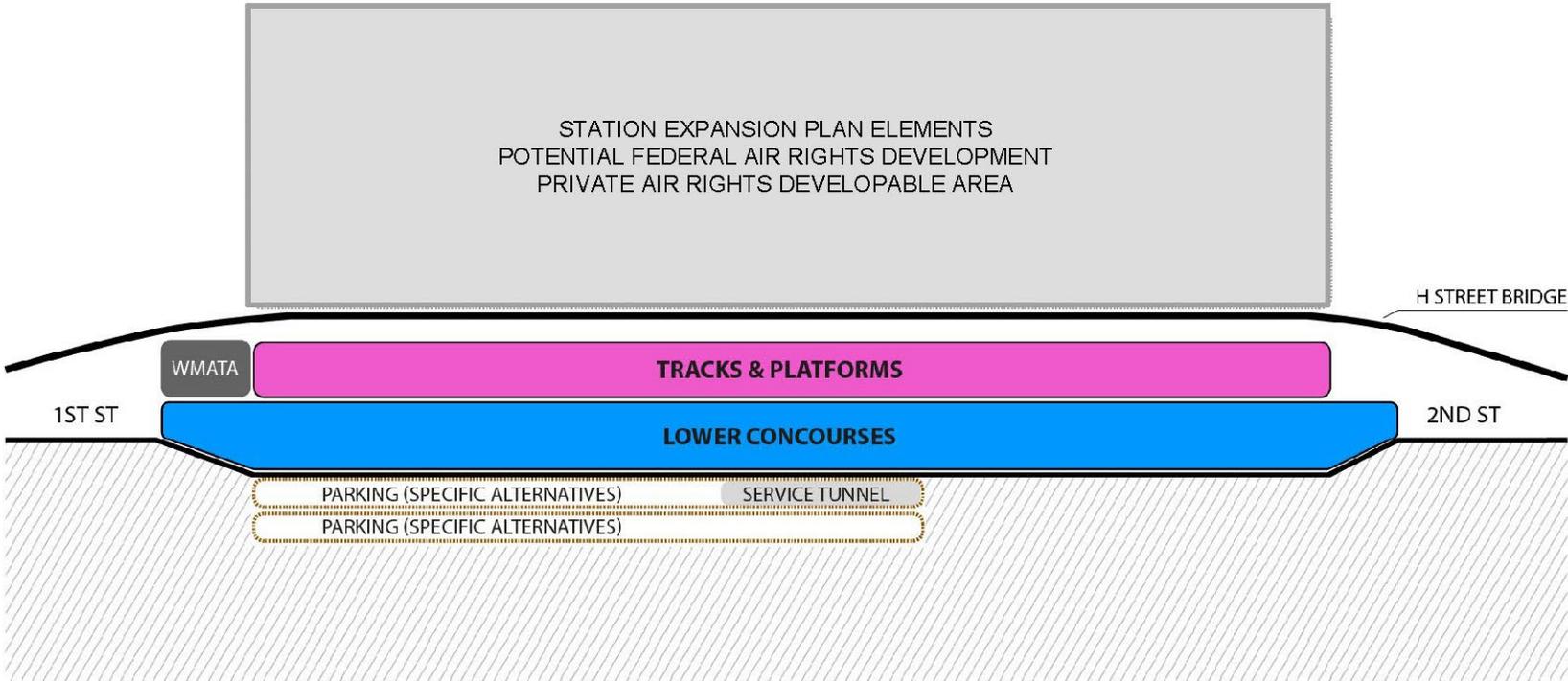


- TRAIN HALL
- BUS FACILITY
- PARKING
- POTENTIAL FEDERAL AIR RIGHTS DEVELOPABLE AREA (P.A.R.D.)
- PRIVATE AIR RIGHTS DEVELOPABLE AREA (F.A.R.D.)
- FEDERAL AIR RIGHTS SQUARE 172

Diagram for illustration purposes only

Sectional Diagram – Action Alternatives

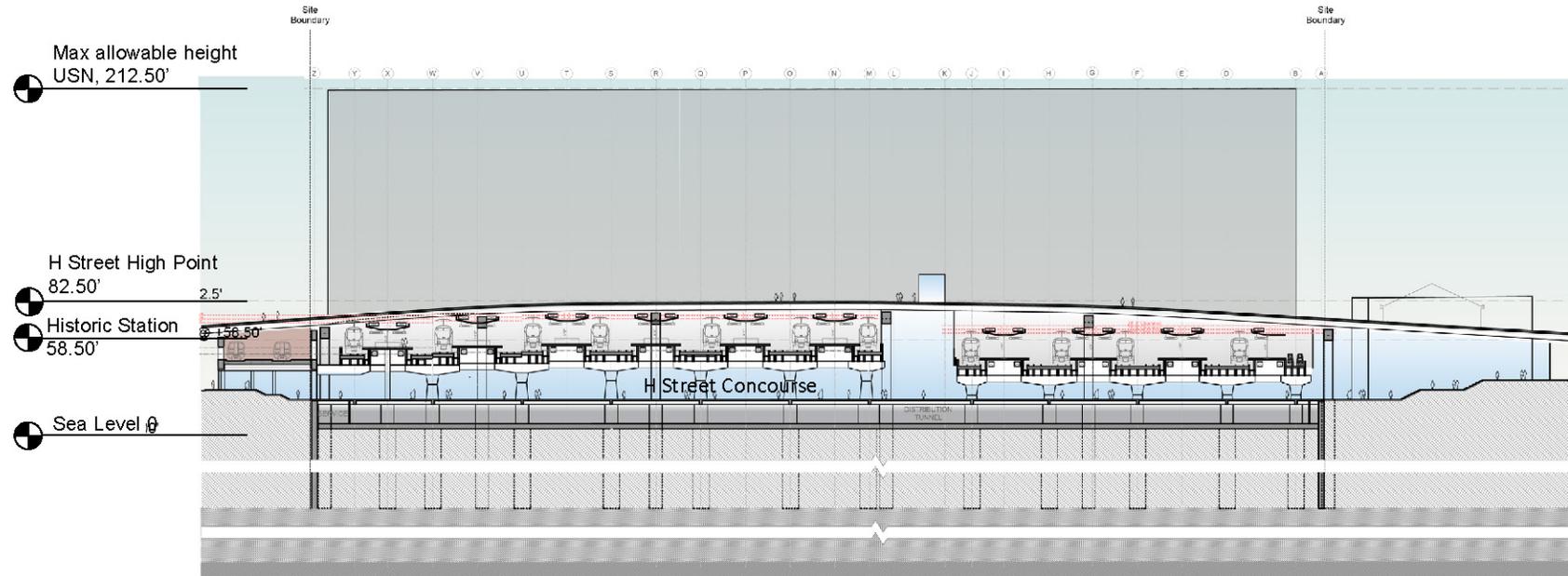
SECTIONAL DIAGRAM



Action Alternatives

SECTION THROUGH H STREET LOOKING NORTH

- CONCOURSES
- WMATA
- PRIVATE AIR RIGHTS DEVELOPABLE AREA



0' 25' 50' 100'

Diagram for illustration purposes only



KEY PLAN

Alternative A

- TRAIN HALL
- BUS FACILITY
- PARKING
- POTENTIAL FEDERAL AIR RIGHTS DEVELOPMENT
- PRIVATE AIR RIGHTS DEVELOPABLE AREA
- FEDERAL AIR RIGHTS SQUARE 172

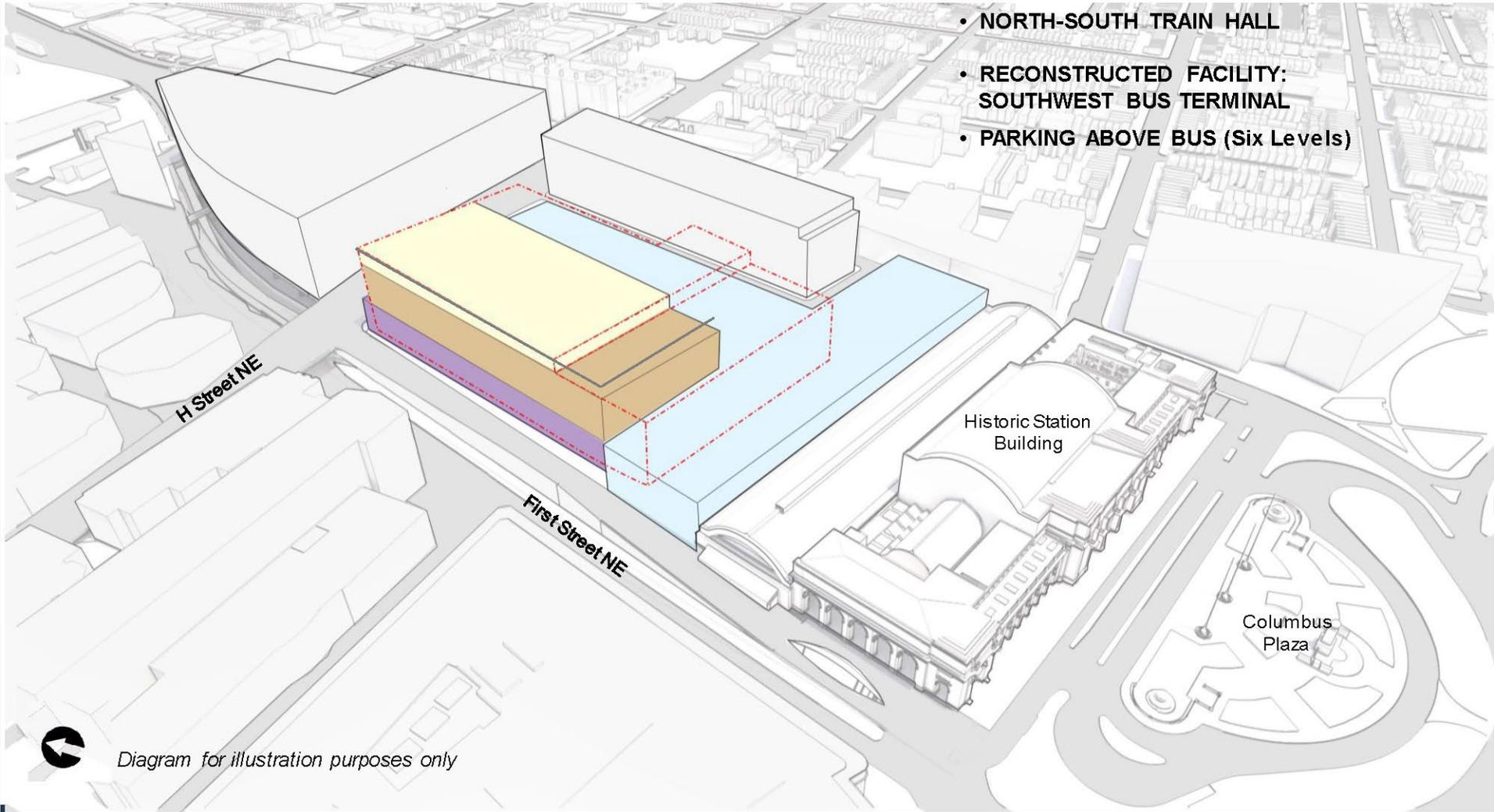
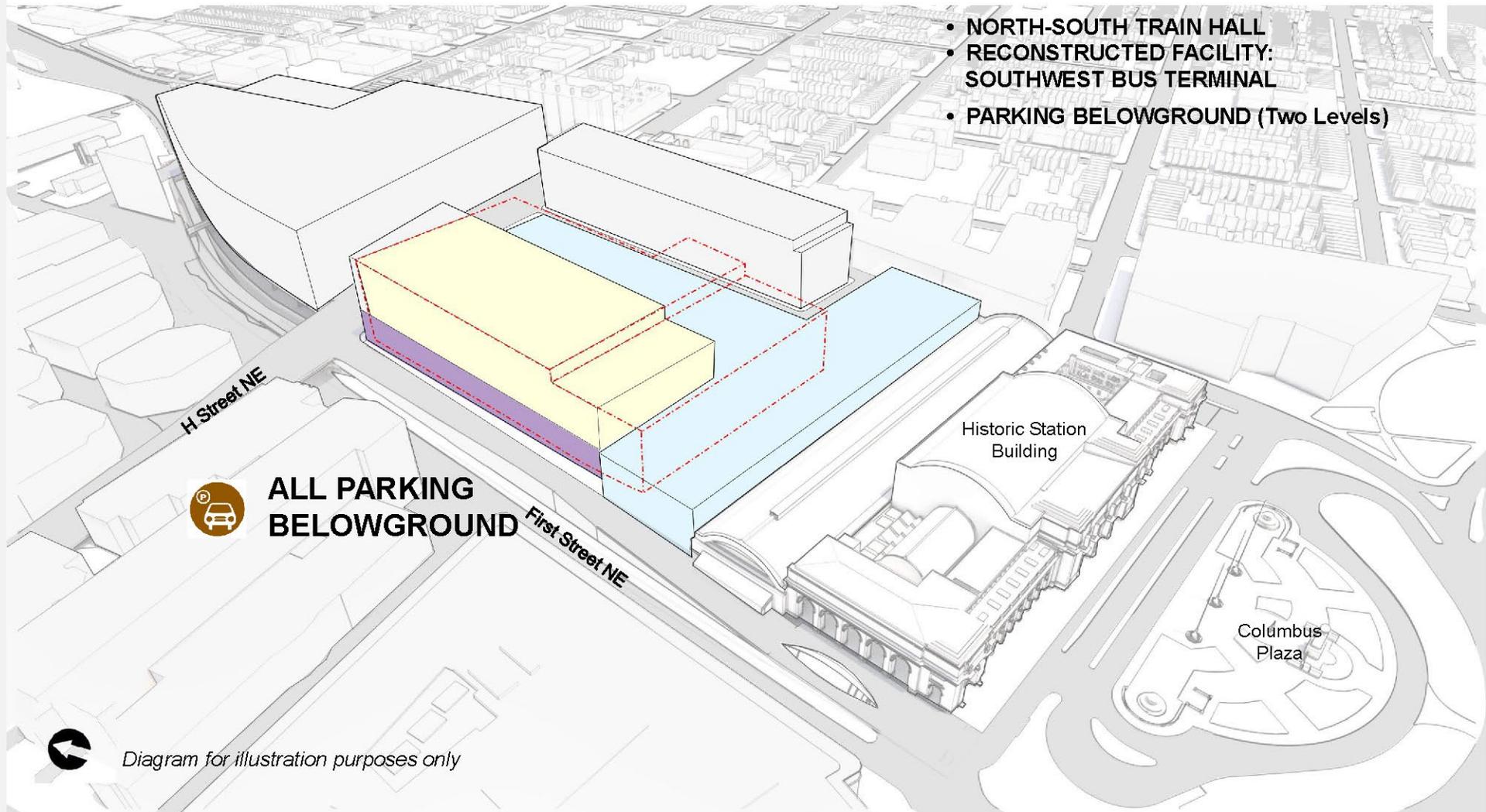


Diagram for illustration purposes only

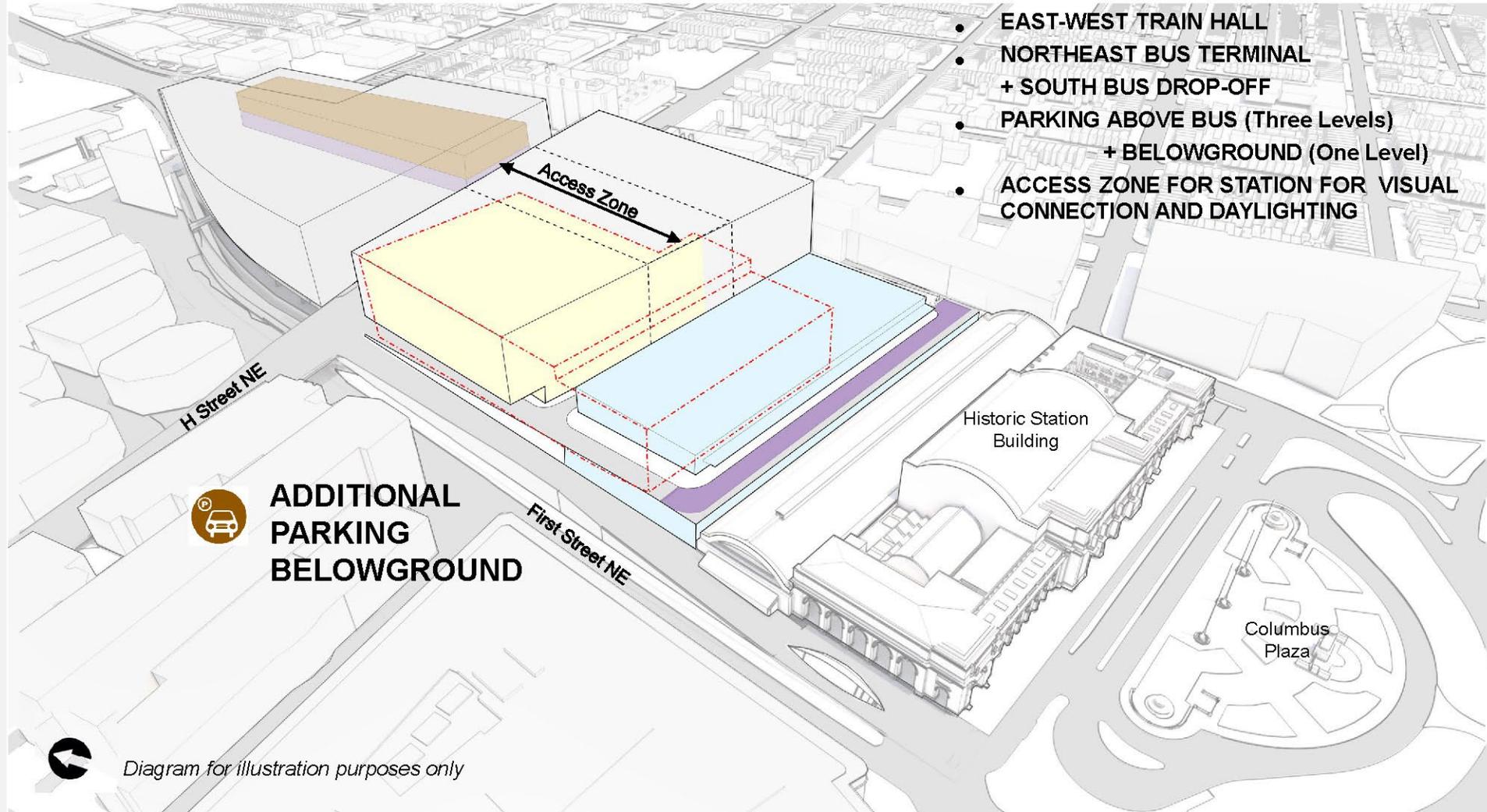
Alternative B

-  TRAIN HALL
-  BUS FACILITY
-  PARKING
-  POTENTIAL FEDERAL AIR RIGHTS DEVELOPMENT
-  PRIVATE AIR RIGHTS DEVELOPABLE AREA
-  FEDERAL AIR RIGHTS SQUARE 172



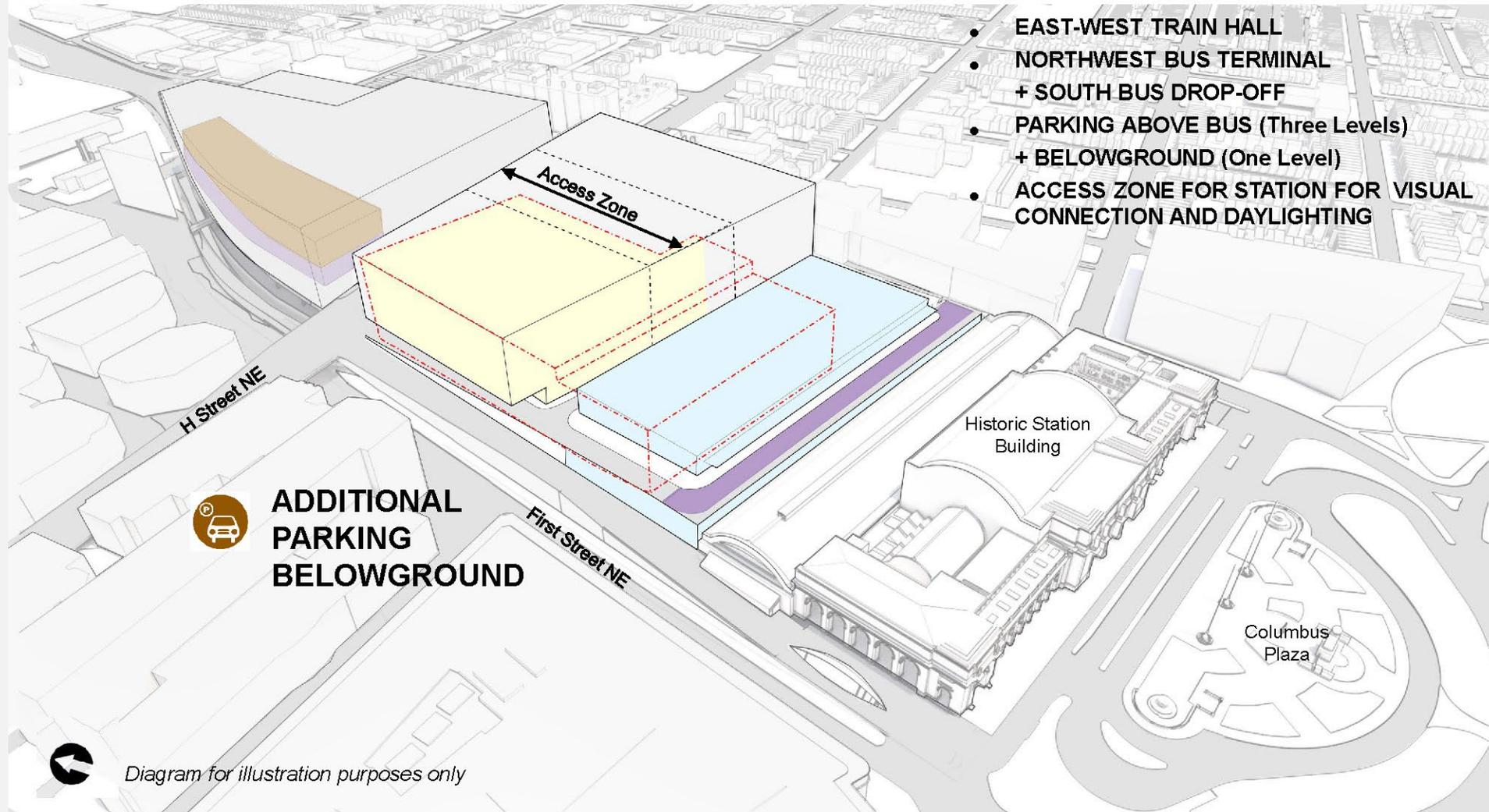
Alternative C: East Parking Option

- TRAIN HALL
- BUS FACILITY
- PARKING
- POTENTIAL FEDERAL AIR RIGHTS DEVELOPMENT
- PRIVATE AIR RIGHTS DEVELOPABLE AREA
- FEDERAL AIR RIGHTS SQUARE 172



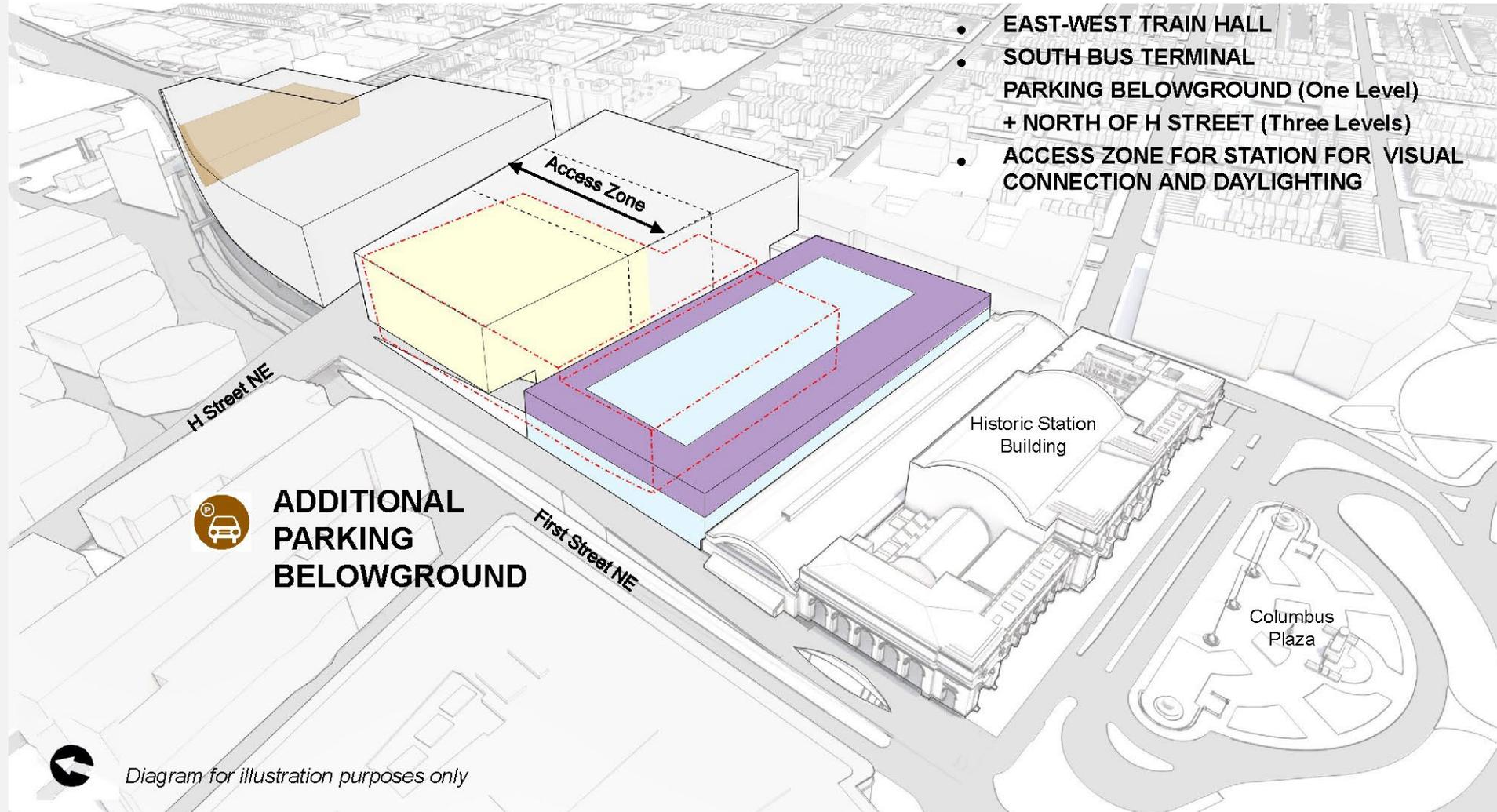
Alternative C: West Parking Option

- TRAIN HALL
- BUS FACILITY
- PARKING
- POTENTIAL FEDERAL AIR RIGHTS DEVELOPMENT
- PRIVATE AIR RIGHTS DEVELOPABLE AREA
- FEDERAL AIR RIGHTS SQUARE 172



Alternative D

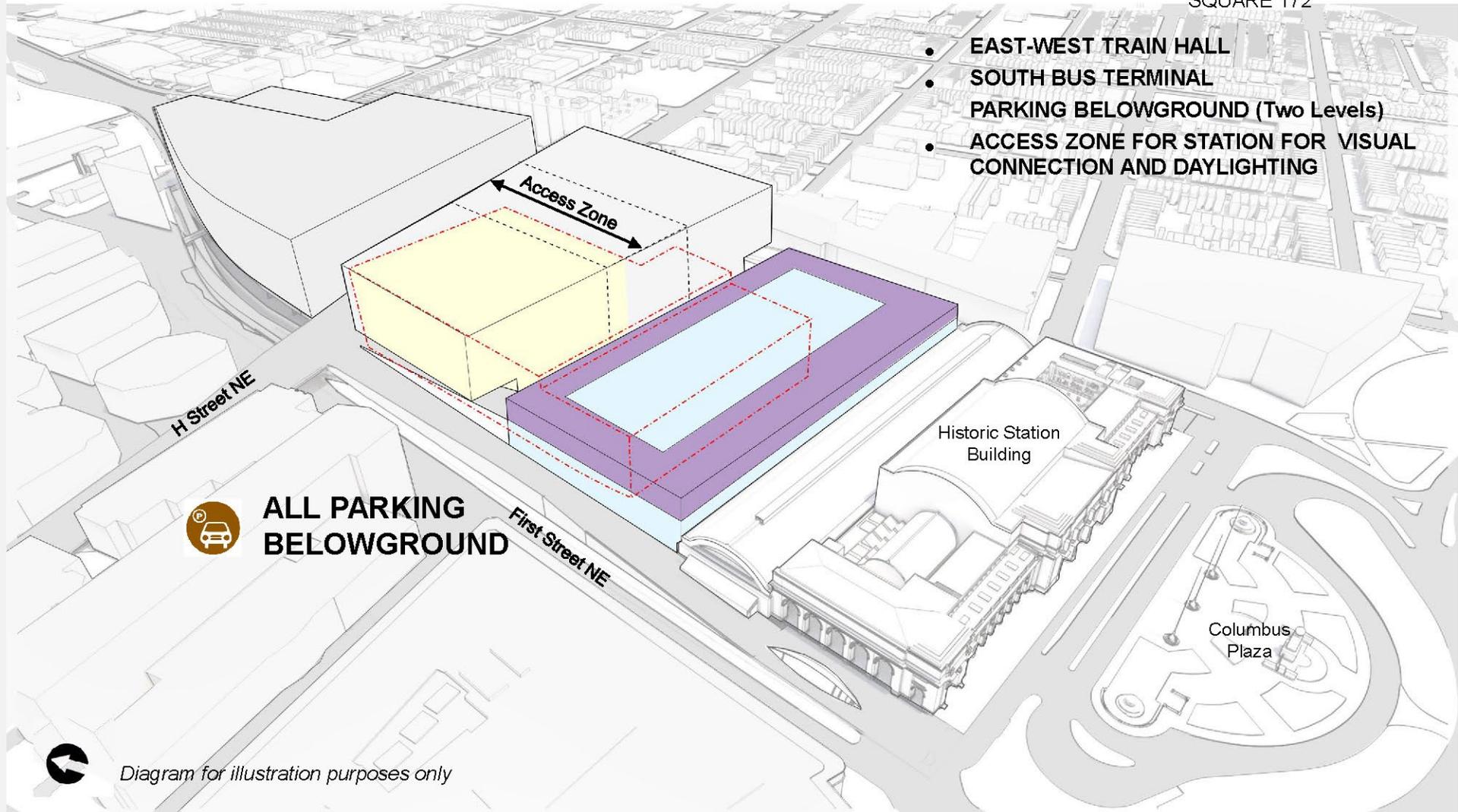
- TRAIN HALL
- BUS FACILITY
- PARKING
- POTENTIAL FEDERAL AIR RIGHTS DEVELOPMENT
- PRIVATE AIR RIGHTS DEVELOPABLE AREA
- FEDERAL AIR RIGHTS SQUARE 172



Alternative E

- TRAIN HALL
- BUS FACILITY
- PARKING
- POTENTIAL FEDERAL AIR RIGHTS DEVELOPMENT
- PRIVATE AIR RIGHTS DEVELOPABLE AREA
- FEDERAL AIR RIGHTS SQUARE 172

- EAST-WEST TRAIN HALL
- SOUTH BUS TERMINAL
- PARKING BELOWGROUND (Two Levels)
- ACCESS ZONE FOR STATION FOR VISUAL CONNECTION AND DAYLIGHTING



 **ALL PARKING BELOWGROUND**

 *Diagram for illustration purposes only*

Preferred Alternative



Alternative A-C (Preferred)

AERIAL PERSPECTIVE LOOKING NORTHEAST

- TRAIN HALL
- BUS FACILITY
- PARKING
- FEDERAL AIR RIGHTS SQUARE 172
- POTENTIAL FEDERAL AIR RIGHTS DEVELOPMENT
- PRIVATE AIR RIGHTS DEVELOPABLE AREA
- POTENTIAL DEVELOPMENT

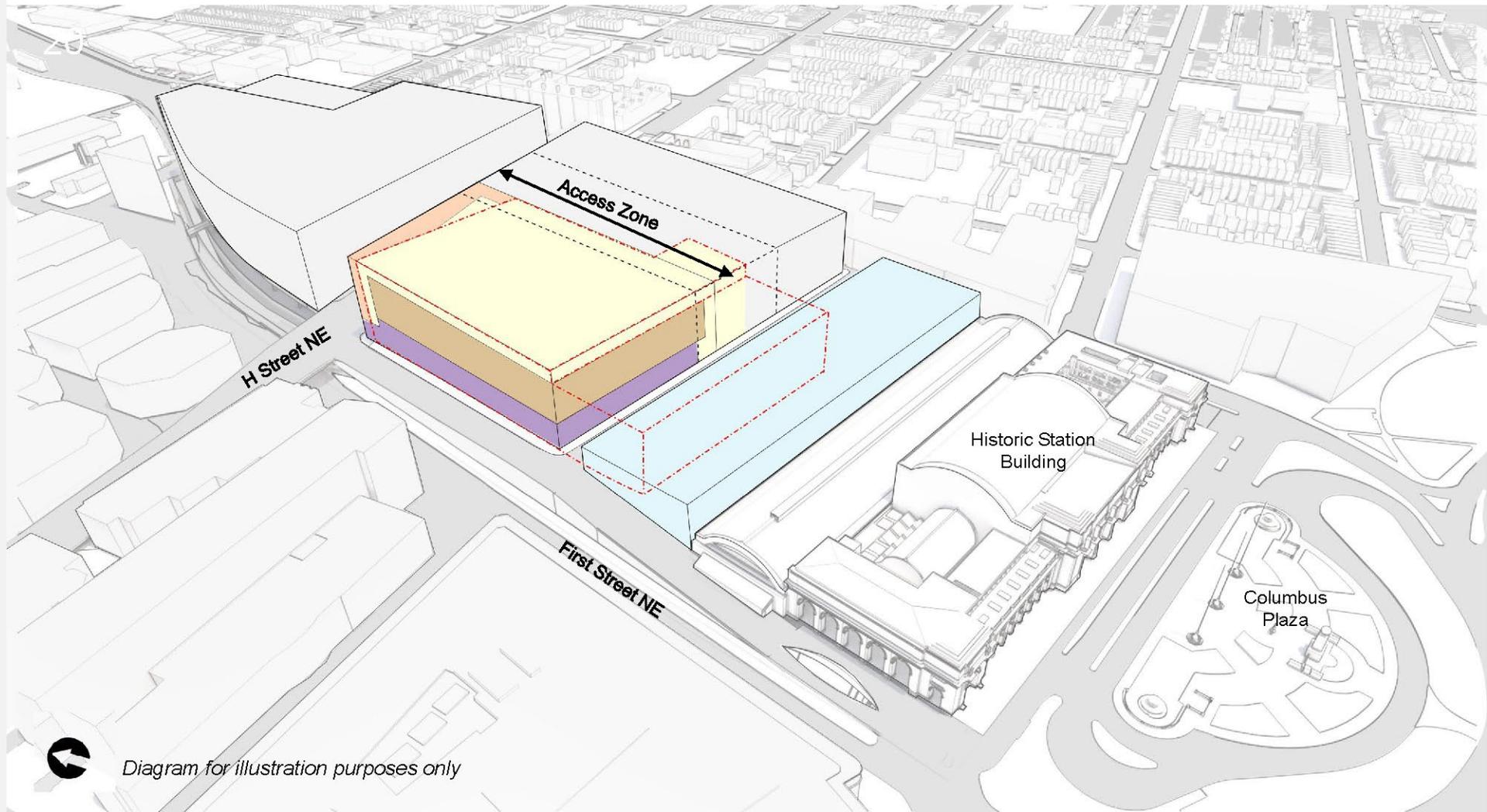
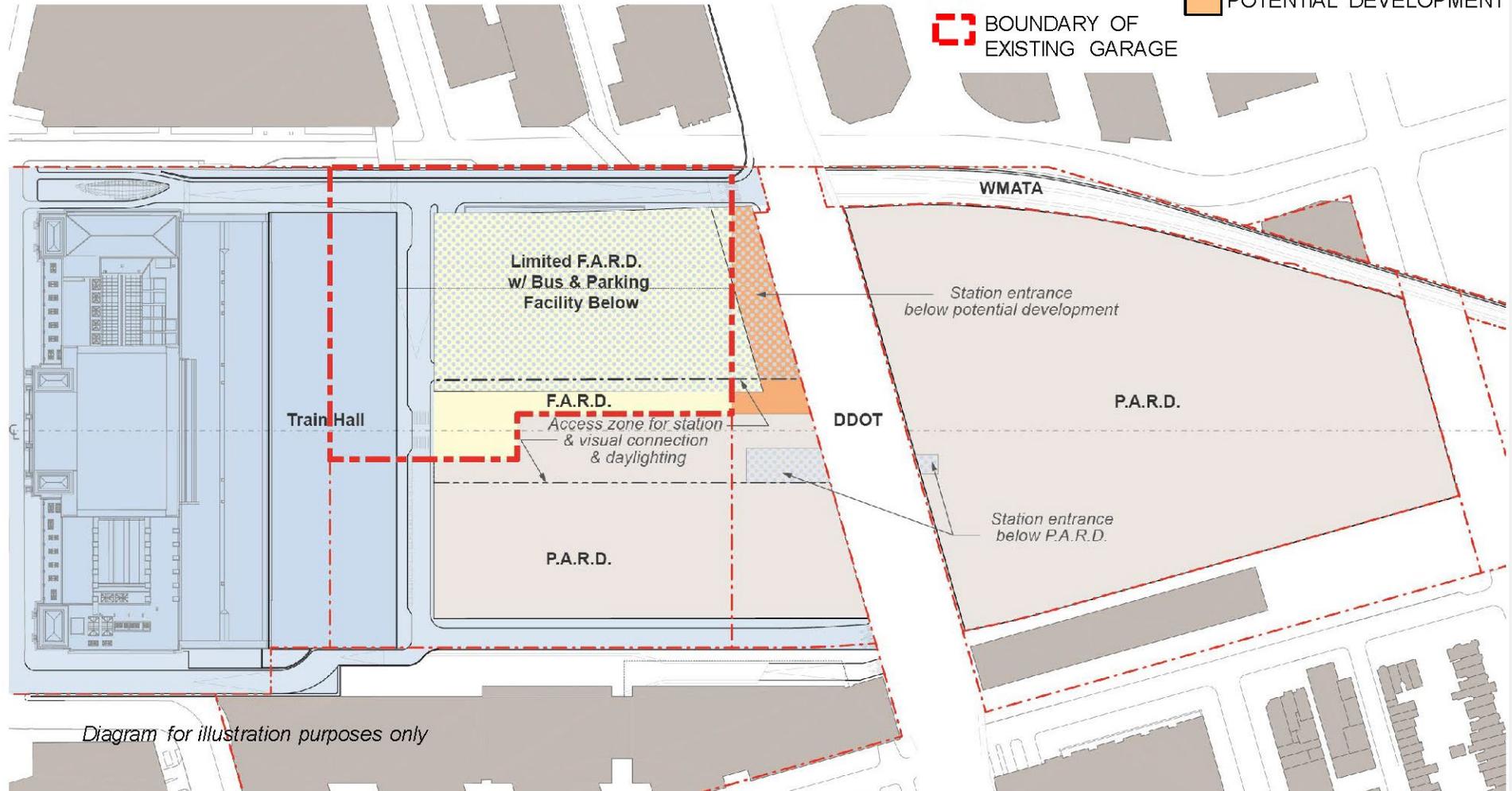


Diagram for illustration purposes only

Deck (Plan) Area Allocation

Alternative A-C (Preferred)

DECK ALLOCATION DIAGRAM



Lower Concourse Level Plan (2nd and 1st Street access)

Alternative A-C (Preferred)

LOWER CONCOURSE LEVEL PLAN

- CONCOURSES
- BACK OF HOUSE

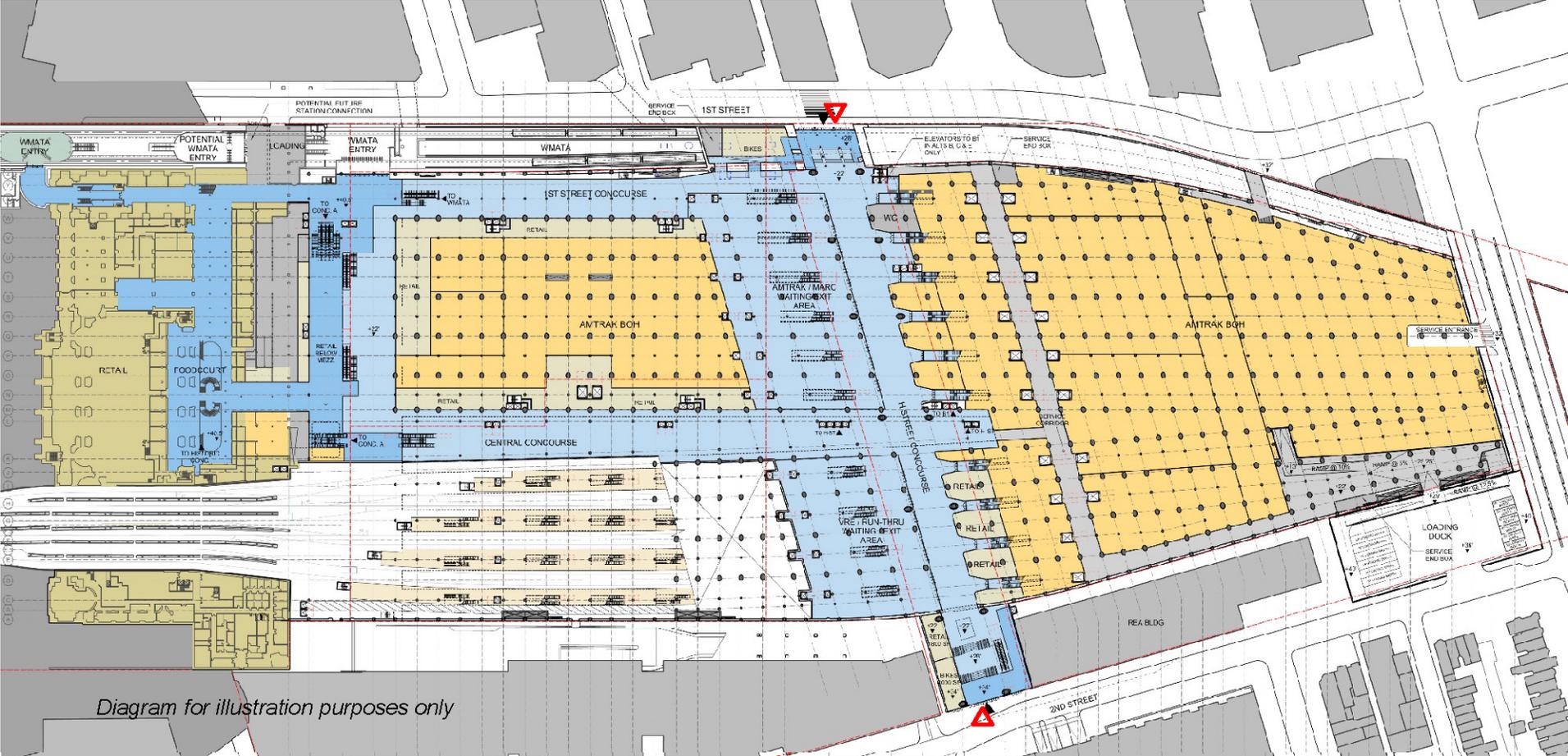


Diagram for illustration purposes only

Platform Level Plan

Alternative A-C (Preferred)

CONCOURSES

PLATFORM PLAN

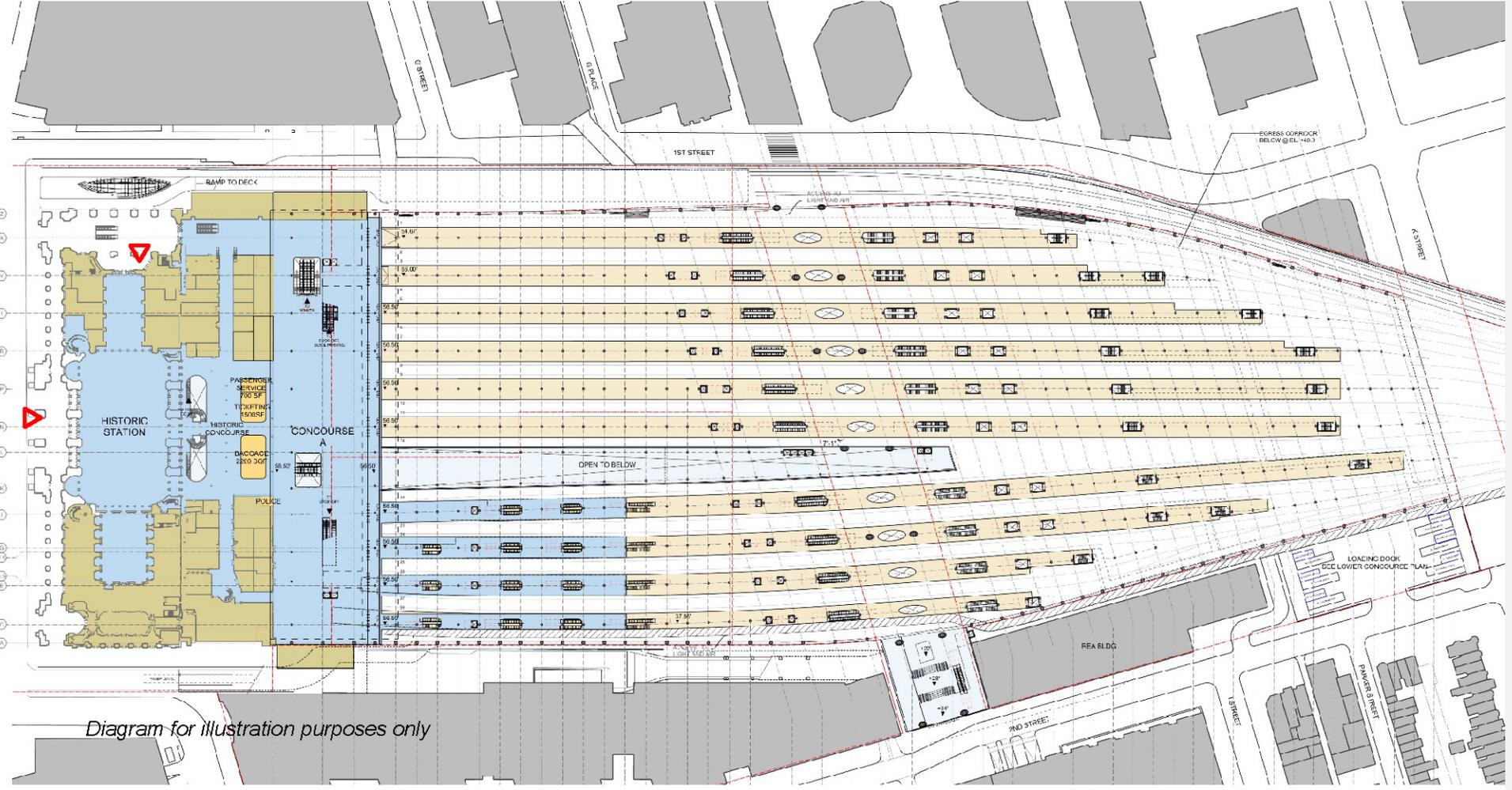


Diagram for illustration purposes only

Deck Level Plan

Alternative A-C (Preferred)

DECK LEVEL PLAN

- TRAIN HALL
- BUS FACILITY
- PARKING
- PROPERTY LINE
- POTENTIAL FEDERAL AIR RIGHTS DEVELOPMENT
- PRIVATE AIR RIGHTS DEVELOPABLE AREA
- POTENTIAL DEVELOPMENT

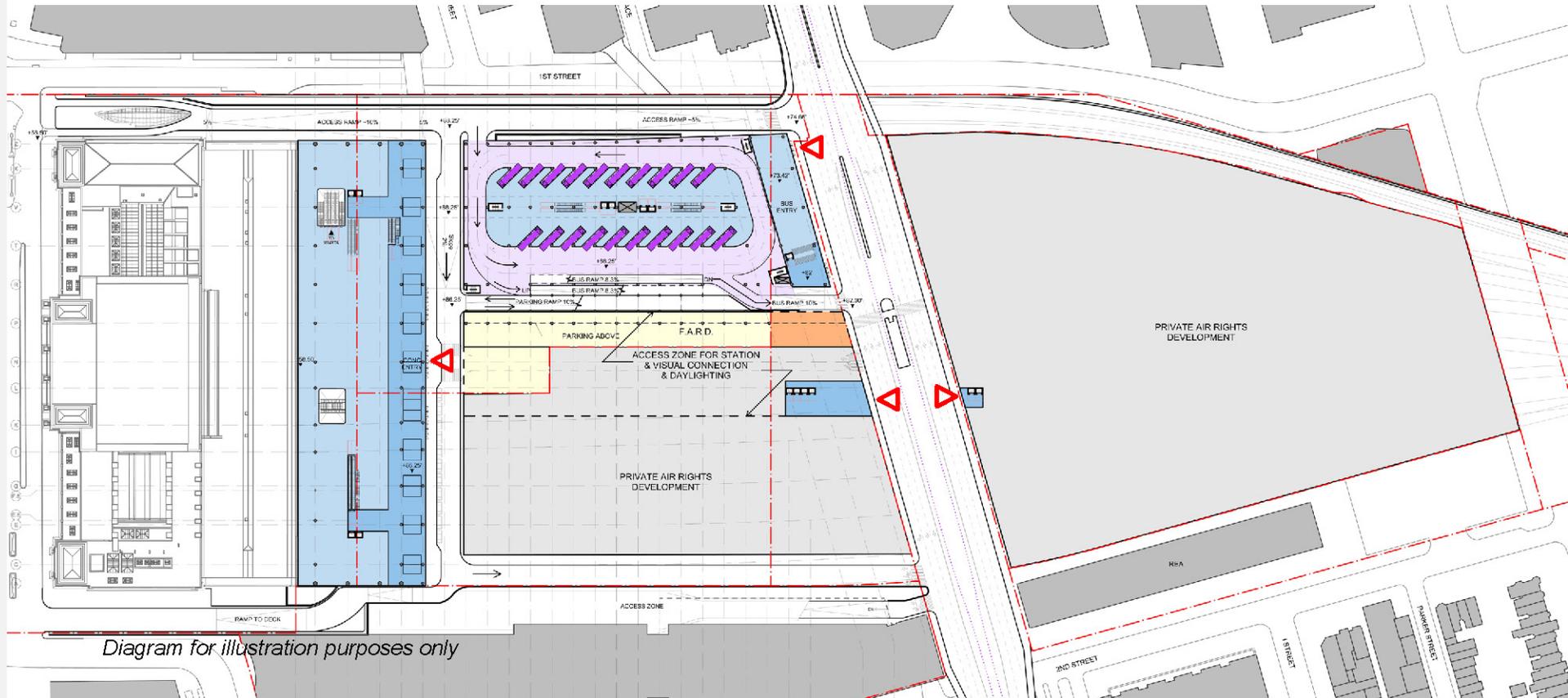


Diagram for illustration purposes only

Upper Deck Level Plan

Alternative A-C (Preferred)

UPPER DECK LEVEL PLAN

- TRAIN HALL
- BUS FACILITY
- PARKING
- PROPERTY LINE
- POTENTIAL FEDERAL AIR RIGHTS DEVELOPMENT
- PRIVATE AIR RIGHTS DEVELOPABLE AREA
- POTENTIAL DEVELOPMENT

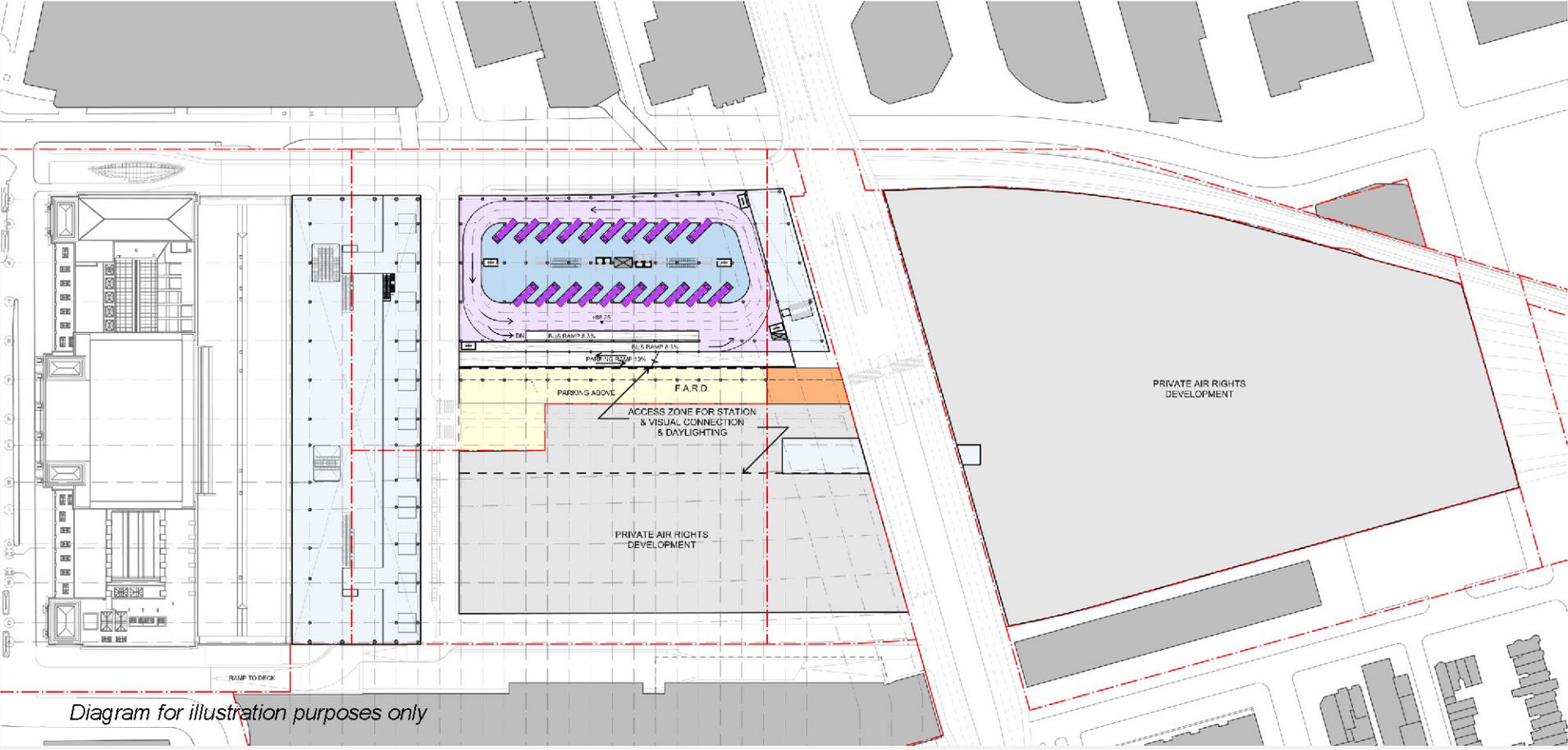


Diagram for illustration purposes only

Parking Level Plan (Typ)

Alternative A-C (Preferred)

PARKING LEVEL PLAN

- TRAIN HALL
- BUS FACILITY
- PARKING
- PROPERTY LINE
- POTENTIAL FEDERAL AIR RIGHTS DEVELOPMENT
- PRIVATE AIR RIGHTS DEVELOPABLE AREA
- POTENTIAL DEVELOPMENT

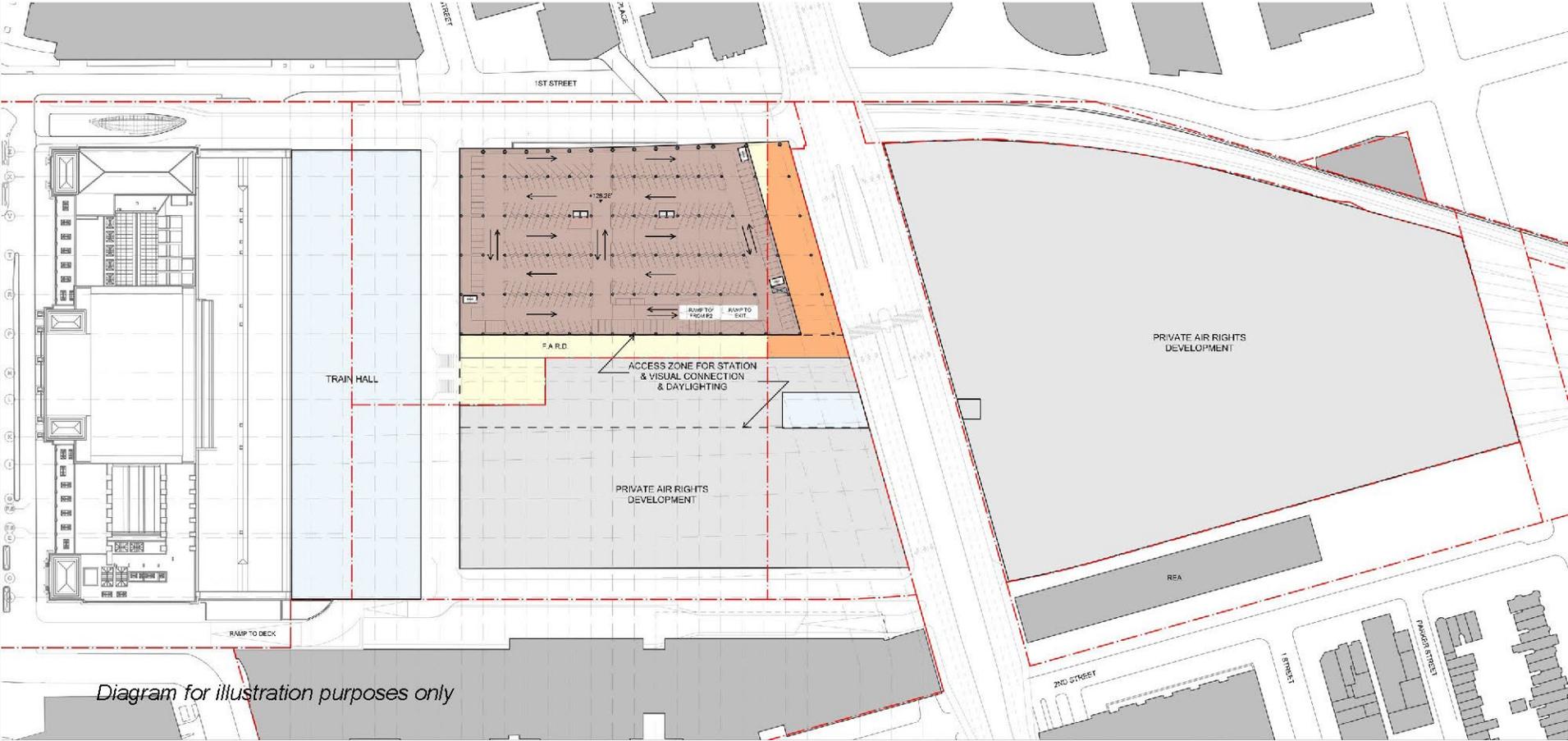
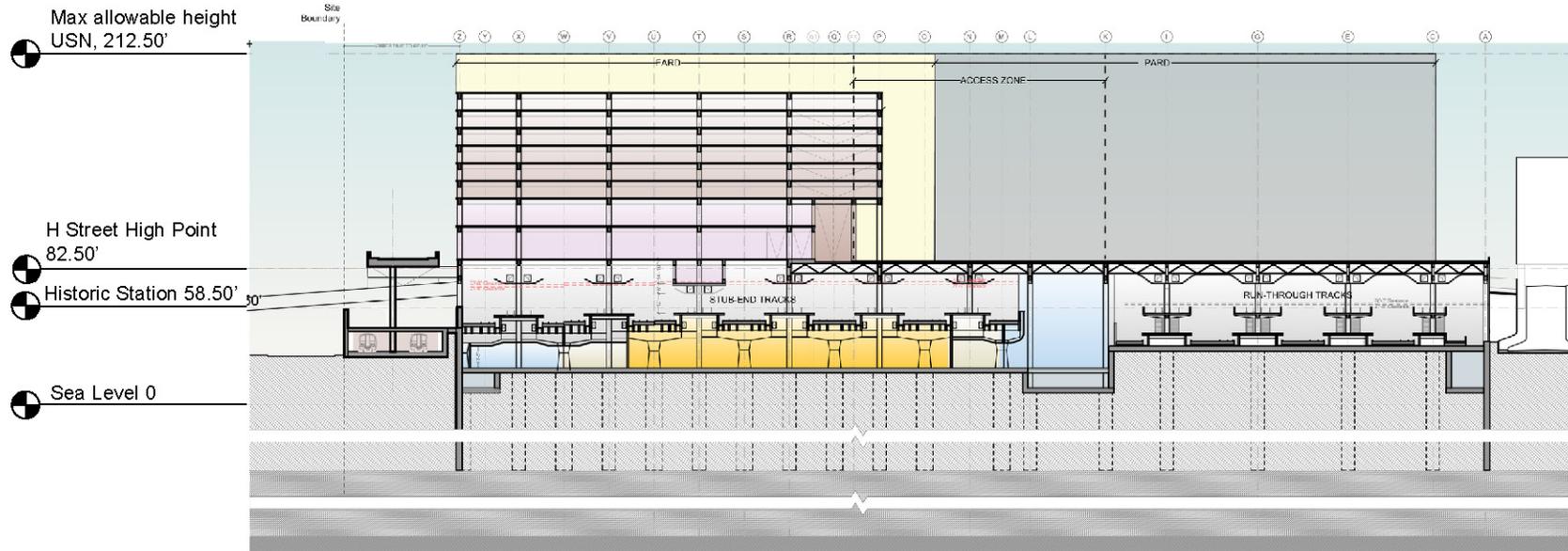


Diagram for illustration purposes only

Alternative A-C (Preferred)

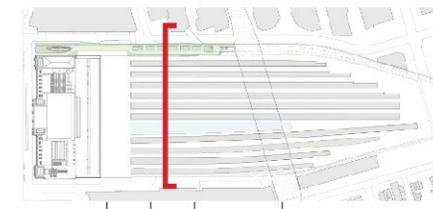
TRANSVERSE SECTION THROUGH BUS AND PARKING

- CONCOURSES
- BACK OF HOUSE
- BUS FACILITY
- PARKING
- PRIVATE AIR RIGHTS DEVELOPABLE AREA
- POTENTIAL FEDERAL AIR RIGHTS DEVELOPMENT



0' 25' 50' 100'

Diagram for illustration purposes only



KEY PLAN

Alternative A-C (Preferred)

LONGITUDINAL SECTION THROUGH BUS AND PARKING SOUTH OF H STREET

- CONCOURSES
- BACK OF HOUSE
- BUS FACILITY
- PARKING
- PRIVATE AIR RIGHTS DEVELOPABLE AREA
- POTENTIAL FEDERAL AIR RIGHTS DEVELOPMENT

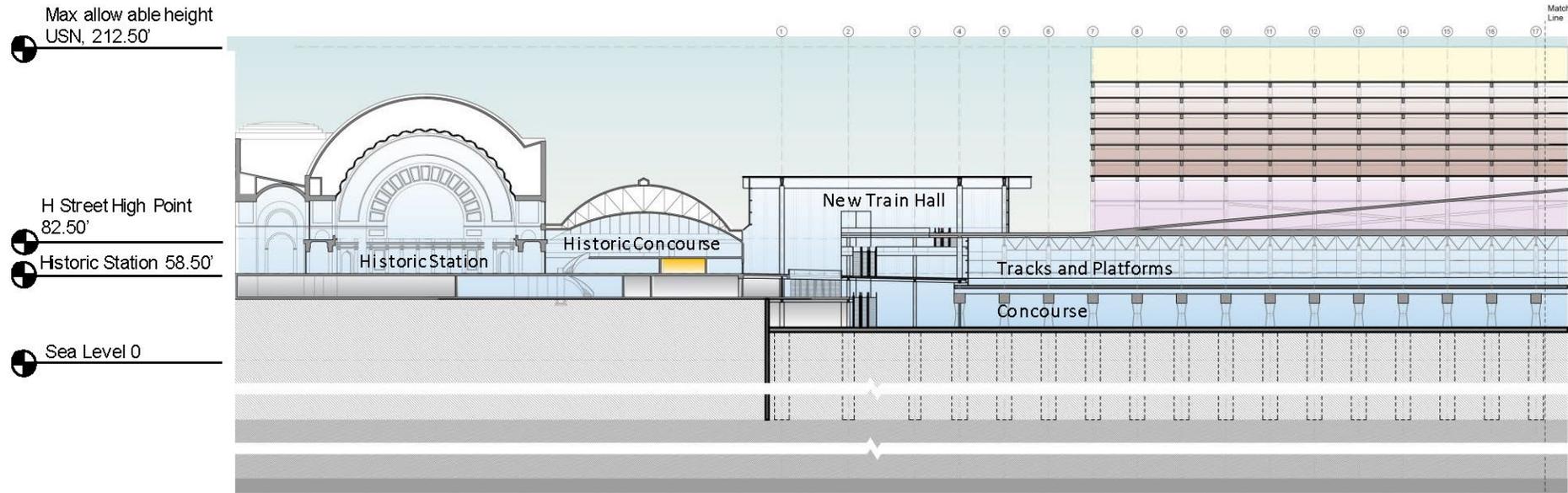


Diagram for illustration purposes only



KEY PLAN

Alternative A-C (Preferred)

LONGITUDINAL SECTION THROUGH BUS AND PARKING NORTH OF H STREET

- CONCOURSES
- BACK OF HOUSE
- BUS FACILITY
- PARKING
- PRIVATE AIR RIGHTS DEVELOPABLE AREA
- POTENTIAL FEDERAL AIR RIGHTS DEVELOPMENT
- POTENTIAL DEVELOPMENT

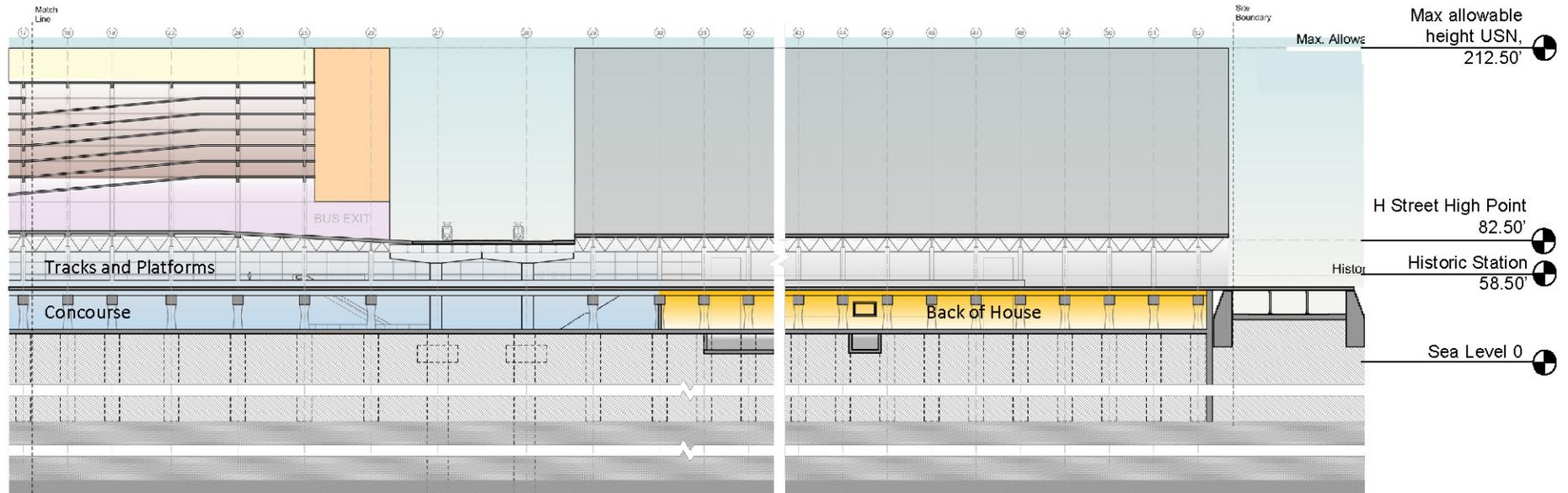


Diagram for illustration purposes only



KEY PLAN

U.S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

401 F STREET NW SUITE 312 WASHINGTON DC 20001-2728 202-504-2200 FAX 202-504-2195 WWW.CFA.GOV

27 November 2019

Dear Mr. Valenstein:

In its meeting of 21 November, the Commission of Fine Arts was pleased to hear an information presentation on plans for the renovation and expansion of Washington's Union Station, the historic building and complex that accommodates commuter and intercity rail service, Metrorail, retail, parking, and the city's central bus station. The Commission expressed support for Alternative A-C, the project team's preferred approach, and provided the following comments.

The Commission members noted the ambitious scope of the project, which will provide extensive modernizations for a wide-ranging program, to be implemented while the station remains in operation. They expressed support for the general approach, sectional disposition, and plan layout of the programmatic elements in the preferred alternative; they added that the inclusion of the bus terminal at Union Station is an important, equitable convenience for travelers. For the development of the plan, they commented that the design of the expansion in relation to the H Street viaduct needs careful consideration with the goal of avoiding the perception of the viaduct as an impediment to people's use of the area. They also commented that the conceptualization of the train hall should be carefully developed so that its design can appropriately express its intended civic role.

Regarding the parking program, the Commission members expressed concern that the planning for this long-term project seems to be based on a model of past decades that may not be a useful predictor of future needs. They observed that Union Station is not primarily a retail destination, but the parking program appears sized to accommodate large numbers of retail customers; the resulting built form, in conjunction with a large two-level bus terminal, generates an ungainly above-ground volume that presents aesthetic and programmatic problems in designing the area above the train platforms. They suggested reconsideration of this component of the project, in conjunction with further study of retailing trends, in order to develop a more appropriately sized and sympathetically configured massing.

The Commission looks forward to review of the project when it is submitted at the concept level. As always, the staff is available to assist you.

Sincerely,



Thomas E. Luebke, FAIA
Secretary

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

cc: Beverley Swaim-Staley, Union Station Redevelopment Corporation
Hany Hassan, Beyer Blinder Belle

ATTACHMENT

Akridge – Comment Letter

January 2, 2020

Mr. Marcel Acosta
Executive Director
National Capital Planning Commission
401 9th Street NW, North Lobby, Suite 500
Washington, DC 20004

RE: Washington Union Station Expansion Project – NCPC File Number 7746

Dear Mr. Acosta:

For the past 17 years, Akridge has pursued the development of 14 acres of air rights above Union Station's tracks (Burnham Place). Our organization has arguably served as the most vocal and consistent proponent for the station's expansion. Regrettably, the Federal Railroad Administration (FRA) has developed a Preferred Alternative for its Environmental Impact Statement (EIS) that Akridge emphatically opposes. For the reasons described in this letter, we recommend that the Commission withhold providing any comments that could be construed as a favorable endorsement of a Preferred Alternative. Instead, the Commission should direct the FRA to provide significantly more information, documentation and justification for its conclusions and to return with an improved submission based on best planning practices for urban rail stations that holistically addresses federal, local and neighborhood goals and objectives.

Burnham Place and Station Planning History

In 1997, Congress required Amtrak, through the U.S. General Services Administration (GSA), to sell for private development 14 acres of air rights above the railyard north of Union Station. In 2006 Akridge purchased those rights. We named our project Burnham Place, after the station's architect, Daniel Burnham. In 2010 we established shared design goals with Amtrak including: expand station capacity, enhance the passenger and visitor experience, and create harmonious public and private projects.

Our collaboration with Amtrak yielded a 2012 plan and vision, which holistically considered rail, parking, bike, bus, streetcar, private development, urban design and open spaces and neighborhood integration. In addition to expanded and light-filled station areas, above the tracks were parks and plazas connecting the Capitol Hill neighborhood from H Street to the heart of the station, including a five-block long greenway for pedestrians and bicyclists.

In the years since the development of the 2012 vision, those leading the planning efforts have focused nearly exclusively on station capacity, while discounting the vital ingredients of federal city and neighborhood integration, place-making and human experience that are absolutely critical to making a project of this magnitude successful. However, we believe that FRA's station capacity requirements can be met while at the same time achieving broader planning and design goals by taking a critical look at, and making adjustments to the assumptions that are driving FRA's surface transportation elements.

NCPC's Unique Review Role: Adoption of EIS Will Establish Opportunities and Limitations

NCPC serves a unique role when it comes to improvements at and around Union Station. Because of its wide range of review authorities, NCPC has the collective authority to review changes and additions to Union Station proposed by FRA and USRC; new private development proposed by Akridge through the zoning referral process; transportation improvements, including the H Street Bridge reconstruction, proposed by DDOT; and transit changes proposed by WMATA (see Attachment A).

The concept ultimately selected and codified within the Federal Railroad Administration's (FRA) Environmental Impact Statement (EIS), will lock into place the potential and limitations for nearly all of the public and private improvements proposed around Union Station. The placement of the new rail tracks, platforms and concourses (and their associated column grids), and the sizes and locations for parking, bus, pick-up and drop-off and back-of-house facilities will dictate the location and configuration of over a mile of city and private roadways and intersections; open space and public realm opportunities; private development building sizes and locations; view shed opportunities and impacts; station entrances and exits and the degree to which these facilities enhance or detract from the passenger and visitor experience and surrounding neighborhoods.

Summary of Flaws of Preferred Alternative A-C

Akridge has demonstrated a decade-long commitment to collaborating with public partners to plan Burnham Place in a way that successfully integrates with a world-class train station and the surrounding neighborhoods. We have attempted throughout the EIS process to advance those goals. Unfortunately, rather than producing and documenting a plan that balances the complex and multi-layered goals required for this undertaking, the FRA's Preferred Alternative is narrowly focused, severely flawed, and its presentation lacks critical information required to assess its conclusions:

- *Limited Planning Focus* - As shown in the FRA's submission materials, the different Alternatives were limited in focus to just three elements: an intercity bus facility, station parking, and a "train hall." Although the project is fundamentally driven by an expansion of intercity and commuter rail service, the FRA plans are oriented to private automobile parking and bus facilities, with little consideration of the broader urban design, place-making and experience of a commuter, traveler, tourist or resident.
- *Oversized Parking Garage* - While Amtrak has stated they require no parking to serve their passengers, and peer stations are providing little or no parking in the future due to shifting modal splits, FRA's concept includes a 10-story, 1,575-car garage. This facility would stifle the creation of compatible open spaces and visually dominate views to and within the site. Consider the theoretical impact on City Center or The Wharf if these projects included a 2.6-acre, 100-foot tall garage. This proposal is also inconsistent with current local jurisdiction approaches to parking and NCPD's well-established leadership in advancing parking policy that responds to current thinking about mobility, sustainability, and land use planning. While agencies like GSA are eliminating parking from facilities in favor of sustainable, pedestrian-oriented spaces, FRA's proposal maintains an outdated 1980s approach to parking.
- *No Below-Grade Vehicle Functions* - Although five of the six Action Alternatives studied utilized below-grade areas for some or all of the station parking and a taxi or Transportation Network Company facility ((TNC), i.e., Uber, Lyft, Via, etc.), the Preferred Alternative locates these functions at or above-grade. The FRA has stated without documentation that cost and groundwater related constructability concerns led to this conclusion. Multiple feasible access points to below-grade parking were also not studied. Excavating just one additional level below the rail concourses (well above the lowest levels of the adjacent Securities and Exchange Commission garage) for these functions would greatly reduce traffic congestion around the station, help prioritize pedestrian movement and dramatically improve the urban design at the H Street level.
- *Oversized and Inefficient Bus Facility* - The footprint of the station garage is driven by its number of bus slips. As proposed, the FRA's planning assumptions for 18 to 20 intercity buses provides double to triple the number of slips than a peer station would in order to serve the equivalent number of passengers. Beyond these slips, the facility would also house charter buses which could instead be served at grade, adjacent to the historic station for the limited hours of the week and year when required.

- *Insufficient Data and Explanations* - The plan materials leave most members of the public confused as to what is being proposed and why, and how their experiences at and around the station will change in future. With a lack of documentation and visual imagery, many are left with more questions than answers. Will Columbus Circle and Plaza be more hospitable to pedestrians and more efficient for vehicles? What will a 100-foot tall garage look like from H Street or First Street? How does the plan accommodate the projected increase in pick-up and drop-off activity? The FRA has not released any form of traffic analysis yet for what is arguably the most complicated surface transportation project in the District. Yet, the FRA has identified a Preferred Alternative and asked others such as NCPD for feedback.
- *Feasibility of Implementation Not Demonstrated* – Fundamental questions regarding the viability of the Preferred Alternative have not been addressed. The FRA has not established how the project proponents will acquire the property rights required for the concept. The proposed concept consumes more than 3.5 acres of Akridge’s privately-owned 6.2-acre property south of H Street NE for station functions or easements. As Akridge will not consent to a sale of these property rights due to severe flaws and material adverse impacts of the Preferred Alternative, this calls into question the plan’s feasibility. With parking and bus functions shown in the same location as they exist today, it is unclear where these functions will be located during construction. With a relatively low-cost intercity fare structure, private intercity bus carriers generally do not have the ability to pay high costs for slip use. A project sponsor is not yet identified for what will be one of the most expensive parking and bus facilities in the country.

Stakeholder Feedback

Akridge is not alone in its critique. In just the six weeks since FRA released its Preferred Alternative, key stakeholders have started to express strong concerns (see Attachment C for complete letters). DC Ward 6 Councilmember Charles Allen stated his objections in a letter to Mayor Muriel Bowser and DC Council Chairman Phil Mendelson:

“The FRA’s proposed plan disregards and subordinates the interests of District residents and stakeholders to objectionable or ill-advised priorities. The misguided direction of the current plan would be a costly investment in infrastructure that undermines rather than enhances the District of Columbia’s efforts to increase economic vitality, livability, and urban experience.”
(November 27, 2019)

The U.S. Commission of Fine Arts (CFA) wrote that members found:

The parking program “in conjunction with a large two-level bus terminal, generates an ungainly above-ground volume that presents aesthetic and programmatic problems... The planning for this long-term project seems to be based on a model of past decades that may not be a useful predictor of future needs.”
(November 27, 2019)

Advisory Neighborhood Commission 6C wrote:

“The Action Alternatives to date prioritize private automobile usage and parking over mass transit, walking and biking....Furthermore, FRA plans include poorly planned station access and circulation for private cars, for-hire vehicles, and local and intercity buses. As currently envisioned, the expanded Union Station would be surrounded by a snarl of cars and buses, creating a

*barrier to access for the residents of the surrounding neighborhoods”
(November 16, 2019)*

The FRA planning process, while taking more than four years, has not meaningfully incorporated the feedback or ideas provided by those most impacted by the proposed project. Throughout this four-year process, Akridge has provided extensive comments to the FRA regarding the alternative concepts, in the form of identification of impacts and ideas (including many which utilize Burnham Place property for station functions) for better meeting the defined purpose and need of the project.

NCPC can play a critical role in correcting this course by requiring that the FRA provide the full planning context data analysis and justifications for its conclusions now, as opposed to later within a Draft EIS. Release of this information would allow the productive engagement with all stakeholders necessary to improve the current concept. Attached to this letter as Exhibit 1 are further details NCPC should request from FRA prior to providing any favorable or unfavorable comments on the proposed SEP concept, and certainly well before taking any formal action on the SEP project.

The following sections provide additional analysis and considerations within the three key areas requiring the greatest level of adjustment within the Preferred Alternative: parking, buses and vehicle circulation.

Parking

The 1,575-space garage proposed is based on 1980s-style planning where abundant car parking is essential to support rail travel and shopping downtown. Passengers are rapidly shifting their preferences for how they travel to rail stations and airports as Uber, Lyft and transit replace private car trips.

Amtrak has stated that they do not require parking at the station to serve their passengers. For the existing 200,000 square feet of retail uses at Union Station, the parking required (theoretically) by current DC zoning regulations for such a use is approximately 150 spaces. No other center city passenger rail station in the United States is being planned or built to include customer parking: Denver, San Francisco, New York, and Chicago all include no parking for any uses in their new stations and plans, and Philadelphia and Boston both have fewer than 400 spaces planned (see Attachment B, page B-20 for detail).

Amtrak’s proposed track and platform plan requires the demolition of the existing station garage. How many parking spaces are built back (and where) to serve Union Station in the coming decades should follow a ‘blank slate’ approach where each land use is newly assessed for parking demands. Comparison of the number of spaces in a proposed station garage to the number of spaces in the existing garage is at best marginally relevant as compared to assessing future trends. Existing contracts established in the 1980s with the station’s retail operator call for 1,575 spaces—the exact number proposed in the Preferred Alternative. These contracts will require renegotiation to address removal of the current garage. Thus, like the District has done in its new zoning regulations, like the new aggressive approach to parking taken by GSA at its facilities, and like NCPC’s recent reevaluation of its own parking policies, FRA and USRC should employ similar, modern parking parameters in a new agreement with the station retail operator.

Bus Facility

The size and location of the bus facility are critical as the proposed facility is in conflict with other plan components, including efficient circulation on H Street, pedestrian access to the streetcar stop, and the previously proposed Greenway from the 2012 concept, which has been eliminated in the FRA Preferred Alternative and replaced with bus and auto circulation.

Compared to newly designed and planned bus facilities, FRA's planned 18 to 20 intercity slips would process one half to a third the number of intercity buses and passengers per day (see Attachment B, page B-23 for detail). This suggests that a significant reduction in the number of slips (for example, 'right-sized' at 10 to 12 slips) could still yield greater than the desired capacities at a lower cost and reduced impacts if best practices for operations are followed. Conversely, at the maximum size proposed in the Preferred Alternative (20 to 40 bus slips in total), the facility could process 800 buses per day rather than the 250 per day implied by FRA's annual ridership projection, a material increase in bus movements on H Street NE and cause for concern.

The FRA plans include an allotment of nine charter bus slips. This number is approximately one third the size of the proposed bus facility or nearly the same number of slips that are required for a right-sized intercity operation. Charter buses would serve tour groups in the consolidated above-track facility in the Preferred Alternative. Charter bus uses peak at certain times of day, on certain days of the week at only specific times of year. Dedicating valuable, above-track garage space to this function does not follow best practices and has negative impacts and high opportunity costs. Other viable options for serving these buses include along E Street NE between North Capitol Street and Massachusetts Avenue (adjacent to where Circulator buses currently lay over). Alternatively, tour buses could be served near the main south entrance to the historic building or along the west side of the station on First Street NE.

Vehicular Circulation and Pick-up and Drop-off Activity

Vehicular uses are important to serving passenger rail and other functions of the station. Increasing the station's capacity requires highly efficient, easy-to-find and distributed pick-up and drop-off locations for taxis, TNC's and private cars. However, the street network that accommodates this vehicular capacity cannot compromise pedestrian and bicycle modes, which are essential to optimizing intermodal and rail capacities and enhancing safety and visitor experience.

Conclusion

While NCPC is reviewing the SEP as a building project, the size, scope, importance, complexity and planning horizon of this project require consideration of the formal components of a "master plan" under NCPC guidelines. Given the extreme lack of information in the FRA submission, it is not clear how NCPC could carry out a meaningful and well-informed review even at the concept level. It is questionable whether the submission even meets NCPC's submission guidelines for concept review. We believe it is premature for NCPC to provide concept level comments on any of the FRA EIS Alternatives without the referenced supporting data, analysis, information and context. The endorsement of a concept will essentially determine, and in many cases constrain, future planning and design for several nearby related projects for the rail, Union Station building, Columbus Circle and Plaza, H Street Bridge, and Burnham Place sites, all of which will be reviewed to some extent by NCPC (See Attachment A). Thus, what NCPC says with regard to the SEP has the potential to significantly impact the quality and success of these other projects that will eventually be submitted or referred to NCPC.

We urge the Commission to require that the FRA advance an inclusive and holistic planning approach for the Union Station Expansion Project, meeting or exceeding the methodologies employed and plans developed by peer stations around the country and world. For the planning process to meet a successful outcome, the FRA must share its data and analysis which underpin its findings and be held accountable for genuinely engaging with stakeholders and impacted parties to consider the merits of new ideas.

Following this letter, we include as attachments a package of imagery, diagrams and plans with more detailed analysis of the Preferred Alternative including proposed adjustments. Absent data from the

FRA, the Burnham Place team engaged with leading experts in transportation planning and urban design to develop independent data and analyses where possible, which inform our proposed concept adjustments. We also include letters from key stakeholders for your review.

The stakes for developing a high-quality station plan are difficult to overstate. With an estimated price tag of \$8 billion, the SEP plan must sustainably serve 40 to 50 million annual passengers and visitors for at least the next 50 years. The District of Columbia government has committed more than \$200 million to rebuild the H Street Bridge to enable this project. Every major regional business organization has identified the project as one of the region's most important economic development and traffic reduction projects. Akridge remains committed to achieving harmonious public and private initiatives for the SEP and Burnham Place and stands ready to assist the Commission in any way it requests to that end.

Thank you for your consideration.

Sincerely,



David Tuchmann
Vice President, Development

Exhibit 1 – Required Data and Information

Rail Capacity, Passenger Experience, and Intermodal Connections

Understanding intercity and commuter rail needs is critical to the development of all other station components, including parking, bus facilities, and vehicular circulation: Thus, NCPC should request the following information:

- Current and future rail capacity data, mode splits and origin and destination data for arriving and departing rail passengers
- Explanation of the rail passenger experience, including passenger amenities, distances between modes, station entrances, and passenger circulation

Parking

To adequately review the need for a proposed station parking facility and its location, NCPC should request the following information from FRA:

- Projected parking demand and allocation based on modal splits, for both existing and proposed 2040 conditions
- Comparison of Union Station's future parking demand and modal splits as compared to those at comparable stations
- Inventory and utilization rates for existing parking facilities within walking distance of Union Station (the Burnham Place team estimates 5,000+ spaces with 80% utilization rates during weekdays and largely empty on weekends and evenings)
- Impacts of potential parking entrances and exits on surrounding intersections and neighborhood streets, including both below-track and above-track parking proposals

Bus Facility

To properly evaluate the bus facility (including both existing conditions and 2040 projections), NCPC should request the following information:

- Annual, daily, and peak hour bus passenger projections for intercity and charter functions
- Bus service needed to accommodate passenger projections, including numbers of daily, hourly, and peak-hour bus movements
- Bus facility operations requirements and assumptions
- Modal split usage and assumptions for arriving and departing intercity bus passengers

Vehicular Circulation and Pick-up and Drop-off Activity

Without the following information, it is not possible to evaluate any of the circulation plans within FRA's Alternatives (which all increase paved areas for vehicular circulation on the station perimeter):

- Private auto, taxi and TNC demand during peak times based on 2040 ridership and modal split projections
- Size and operations for pick-up and drop-off functions including entrances and exits, waiting areas, queue or holding locations, and location distribution
- FRA's estimate of Burnham Place pick-up and drop-off demand and location distribution
- Identification of impacts on the pedestrian realm and bicycle access and circulation around the station

Urban Design

Mixed-use, transit-oriented urban development surrounding the station, including Burnham Place, must be coordinated and integrated with the station transportation functions. The alternatives must be evaluated in the context of their ability to:

- Include significant open space critically important for place-making, identity, and public amenities
- Identify the role, uses, and stewardship of the monumental and historic Union Station building and other historic landmarks in the station vicinity
- Provide opportunity for appropriate mixed-use development at Burnham Place

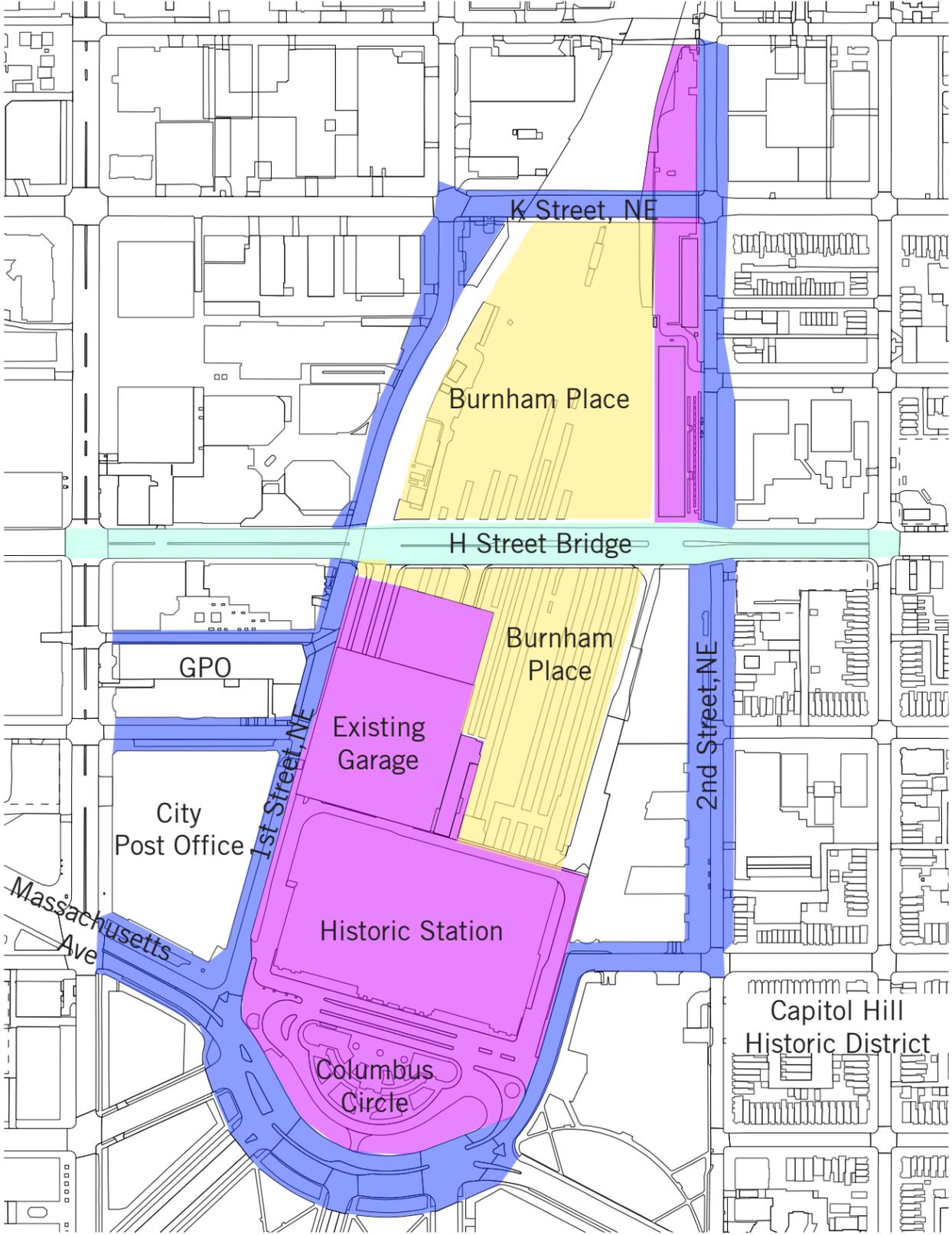
Implementation

Successful implementation will require understanding what entities will own and maintain the respective station components (parking, train hall, bus slips, etc.) to assess feasibility within project component sponsorship. High-level project phasing and the cost and complexity of maintaining required uses during construction for various concepts are important evaluation criteria. FRA has not yet provided the public with any information regarding:

- Changes in ownership requiring dispositions, land swaps or other transfers
- Constructability criteria and variations in alternatives with respect to overall project phasing and construction

ATTACHMENT A

Station Expansion Project and Related Project Site Areas



- Station Expansion Project 20.8 acres (Current Federal Ownership)
- H Street Bridge Replacement 4.1 acres
- Burnham Place 14.6 acres
- Circulation Changes 15.8 acres

Total Site Area: 55.3 acres

BURNHAM PLACE

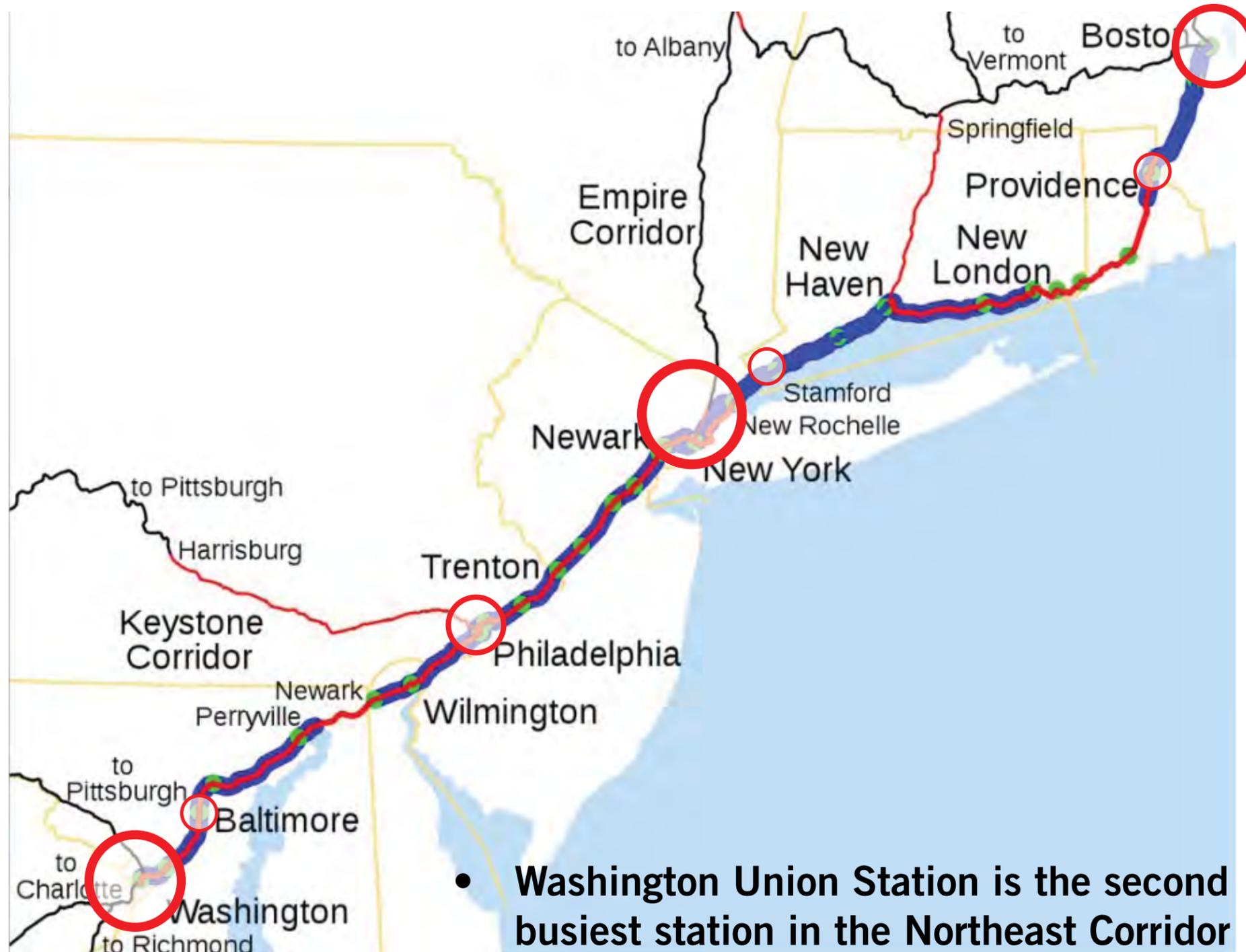
ATTACHMENT B

UNION STATION EXPANSION PROJECT

Course Correction Required to Ensure Success

January 9, 2020

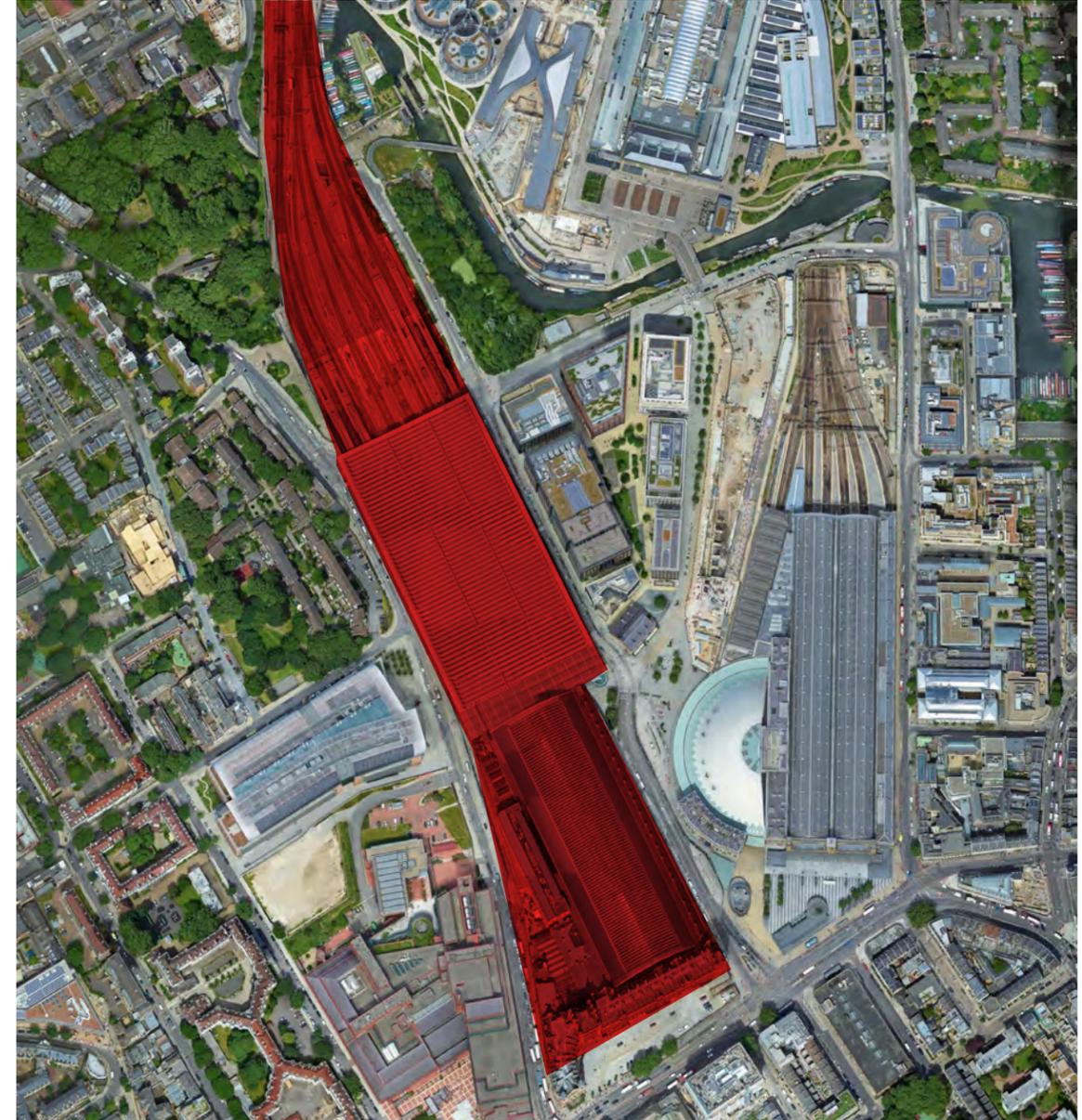
The Northeast Corridor: Megaregion Accounts for 20% of U.S. GDP



Union Station's Current Capacity is Among the Lowest of Comparable Stations Worldwide



Washington Union Station
20 tracks | 48,500 daily passengers

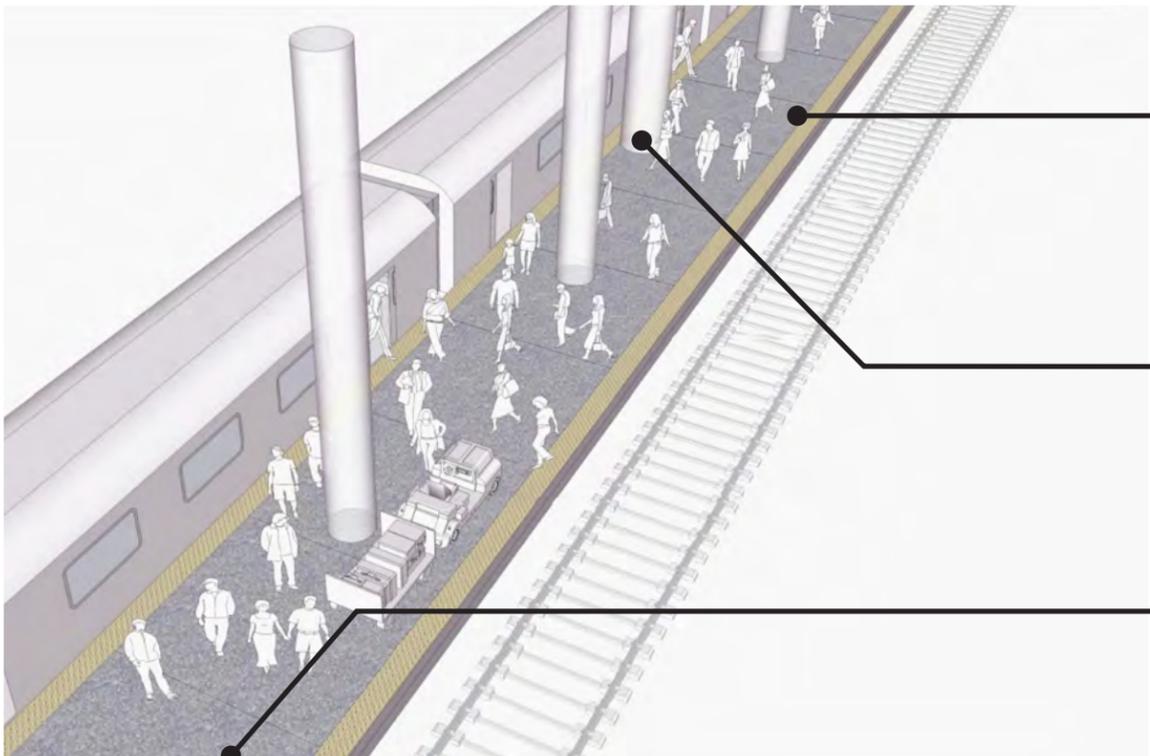


St. Pancras Station, London
15 tracks | 115,000 daily passengers

**Within the same footprint, stations around the world are accommodating
3 to 10 times the number of rail passengers per track.**

Current Rail Platform Layout Constrains Capacity Growth

Existing

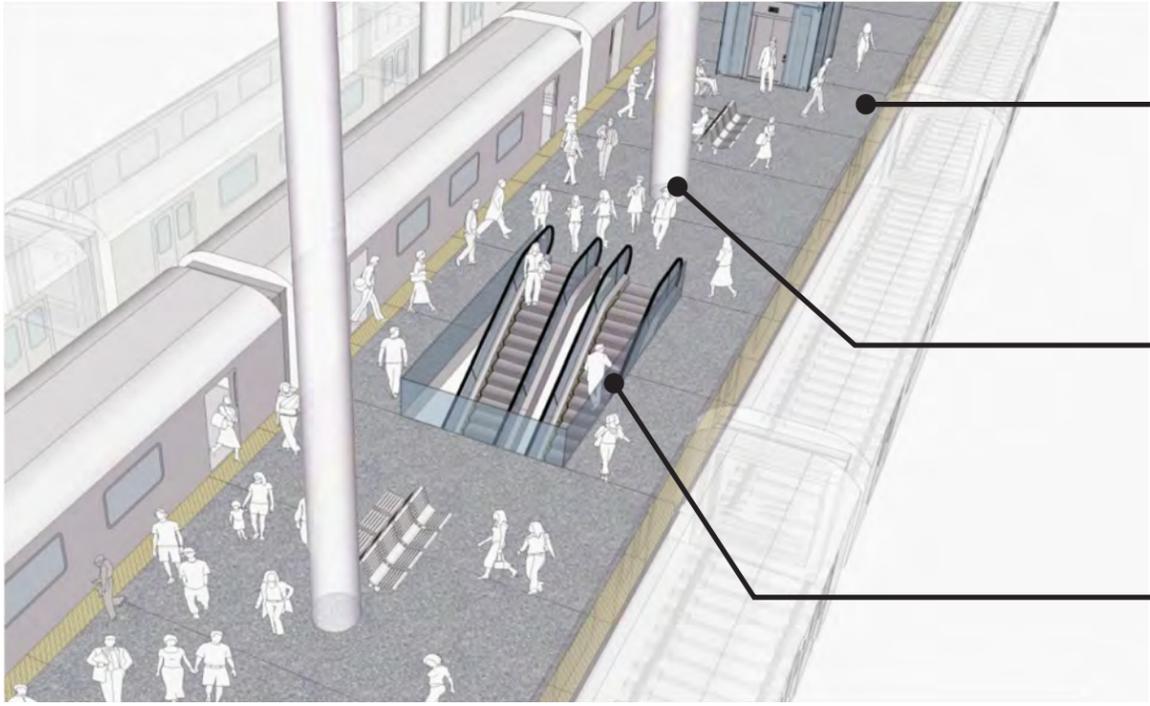


< 20-foot wide platforms

Garage columns poorly located

Single access point

Proposed

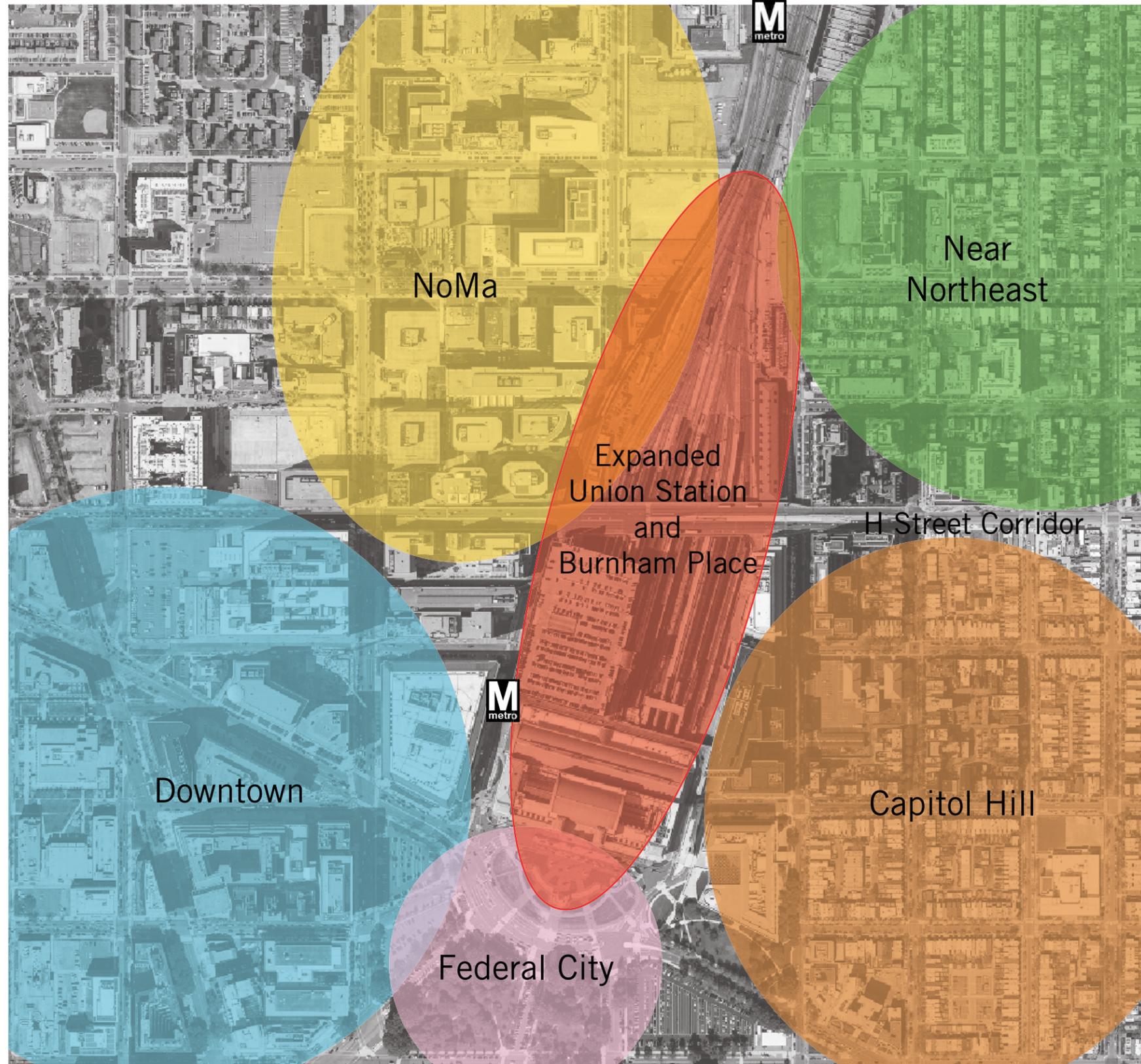


30-foot wide platforms

Columns strategically centered on platforms

Multiple access points

Union Station and Burnham Place Will Fill a Gap in the City's Fabric



BURNHAM PLACE

Cities Are Harvesting Economic Potential Above Rail Infrastructure



Hudson Yards, New York



Millenium Park, Chicago

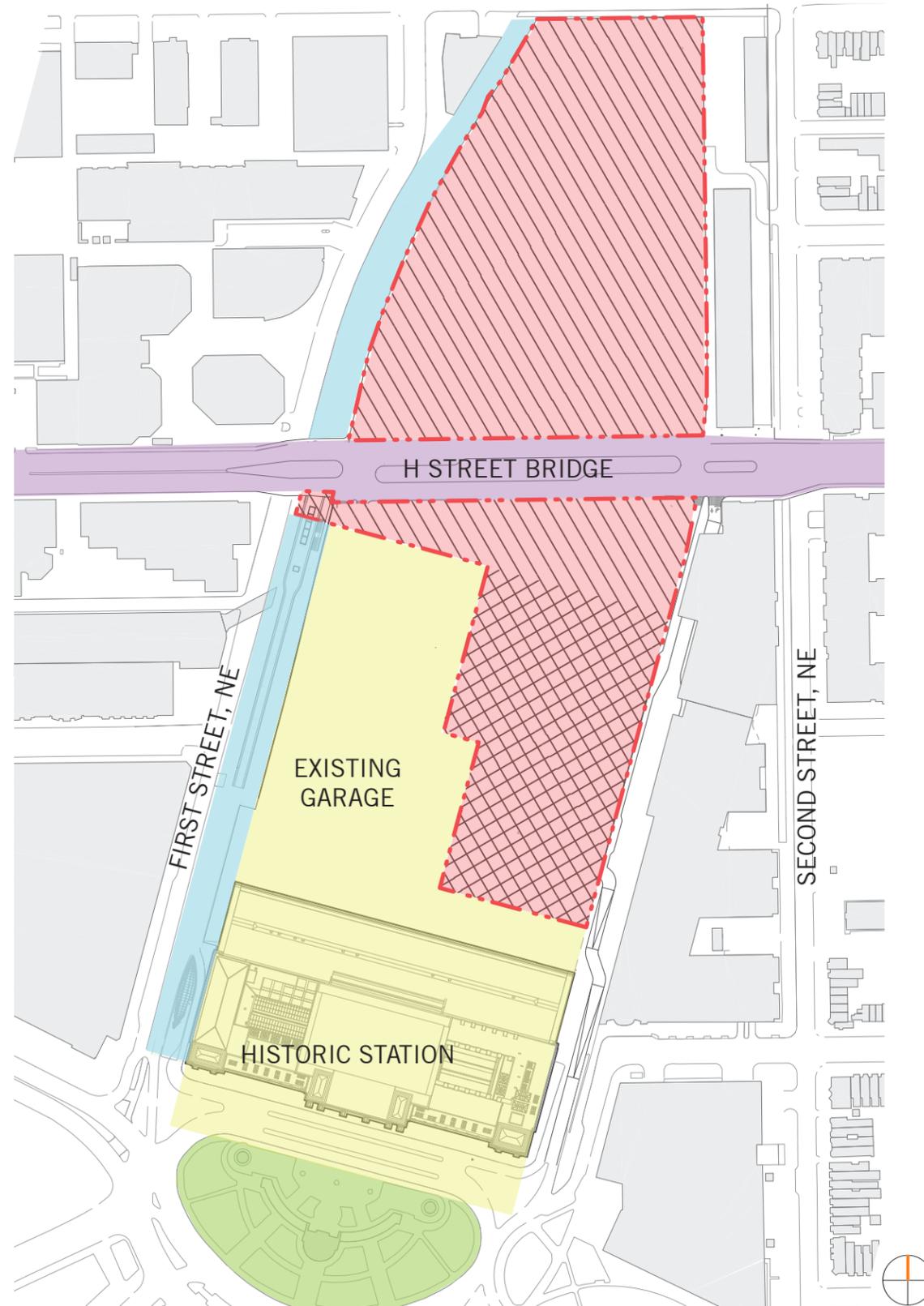


Broadgate - Exchange House, London

Property Rights

All FRA Alternatives locate portions of the Train Hall, vehicular circulation, concourse skylights, and H Street head houses within private air rights property

- FRA/USRC
- AKRIDGE/AMTRAK
- AKRIDGE/FRA
- DDOT
- WMATA
- NATIONAL PARK SERVICE



BURNHAM PLACE

2012 Amtrak/Akridge Master Plan Vision



BURNHAM PLACE

WASHINGTON, D.C.

01/09/2020

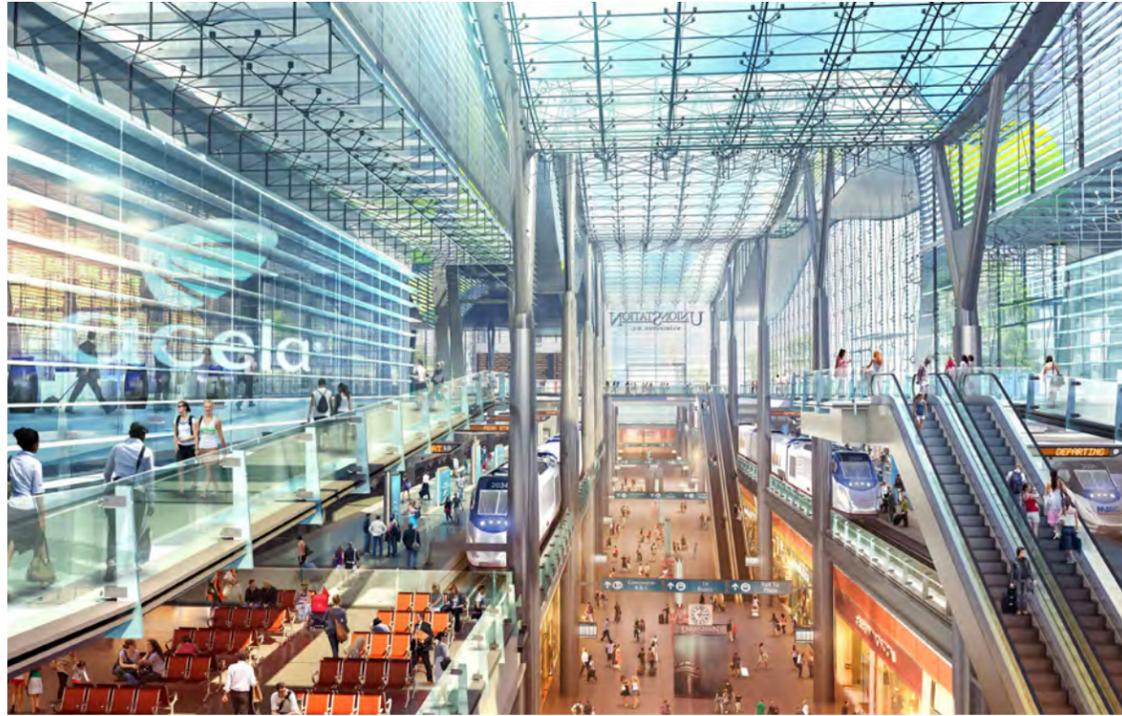
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The 2012 Vision: Union Station as World Class Transportation Hub



Union Station Master Plan (2012) - Central Concourse and Train Hall
Produced by Amtrak and HOK in partnership with Akridge and Shalom Baranes Associates



Liege Station, Belgium



King's Cross Railway Station, London



Malmo Central Station, Sweden

The 2012 Vision: Union Station as Community Asset



Union Station Master Plan (2012) - Station Entrance at First Street and K Street, NE
Produced by Akridge and Shalom Baranes Associates in partnership with Amtrak and HOK



Broadgate - Exchange House, London



Union Station Master Plan (2012) - Greenway
Produced by Akridge and Shalom Baranes Associates in partnership with Amtrak and HOK



Anzac Railway Station, Melbourne

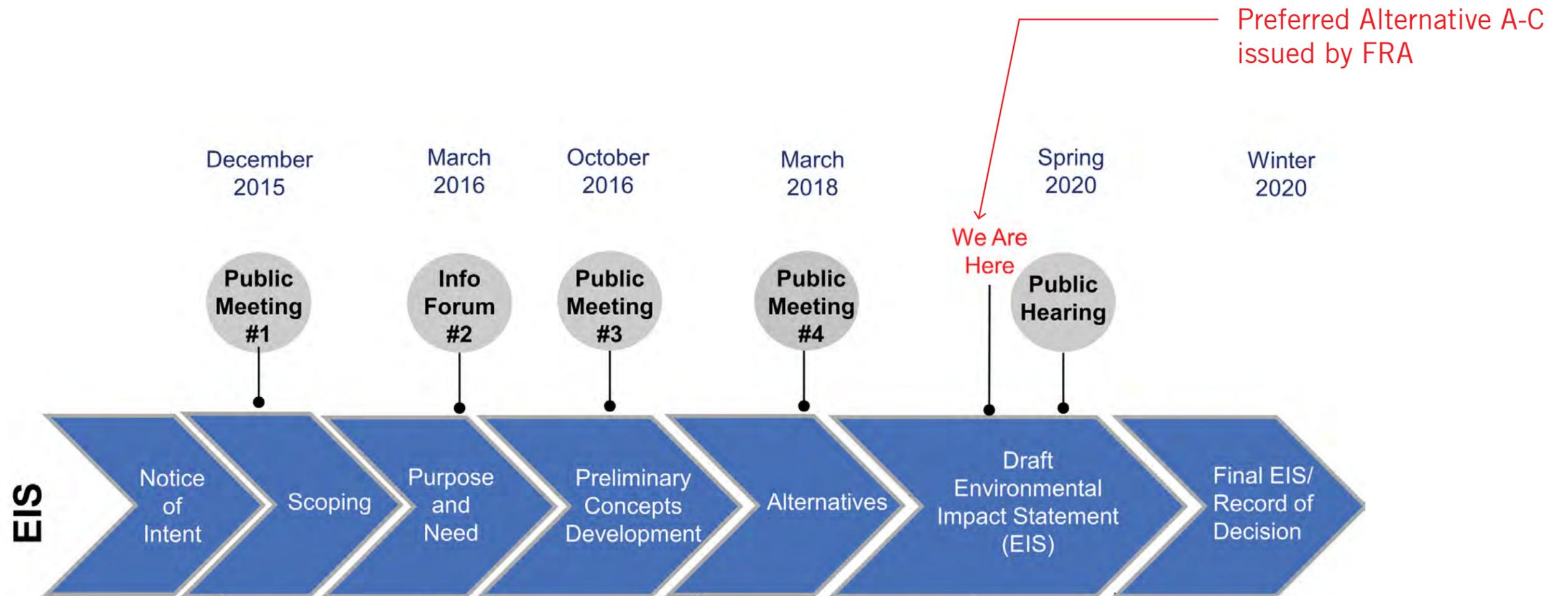
BURNHAM PLACE

Once in a Century Opportunity



- **More than doubles rail passenger travel - equivalent to adding another National Airport**
- **COG, FCC and GWBOT: the region's most significant transportation investment and vital to economic competitiveness**
- **Burnham Place: three million square feet of development, including 1,000 - 1,500 residential units**

FRA's Environmental Review Process Status



SOURCE: Federal Railroad Administration (FRA) presentation submitted to the Commission of Fine Arts (CFA), 11/21/2019: https://www.cfa.gov/system/files/meeting-materials/3_-_union_station_presentation.pdf

Akridge Has Provided Solution-Oriented Feedback Throughout Process

2014

2017

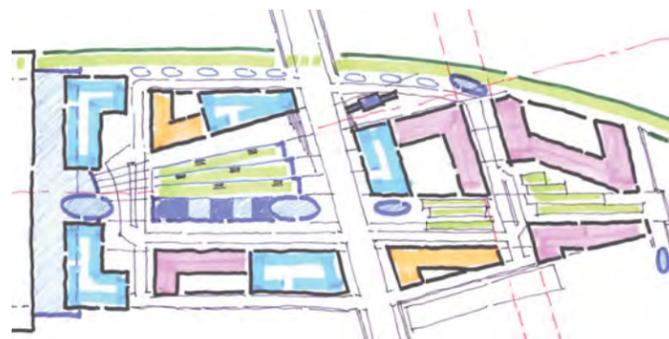
2020

Timeline

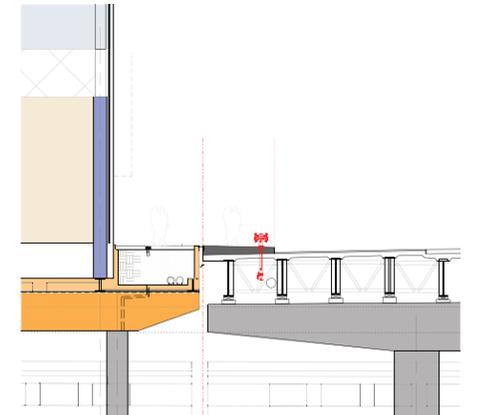


Preferred Alternative

BP Feedback



Sub-requirements	ALTERNATIVE A & B	ALTERNATIVE C	ALTERNATIVE D	ALTERNATIVE E
Sufficient and high-quality overall density	Red	Red	Yellow	Green
Efficient scale BP building pads	Red	Red	Yellow	Green
Distribute density throughout BP and achieve effective phased development	Red	Red	Yellow	Green
Maximize H Street frontage	Red	Red	Yellow	Green
Circulation network and turning movements at acceptable levels of service	Red	Red	Yellow	Green
Primary central street connecting north and south parcels	Red	Red	Yellow	Green
Vehicular access to front doors, service, and parking areas	Red	Red	Yellow	Green
Safe, active and interconnected pedestrian areas	Red	Red	Yellow	Green
Distribute north and south of H Street	Red	Red	Yellow	Green
World-class placemaking	Red	Red	Yellow	Green
Maximize views to the Capitol and historic Station	Red	Red	Yellow	Green
Building separation, solar access, and sight-lines compatible with high-quality mixed-use development	Red	Red	Yellow	Green
World-class BP and Station components complement one another	Red	Red	Yellow	Green
Multiple and gracious pedestrian connections between BP, Station, and surrounding neighborhoods	Insufficient information to evaluate			
Easy-to-find entrances to BP buildings and Station	Red	Red	Yellow	Green



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WASHINGTON, D.C.

01/09/2020

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B-12

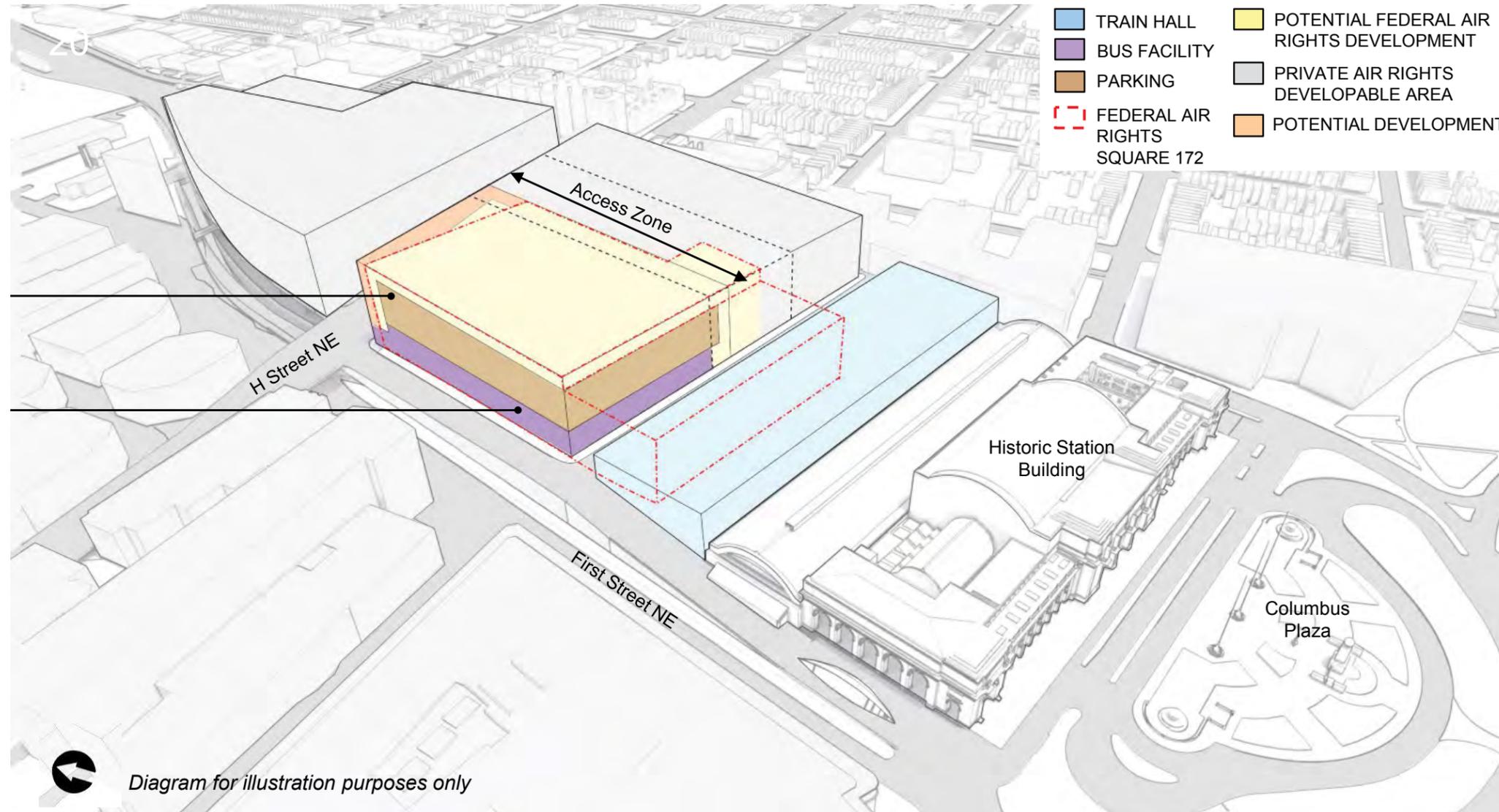
FRA's Six Alternatives



SOURCE: Material adapted from Federal Railroad Administration (FRA) presentation submitted to the Commission of Fine Arts (CFA), 11/21/2019: https://www.cfa.gov/system/files/meeting-materials/3_-_union_station_presentation.pdf

FRA has defined the project primarily on the basis of parking and bus facilities throughout the planning process

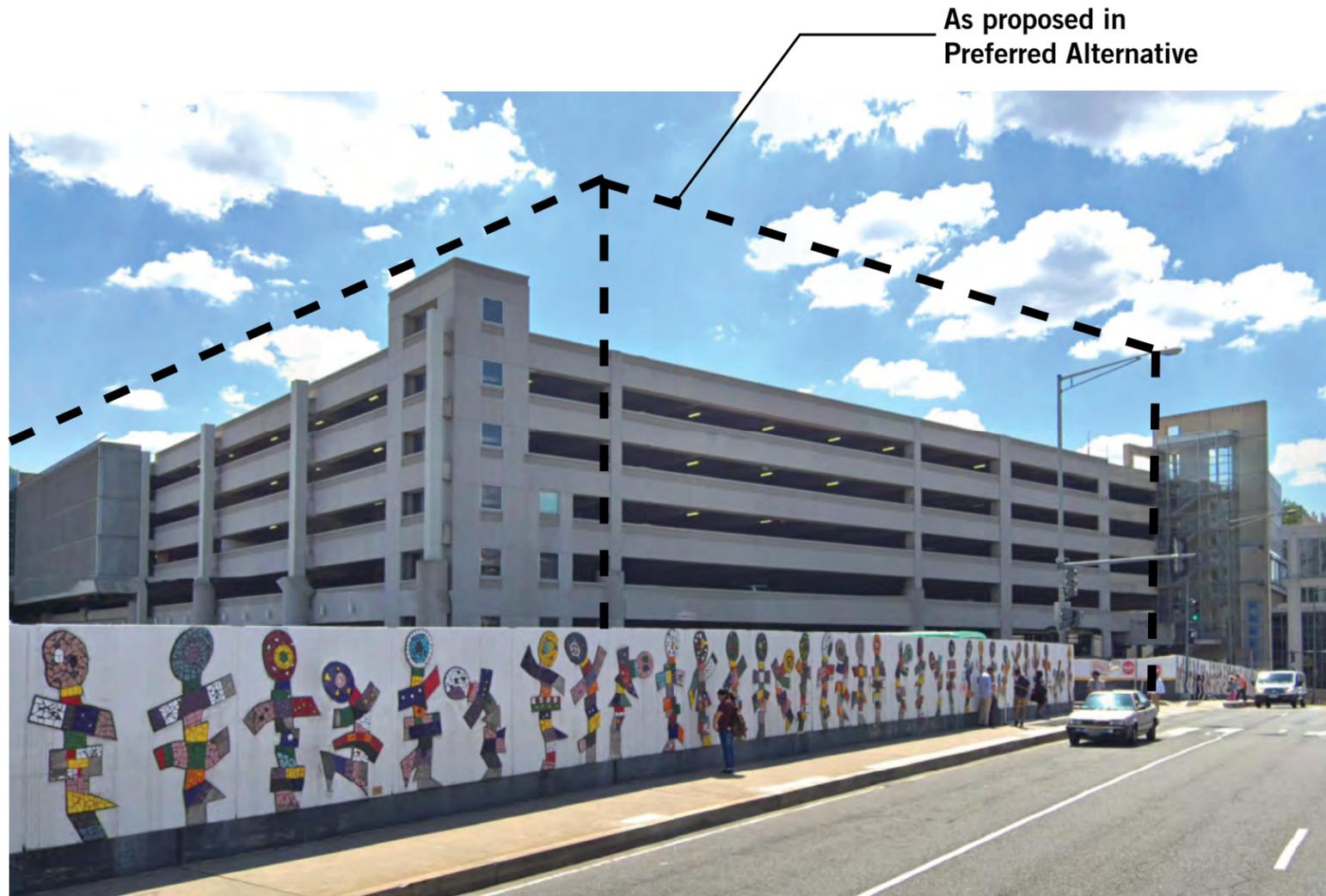
FRA Preferred Alternative



SOURCE: Material adapted from Federal Railroad Administration (FRA) presentation submitted to the Commission of Fine Arts (CFA), 11/21/2019: https://www.cfa.gov/system/files/meeting-materials/3_-_union_station_presentation.pdf

- This image is the only publicly available visualization of the Preferred Alternative
- Design and plan information lacking for concept review

Proposed Parking Garage Above Tracks Worsens Problems of Current Garage



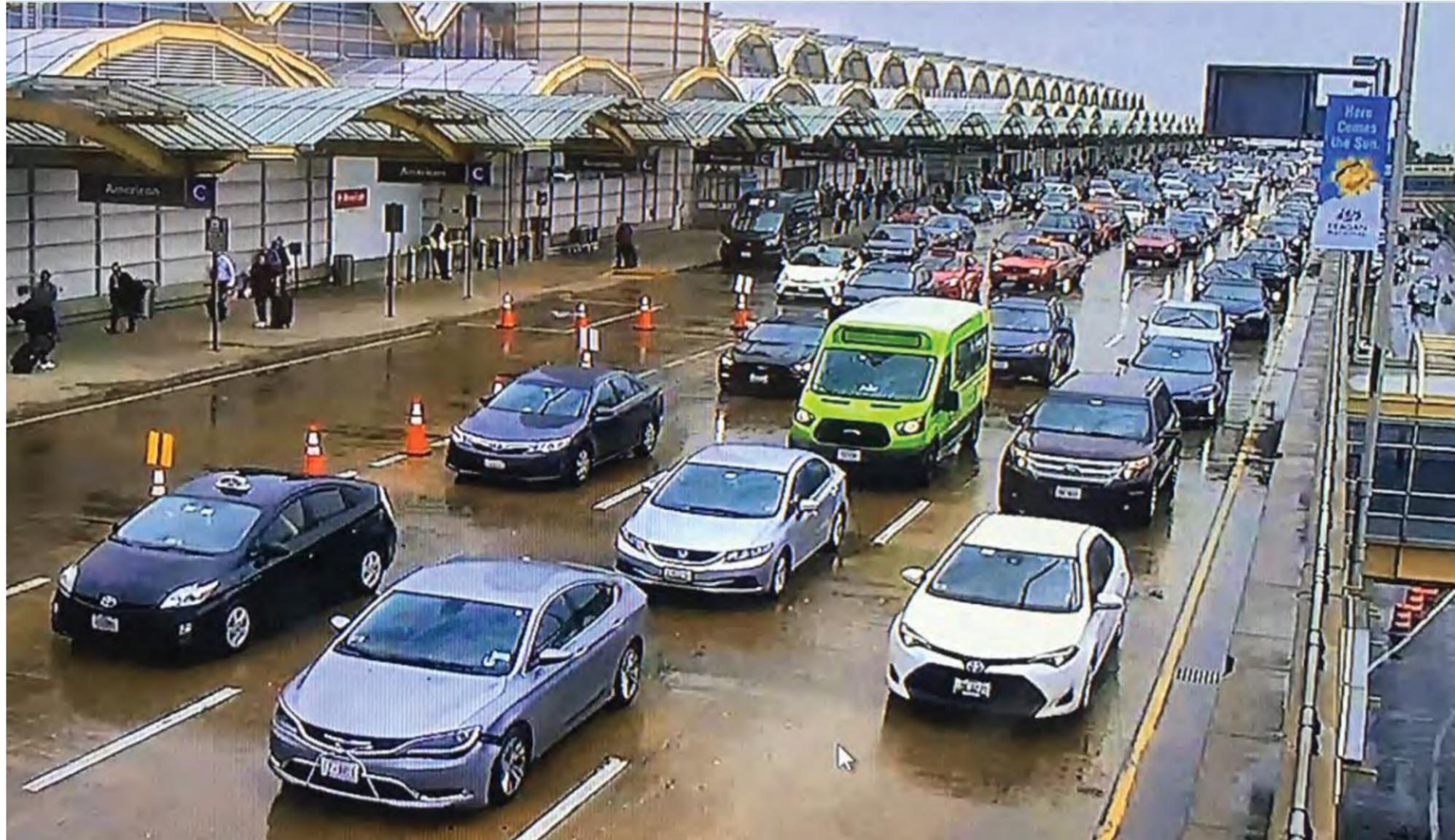
H Street Bridge



First Street, NE looking North

FRA Preferred Alternative proposes rebuilding 10-story garage in almost the same location

Station Pick-up and Drop-off Proposals Preclude Pedestrian Amenities



Ronald Reagan National Airport drop-off zone

**FRA's proposal includes airport-style pick-up and drop-off zones
in the highest pedestrian use areas**

Prioritizing Vehicles Harms the Environment Around the Station



Columbus Circle



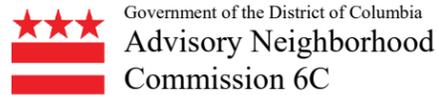
H Street NE and North Capitol Street

Stakeholder Responses to Preferred Alternative Are Negative



Charles Allen, Ward 6 Councilmember

“I believe this federally-produced plan would create significant adverse effects for the District of Columbia” and “the plans released fall well short of capturing the extraordinary potential associated with this important project” (November 27, 2019)



“We have grave concerns that the Action Alternatives developed by the FRA to date in the EIS process would significantly and needlessly harm the station and the surrounding neighborhoods” (November 16, 2019)



The parking program *“in conjunction with a large two-level bus terminal, generates an ungainly above-ground volume that presents aesthetic and programmatic problems... The planning for this long-term project seems to be based on a model of past decades that may not be a useful predictor of future needs.”* (November 27, 2019)

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



Commented that the plan provided a *“lack of civic space”* (November 19, 2019)



“Amtrak requires no parking at Union Station” (Dave Handera, November 18, 2019)

To ensure Union Station's expansion is successful, it must:

- 1. Reduce parking and improve circulation**
- 2. Right-size and consider alternate on-site bus facility locations**
- 3. Strategically locate pick-up and drop-off**

Comparison of Passenger Rail Station Parking

		Washington Union Station	Philadelphia 30th Street Station	Chicago Union Station	San Francisco Transbay
		(2040)	(2040)	(2040)	(2040)
Rail	Daily Intercity Passengers	32,000	27,500	30,500	40,000
Parking	Planned Spaces	1,575	355	0	0
	Rail Passengers/Space	20	77	0	0

*For sources see appendix

- **Best practices at urban rail stations include minimal or no auto parking**
- **Amtrak leadership has stated that they do not “require any parking” at Washington Union Station**
- **DC zoning regulations would require approximately 150 parking spaces to serve existing Union Station retail**

- **Parking is oversized**
 - **Not required to meet transportation demands**
 - **Not required to serve retail patrons (regardless of 1980s obligations)**
- **Inconsistent with national and international best practices**
- **Inconsistent with D.C. government policies and regulations**
- **Demand will decline in coming decades, calling into question the sustainability of parking income for USRC**
- **Significantly harms other project elements and project goals**

Alternative Structured Parking Options

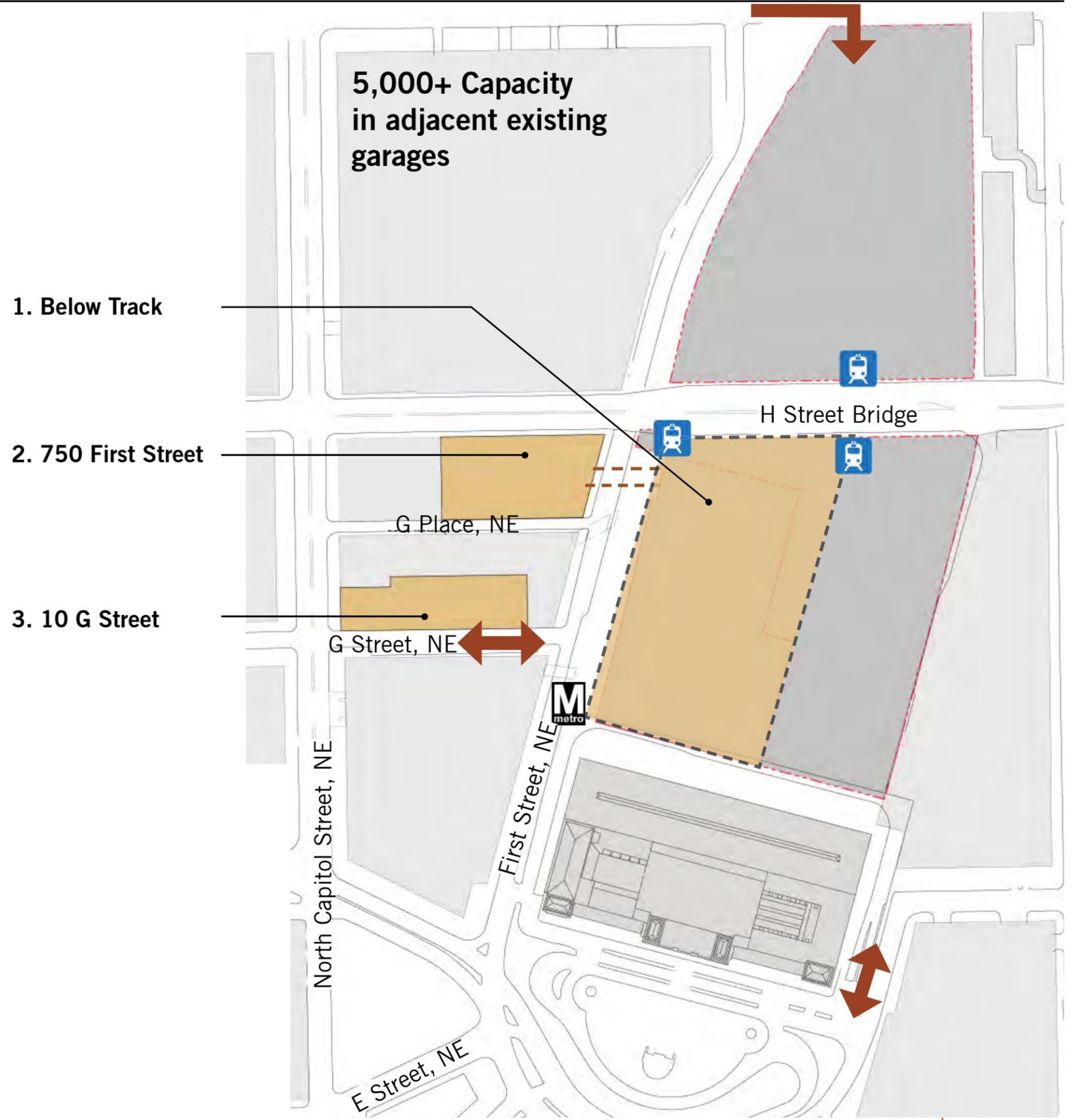
Right-sized parking facility of up to 600 spaces should be located below-track or on adjacent sites

Below-track parking access options remove vehicular traffic from station frontages and prioritize pedestrian circulation

 Below-grade vehicle access

 Station entrance

Potential development above options 2 and 3



BURNHAM PLACE

Comparison of Intercity Bus Station Capacities Per Slip

		Washington Union Station	Philadelphia 30th Street Station	Rotterdam Centraal, NL	Hamburg Germany Bus Port ZOB
		(2040)	(2040)	(existing)	(existing)
Bus	Daily Passengers	8,200	9,600	1,500	12,500
	Planned Slips	18	7	1	14
	Passengers/Slip	456	1,371	1,500	893

*For sources see appendix

- **Best practices at urban intercity bus facilities achieve substantially higher capacities with fewer bus slips**
- **Preferred Alternative A-C maximum capacity of 30 intercity bus slips could accommodate up to 40,000 passengers per day using the Philadelphia planning standard - 5 times the number forecast by the FRA**

- **Bus station is oversized**
 - **Best practices suggest 10-12 slips can meet forecasted intercity demand**
 - **Tour/Charter bus should be accommodated separately on surface roads**
- **Current size and location significantly harms other project elements and goals**
- **Right-sized program provides cost, phasing and circulation benefits**

A Right-Sized and Well-Designed Intercity Bus Station Can Complement Burnham Place and Union Station



Architectural concepts are shown for illustrative purposes only

BURNHAM PLACE

WASHINGTON, D.C.

01/09/2020

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Alternative Intercity and Charter Bus Options

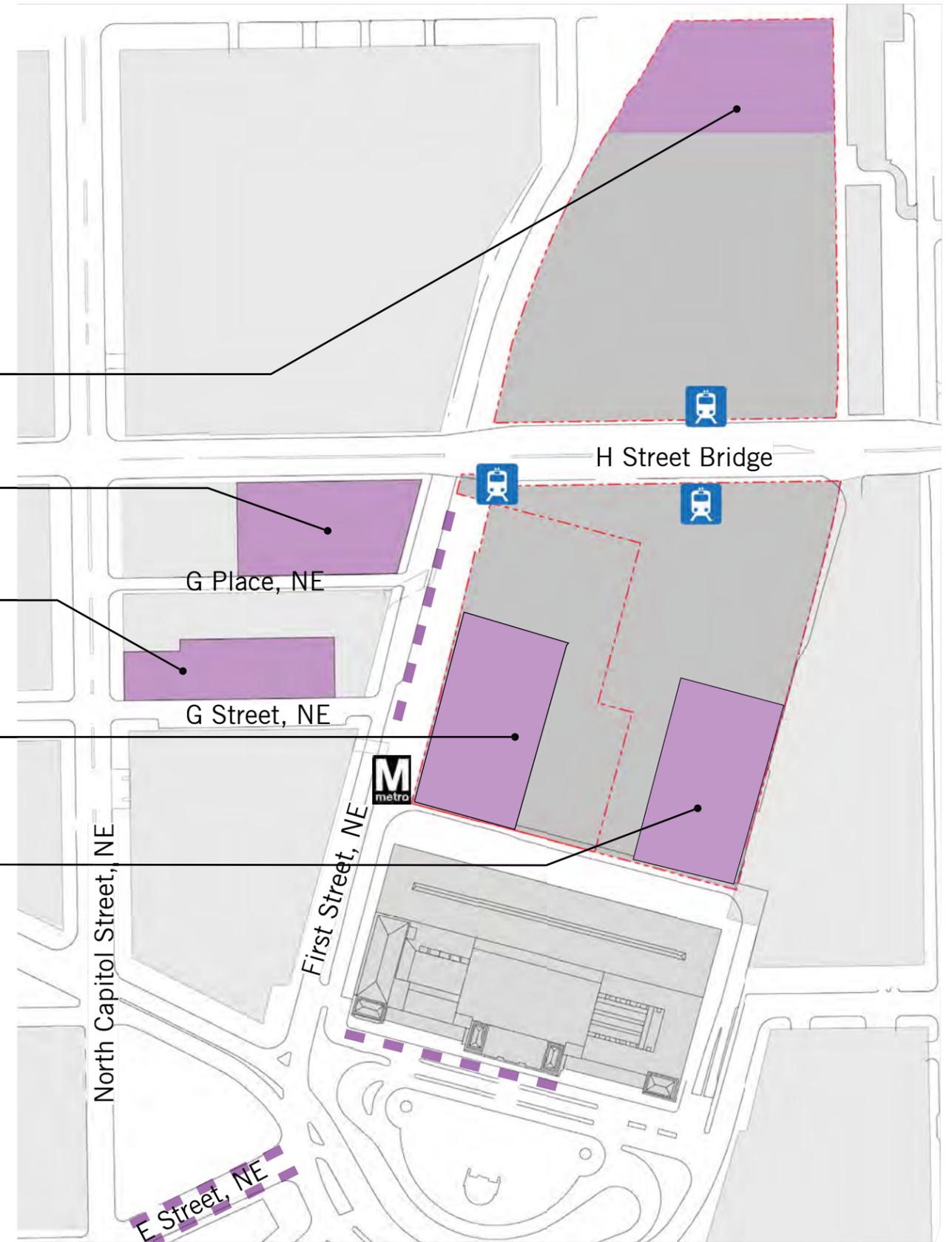
Right-sized intercity facility of 10-12 slips meets capacity goals and has multiple options for location within the station project

Charter buses are well suited for surface road pick-up and drop-off due to their seasonal nature

-  Intercity Bus
-  Charter Bus
-  Station entrance

Potential development above options 2 and 3

1. Bus on North (C-1)
2. 750 First Street
3. 10 G Street
4. SW Quadrant
5. SE Quadrant

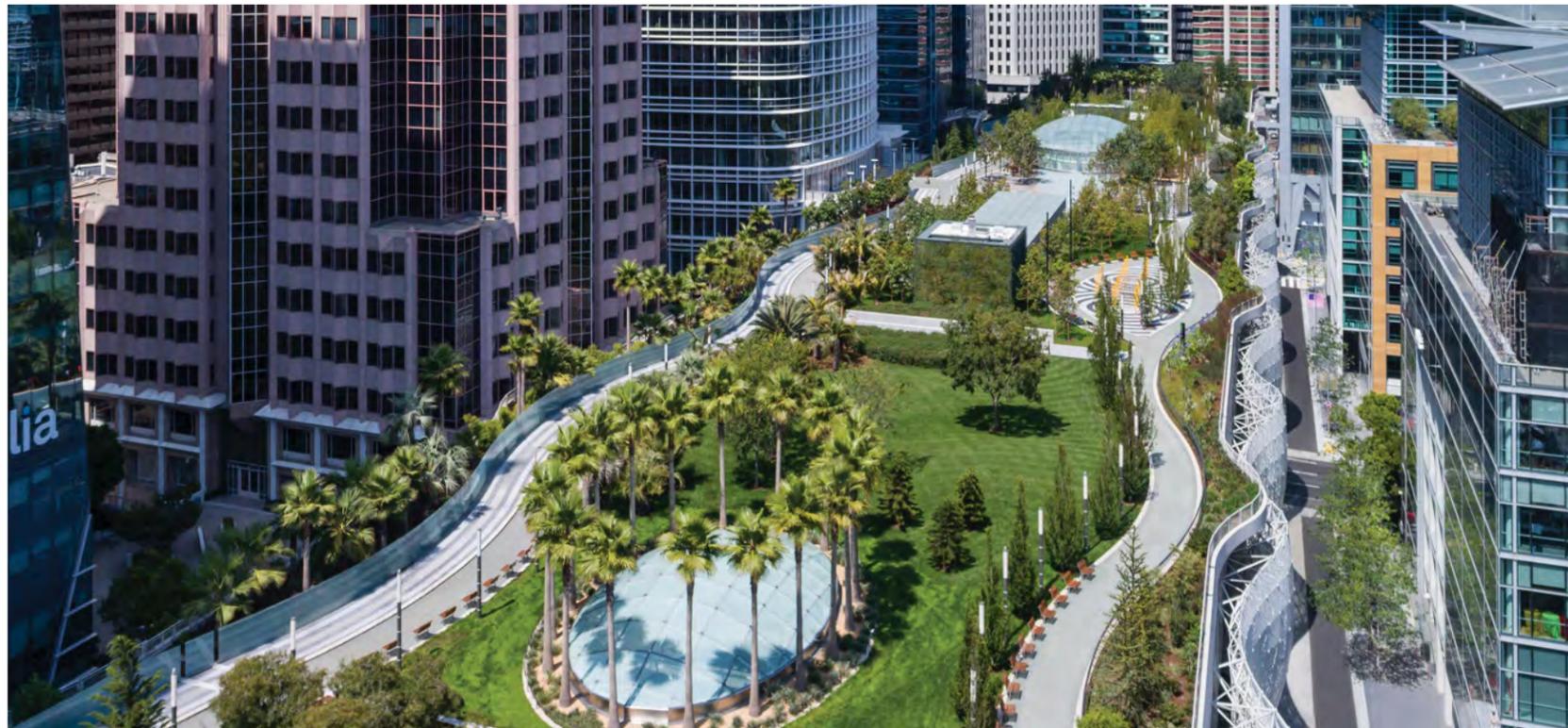


BURNHAM PLACE

- **Without broad-based support, project will not secure funding**
- **Parking-centric plan conflicts with DC Government policy and defies urban planning best practices**
- **Economic justification for building parking over train terminal is flawed**
- **Proposed project has material negative impacts to surrounding neighborhoods, Burnham Place and economic development potential**
- **Preferred Alternative requires use of half of Akridge's private property south of H Street, to which Akridge does not consent**

Summary

- **NCPC has important status in this project and can require FRA to develop a data-driven, holistic solution with broad stakeholder support**
- **Parking, bus and vehicle circulation concepts are severely flawed and have already garnered key stakeholder opposition**
- **Viable solutions are available that meet project purpose and need**



Transbay Transit Center, San Francisco

APPENDIX

Sources

Page B-2:

- Washington Union Station daily rail passengers from 2016 FRA Station Expansion Plan Concept Development Report
- St. Pancras Station daily rail passengers from: <https://dataportal.orr.gov.uk/statistics/usage/estimates-of-station-usage>

Page B-20

- Washington Union Station daily intercity rail ridership from 2016 FRA Station Expansion Plan Concept Development Report
- Philadelphia 30th Street Station 2040 daily intercity rail ridership calculated as current annual passengers divided by 300, and doubled, per p. 6 of “30th Street Station District Plan”
- Chicago Union Station 2040 daily intercity rail ridership from Chicago Union Station Master Plan Study Final Report, p. 32, May 2012: https://chicagounionstation.com/uploads/documents/CUS_MasterPlan_FinalReport_Opt.pdf
- Washington Union Station parking spaces per FRA EIS Preferred Alternative A-C, November 2019
- Existing parking within Philadelphia 30th Street Station being removed and replaced with new north concourse per “30th Street Station District Plan”
- Existing 700 space Amtrak-owned parking structure being demolished for construction of new office tower, with no replacement parking for rail passengers
-

Page B-23

- Washington Union Station daily bus ridership derived from 2016 FRA Station Expansion Plan Concept Development Report
- Listed number of bus slips at Washington Union Station is a rounded average of identified intercity bus slips in FRA EIS Alternatives A through E
- Per “30th Street Station District Plan” p. 78, intercity bus facility includes 7 bays for up to 20 peak hour buses and 9,600 daily intercity passengers (average of the stated 8,300 to 10,900 passengers)
- Rotterdam intercity bus capacities verified through schedule examination and field observation, September 2019
- Hamburg, Germany bus capacities sources <https://www.intelligenttransport.com/transport-articles/2199/hamburgs-new-central-bus-station/>, <https://www.zob-hamburg.de/departures.php>

ATTACHMENT C



COUNCIL OF THE DISTRICT OF COLUMBIA
THE JOHN A. WILSON BUILDING
1350 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20004

Charles Allen
Councilmember, Ward 6
Chairperson
Committee on the Judiciary and Public Safety

Committee Member
Business and Economic Development
Education
Transportation and the Environment

November 27, 2019

The Honorable Muriel Bowser
Executive Office of the Mayor
1350 Pennsylvania Avenue, NW
Washington, DC 20004

The Honorable Phil Mendelson
Chairman, Council of the District of Columbia
1350 Pennsylvania Avenue, NW
Washington, DC 20004

Dear Mayor Bowser and Chairman Mendelson:

The Federal Railroad Administration (FRA) recently released its preferred plan for the Union Station Expansion Project. After reviewing the concept and meeting with key stakeholders, including representatives from ANC 6C, I believe this federally-produced plan would create significant adverse effects for the District of Columbia, as well as the surrounding Capitol Hill, Near Northeast, and NoMa neighborhoods in Ward 6. The expansion of Union Station represents a once-in-a-century opportunity for one of the busiest transit hubs in the region, and the largest within the District, that will shape movement in and out of our city for generations to come. The plans released fall well short of capturing the extraordinary potential associated with this important project.

Union Station's expansion represents the single greatest economic development and transportation opportunity for the District of Columbia. By more than doubling the station's daily capacity for Amtrak and commuter rail passengers, the job growth, fiscal benefits, and mobility improvements are immeasurable. Unfortunately, the FRA's proposed plan disregards and subordinates the interests of District residents and stakeholders to objectionable or ill-advised priorities. The misguided direction of the current plan would be a costly investment in infrastructure that undermines rather than enhances the District of Columbia's efforts to increase economic vitality, livability, and urban experience.

Union Station is and should be a national gateway to the District of Columbia. The Station Expansion and related projects are an opportunity to produce a vital and nationally significant transportation center with great public spaces on par with those in any world class city. The FRA-preferred plan shrinks from

the opportunity before us, damages the District's long-term interests in Union Station's potential, and will create substantial harm that cannot be easily reversed in the future. I urge greater priority and engagement among District stakeholders in this project as we are at a serious inflection point, now entering the fifth and final year of a federal environmental review process.

I ask that we work collectively to strengthen the District's role and guide the needed course correction to shape this historic and monumental investment to ensure that the Union Station Expansion Project seizes on the opportunity before us to create a world-class transit hub that is integrated into the surrounding communities and protects the District's long-term needs.

Sincerely,



Councilmember Charles Allen, Ward 6
Chair, Committee on the Judiciary and Public Safety

cc: John Falcicchio, Interim Deputy Mayor for Planning and Economic Development
Andrew Trueblood, Director – Office of Planning
Jeff Marootian, Director – Department of Transportation
Karen Wirt, Chair – Advisory Neighborhood Commission 6C

CFA 21/NOV/19-3

LOCATION

50 Massachusetts Avenue, NE
Washington, DC

OWNER

Federal Railroad Administration
Union Station Redevelopment Corporation

PROPERTY

Washington Union Station

DESCRIPTION

Station expansion project (Federal properties)

REVIEW TYPE

Information presentation

SUBMITTED DOCUMENTS

[Union Station presentation](#)

Letter

27 November 2019

Dear Mr. Valenstein:

In its meeting of 21 November, the Commission of Fine Arts was pleased to hear an information presentation on plans for the renovation and expansion of Washington's Union Station, the historic building and complex that accommodates commuter and intercity rail service, Metrorail, retail, parking, and the city's central bus station. The Commission expressed support for Alternative A-C, the project team's preferred approach, and provided the following comments.

The Commission members noted the ambitious scope of the project, which will provide extensive modernizations for a wide-ranging program, to be implemented while the station remains in operation. They expressed support for the general approach, sectional disposition, and plan layout of the programmatic elements in the preferred alternative; they added that the inclusion of the bus terminal at Union Station is an important, equitable convenience for travelers. For the development of the plan, they commented that the design of the expansion in relation to the H Street viaduct needs careful consideration with the goal of avoiding the perception of the viaduct as an impediment to people's use of the area. They also commented that the conceptualization of the train hall should be carefully developed so that its design can appropriately express its intended civic role.

Regarding the parking program, the Commission members expressed concern that the planning for this long-term project seems to be based on a model of past decades that may not be a useful predictor of future needs. They observed that Union Station is not primarily a retail destination, but the parking program appears sized to accommodate large numbers of retail customers; the resulting built form, in conjunction with a large two-level bus terminal, generates an ungainly above-ground volume that presents aesthetic and programmatic problems in designing the area above the train platforms. They suggested reconsideration of this component of the project, in conjunction with further study of retailing trends, in order to develop a more appropriately sized and sympathetically configured massing.

The Commission looks forward to review of the project when it is submitted at the concept level. As always, the staff is available to assist you.

Sincerely,

/s/Thomas E. Luebke, FAIA
Secretary

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

cc: Beverley Swaim-Staley, Union Station Redevelopment Corporation
Hany Hassan, Beyer Blinder Belle



Government of the District of Columbia

Advisory Neighborhood Commission 6C

P.O. Box 77876 Washington, D.C. 20013 | (202) 547-7168

November 16, 2019

The Honorable Muriel Bowser
Executive Office of the Mayor
1350 Pennsylvania Avenue, NW
Washington, D.C. 20004

The Honorable Phil Mendelson
And Members of the Council
Council of the District of Columbia
1350 Pennsylvania Avenue, NW
Washington, D.C. 20004

Re: Union Station Expansion Project

Dear Mayor Bowser and Councilmembers:

We are writing to express our urgent concerns regarding the Union Station Expansion Project and to call upon you to provide the leadership necessary to ensure this project succeeds in providing a world-class transportation center worthy of the nation's capital and the residents of the District of Columbia.¹

As you are aware, the Union Station Redevelopment Corporation (USRC) and Amtrak are proposing an expansion of Union Station. The Federal Railroad Administration (FRA) is the lead agency and has been coordinating the Environmental Impact Statement (EIS) and Section 106 process for over four years.

The stated goals of this proposed multi-billion dollar project are to improve the station's functionality, enhance the customer experience, and meet increased demand for transportation services. In addition, the project is supposed to include preservation and maintenance of the historic building as well as sustain the station's economic viability and its integration with adjacent neighborhoods, businesses and planned development.

We have grave concerns that the Action Alternatives developed by the FRA to date in the EIS process would significantly and needlessly harm the station and the surrounding neighborhoods.² We do not see any Action Alternative to date that meets the goal of a successful integration of the expanded station with either the adjacent neighborhoods or the planned development of the Railroad Air Rights known as the Burnham Place project. Union Station is a multimodal transportation hub located in the center of the District in a vibrant and growing neighborhood, yet the Action Alternatives to date prioritize private automobile usage and parking over mass

¹ On November 13, 2019 at a regularly scheduled, duly noticed monthly meeting of ANC 6C, with a quorum of 6 out of 6 commissioners and the public present, the above-mentioned item came before us. The commissioners voted unanimously, 6:0:0, to send this letter to express our urgent concerns regarding the Union Station Expansion Project.

²See ANC 6C letters to the Federal Railroad Administration, May 14, 2018 and May 9, 2019.

transit, walking and biking. These alternatives are contrary to the proposed DC Comp Plan. We believe there is little need to accommodate private parking at the station, especially where doing so would sacrifice the opportunity for the development of vibrant public spaces, as would occur if a massive above-ground parking garage were constructed.

Furthermore, we believe the Action Alternatives to date include poorly planned station access and circulation for private cars, for-hire vehicles, and local and intercity buses. As currently envisioned, the expanded Union Station would be surrounded by a snarl of cars and buses, creating a barrier to access for the residents of the surrounding neighborhoods and leading to an increase in traffic on the narrow streets of the Capitol Hill historic district.

There is still time to influence this project. The FRA has announced a meeting on November 19, 2019, to share information on a new alternative as part of the Section 106 process. ANC 6C believes that the senior leadership of the Office of Planning and the District Department of Transportation should be actively involved making clear the District's priorities in reducing dependencies on car traffic, creating active street life and well-designed public spaces, and enhancing one of the crown jewels among the District's historic landmarks.

As we approach a critical inflection point for this massive and critically important project, we have grave concerns that the interests of community members and District residents are being given short shrift in the planning process. The result threatens to be not just a major missed opportunity, but a costly investment in infrastructure that undermines rather than enhances the District of Columbia's efforts to increase resilience, equity and livability in our built environment.

Union Station is and should be a national gateway to the District of Columbia. This is an opportunity to create both a great public space that people will want to visit as well as a world class transportation center that can be a model for the country and the world. We urge you to recognize the potential for this project and to guide its development at this crucial time.

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

On behalf of ANC 6C,



Karen Wirt
ANC 6C Chair

Cc: The Honorable Eleanor Holmes Norton
Andrew Trueblood, OP
Jeff Marootian, DDOT
David Valenstein, FRA
Beverly Swaim-Staley, USRC
Johnette Davies, Amtrak