

IN REPLY REFER TO:  
NCPC FILE No. 7746

July 21, 2020

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

Re: Comments on Washington Union Station Expansion Project Draft Environmental Impact Statement – Parking Program

Dear Mr. Valenstein:

In January 2020, NCPC reviewed the concept plans for the Washington Union Station Expansion Project. The Commission provided a series of comments and recommendations to help facilitate the project development. In particular, they requested that FRA substantially reduce the number of parking spaces. The Commission also asked 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.

At the July 9, 2020 Commission meeting, NCPC staff presented an initial analysis of the parking program included in the Draft Environmental Impact Statement (DEIS) for the project. Staff advised that FRA had not altered the proposed parking levels in the DEIS since the concept review in January. Commission members were unanimous in expressing significant concern that FRA had not undertaken a good-faith effort to reduce the parking program per the Commission's previous request, and further, expressed frustration that their initial comments did not appear to have been heard by FRA. The Commission was clear that the next project submission should include a substantial parking reduction and that it is incumbent upon FRA to accommodate that reduction in the EIS documentation.

Commission members noted the unusual consensus from a number of stakeholders about reducing the parking program, including the Advisory Neighborhood Commission, (ANC), Congresswoman Eleanor Holmes Norton, the District agencies, and several District Councilmembers. They noted that such unanimity is unusual in such a large and complex project.

The Commission underscored the importance of accommodating the projected increase in ridership while recognizing the project's implications for infrastructure, urban design, and land use will likely impact federal, District and neighborhood interests. The Commissioners also expressed the need for an overarching vision that will help frame these issues and provide a guide to the decision-making necessary for such a complex and interwoven undertaking. While the Commission's comments largely focused on parking, staff will provide additional comments on circulation, urban design and other aspects of the alternatives during the public comment period.

### Proposed Parking

Staff noted the parking report developed by the District Office of Planning and the District Department of Transportation recommended substantially less parking (300 spaces) than proposed by FRA (1,600 spaces). Commissioner Trueblood, in prepared remarks (attached), stated that there are federal, District, and neighborhood concerns. And further, the project does not meet good land use or urban design standards. He maintained that the context has changed substantially since the station was last redeveloped, and the assumptions about how the facility will operate into the future are outdated. He concluded requesting the Commission ensure that FRA will advance a project that is not only respectful of the historic laws and context, but also embodies the highest quality urban design and transportation infrastructure for this highly transit accessible area of the District.

The Commission requested additional clarity about the process moving forward, and particularly how a substantial reduction in the parking program would be reconciled with the NEPA process and NCPC's review responsibilities. They reiterated that NCPC has approval authority regarding the project, and the Commission could make a separate determination regarding the appropriate parking levels. They strongly recommended FRA work collaboratively now to avoid delays, cost increases, and changes to the project later in the process.

The Commission reiterated that the burden of proof remained with FRA and USRC to justify the necessary parking, and thus far had not done so. Below are a series of comments and requests to assist in better understanding both the existing parking needs and the future trends that may inform the proposed parking program:

- 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 (see attached Amtrak Memorandum). 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 neighboring commercial uses. FRA should evaluate whether these trends are in fact

changing the occupancy and nature of the garage, and if so, whether the need for substantial long-term parking for Union Station users remains justified.

- 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, NCPD is interested in understanding whether parking related to non-station office use 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.
- 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.
- Commissioners questioned how the project will advance given the still-outstanding questions about the parking program. In particular, FRA should describe how it envisions the NEPA process unfolding if changes are mandated to the EIS based on Commission and other public comments. It was also recommended that the EIS be robust enough to accommodate any potential changes to the parking program to not require backtracking. We recommend that FRA include an alternative reflecting the District's recommended parking level to capture the potential minimum program. This is in FRA's best interest since it would ultimately save time and effort down the road should the selected parking count fall between this number and the one initially proposed by FRA.

### Project Vision

Commissioners underscored the need for an overarching vision and high-quality urban design. At this time, the DEIS does not speak to these aspects of the project clearly. Over the next few months, staff will review the DEIS and provide 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, effective passenger pick-up and drop-off, 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.

NCPC advises continued dialogue with Akridge, the private developer of Burnham Place. We recognize the two projects are independent and will be implemented separately, but given the scale and adjacencies of each development, great opportunities exist to align the transit-oriented visions for each in a manner that is mutually beneficial. Together, the Washington Union Station Expansion Project and Burnham Place will be one of the most complex and consequential interventions proposed within the District of Columbia. Continued conversations and coordination among both owners is critical to getting each accomplished.

NCPC will continue to work with FRA on the EIS process and will continue to provide comments and planning expertise as this is a critical multimodal infrastructure investment in the nation's capital. We will also rely on the expertise of the District Office of Planning and District Department of Transportation, per the direction of the Commission at the January 2020 meeting, in evaluating the project and making further recommendations to the Commission. Again, we appreciate the coordination of FRA on this important and complex project. If you have any questions or would like to further discuss the review process or the Commission's actions thus far, please do not hesitate to contact me or Matthew Flis at [matthew.flis@ncpc.gov](mailto:matthew.flis@ncpc.gov) or (202) 482-7236.

Sincerely,



Marcel Acosta  
Executive Director

Cc: Andrew Trueblood, Director, DC Office of Planning  
Jeff Marootian, Director, DC Office of Transportation  
Beverly Swaim-Staley, President and CEO, Union Station Redevelopment Corporation  
Frederick Lindstrom, Assistant Secretary, US Commission of Fine Arts

Attachments: January 2020 - Commission Action  
July 2020 - Testimony of Commissioner Trueblood  
January 2020 – Amtrak Memorandum



## Commission Action

January 9, 2020

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

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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 21<sup>st</sup> Century.

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

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

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

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

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

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

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

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

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

*Regarding the transportation facilities:*

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

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

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

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

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

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

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

*Regarding the parking facilities:*

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

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

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

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

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

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

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

*Regarding historic preservation and urban design:*

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

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

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

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

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

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

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

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

*Regarding further coordination:*

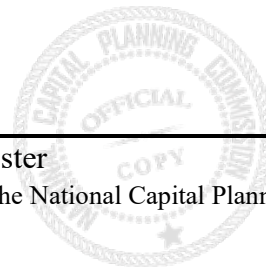
**Requests** the applicant coordinate with the Washington Metropolitan Area Transit Authority regarding the proposed improvements and new entry to the Metrorail station along 1<sup>st</sup> Street, NE.

**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.

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Julia A. Koster  
Secretary to the National Capital Planning Commission





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

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

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

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

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

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

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

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

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

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

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

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

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

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



# Memorandum

**To:** David Valenstein; Beverley Swaim-Staley  
**CC:** David Handera; Daniel Sporik; Kevin Forma; Bradley Decker  
**From:** Gretchen Kostura  
**Date:** January 7, 2020  
**Re:** Amtrak Parking for the Washington Union Station Expansion Project

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

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

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

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

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

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