

Information Presentation

Commission Meeting: July 9, 2020

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

7746

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SUBMITTED BY
Staff of the National Capital Planning Commission

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PURPOSE AND OVERVIEW

The purpose of this information presentation is to provide an update on the Washington Union Station Expansion Project and seek the Commission's comments on staff's review of the Draft Environmental Impact Statement (DEIS), which is currently available for public comment. 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 (WUS). The Federal Railroad Administration (FRA) has prepared the 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 for its approval over projects on federal land. The historic station, existing parking structure, and bus facilities are located on federal (FRA) land.

The Commission reviewed the concept plans for the project in January 2020. The Commission provided a series of requests to help facilitate the next project review. These included the request that FRA substantially reduce the number of parking spaces, and that the applicant, private development owner, and staff work with the District of Columbia Office of Planning (DCOP) and District Department of Transportation (DDOT) to evaluate and confirm the appropriate amount of parking given the mix of uses, traffic and urban design impacts, and transit-oriented nature of the project, prior to the next stage of review. The result of this request was the creation of the parking working group which met through the spring of 2020 to discuss the proposed parking program.

After initial review of the DEIS, staff has outlined some preliminary findings and comments and seeks the Commission's general concurrence. For this discussion, staff has focused on parking which was the main subject of discussion at concept review. Following the information presentation, staff will summarize these and other Commission comments in a letter that will be transmitted to FRA. The comments should provide feedback to FRA regarding the DEIS and guidance regarding how the Commission will evaluate the project when it is submitted for the next concept review. Staff has advised FRA that they should submit a revised concept plan to NCPC that responds to the Commission's previous comments prior to the release of the Final EIS.

PROJECT SUMMARY

The 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.

KEY INFORMATION

- The 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.
- FRA is the lead federal agency for the purposes of compliance with NEPA. USRC and Amtrak are the project proponents.
- The DEIS includes six action alternatives, and the project proponents have identified one Preferred Alternative A-C, which is unchanged from what the Commission reviewed in the January 2020.
- Although the proposed parking (1,600 spaces) is less than the existing parking (2,200), the parking has not been altered with the concept review. At that time the Commission requested the applicant "substantially reduce the number of parking spaces."
- The parking includes space for long-term train and bus riders, retail and office, and rental cars.
- FRA as owner, and USRC as operator of WUS, have concluded that the best currently available information does not warrant a further reduction of the parking program at this time. Both are aware of the possibility that conditions could sufficiently change during the development of the project and, if so, have indicated they would consider re-examining the parking program as appropriate.
- NCPC reviews projects on federal land in the District of Columbia in-lieu of local zoning approval. In this instance, the historic Union Station and existing parking garage and bus facilities are located on federal land Absent a zoning code, the Commission looks to the Comprehensive Plan to guide its decision making. At concept review, staff noted that the federal Transportation Element provides specific guidance for federal employee parking. However, 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 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.
- In response to the Commission's action in January 2020, the DC Office of Planning and District Department of Transportation have issued a *joint Report to NCPC re: Appropriate Parking Numbers for the Washington Union Station Expansion Project* ("District Parking")

Report") dated June 5, 2020 providing analysis and policy background regarding the proposed parking at Union Station.

- The District report recommends about 300 parking spaces at Union Station.
- In response the Commission's request for additional coordination among the stakeholders, a series of parking working group meetings were held through the spring of 2020. The working group included FRA, USRC, NCPC staff, the District Department of Transportation (DDOT), the District Office of Planning (DCOP) and Amtrak. FRA's parking recommendations are outlined in the DEIS and the District Parking Report outlines the recommendations of DCOP and DDOT. Much of the focus has been on the provision of long-term parking.
- At the concept review, the Commission asked to better understand the proposed private air rights development adjacent to the station. Akridge is the owner and developer and they have discussed with staff their concerns with the WUS alternatives. Akridge provided an Information Presentation to the Commission in May 2020 to describe their project and areas for collaboration with the expansion project.
- The adjacent private air rights development called Burnham Place will be reviewed by NCPC as a referral from the District of Columbia Zoning Commission for comments.

PRELIMINARY STAFF COMMENTS

The fundamental planning question related to parking is understanding how the garage functions today, in particular how many parkers can be attributed to travel/transit use versus commercial uses, and what are the trends and assumptions that will inform how much parking is needed in the future. The parking program includes several components with different users, including short term (retail/office), long term (bus/train) and rental car spaces. Therefore, the analysis that follows has been broken out by categories of use. As noted previously, the Commission previously requested the applicant substantially reduce parking. While parking has been reduced from the existing conditions, no reduction has occurred since concept review.

Regarding long-term parking:

- The number of train users parking at the garage appears to be declining, according to more recent Amtrak ridership information. Further, Amtrak has indicated they do not require passenger parking for their operations at Union Station. The District of Columbia has reiterated that they do not believe long-term parking for train and bus users is necessary at the station given its multimodal function. Given this, FRA should provide additional documentation or support to justify the inclusion of long-term parking at the station.
- An increase in monthly parkers and decrease in train riders parking at the station suggest
 the purpose of the garage may be shifting from traveler-oriented to one more serving
 commercial uses. FRA should evaluate whether these trends are in fact changing the

occupancy of the garage, and if so, whether the need for substantial long-term parking remains justified.

Regarding commercial/short-term parking:

- The District of Columbia agencies recommend no parking for retail uses and some limited parking for office uses. They note that retail may be supported by increased station visitation through 2040. Therefore, FRA and USRC should evaluate whether parking is necessary for retail uses at the station given the station's anticipated growth in visitation and high level of multimodal accessibility.
- While parking demand for train riders appears to be declining, the overall parking occupancy levels appear constant. This suggests other users are taking advantage of the available parking supply. FRA and USRC should evaluate if this is the case. Further, NCPC is interested in understanding whether parking related to non-station offices uses is increasing and whether the provision of such parking is consistent with the project's purpose and need. The Commission's perspective on such parking may be a consideration for the next concept review.

Regarding rental parking:

 Based on FRA information, existing rental operations support both station and local neighborhood users At the same time, some amount of parking within the garage also appears to be dedicated to other car-sharing services for whom the primary user is not clear. DCOP and DDOT found that there was not sufficient data to support a rental car facility within that station at this time. As such, FRA and USRC should provide additional information to explain how these services support multimodal functionality at the station.

Regarding other issues:

• Staff will continue to review the DEIS for additional comments regarding access, circulation and urban design. Overall, the project should maximize accessibility for station users, including the surrounding neighborhoods. Circulation should prioritize pedestrian and bicycle movement, and avoid or minimize conflicts with vehicles. In terms of urban design, the overall height and bulk of the new development should respect the historic station building. Active ground floor uses, civic spaces and other placemaking opportunities, should be integrated into the project plans. These components should be clearly described in the revised concept submission to the Commission.

PROJECT TIMELINE

Previous actions	July 2016 – Information Presentation on proposed WUS Expansion Project	
	January 2020 - Concept Review of proposed project	

Remaining actions (anticipated)	 Review of revised concept plans that respond to previous Commission comments
	 Approval of preliminary and final site and building plans

ANALYSIS

Project Overview

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.

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 action alternatives, and the project proponents have identified one preferred alternative in the submission. The preferred Alternative A-C is unchanged from what the Commission reviewed in January 2020. 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 proposed parking is unchanged from what the Commission reviewed in January, and approximately 1,600 parking spaces are proposed. This is a reduction from the current 2,200 striped spaces located within the parking garage today.

The project is in the NEPA process, and therefore the alternatives are shown as general diagrams identifying the general placement and configuration of facilities. Staff notes that for the next NCPC review, FRA will need to submit a revised concept design that respond to the Commission's previous comments and that provides the necessary level of design development (10-15%) to sufficiently detail the project plans.

NCPC Review Authority

NCPC has review and approval authority for projects located on federal land within the District of Columbia pursuant to the National Capital Planning Act. In this instance, the historic Union Station and existing parking garage and bus facilities are located on federal land and are subject to NCPC review and approval. The adjacent private air rights development called Burnham Place will be reviewed by NCPC as a referral from the District of Columbia Zoning Commission for comments. As such, NCPC is the only body that will review both projects.

NCPC reviews projects on federal land in the District of Columbia in-lieu of local zoning approval. Absent a zoning code, the Commission looks to the Comprehensive Plan to guide its decision making. At concept review, staff noted that the federal Transportation Element provides specific guidance for federal employee parking. However, 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 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. In response to the Commission's action in January, NCPC staff consulted with DCOP and DDOT to understand how the local planning jurisdiction would evaluate the proposed parking at Union Station.

Commission Comments - January 2020 Concept Review

The Commission reviewed the concept plans for the project in January 2020 and adopted a series of comments, requests and recommendations. In particular, the Commission supported the overall project purpose and goals. The Commission also expressed support for the reconfiguration of the train platforms to create greater efficiency, improve accessibility, and enhance the user experience; 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; and found that the rail station, bus facility and Metrorail Station should be located in close proximity to each other to facilitate intermodal connections for travelers. The overall importance of Union Station as an important gateway to the national capital and a transportation hub is highlighted in the Comprehensive Plan.

The Commission action also included a series of requests to help facilitate the next project review. These included the request that FRA substantially reduce the number of parking spaces, and that the applicant, private development partner, and staff work with the DCOP and DDOT to evaluate and confirm the appropriate amount of parking given the mix of uses, traffic and urban design impacts, and transit-oriented nature of the project prior to the next stage of review. The result of this request was the creation of the parking working group which met through the spring of 2020 to discuss the proposed parking program.

At the concept review, the Commission also asked to better understand the proposed air rights development. Akridge is the owner and developer. They have discussed with staff their concerns regarding the WUS alternatives. Subsequently, Akridge provided an Information Presentation to

the Commission in May 2020 to describe their project and areas for collaboration or coordination with the Washington Union Station Expansion Project.

Parking Evaluation

In response the Commission's request for additional coordination among the stakeholders, a series of working group meetings were held through the spring of 2020. FRA's parking recommendations are outlined in the Parking Memorandum included as Appendix A6 of the DEIS. DCOP and DDOT prepared and submitted the District Parking Report to NCPC which is dated June 5, 2020 describing the District policies and position regarding parking. The fundamental planning question related to parking is understanding how the garage functions today, in particular how many parkers can be attributed to travel/transit use versus commercial uses, and what are the trends and assumptions that will inform how much parking is needed in the future. In particular, the amount of long-term parking necessary for train and bus users has been the source of significant discussion.

Overview of Positions

It is important to note that the parking program includes several components with different users, including short term (retail/office), long term (bus/train) and rental car spaces. As such, the analysis that follows has been broken out by categories of use. Currently, there are 2,200 striped parking spaces within the parking garage and an additional 295 rental car spots. According to USRC and FRA, those spaces are 90% occupied on average.

FRA projections suggests a need for 2,700-2,800 spaces in 2040; however, FRA recommends about 1,600 spaces in the preferred alternative. This is the same number of spaces that was presented to the Commission at concept review. Despite the Commission's request to substantially reduce the parking number, FRA as owner, and USRC as operator of WUS, have concluded that the best currently available information does not warrant a further reduction of the parking program at this time. Both are aware of the possibility that conditions could sufficiently change during the development of the project and, if so, have indicated they would consider re-examining the parking program as appropriate. FRA and USRC have stated they will continue to coordinate with the District and NCPC regarding parking and other issues.

The District of Columbia agencies' analysis, found in the parking report provided to NCPC, recommends approximately 300 spaces based on District policies, analysis of the project's parking demand, and a review of comparable facilities. The recommendation includes parking for the office components of the station development, as well as some limited short-term parking for travelers and accessible spaces for those with mobility needs. A summary of the FRA/DEIS and District Agency positions is included in the table below. Staff notes the largest differences are focused on long-term parking.

Existing Condition	FRA Proposal	District Recommendation
2,200 spaces + 295 rental car	1,575 spaces	295 spaces
	(600 retail, 900 other/long-term,	(206 office, 40 short-term, 49
	75 rental car)	ADA)

A. Long-Term Parking

Long-term parking refers to spaces for train and bus users. The parking working group has had extensive discussions over two issues regarding long-term parking: 1) how much of the long-term parking today is attributed to train and bus users (as opposed to downtown office users); and 2) what assumptions should inform how much long-term parking for train and bus users will be needed in the future.

<u>Long-Term Parking – Current Conditions and Future Needs</u>

FRA estimated long term parking use today through two methods. The first applied the Amtrak rider survey parking rate of 8% to determine how many spaces are used by train riders. The second method assessed recent occupancy of the parking garage. In this method, all vehicles that are in the garage for more than one day are assumed to be using the Amtrak or intercity services, with monthly parkers not counted. Both methods yielded similar estimates of around 1,200 spaces used today by long-term parkers.

Given the above calculation and the assumed existing long-term parking, FRA applied a 95% growth for users to calculate the 2040 needs, resulting in an estimated need around 2,400 spaces. This growth reflects a direct correlation with the anticipated growth in ridership over the same time. The calculation was also based on the 2015/16 Amtrak ridership survey that showed about 8% of Amtrak users are parking at the garage.

Reassessing Long-Term Parking

In a memorandum dated January 7, 2020, Amtrak stated that the proportion of Amtrak passengers driving and parking at WUS had declined from 8 percent in 2015/2016 to 4 percent in December 2019. Secondly, staff notes that the number of monthly parkers has been growing over time. In 2017, the facility provided space for 536 monthly parkers on Level 3. These parkers were not included in the assessment of the long-term parkers. As of December 2019, FRA and USRC indicated there were a total of 1,390 monthly parkers in the garage.

The decrease in Amtrak rider use of parking, along with the increase in monthly parkers, raises questions as to the primary users of garage, and in particular whether commercial users are more predominant than rail and bus users. Additional analysis by FRA, along with information from USRC, would be helpful to understand if this is the trend. If the garage serves as a reservoir of parking for surrounding commercial uses, then its role in the expansion project may need to be reassessed.

Stakeholder Positions

In its January 2020 memorandum, Amtrak reiterated its position that parking for its passenger operations at WUS "is not essential to Amtrak's operation of intercity passenger rail" and that "Amtrak does not support any entity building a parking garage specifically to support Amtrak passengers." Given the primary function of the station as a rail hub, the relative value of long-term parking may need to be reconsidered.

Per their parking report, DCOP and DDOT indicated that they do not support general long-term parking at WUS to serve intercity rail passengers, based on (a) Amtrak's current stated position that it does not require parking for its passenger operations at WUS, (b) the level of proposed parking at other urban rail stations, (c) the availability of parking at other regional rail stations, and (d) recent reductions in parking demand reported by Amtrak and area airports.

NCPC Evaluation

The need for long term parking at Union Station for train and bus users is one that should be further evaluated. Additional analysis and information regarding recent trends in garage use is necessary and may influence the estimates for long term needs. As noted above, surveys of Amtrak passengers seem to show a declining need for parking. At the same time, monthly parkers appear to be a growing share of station users.

If the parking garage is transitioning from one that primarily serves train and bus users to one that primarily serves retail and commercial uses, the purpose of the garage should be reassessed. Amtrak and the District have both indicated they do not believe long term parking is necessary.

Proposed comments:

- The number of train users parking at the garage appears to be declining, according to more recent Amtrak ridership information. Further, Amtrak has indicated they do not require passenger parking for their operations at Union Station. The District of Columbia has reiterated that they do not believe long-term parking for train and bus users is necessary at the station given its multimodal function. Given this, FRA should provide additional documentation or support to justify the inclusion of long-term parking at the station.
- An increase in monthly parkers and decrease in train riders parking at the station suggest the purpose of the garage may be shifting from traveler-oriented to one more serving commercial uses. FRA should evaluate whether these trends are in fact changing the occupancy of the garage, and if so, whether the need for long-term parking remains justified.

B. Short Term Parking (Retail and Office Use)

The FRA parking program analysis assumes about 400 spaces for the retail/short-term parking program. According to FRA, the current need for short-term retail and visitor parking is normally between 360 and 429 spaces. FRA has stated they have assumed no growth in retail parking into the future. FRA and USRC also estimate a program of 152 spaces associated with the federal air rights development located above the garage.

The District Parking Report recommends zero retail parking. The District's *Guidance for Comprehensive Transportation Review* ("CTR Guidelines") strongly encourage projects located less than one-quarter of a mile from a Metrorail station to provide zero on-site vehicle parking, where allowable by zoning. The District report states it is often supportive of zoning relief when a project is in close proximity to transit in order to provide less parking than Zoning Regulations would normally require.

The District believes that the future retail operations will be fully supported by the anticipated significant increase station use which are not served by single-occupancy vehicles. Additionally, this increase in foot traffic does not account for additional increase in Metrorail ridership or increases in tourist and local neighborhood foot traffic due to population growth. The District believes the tens of thousands of additional persons walking through Union Station who do not require onsite private vehicle parking will more than adequately support the future retail program; moreover, the District does not view WUS's retail program as one for which people will drive to as a destination and park, either today or in the future.

The District report recommends 206 spaces for the Federal air-rights office program, which is the maximum of their framework. The District recommends this level because of the trip generation profile of office uses, likely office lease requirements that parking be provided, and the need for office uses at WUS to be competitive with other office space in the District. The District report also recommends some limited (40) short term spaces for intercity travel and Americans with Disabilities Act (ADA) spaces.

Proposed comments:

- The District of Columbia agencies recommend no parking for retail uses and some limited parking for office uses. They note that retail may be supported by the increased station visitation through 2040. Therefore, FRA and USRC should evaluate whether parking is necessary for retail uses at the station given the station's anticipated growth in visitation and high level of multimodal accessibility.
- While parking demand for train riders appears to be declining, the overall parking
 occupancy levels appear constant. This suggests other users are taking advantage of
 the available parking supply. FRA and USRC should evaluate if this is the case.
 Further, NCPC is interested in understanding whether parking related to non-station
 offices uses is increasing and whether the provision of such parking is consistent with

the project's purpose and need. The Commission's perspective on such parking may be a consideration for the next concept review.

C. Rental Cars

Approximately 295 rental car spaces are in use today. These include the traditional rental car agencies. Based on information from rental car operators, USRC understands that the rental car program serves both intercity passengers and local District residents, with intercity passengers accounting for approximately 45 percent of the demand, and District businesses and residents making up the other 55 percent. FRA has stated 75 spaces are necessary to comply with current lease obligations.

According to the DEIS materials, the garage also includes Zipcar and Maven car-sharing, but these occupy normal parking spaces as long term or monthly leases. It is unclear how these are be accounted for the parking analysis and whether users of these car-sharing services are in fact using the station as well. FRA also notes that other car uses, such as storage for autonomous vehicles, may need to be considered in the future.

The District parking report indicates inclusion of a traditional rental car facility at the station is not necessary unless there is data to support that the facility is needed for intercity travelers. The report states that without such data, it would be more appropriate for a rental car facility to locate in the surrounding area to serve residents.

Proposed comments:

• Based on FRA information, existing rental operations support both station and local District users in the neighborhood. At the same time, some amount of parking also appears to be dedicated to other car-sharing services for whom the primary user is not clear. DCOP and DDOT found that there was not sufficient data to support a rental car facility within that station at this time. As such, FRA and USRC should provide additional data to explain how these services support multimodal functionality at the station.

Other Comments

Staff will continue to review the DEIS for additional comments regarding access, circulation and urban design. Overall, the project should maximize accessibility for station users, including the surrounding neighborhoods. Circulation should prioritize pedestrian and bicycle movement, and avoid or minimize conflicts with vehicles. In terms of urban design, the overall height and bulk of the new development should respect the historic station building. Ground floor uses, civic spaces and other placemaking opportunities, should also be integrated into the project plans. These components should be clearly described in the revised concept submission to the Commission.

Review Process and Next Steps

Following the Information Presentation, staff will summarize the Commission comments and prepare a letter for transmittal to FRA. will consider public comments as they prepare the Final EIS. Following this, the next step is for FRA to submit the project as a revised concept and address the planning issues raised by the Commission during the initial concept review. Preliminary and Final approval occur between 30-70 percent design development for the entire project.

While FRA may advance their preferred alternative, ultimately the Commission will determine and approve the appropriate level of parking for the project. That parking number will be included in the Commission's final approval for the project and will be reflected in the Record of Decision (ROD) prepared to satisfy NCPC's NEPA obligations. The ROD will be signed at the time of final review.

Documents Available Online:

- DEIS Executive Summary
- District Parking Report
- DEIS FRA Parking Memorandum

Attachment:

• Project Overview and Alternatives



Washington Union Station Expansion Project

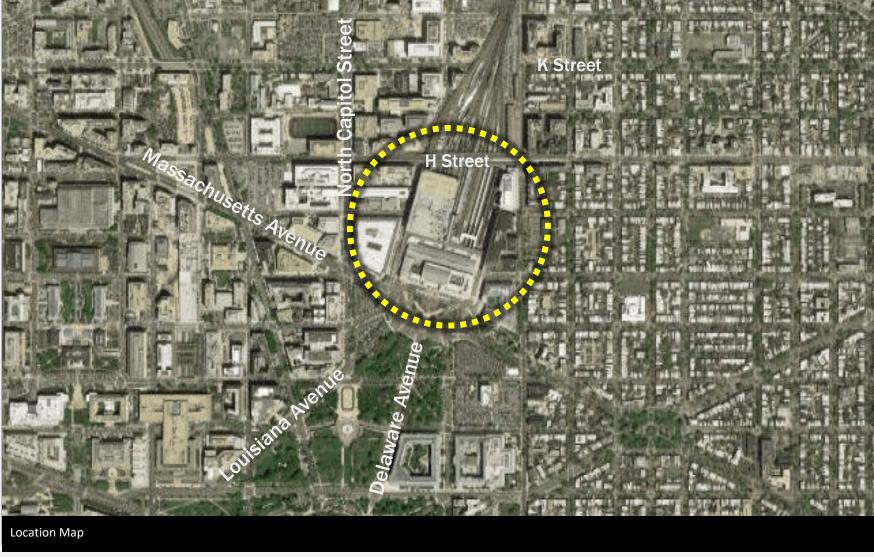
50 Massachusetts Avenue, NE, Washington, DC

Information Presentation

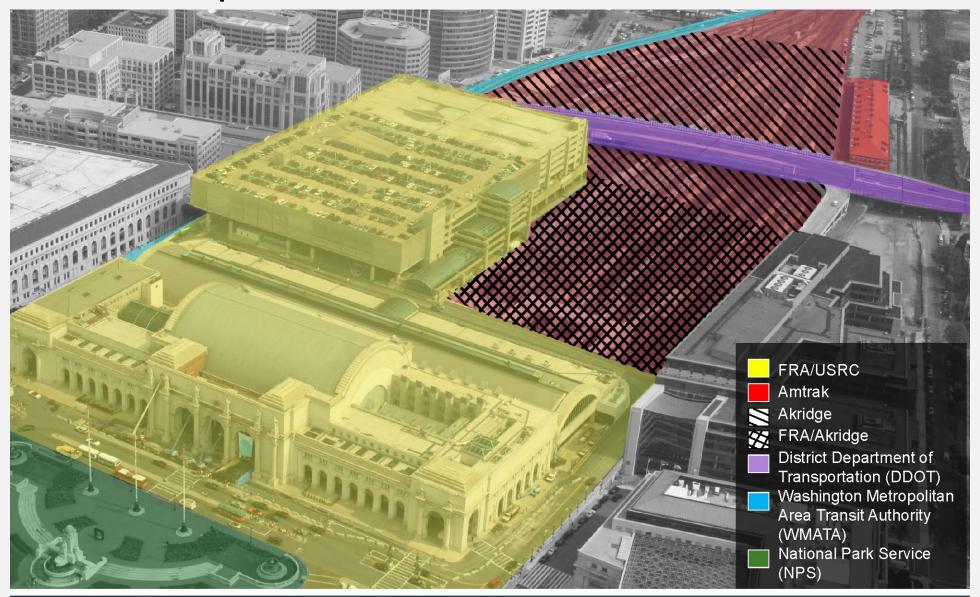
Staff of the National Capital Planning Commission

Site Location





Station Ownership & Jurisdictions



Union Station Background



Project Goals



Components of Alternatives

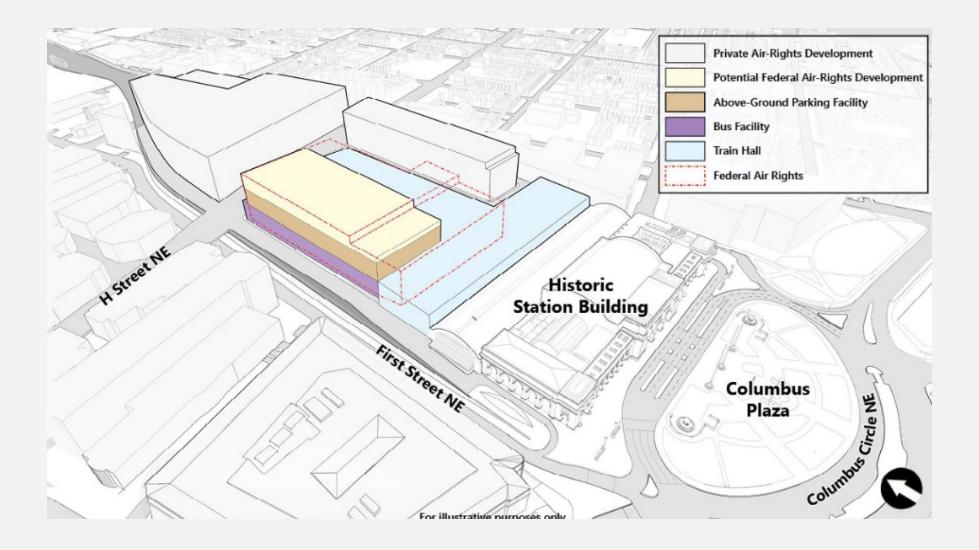
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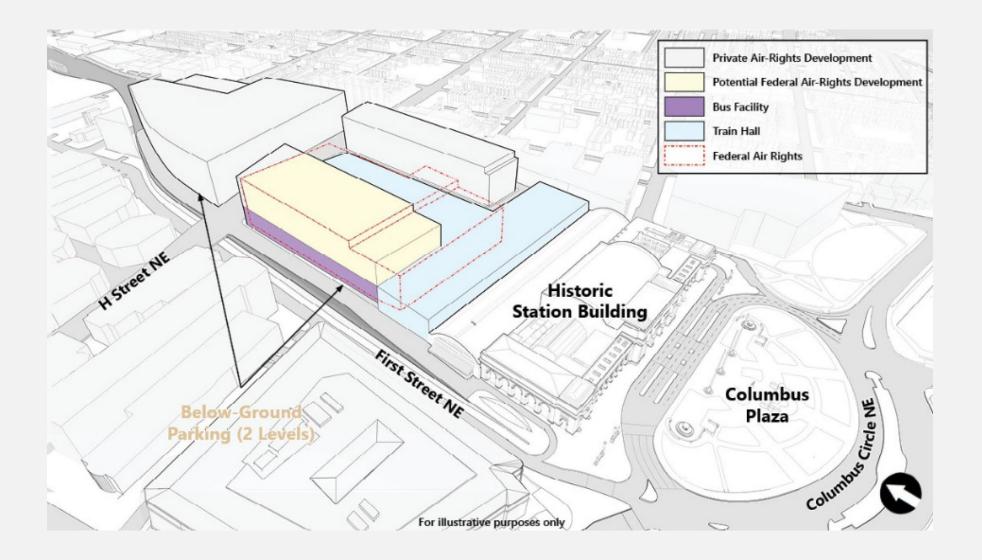
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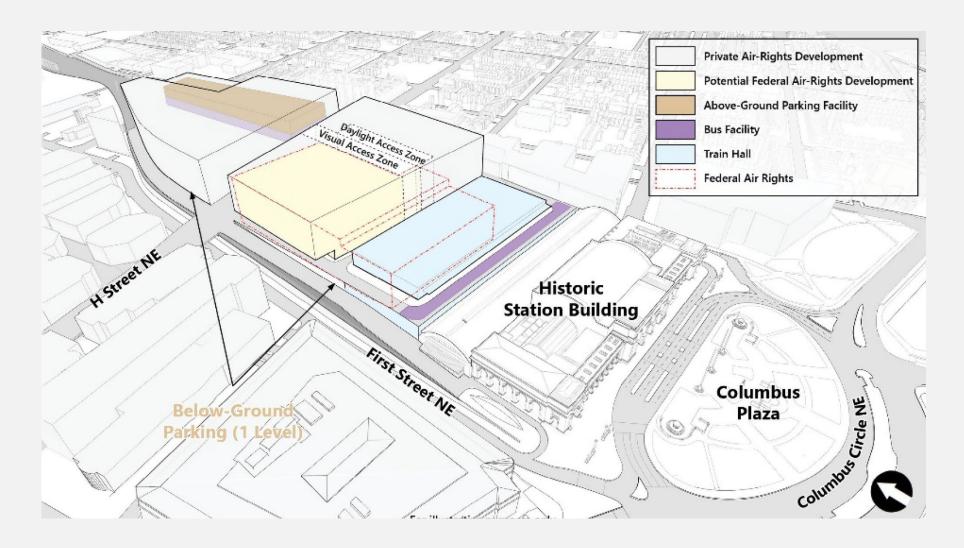
Alternative A



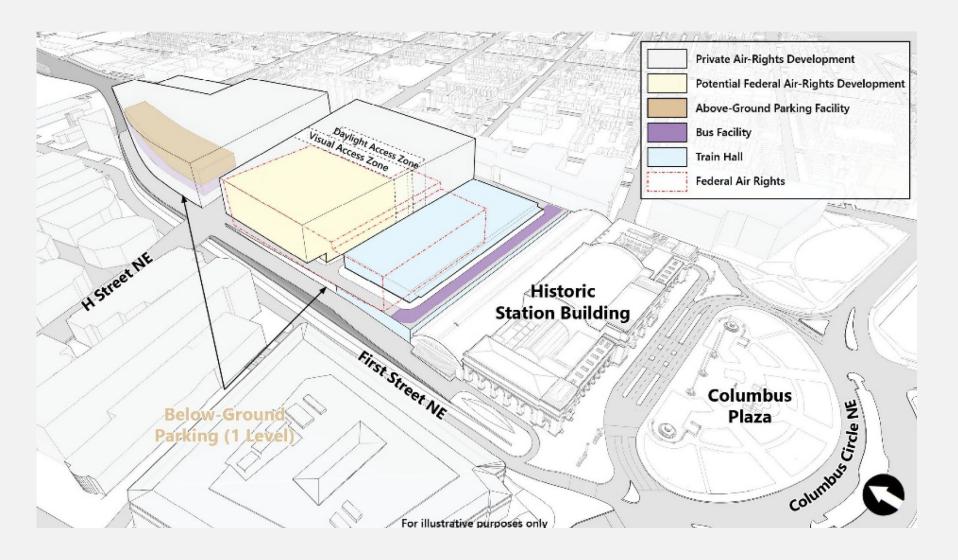
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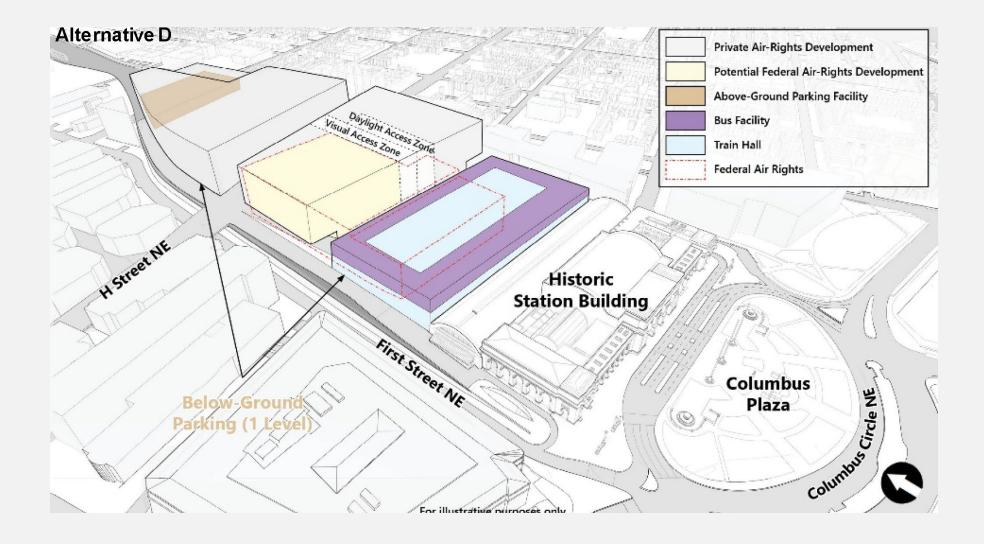
Alternative C – East Option



Alternative C – West Option

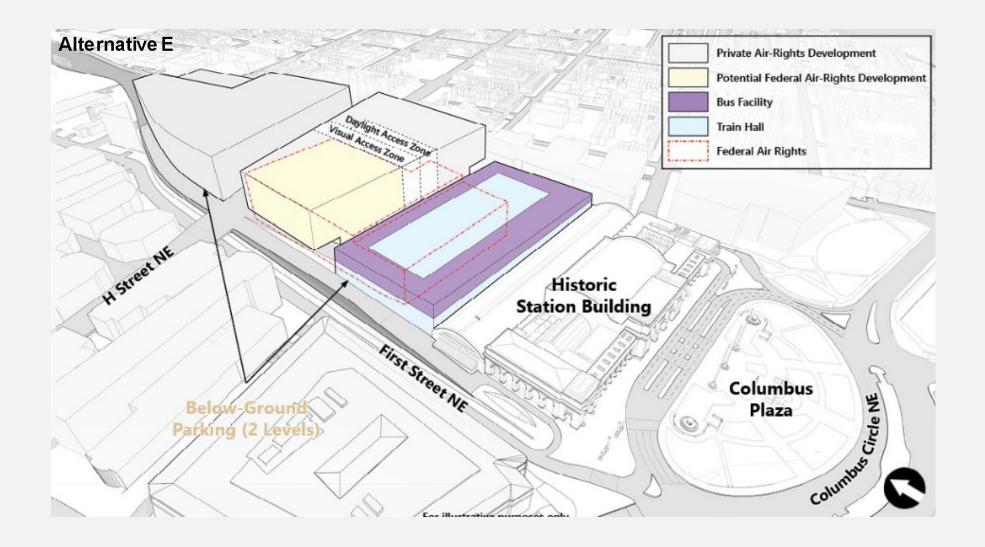


Alternative D



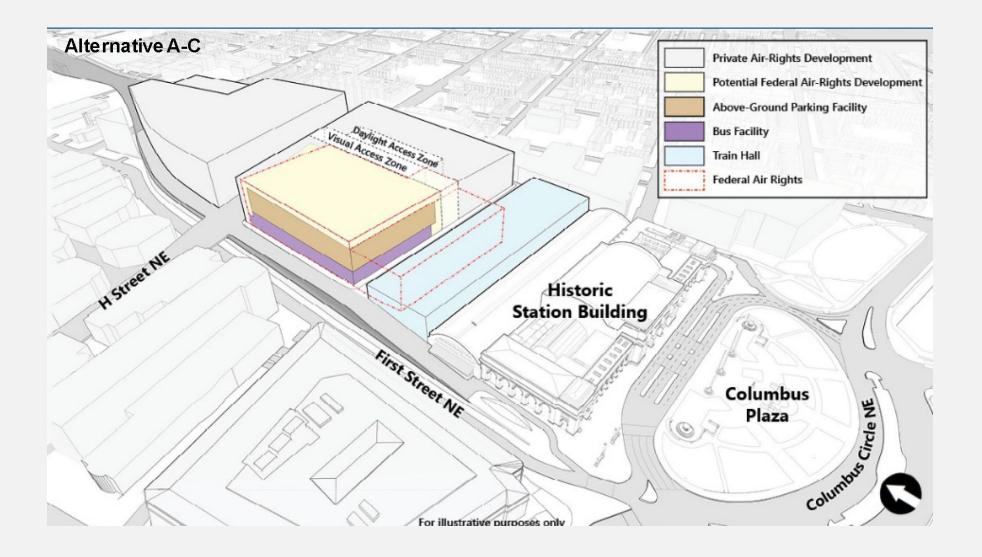
11

Alternative E



12

Alternative A-C



13