

June 30, 2022

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:

I write to express Akridge's strong support for the Federal Railroad Administration's (FRA) revised concept submission for Union Station's expansion. In the past, we sharply criticized the previous concept proposal as fundamentally flawed. In contrast, we believe the new planning framework includes station components, open spaces and circulation elements in optimal sizes and locations. The new concept achieves its principal transportation and policy goals while facilitating high-quality urban design and opportunities for air rights development.

Relationships between Burnham Place and the Station Expansion

Akridge's air rights development (Burnham Place) is independent from the Station Expansion Project (SEP). NCPC will review and approve the SEP under its National Capital Planning Act Authority to review federal projects. For Burnham Place, NCPC will provide input relative to federal interests upon referral from the District of Columbia Zoning Commission. While their approval processes are distinct, the two projects will be planned and constructed concurrently.

The SEP master plan will determine the framework for development opportunity, open spaces, and circulation routes for Burnham Place—particularly within the south portion of our project between the historic station and H Street NE. To assist the Commission in understanding the urban design and development implications of the revised SEP concept, Akridge created illustrative materials to show what is conceptually possible for Burnham Place within this framework. While the specific building massing, uses and architectural styles depicted in this imagery are not formal proposals, the building sites, roadways, and open spaces shown reflect the parameters set by the SEP.

Collaborative Process

In its July 2020 letter to the FRA, NCPC recognized the need for the FRA and Akridge to align visions "in a manner which is mutually beneficial." The letter stated that "continued conversations and coordination among both owners is critical." I am pleased to report that from Akridge's perspective that mission has been accomplished.

During the past 18 months, our two project teams coordinated intensively and productively. Both teams committed to explore creative ways each project could accomplish its objectives while adhering to technical constraints. We further set out to develop complementary visions which addressed stakeholder feedback and concerns. The revised SEP concept and new Burnham Place planning vision are the products of this process.

Key SEP Changes

We believe three major revisions to the proposed SEP effectively respond to our previous concerns and those of other stakeholders. These include:

- Reducing the station parking program and relocating it below-grade;
- Creating a below-grade Pick-up and Drop-off (PUDO) facility; and
- Reconfiguring the bus facility onto one level adjacent to the Train Hall, below the air rights plaza

These three changes have a transformational impact on urban design potential. The revisions decrease and shift vehicular activity below-grade, opening the station's perimeter for pedestrian- and bicycle-oriented activation. The bus facility location unifies intercity travel services at a Train Hall of grand proportion, while minimizing the visual and acoustic impacts of the buses at grade level. The removal of an above-grade parking garage and reconfiguration of property lines between public and private entities facilitates a two-block long central space, the opportunity for high-quality adjacent development, and buildings and open spaces with appropriate relationships to the historic station building.

Projects in Harmony

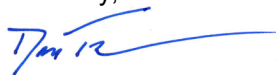
As shown in the attached materials, Burnham Place will comprise a dozen buildings flanking both sides of a rebuilt H Street Bridge with parks, plazas and new circulation routes connecting to the station and adjoining neighborhoods. While projects like The Wharf and The Yards center their focus on the waterfront, Burnham Place will define *its* identity in relationship to our region's most important transportation facility and the dynamic neighborhoods surrounding it.

Akridge firmly believes that while the SEP and Burnham Place are independent projects, the two can and must be symbiotic. Urban design, historic preservation and neighborhood connectivity all must be strategically integrated by the two simultaneous undertakings. We think that our aligned planning efforts now underway will ultimately yield built forms and the spaces between them that are optimized and in harmony.

Our vision is that people will come to Union Station and Burnham Place not just when they *have* to travel through the station, but because they *want* to experience a caliber of urban station development normally associated with great European and Asian stations, here in our Nation's Capital. Neighbors, tourists and travelers will explore and experience a remarkable public building with national significance, that is seamlessly connected to unique open spaces with both civic and neighborhood character. We believe that with the revised SEP proposal and complementary Burnham Place planning framework, we are well on our way toward achieving this shared vision.

Thank you for your consideration.

Sincerely,



David Tuchmann
Senior Vice President

Attachment: Burnham Place Informational Submission

BURNHAM PLACE

A Vision for a Vibrant Air-Rights Neighborhood at Union Station

Informational Submission to the
National Capital Planning Commission

June 30th, 2022

Vision and Site Context

Union Station Expansion and Air-Rights Development



Circa 2002

World Class Transportation Centers and Urban Development
Examples of Integrated Projects



Manhattan West, New York



Broadgate - Exchange House at Liverpool Street Station, London

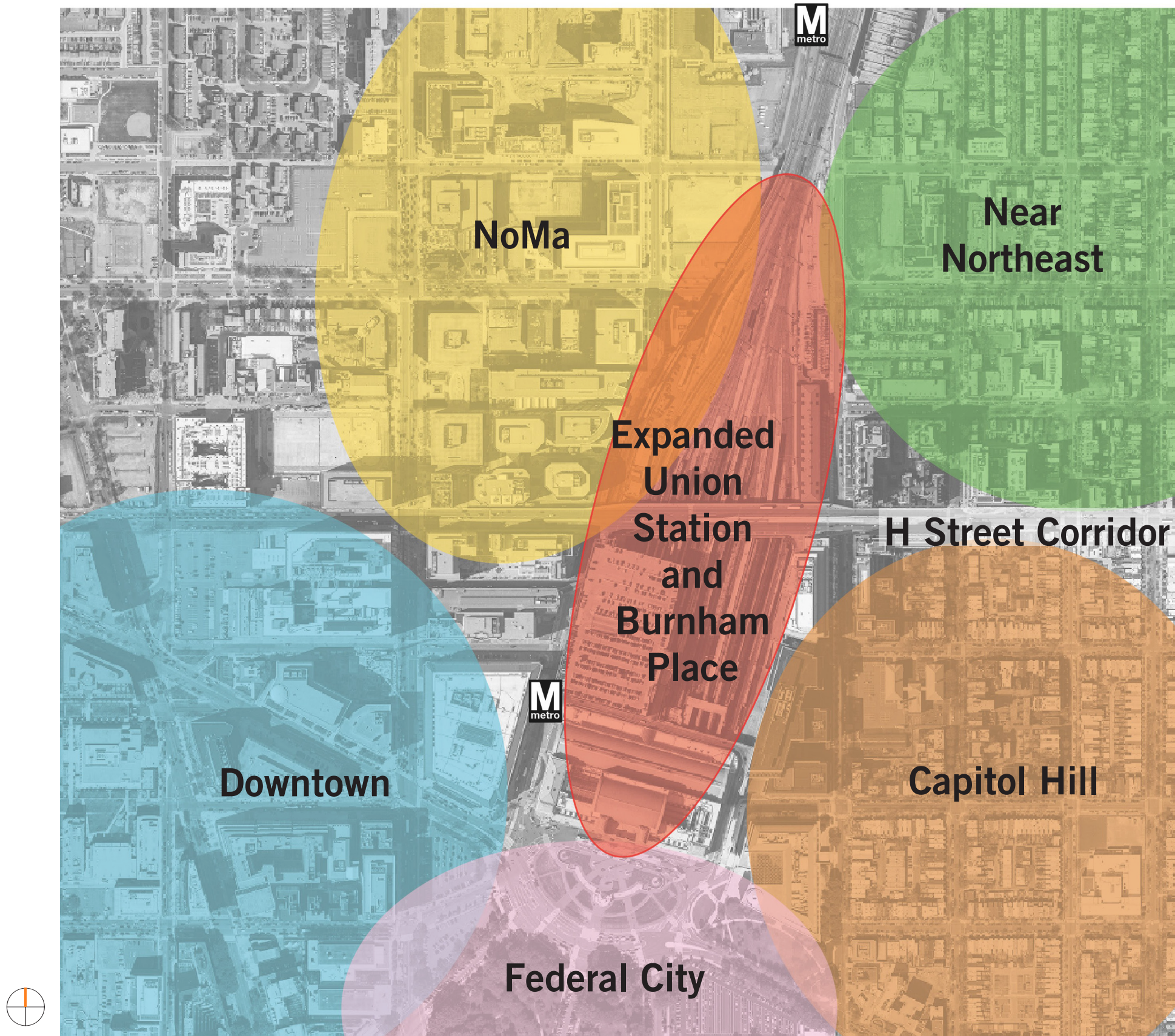


St. Pancras Train Station, London



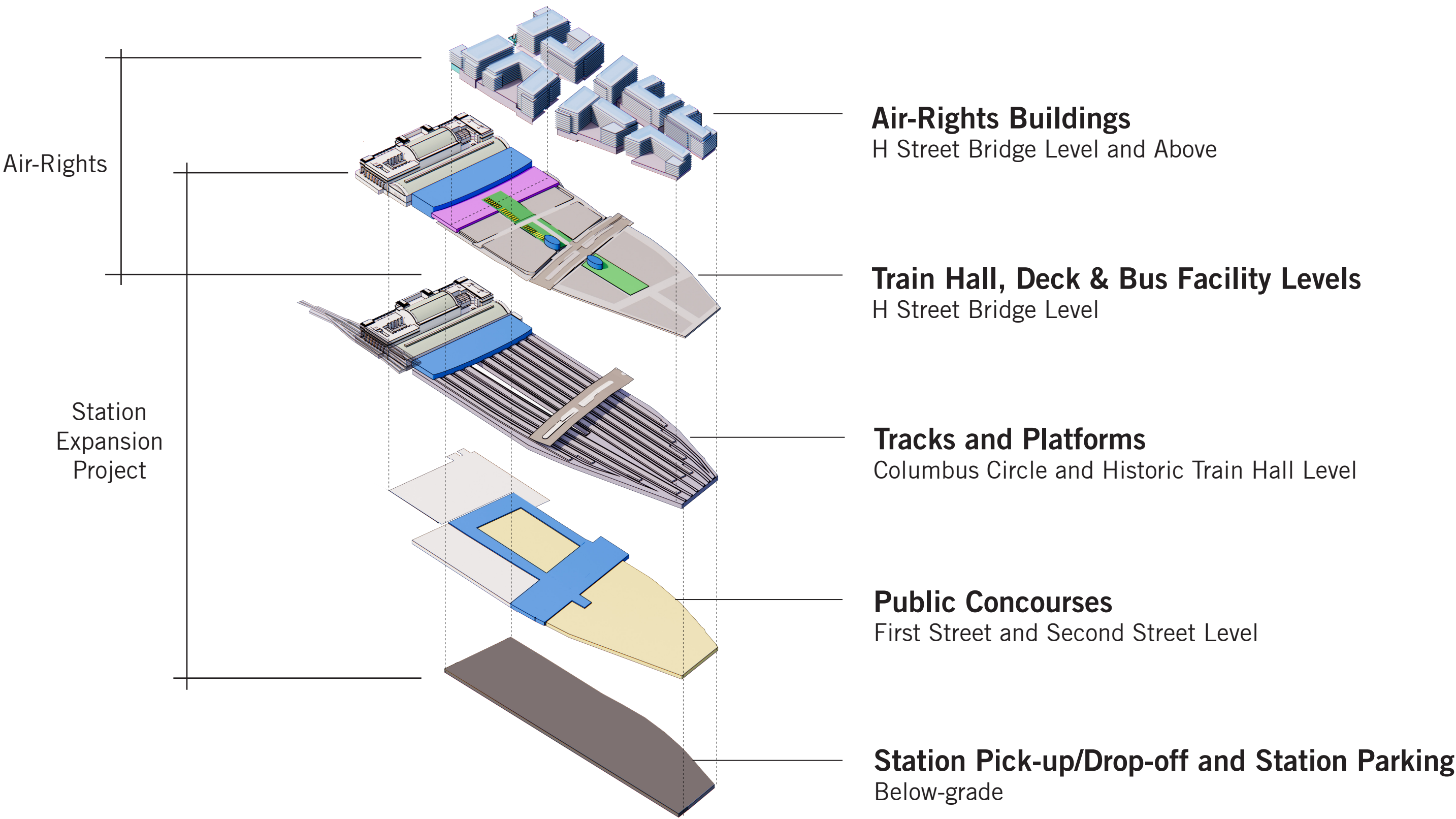
Liverpool Street Station, London

Neighborhood Connections and New Urban Hub



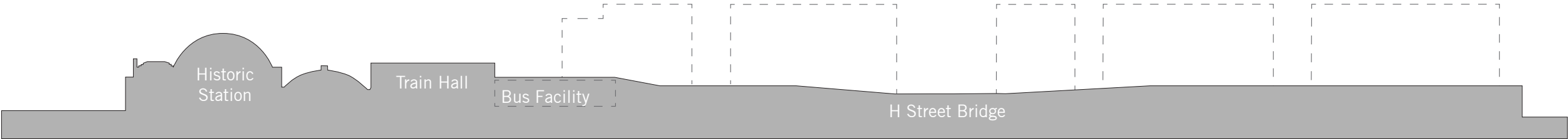
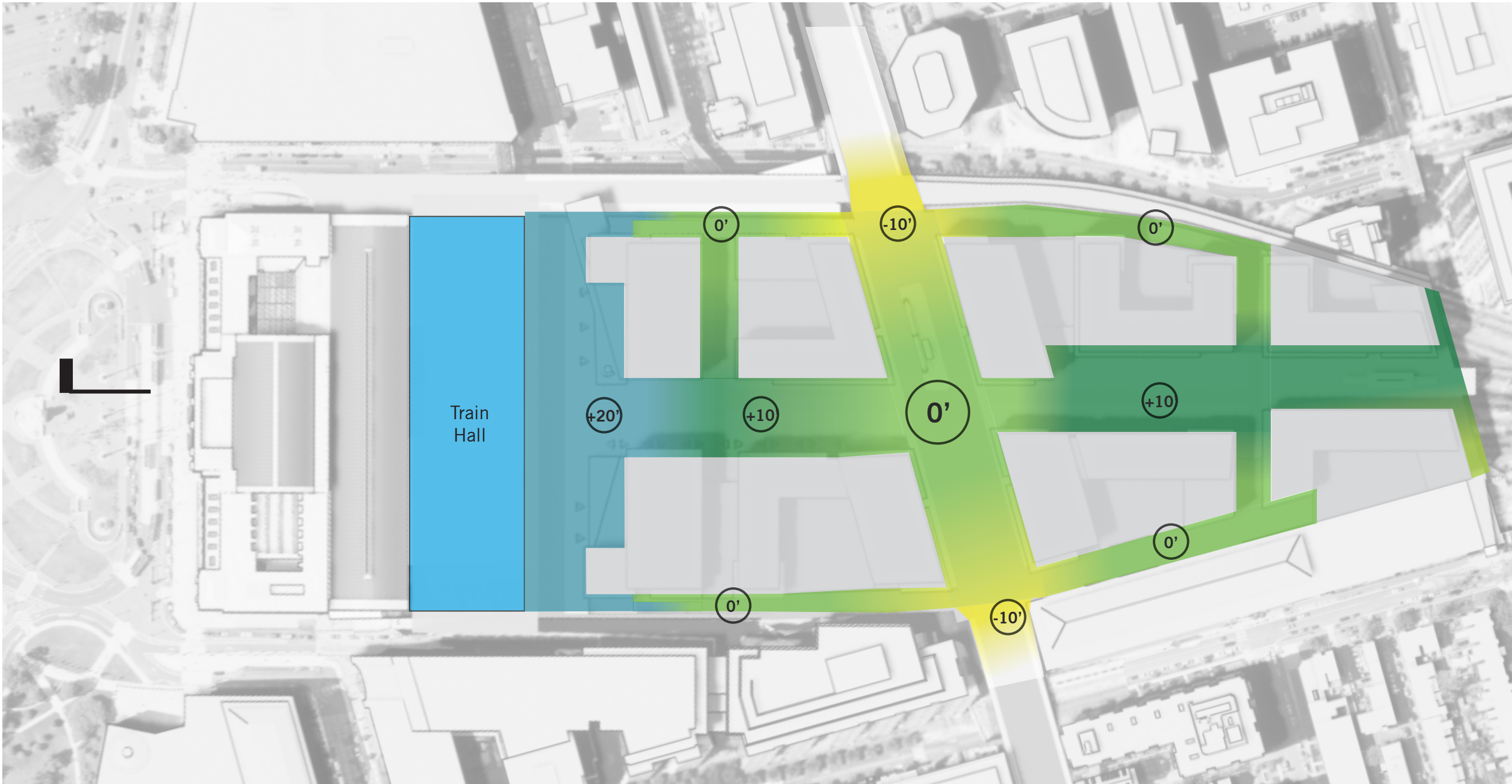
Air-Rights Framework Established by the Station Expansion Project

Integrated Air-Rights and Station Expansion Projects (SEP)

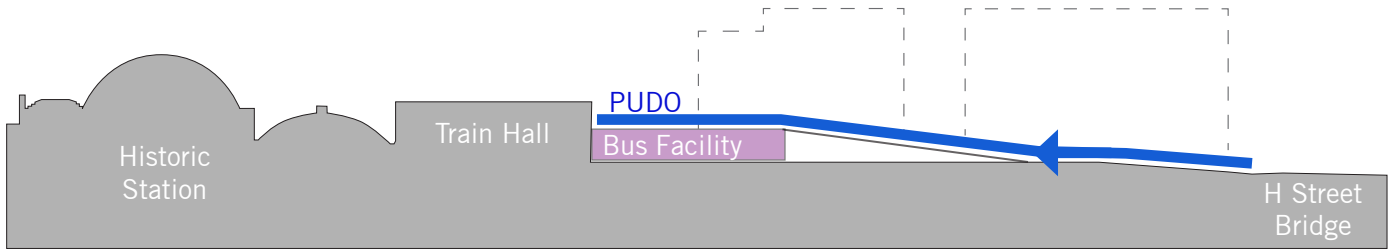
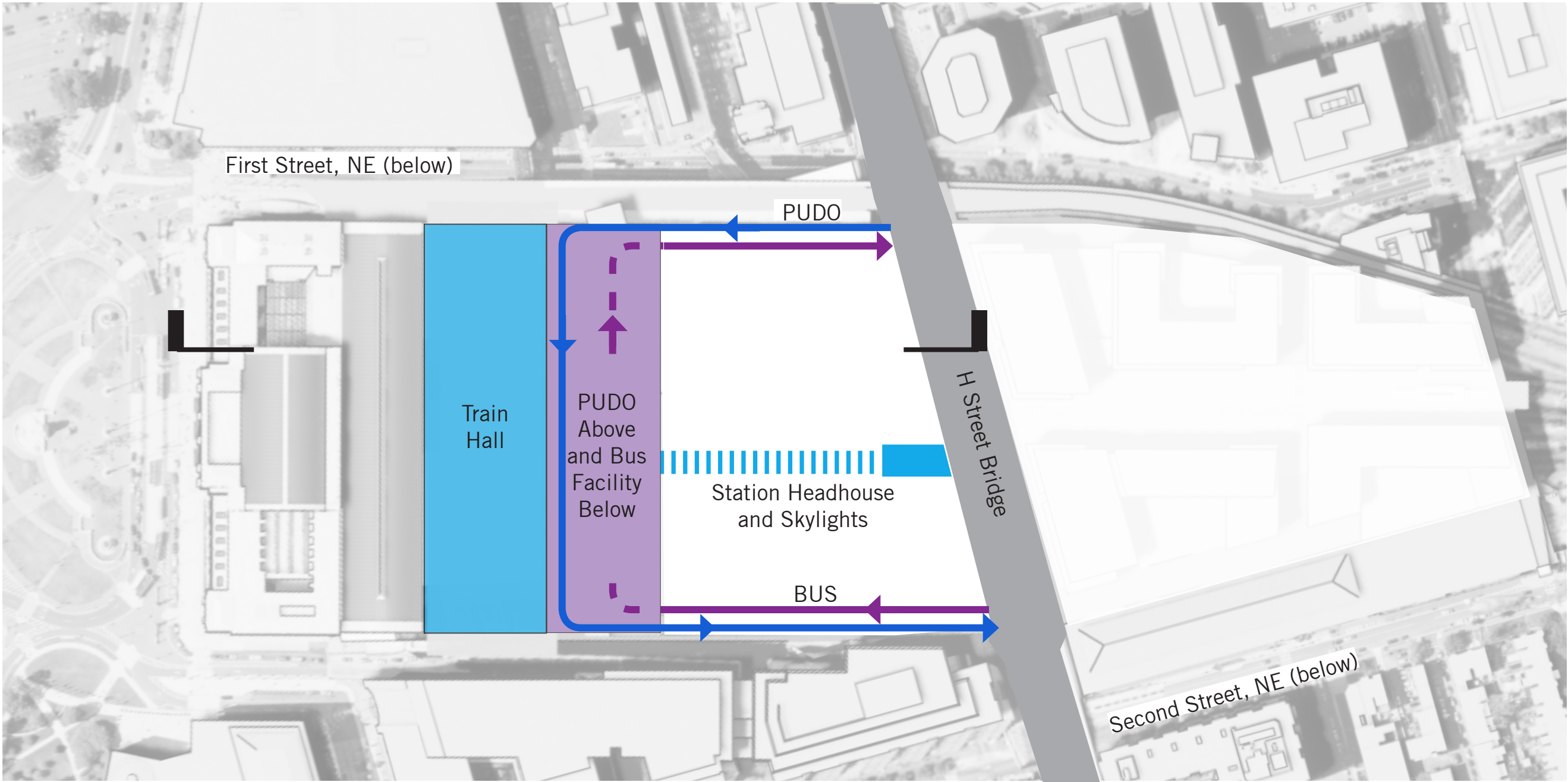


Deck Level Relative Elevations

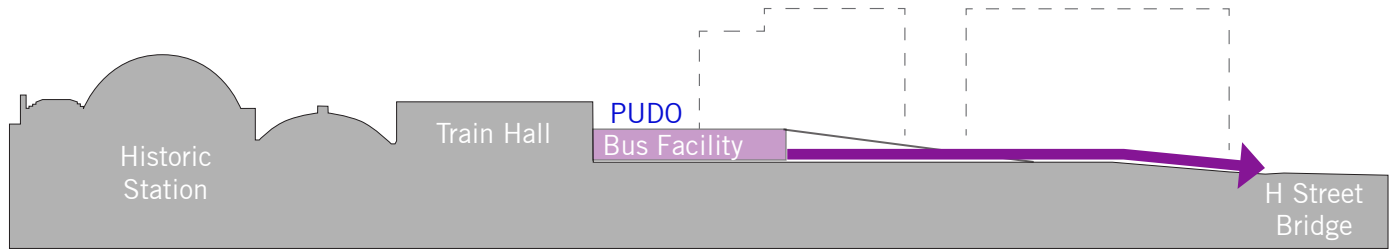
*All elevations are approximate



SEP Program and Circulation Components that Establish the Air-Rights Planning Framework

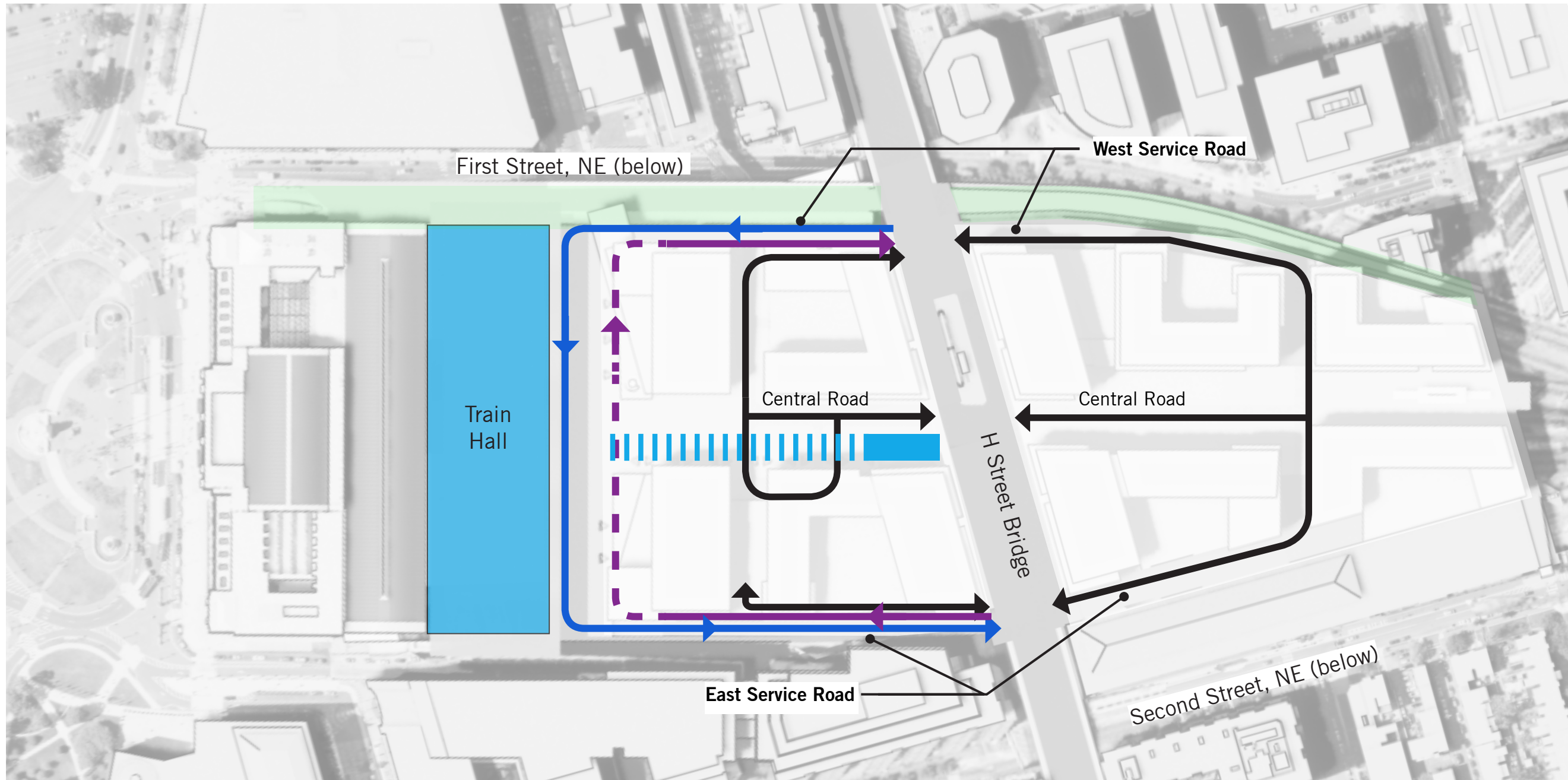


Pick-up/Drop-off (PUDO) Access (ramps up over top of the bus facility)



Bus Facility Access

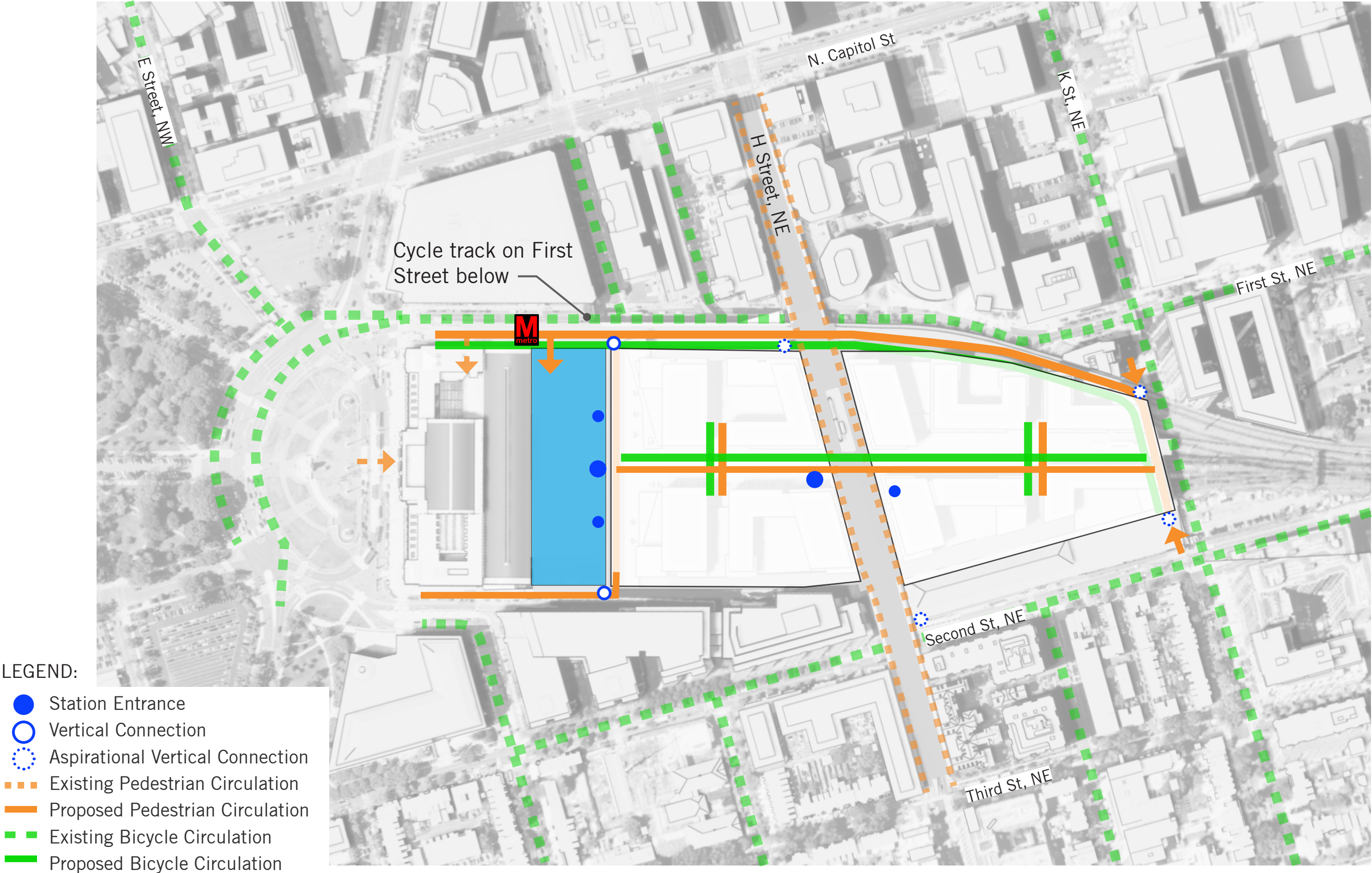
Combined Station and Air-Rights Circulation Network

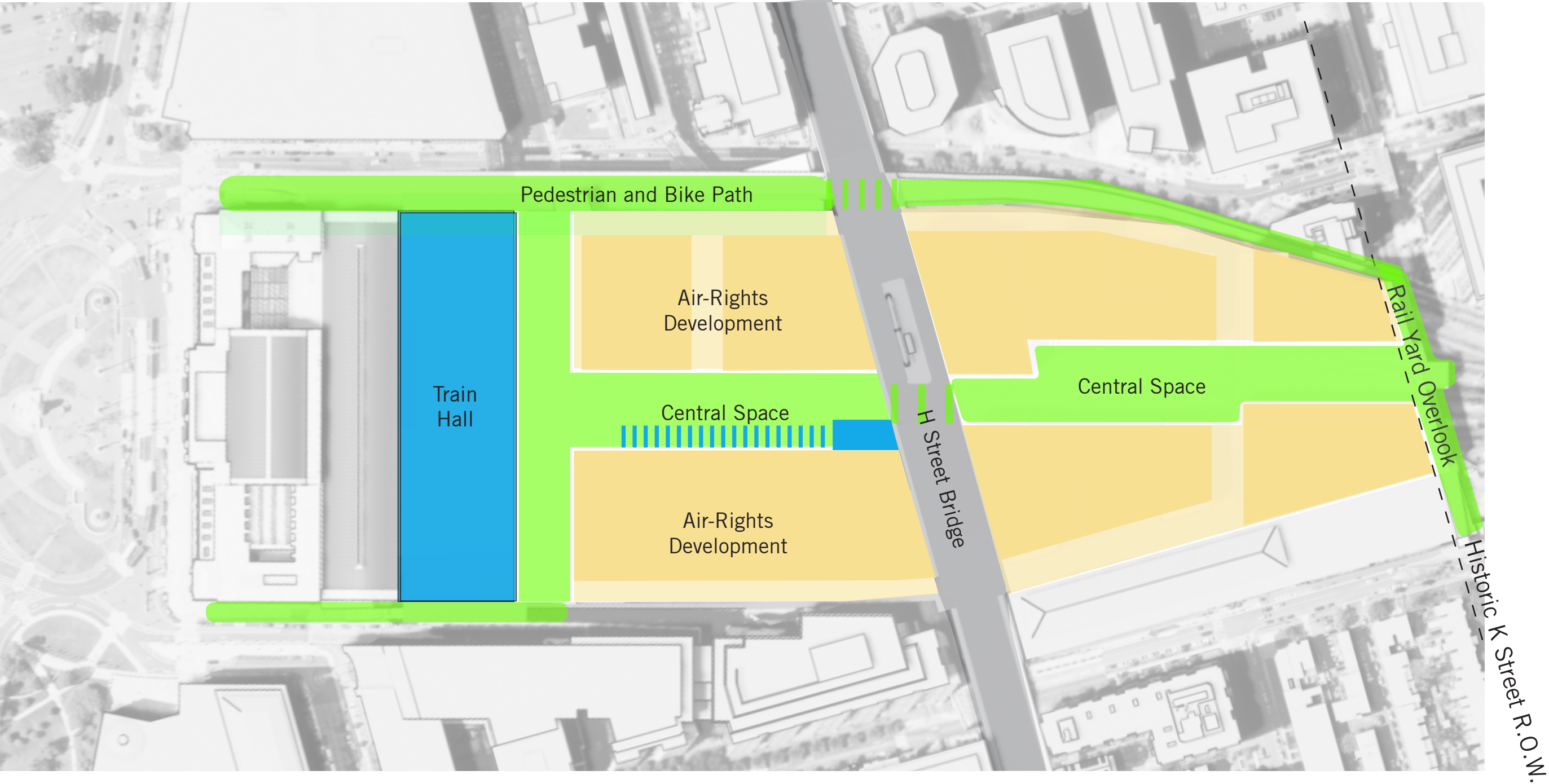


LEGEND:

- LEGEND:
- Station PUDO (Pick-up and Drop-off Circulation)
 - Bus Circulation
 - Air-Rights Circulation

Deck level pedestrian and bicycle connections and circulations



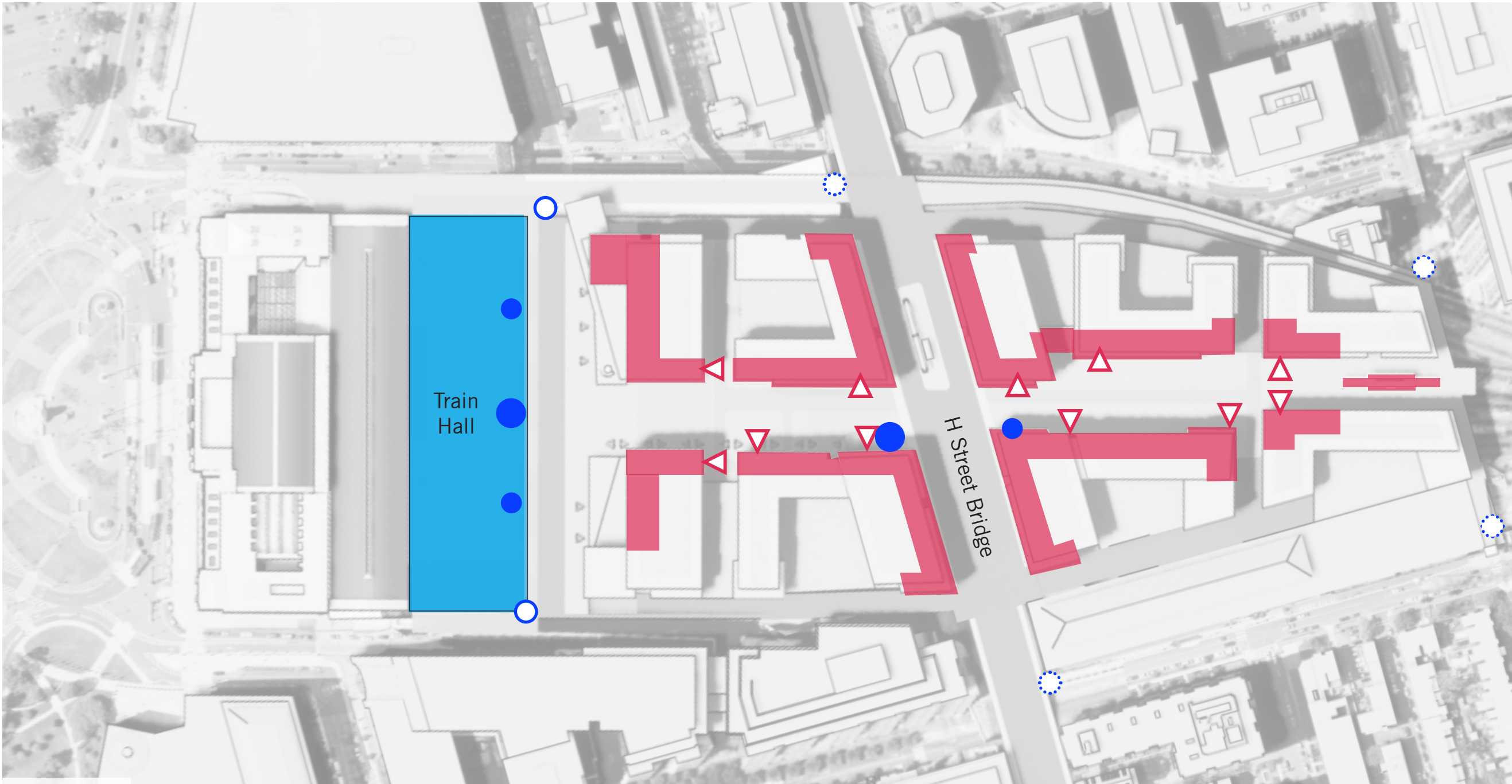




Note: The layout and distribution of air-rights buildings and uses are shown here for illustrative purposes.

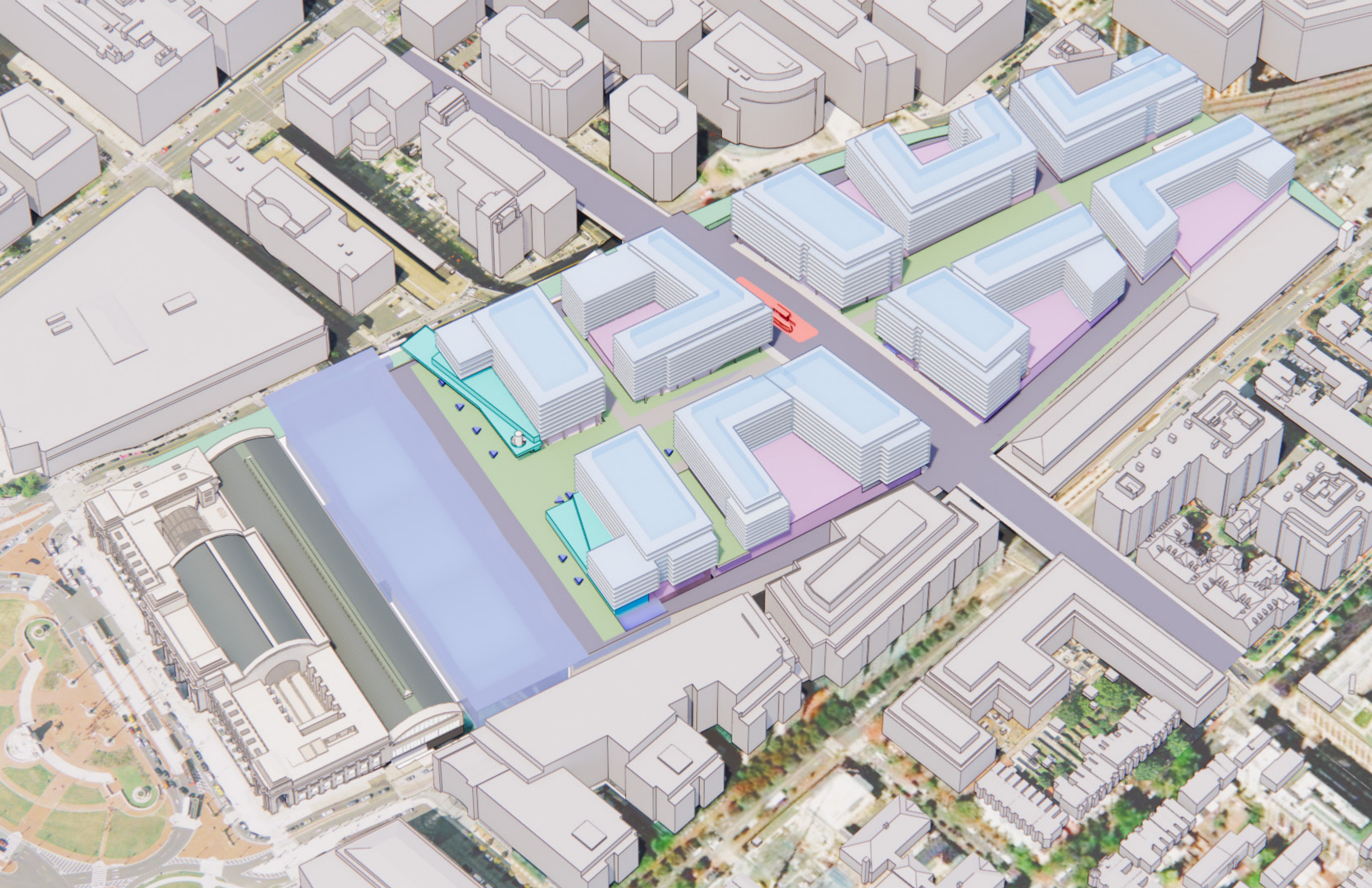
- LEGEND:
- Office
 - Residential
 - Hotel

Entrances and Activated Uses



- LEGEND:
- Building Lobby
 - Station Entrance at Air-Rights Level
 - Activated Edge
 - Vertical Pedestrian Connection
 - Aspirational Vertical Connection

Air-Rights Massing for Draft Revised SEP Alternative Context





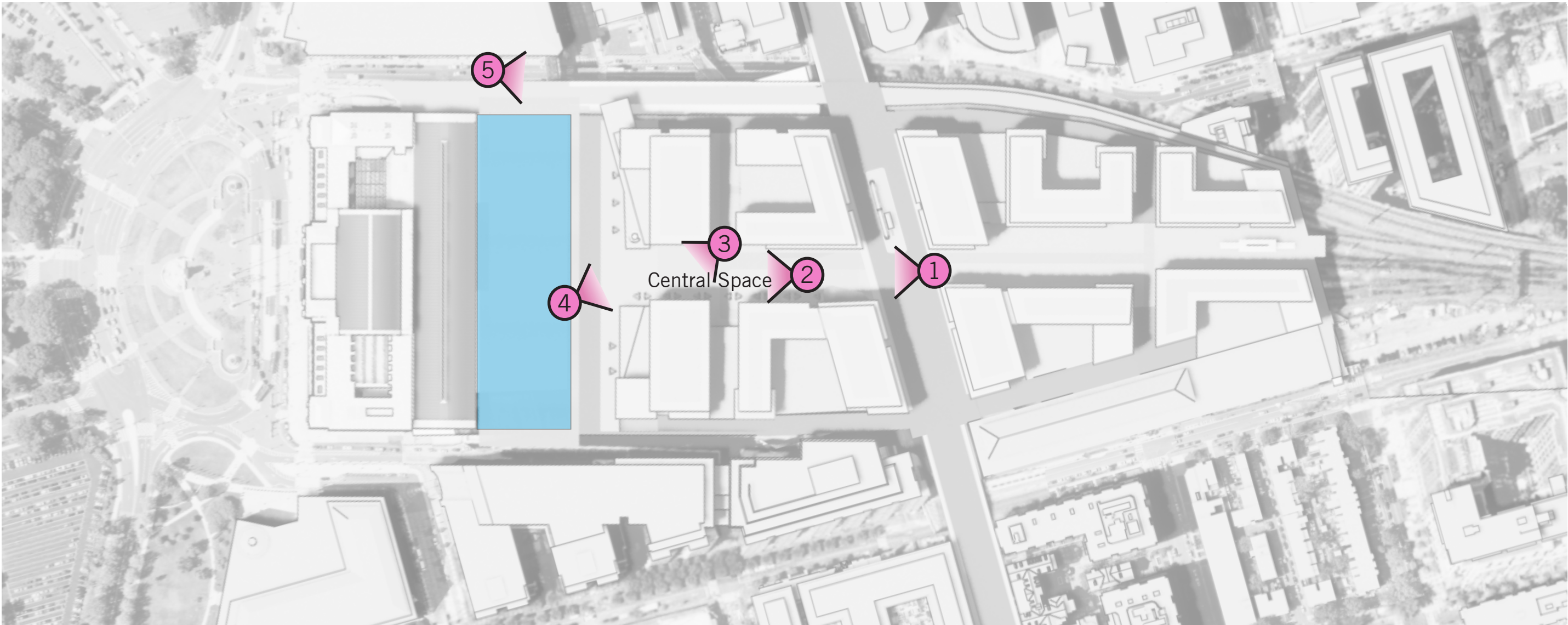
Aerial view looking west along H Street



Aerial view looking south

Preliminary Air-Rights Visualization

Rendering Key Plan (see pages A-21 - A-25)





1. Illustrative view south from H Street



2. Illustrative view within Central Space toward new Train Hall



COLOGNE GER

STATION CAFE

UNION STATION

3. Illustrative view looking south towards new Train Hall



Arts and Cultural Center

4. Illustrative view north through Central Space



5. Illustrative view north along First Street, NE

Testimony of Greyhound Lines, Inc. before the National Capital Planning Commission
re: Washington Union Station Expansion Project (NCPC File Number: 7746)

July 7, 2022

Thank you for providing this forum to receive input from intercity bus carriers and other stakeholders on the future of Washington Union Station. I am Greg Cohen, representing Greyhound Lines. Greyhound provides the backbone of intercity bus transportation across the country, serving more than 2000 communities – 4 to 5 times the number served by passenger rail. Intercity bus is the greenest mode of intercity transportation and the mode of choice for cost-conscious customers seeking the most affordable transportation. Personally, I want to mention that I was a bus driver in college and then become a transportation planner for the State of Maryland upon graduation. So these issues are close to my heart.

The Union Station Redevelopment Act created a new vision for Union Station. What was once just a train station was to become – quote “a complex primarily as a multiple use transportation terminal serving the Nation’s Capital and secondarily as a commercial complex”. The law specifically recognizes the importance of intercity buses in the redeveloped complex. We strongly supported this vision and worked for decades to relocate Greyhound into Union Station. That has been a great success for us and for the economy of the station. Without the support of Congresswoman Norton, we might still be 3 blocks away with our passengers rolling their luggage over cracked sidewalks to get to the Metro station.

Today, we support implementation of a fully-funded, world-class redevelopment that provides a welcoming gateway to the Nation’s Capital for all. Washington is the southern terminus of the most well-traveled bus corridor in America. At the northern terminus, Boston is building a major expansion of its intercity bus facility at South Station while New York is planning to do the same at a new Port Authority terminal. The goal in these cities is to get away from inadequate facilities that push intercity bus pickups onto local city streets.

However, in Washington, all of the DEIS action alternatives call for bus slip capacity to be substantially reduced from the current level of 61 while rail capacity and commercial development is dramatically increased. This suggests the transportation needs of bus customers are of secondary importance. I am here to ask the NCPC to make sure the intercity bus mode is treated equitably and with dignity by increasing capacity for intercity buses.

The DEIS recognizes that “minorities and low-income persons rely on the bus for intercity travel much more than other demographics.” That is certainly the case with Greyhound, which is a majority minority bus service provider. Greyhound’s 2019 nationwide survey of its passengers found that 56% were minorities (35% Black, 14% Hispanic, 7% Asian). The survey also found that 43% of Greyhound passengers had annual household income of less than \$35,000 and 57% had annual household income of less than \$50,000.

Throughout the planning process, Greyhound has worked with planners and stakeholders to increase bus capacity and maintain a close connection to Metro. This included providing plans from one of the

world's most experienced intercity bus facility architects showing how with minor modifications, bus slip capacity could be increased from 35 bus slips to 56. We have made some progress in that the latest design from the project architects includes 39 bus slips on the bus deck and room for 12 spots for "staging" buses on the level above, with direct access to the loading and unloading areas on the bus deck.

While Greyhound strongly prefers growth in capacity rather than reduction, we are open to a compromise based on FRA plans, but only under some key conditions:

- (1) We request that the 56-slip plan proposed by the bus deck carriers receive detailed analysis and more thoughtful consideration.
- (2) If the 56-slip plan is ultimately rejected, we request that the latest 39+12 slip plan preferred by FRA include a written commitment that the 12 "staging" area spots be guaranteed to be available on demand.
- (3) Bus companies pass on their facility costs to their customers. As the provider of the lowest-cost intercity service, the plan should recognize and commit to keeping access costs at current levels plus inflation.
- (4) Scheduled service open to the public must have priority access to the bus deck. Greyhound does not oppose reserved and pre-paid access for charter and tour operators provided that it does not limit peak period scheduled services.

Again, we have developed a positive working relationship with the planners, but we do not yet support the latest plans. If we can reach an agreement that meets the conditions I discussed, that would help to keep the project moving quickly. If we can't come to an agreement, we owe it to our customers to seek a fully equitable solution, even if it delays the process. Thank you again for the opportunity to testify on behalf of Greyhound.



TESTIMONY TO THE NATIONAL CAPITAL PLANNING COMMISSION

By Dan Rodriguez

July 7, 2022

My name is Dan Rodriguez, and I am before you as the representative of both Coach USA its subsidiary Megabus and the Bus Association of New Jersey of which I am President of. I would like to thank the National Capital Planning Commission for the opportunity to state our position on the expansion of the Washington Union Station project.

By way of background, Coach USA is one of the largest transportation operators in North America. We operate more than 2,500 buses and coaches and employ thousands across the nation and Canada. We provide critical local and intercity transport services for communities throughout the United States and Canada. We bring service to financially insecure diverse families, who depend on our services for fast and affordable transportation to their jobs and other important destinations.

Coach USA operates more than 25 bus carriers in North America that operate scheduled bus routes, motorcoach tours, airport shuttles, charters and/or city sightseeing tours. Since its launch in April 2006, Megabus is one of the leading intercity motorcoach services with a central focus on the northeast, offering daily express service for as low as \$1.

Megabus has served more than 55 million customers throughout more than 100 cities across North America including Washington, DC. Megabus's relationship with the Washington Union Station is vital to this service and most importantly, to our passengers who rely on an economical and efficient transportation to the DC metropolitan area.

We want to stress and make clear from the start, that we value and support the needs to evolve while preserving the historical Washington Union Station. We are very much part of the community that comprises all that is offered at Washington Union Station and look forward to our future together.

We have carefully and fully reviewed the Draft Environmental Impact Study (DEIS) and find it disconnected between the alternatives provided and the motorcoach traveler needs. To displace and/or significantly reduce the bus capacity of Megabus and that of the other carriers would rupture the very specific intent of what the Washington Union Station set out to achieve in the Union Station Redevelopment Act of 1981(USRA), specifically it empowers the Secretary of Transportation to, and I quote, "Provide for the rehabilitation of and redevelopment of the Union Station complex primarily as a multiple use transportation terminal service for the nation's capital and secondarily as a commercial complex", end of quote.

As stated, the primary purpose of the Washington Union Station is to provide a "multiple use transportation terminal service." While the Union Station Redevelopment Act was enacted in 1981, a bus deck was not offered to the public at the Washington Union Station until 2012.



The popularity was instantaneous as it increased over the years which now provides Megabus and the other carriers 61 bus slips to use on a regular basis for the loading and unloading of passengers. These bus slips offer a safe way for customers to avoid traffic and protects them from the elements of weather.

Given the current environment, where airline cancellations and high gas prices have become commonplace. The communities we serve are more than ever in need of the affordable transportation, mass transportation such as ours that takes thousands of cars off the roads. Just this past holiday weekend there were over 42 million Americans that took to the roads. A record.

In its No Action Alternative, the DEIS provides that intercity bus service is projected to increase from 2.5 million passengers annually to 3.175 million passengers annually or a 27% increase from the current daily numbers. Moreover, the DEIS also notes an increase in the rail service to grow 24%. The increase for rail service is similar to the bus service with a notably slightly less increase.

The increases for both rail and bus are necessary to point out for this insofar as they are not only projecting a similar rate increase, but also reflects the need to provide multiple use options for travel. The DEIS provides a variety of the alternatives, but in every instance, there is a reduction to the bus facility area and a significant increase to the rail tracks and platforms. Our concern lies with the ability to meet the same increased demand and still continue to have a fully operational and functional home at Union Station that is satisfactorily equipped to achieve this purpose. A reduction of bus slips would create a disparity of choice for those who depend on us the most. This disparity does not serve USRA's purpose, but rather falls back to a time where there was no multiple use terminal, one that will affect financially insecure diverse families the most. The data as provided in the DEIS shows that there is a clear need for a less costly efficient and reliable transportation option.

Our goal today, is to engage this commission and others in a dialogue and conversation that will allow us the opportunity to continue to serve the public need for bus transportation services. Bus transportation provides a myriad of opportunities that will only increase over time. To stifle and protract those opportunities would be a disservice to the public, especially the underserved. Our preference would be to preserve the current levels of bus slips.

The alternatives as proposed in the DEIS are woefully lacking in meeting our and other carriers' operational needs. The proposed reduction to 40 bus slips capacity is a reduction from the July 7, 2016 memorandum which originally provided an allowance of 47 bus slips. In fact, the 2016 memo states that, and I quote, "the estimated current demand for intercity bus services alone in 19 spaces." This was based on data from 2013 to 2015. Between 2016 and 2019, Megabus increased its trips to Union Station by 22%. The 2016 memo was revised in February 2017, and again in May 2020 that continues to support 47 slips as it notes that any of the alternatives that reduces the bus slips at a range from 17 to 27 would not be conducive for either the bus



passenger, operating carrier or the surrounding area of Union Station as it will dramatically decrease economic activity generated by tourism and business travel.

I would like to note, events that draw large numbers of people, a majority of which use bus service for events such as the Cherry Blossom Festival, Jazzfest, Capital Pride, inauguration, and marches.

For Thanksgiving in 2019, Megabus added 40 extra buses to ensure we met demand for Union Station as a final destination. Seventeen or even forty bus slips could not handle these events in any practical or efficient manner.

Simply put, the reduction of slips does not address or acknowledge how a much-reduced bus facility would accommodate the influx of bus travelers to these events.

Coach USA considers itself part of the mosaic of Washington Union Station and are optimistic and enthusiastic to help bring the project to fruition.

But it must be done in a preserving and retaining a sufficient number of bus slips to accommodate the increasing volume and provide a satisfactory alternative to rail.

I thank the Commission for the opportunity to address it and this issue of importance. I look forward to its work in this regard. Thank you.

Dan Rodriguez
Vice President, Public Affairs.



Submitted Electronically

July 6, 2022

Transmitted via email to info@ncpc.gov

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;
Public Testimony for the Federal City Council at July 7, 2022 NCPC meeting**

Good afternoon Mr. Acosta and Commission Members,

My name is Anthony Williams, and I am the CEO and Executive Director of the Federal City Council, and former Mayor of the District of Columbia from 1999-2007. I am pleased to have the opportunity today to express the Federal City Council's strong support for the Federal Rail Administration (FRA)'s revised concept for the Washington Union Station Expansion Project (SEP).

The Federal City Council (FC2) believes the expansion of Union Station represents the single greatest economic development and transportation opportunity for the District of Columbia and the region. Founded in 1954, the FC2 feels both a sense of organizational ownership and pride for Union Station given our instrumental role in realizing the redevelopment of the station in the 1980s, and through our service as one of five board members of the Union Station Redevelopment Corporation (USRC). FC2 has frequently championed some of the biggest, most complex, and transformative infrastructure and economic development projects in the District of Columbia's history. We know that the expansion of Union Station requires a bold vision to garner the full support of key stakeholders at the local, regional, and federal levels.

Today, the Federal City Council is thrilled to support the FRA's revised concept. The FC2 believes FRA's revised concept effectively responds to stakeholder concerns raised during the Draft Environmental Impact Statement (DEIS) public comment period. In doing so, the SEP plan now embodies best practices in safety, accessibility, station operations, historic preservation, and urban design. We believe FRA's revised concept provides a bold vision for stakeholders to rally behind, and with it, finally get the political and financial underpinning required to realize the SEP. **Specifically, the FC2 supports the following key changes addressed by the FRA in their revised concept, including:**

- 1) Right-sized, optimally located parking facilities.** The revised concept significantly reduces the proposed station parking and rental car facility size, and shifts the parking facility underground, beneath the rail concourse level. The FC2 is pleased that these changes to the parking facility follow the District Government's recommendations and we agree with this rightsizing given recent trends and traveler preferences.

- 2) **A centrally located, world-class bus facility.** The revised concept now incorporates a high-capacity, intercity and charter bus facility that is centrally located. In addition, it provides an attractive and safe waiting and boarding experience that is fully integrated with station amenities. By reconfiguring the bus facility to be accessible from both the new Train Hall and air rights development level, the revised concept ensures that all riders, regardless of which mode they are using for their trip, will be treated with a first-class customer experience at the updated Union Station. The plan also efficiently connects bus passengers to Metrorail, Metrobus, DC Streetcar, taxis, bike share, and other non-auto services on-site to promote multimodal travel connections. The FC2 appreciates the work done by USRC staff to coordinate closely with a wide variety of bus carriers and the District Department of Transportation (DDOT) during the past year, and appreciates that the FRA has incorporated feedback from these stakeholders into the revised plan for the bus facility.
- 3) **Below-grade Pick-up/drop-off (PUDO) facility, and new, dedicated space and programming for optimal PUDO management.** Shifting the majority of PUDO activity to the parking facilities below-grade, and creating new dedicated PUDO operations at Columbus Circle and the Train Hall, has significant benefits. The revised concept's underground facility provides for dynamic management for PUDOs – allowing for the spacing of vehicles by provider or destination to handle peak demands -- making it easier for passengers to get home when multiple buses or trains arrive at the same time. Mandating PUDO activity to dedicated PUDO facilities alleviates conflicts with bicyclists and pedestrians and reduces congestion on the roads surrounding the train station. Rail and bus passengers will have more direct access points from dedicated PUDO locations and be able to access their destinations more quickly within the new train hall and air rights development.
- 4) **Dedicated, connected bicyclist and pedestrian infrastructure and facilities.** The plan reimagines the station's existing east and west vehicle ramps as pedestrian and bicycle routes with only occasional station vehicle uses. The FRA's incorporation of the greenway and maintaining protected multimodal connections around the station is a big win for stakeholders. This means people who walk, roll, and bike will now have fully protected, connected routes to easily access both the lower First and Second Street NE levels, Columbus Circle, H Street Bridge, and the future air rights development. The new project vision significantly improves safety, access, and connectivity around, and adjacent to the station. The improved experience around the station, as well as enhanced facilities for storage and access to the station for bicyclists and micromobility users, will encourage increased multimodal travel to and from the station.
- 5) **High-quality urban design.** The FC2 appreciates the federal government's embrace of best-class urban design practices, and we support the FRA's revised concept marrying the preservation of the historic hall with a world-class transit hub. The new project vision ensures that the federal government and air rights developer can now work together to maximize the benefits of the real estate above the rail yard. This approach now holds enormous potential for public and private spaces that can fill important needs such as parks, public spaces, and connections to the surrounding community, reinforcing the importance and prominence of the station in its broader neighborhood context.

As a stakeholder who has supported this project during the entire environmental review process, the FC2 wants to reiterate our steadfast support for this project. Without more frequent, affordable, and reliable rail options, our congested roadways will continue to pollute our region and disconnect hundreds of thousands of people from opportunity simply because they cannot afford to own a car. Ability to expand capacity for transit and move people in an environmentally sustainable way for the next century is critical to combat the climate crisis.

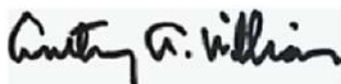
Our rail network is a system and is only as strong as its weakest link. Union Station's rail infrastructure is the same aging, rusted and in many cases failing infrastructure as Maryland's Frederick Douglass (formerly B+P) Tunnel or Virginia's Long Bridge. From Richmond to Baltimore, and Raleigh to Boston, Union Station's transformation is the missing link in our region's growing commuter rail service, and in our nation's passenger rail network. The SEP is essential for realizing Amtrak's vision of a larger rail network, expanding capacity and connecting the Northeast Corridor with the growing Southeast Corridor. The SEP will fix tracks and rail infrastructure in the 25 acres of railyard and facilities behind Union Station in the first modernization since their construction in 1907. The SEP will finally make Union Station's platforms and facilities ADA compliant and in doing so, enhance access and use for people of all ages and abilities.

The FC2 is pleased to hear of the collective support the new project vision has received from stakeholders thus far. We are also encouraged to see private, public, local and federal entities working together effectively toward a common goal. We believe it signals a strong road ahead for the SEP. The strong, diverse support for the revised DEIS from stakeholders and the public will facilitate the swift completion of the environmental review process and position the SEP for available federal funding opportunities.

We are grateful to NCPD for hearing stakeholders at all levels of the process and we look forward to our continued close collaboration with FRA on this critical, transformational project.

I look forward to answering any questions you may have and thank you again for the opportunity to provide comment today.

Sincerely,

A handwritten signature in black ink that reads "Anthony A. Williams". The signature is written in a cursive, flowing style.

Anthony A. Williams
CEO and Executive Director
Federal City Council

June 29, 2022

National Capital Planning Commission
401 9th Street, NW
Suite 500N
Washington, DC 20004

Testimony Regarding Washington Union Station Expansion Project
NCPC file number 7746

The Coalition for Smarter Growth is the leading organization in the Washington DC region dedicated to making the case for smart growth. The mission of our 25-year-old organization is to advocate for walkable, bikeable, and transit-oriented communities as the most sustainable and equitable way for the Washington, DC region to grow and provide opportunities for all. We've recently been awarded the Urban Land Institute's Changemaker Award, and have been recognized by the Council of Governments with their Regional Partnership Award and three times by the Washington Business Journal in their Power100 most influential players in the region.

We've partnered with other organizations in advocating for major expansion in frequent intercity rail service, and have long monitored the planning for the future of historic Union Station. When we last commented on the FRA's plans for Union Station in January 2020, we affirmed our strong support for expanding rail service and the station, but shared significant concerns about the proposed retention of thousands of above ground parking spaces which undermined the entire design and facility. Therefore, we are very pleased to see that the proposal for 1600 spaces has been reduced to about 400 to 700. We urge selection of the lower end of the range, since the focus for this downtown station should be on transit, pedestrian and bicycle access, as well as pick-up and drop-off.

We are especially pleased to see the removal of the above ground parking structure and the placement of the parking and much of the pick-up and drop-off at the lowest underground level. This opens up the opportunity for the amazing train concourse with much improved access to the trains, bus station, and pick-up and drop-off. We approve of the effort to bring good natural light into the facility and like the north-south green axis through the Burnham Place development and the integration with the new H Street bridge.

We like the location and design of the single level bus station, and we concur with the vehicle access points. We ask you to ensure that the ramp on G Street is designed to have minimal footprint and impact on the pedestrian environment, and that the vehicle access point from First Street NE does not endanger ped/bike access along the sidewalks and bike trail – it likely requires a signal.

We ask that you ensure that the upper east-west aligned pick-up and drop-off roadway allows for safe ped/bike access across the roadway through well-marked crossings, traffic calming, and

on scene safety monitors. Bicycle access to the station is important and the plan should include a well-located, secure, modern, and easy to use bike station similar to those in Europe that can accommodate thousands of bicycles.

Please ensure that there is good access from both H Street and Columbus Circle to high-frequency local bus service with stops positioned to minimize walking distance into the station.

We ask that you restore seating to both the Main Hall of the historic station and to the new concourses. People need comfortable places to sit while awaiting their trains and buses, and good seating contributes to a positive experience while using transit -- helping rail service compete with driving.

Finally, please ensure that the historic Main Hall remains an active part of the rail service operations. It must not become like a museum. Ideally, with the continued use of Columbus Circle, improved bike/pedestrian and direct bus and Metrorail transit access, as well as the foreseen growth in train ridership we will see full use of both the new and old concourses.

Thank you for your attention to this 100-year plan for our region's premier transportation hub. We are excited by the vision presented to you in this updated plan and urge your approval with appropriate recommendations for the issues we have highlighted.

Stewart Schwartz
Executive Director

The Committee of 100

on the Federal City



Comments Concerning

Washington Union Station Expansion Project

NCPC File Number: 7746

Monte Edwards

The update on the Union Station expansion plans to eliminate the parking garage, and thereby allow reconfiguration of the tracks north of Union Station. *But there is no discussion about realignment of the tracks and only very limited and dated information about the lower-level tracks that provide access to the First Street Tunnel and south.* The new rail bridge across the Potomac and the additional SW tracks will allow commuter trains to through-run and allow increased Amtrak service south. The new rail bridge and SW tracks will result in separation of passenger and freight rail operation south of Union Station. This momentous change in rail operation will transform our rail system into a more modern, efficient and inclusive rail network that will better serve the DC region and the east coast rail network. But this dramatic change in rail operations is completely ignored in the Union Station DEIS. In fact, the DEIS clearly states the contrary – that passenger and commuter rail operations south of Union Station will be controlled by CSX. Appendix B, page 23 states: “The 2040 simulation retains operating variability for trains arriving from the south, given assumed continued ownership and dispatch by freight railroads in the future [emphasis added].”

The run-through tracks on the lower level will need to accommodate the increased passenger/commuter traffic to and from the south. But sheet 19 of NCPC File 7746 “Modernized Tracks and Platforms” shows only seven run-through tracks – the same number of run-through tracks in the June 20, 2020 Union Station DEIS that did not take into consideration the new two-track Long Bridge river-crossing, substantial CSX trackage in Virginia that VRE would acquire, as well as the new fourth track in SW that will separate passenger/commuter from freight operations

The 2020 Union Station DEIS failed to take into account the increased number of Amtrak trains to and from and to the south, as well as Marc through running to Virginia and VRE through-running to Maryland.

- Appendix B, Page 23 of the Union Station DEIS showed 29 Amtrak trains 8 Marc trains and 46 VRE trains that would use the SW tracks and new long Bridge by 2040.
- But page 3-29 of the 2020 Long Bridge EIS shows 44 Amtrak trains, 8 MARC trains and 92 VRE trains, and 6 Norfolk Southern trains would use the SW tracks and new Long Bridge by 2040.

The updated Union Station expansion analysis needs to account for this increased rail traffic in design of the lower-level Run through tracks.

Table 7-1 Ops. Table 1 - Revenue Train Volumes for Existing and Future Operating Plans per Direction

Operator	Service	Existing Baseline		2030+		2040 NEC FUTURE	
		Peak Hour	Full Day	Peak Hour	Full Day	Peak Hour	Full Day
Amtrak	HSR	1	16	3	45	4	57
	Regional/SEHSR/ Intercity (LD excluded)	3	22	3	27	1.5	23
	Long Distance	1	7	1	6	0.5	6
TBD	Metropolitan	0	0	0	0	4	58
MARC	Penn	4	27/28	6	39	7*	57*
	Camden	2	10	2	10	4	30
	Brunswick	3	9/10	2	12	6	38
VRE	Fredericksburg	2	8	3	19	4*	23*
	Manassas	2	8	3	22	4*	23*

* Includes MARC/VRE run-through service at 4 trains per hour per direction in the peak hour.

Table 3-9 | Train Volumes in the Long Bridge Corridor

Train Operator	Current Number of Trains per Day ¹	No Action Alternative Number of Trains per Day ²	Action Alternatives Number of Trains per Day ³
VRE	34 ⁴	38	92
MARC	0	0	8
Amtrak/DC2RVA	24	26	44
CSXT	18	42	42
Norfolk Southern	0	6	6
TOTAL	76	112	192

¹ Current train volumes are based on existing operation agreements and confirmed by bridge stakeholders.

² Planning year 2040 No Action train volumes were established based on the concurrent DC2RVA EIS, Rail Service Growth in the No Build Alternative, Table 2.5-2, http://www.dc2rvairail.com/files/5315/0412/9086/Chapter_02_Alternatives_DC2RVA_DEIS.pdf, and confirmed by bridge stakeholders.

³ Planning year 2040 planned train volumes were established based on input from bridge stakeholders, including CSXT, VRE, Amtrak, Norfolk Southern, and MARC, as well as the concurrent DC2RVA EIS.

⁴ The current number of VRE trains per day includes non-revenue movements.

Laura Moore

July 7 2022 NCPC meeting

Project #6A: Washington Union Station Expansion Project

I am a licensed DC tour guide who, like my colleagues, meet tour groups regularly at Union Station. These groups arrive by motorcoach from out of state, often in convoys of several buses that bring hundreds of tourists at a time to Washington. During our busy spring tourist season, there may be thousands of tourists – mostly students – using Union Station at the same time for lunch or dinner.

I am a Board member of the Guild of Professional Tour Guides of Washington DC, an association of about 500 local guides and affiliated tour operators, and co-chair of its Government & Tourism committee, which has been liaising for the last few years with USRC on the redevelopment plans. Tour guides are a major stakeholder in this project and our business will be greatly impacted by the proposed changes to Union Station, so I welcome this opportunity. We had profound objections to the plans in the 2020 DEIS, which would have routed tour buses into local neighborhoods, increased congestion and pollution, and, at best, greatly inconvenienced tour groups trying to access the station and at worst put them into dangerous situations.

So, I'd like to express thanks to USRC for taking our comments seriously in this new plan. My co-chair and I are pleased to see that there will now be enough space for tour groups to unload and move safely through the station and that motorcoach operators will be able to park their buses safely and for the amount of time necessary for tour groups to shop and eat, which is the main reason they come to Union Station. We also appreciate the analysis of the data on usage and the projections for increased usage in deciding on the number of parking slips for buses.

However, we do continue to worry that there will not be enough parking space, especially during our busy season during meal times, so I would like to again emphasize the need for space to safely drop off and pick up groups within the parking area. We certainly would not support any future plans to reduce the amount of parking, if anything would prefer to see more slips or perhaps slips dedicated specifically to drop off and pick up. But at this point, it seems that our main concerns will be operational, rather than with the design. For example, tour groups usually arrive without reservations and cannot realistically hold to specific drop off and pick up times. I look forward to continuing to work with USRC as they move into the next planning stage.