

Public Comments #2

Agenda Item 6B - NCPC File 7746: Washington Union Station

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From: NCPC System <info@ncpc.gov>
Sent: Wednesday, January 8, 2020 5:50 PM
To: NCPC General Information <info@ncpc.gov>
Subject: NCPC Website Email

From: Dan Malouff
Email: jdmalouff@gmail.com

This is a comment regarding the proposed Union Station expansion, on the January 9 meeting agenda. While I support expanding the station and developing the air-rights above it, I am concerned that moving more of the station's rail users further north into the back of the station will exacerbate an ongoing and troubling trend: That the station's Great Hall is gradually being removed from public use, to become a more exclusive private event space. In recent years many public amenities have been removed from the Great Hall, most notably its public seating and decorative water fountains. As a result, the Great Hall has already largely ceased to be a place where people linger, and has instead become only a place they pass through, unless they are paying for an exclusive event. Weakening the public role of this monumental space degrades the city's public life. I strongly encourage NCPC to insist that the Great Hall not only remain open to the public at all times, but that it remain a central feature of rail circulation, and that rail riders not be further removed from it to distant waiting areas. Please do not allow private events to crowd the public out.



COUNCIL OF THE DISTRICT OF COLUMBIA
THE JOHN A. WILSON BUILDING
1350 PENNSYLVANIA AVENUE, NW
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Charles Allen
Councilmember, Ward 6
Chairperson
Committee on the Judiciary and Public Safety

Committee Member
Business and Economic Development
Education
Transportation and the Environment

January 8, 2020

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

Dear Mr. Acosta,

I am writing to submit my comments on the Washington Union Station Expansion Project that the National Capital Planning Commission ("NCPC") will consider at its January 9, 2020 meeting. I represent Ward 6 on the Council of the District of Columbia, which includes Union Station, and I also serve as First Vice Chair of the National Capital Region Transportation Planning Board. As such, I understand the critical importance of Union Station as a transportation hub for the District and the region, as well as a neighborhood landmark, and the need to significantly grow its capacity. 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 short of capturing the extraordinary potential associated with this important project and I urge NCPC, as it considers the design for this project, to consider the implications of the presented design.

The Union Station Expansion Project must embrace both important multi-modal transportation priorities while also facilitating essential elements relative to place-making and urban-design. I am very supportive of the elements that enhance and substantially expand the train capacity at Union Station, as well as the reorientation of the train hall, and believe it shows a commitment to attracting and accommodating the expected growth in rail passengers with a well-lit, welcoming environment inside the station. But the Federal Railway Administration's ("FRA") preferred alternative, in particular the urban planning elements, including a massive garage and ill-considered circulation plan, poses a threat that will miss the opportunity before us, and serve to isolate the station rather than integrate it within the surrounding community, businesses, and planned development. The 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.

I have two particular concerns. First, while I appreciate that the preferred alternative does contemplate fewer parking spaces than in the current garage, I believe parking must be even further reduced at this dense, urban transit hub. The NCPC staff report notes that the train stations in Philadelphia and Boston have a similar number of parking spots as the preferred alternative. However, the report also notes that New York's two main train stations do not include any parking on site, and there are many other examples of train stations in the U.S. and around the world that have relatively fewer parking spots than the preferred alternative. Further, the staff report also notes

that 1,390 of the 2,200 parking spots currently in the Union Station parking garage are used by monthly parkers—generally, neither retail customers at Union Station nor rail passengers. In this light, 1,575 parking spaces in the preferred alternative are nearly double the approximately 800 parking spots currently dedicated to actual Union Station uses. If FRA intends to reduce the number of parking spaces at Union Station—and I believe it should—I urge NCPC to examine what the true current baseline is. Additionally, I’m concerned that the staff report “[n]otes [that] Union Station Redevelopment Corporation (USRC) oversees the station operations . . . and parking revenues comprise 70 percent of USCRC funding.” USRC performs essential functions for Union Station, and all parties are invested in its continued success, but I urge NCPC to consider additional funding streams for USRC, rather than assuming that USRC’s business model cannot change.

Second, I urge NCPC to consider how the preferred alternative will create a Union Station that is better integrated into the rest of the neighborhood and serves the place-making role that this national gateway to the District of Columbia represents. In this respect, I take seriously the concerns raised by Advisory Neighborhood Commission (“ANC”) 6C, which directly represents Union Station’s neighbors. In a letter to Mayor Muriel Bowser and D.C. Council Chairman Phil Mendelson, ANC 6C noted “grave concerns that the interest of community members . . . are being given short shrift in the planning process[,]” and that “[a]s 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.” Additionally, the District has budgeted \$220 million to rebuild H Street, N.E., from the current bridge that isolates Union Station from the neighborhood north of H Street to an at-grade street that will allow for pedestrian connections across H Street. NCPC must take into consideration how the preferred alternative will fit into the planned reconstruction of H Street and the planned private development that adjoins the federal site. Doing anything less will lead to design decisions that isolate the station, damage the District’s long-term interests in Union Station’s potential, and create substantial harm that cannot be easily reversed in the future. I urge NCPC to ensure that FRA, the District government, and the private developers are working in coordination to create the great neighborhood destination that the Union Station Expansion Project has to potential to deliver.

The Union Station expansion and related projects are an exciting opportunity to produce a vital and nationally significant transportation center with great public spaces on par with those of any world class city. I ask that NCPC recognize the moment before us, with shared goals and expectations, and communicate that a course correction is needed to better shape this historic and monumental investment that will determine Union Station’s vital and necessary role for generations to come after.

Thank you for your consideration of this matter. If you have any additional questions, please feel free to contact me or my Chief of Staff, Laura Marks.

Sincerely,



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

cc: Chairman Phil Mendelson, Chair, Committee of the Whole
Councilmember Mary M. Cheh, Chair, Committee on Transportation and Environment
Director Jeff Marootian, District of Columbia Department of Transportation
Director Andrew Trueblood, District of Columbia Office of Planning
Advisory Neighborhood Commissioner Karen Wirt, Chair, Advisory Neighborhood Commission 6C

January 8, 2020

Mr. Matthew J. Flis
Senior Urban Designer
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. Flis:

We look forward to seeing you at tomorrow's hearing. After reviewing the EDR, there are some clarifications I'd like to offer regarding the "Parking Facilities" section on Page 11 which are important. Boston North Station and Philadelphia 30th Street Station are cited in the EDR as comparative examples of rail stations on the Northeast Corridor with a substantial parking component. The report states that "Philadelphia's 30th Street Station has about 2,000 spaces, while Boston's North Station has about 1,275 spaces."

The Burnham Place team has studied the parking facilities in Boston and Philadelphia closely. Based on our research we do not believe the numbers cited above are accurate or relevant for comparison purposes for the reasons below:

Boston North Station

Boston North Station is one of three Amtrak stations located in Boston, but only includes Amtrak services linking Boston with several cities in Maine rather than points south. North Station does not serve the Northeast Corridor.¹

Boston North Station is co-located with TD Garden and the 1,275-space North Station Garage serves as a parking facility largely used for public sporting and entertainment events including professional hockey and basketball games. The parking structure also supports immediately adjacent commercial and residential development. As owner of the North Station Garage, the Massachusetts Bay Transportation Authority (MBTA) designated the facility as a "non-transportation" property.²

Because the Boston North Station parking facility does not serve the Northeast Corridor, is a non-transportation facility, and primarily functions to provide parking at Boston's TD Garden, we do not believe it is a relevant comparison for Union Station.

Boston South Station

Boston South Station is a more relevant comparison for Union Station planning, serving as the northern terminus of Amtrak's Northeast Corridor. South Station is planned for extensive changes in the near future, having completed environmental reviews in 2017. Station-related parking at South Station is not included in any of the environmental documents as part of the project purpose and need, program, plan, or environmental impacts evaluation.³

¹ <https://www.greatamericanstations.com/stations/boston-north-station-ma-bon/>

² <http://www.tradvisors.com/images/projectsheets/North-Station-Garage.pdf>

³ <https://www.mass.gov/lists/south-station-expansion-final-environmental-assessment#appendices->

However, station parking is included within the South Station Air Rights project, which was approved in 2006, with project revisions approved in 2016. Station-related parking was considered as part of that Air Rights project review, and the existing 223 spaces located at the station will be reduced to 188 spaces to serve the transportation functions in the station as well as the Air Rights project.⁴

Philadelphia 30th Street Station

There is no station garage dedicated to rail passengers at Philadelphia 30th Street Station. Instead a privately-owned (by Brandywine Realty Trust) 1,525-space parking structure is located approximately 400 feet north of the station. This structure serves the 780,000 square foot Cira Center office building and provides parking for Amtrak and transit passengers.⁵ In addition, Amtrak has a contract with the private garage operator which addresses rates and availability for the approximately 1,500 Amtrak employees located at 30th Street Station Amtrak corporate offices. Our observations indicate this garage is roughly 50% utilized at most times. There is also a deck level, Amtrak-owned 165-space surface parking lot north of the station, open to the public and available for passenger use. However, the 30th Street Station District Plan proposes that this deck be replaced with additional mixed-use development and an intercity bus facility.

Overall, because of the range of private uses planned around the station, it is difficult to determine the specific forecast for Amtrak passenger parking in the future and where such parking will be provided. We recommend contacting Amtrak, as they may have further detail on the planning assumptions.

⁴ <http://www.bostonplans.org/getattachment/c88ce458-aa50-4753-a06d-716c24444587>

⁵ <https://www.timhaahs.com/projects/amtrak-30th-street-station-parking-facility/>