

District of Columbia Office of Planning



Office of the Director

April 30, 2020

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

RE: District of Columbia Comments on the Preferred Alternative for the Washington Union
Station Expansion Project

Dear Mr. Valenstein:

The District of Columbia Office of Planning (OP) appreciates the opportunity to participate in the ongoing National Environmental Protection Act (NEPA) process for the Washington Union Station Expansion Project for which the Federal Railroad Administration (FRA) is the Lead Agency. This letter is to share with FRA our conclusions regarding parking, which we are providing to the National Capital Planning Commission (NCPC). At 1,575 spaces, the project would be overparked and sacrifices to parking valuable space that should instead be devoted to land uses that would enhance both the station and the surrounding area.

On January 9, 2020, NCPC, in its dual role as a consulting party to the NEPA process and as land use approval authority for the project, requested that:

[t]he applicant (FRA) substantially reduce the number of parking spaces (in the Union Station Expansion Project), 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.

We believe that it is possible to design the project in a manner that supports the best long-term land use, delivers world-class multi-modal transportation, and is financially viable for the Union Station Redevelopment Corporation (USRC) in its role as steward of Washington Union Station. We do not believe that such an important project can compromise on any of these vital



objectives. Unfortunately, because Preferred Alternative A-C makes significant compromises on land-use and parking – sacrificing far more valuable land uses to make room for parking – OP cannot support it.

Based on District policies, comparable U.S. facilities, and our analysis of parking demand, our report to NCPC recommends a total of 295 parking spaces for the subject project, although up to 375 might be appropriate if additional information demonstrated it was justified. Table 1 shows the District’s proposed parking for Union Station.

Table 1: District Proposed Parking for Union Station

| Program | Case | District Rec. Parking # | Min | Max |
|----------------------|-------------------------------|--------------------------------|------------|------------|
| Land Use | Retail | 0 | 0 | 0 |
| | Office | 206 | 0 | 206 |
| Long-Term Parking | Amtrak | 0 | 0 | 0 |
| | Bus | 0 | 0 | 0 |
| Short-Term Parking | Driver leaves car temporarily | 40 | 40 | 120 |
| ADA Parking | | 49 | 7 | 49 |
| Total Parking | | 295 | 47 | 375 |

Source: District Office of Planning, District Department of Transportation¹

Throughout this process, the District has emphasized the importance of:

- Prioritizing intermodal effectiveness and efficiency (including intercity bus, rideshare services, and bicycle connections);
- Providing continued and enhanced quality of life for people who live in, work in, and visit the Washington Union Station area;
- Affirming the civic identity rooted in the transportation infrastructure at Union Station;
- Retaining intercity bus service at Washington Union Station; and
- Promoting pedestrian mobility in the design.

As illustrated by our recommended parking numbers in Table 1, OP and DDOT agree with NCPC that the 1,575 parking spaces in Preferred Alternative A-C will undermine the ability of the project to achieve these goals and must be reduced. OP reached this conclusion through the Inter-Agency Parking Working Group, which was created to address NCPC’s request and included representatives of FRA, USRC, Amtrak, OP, and DDOT.

Union Station is a unique facility in a dense urban location. It hosts more visitors than the Las Vegas Strip and handles more passengers than any of the major airports in our region. Beyond its role as an intercity transit hub, Union Station is accessible by Metrorail, Streetcar, MARC, VRE, and Circulator and WMATA bus routes. Moreover, it is adjacent to the District’s highly

¹ The numbers recommended herein were developed in collaboration with the District Department of Transportation (DDOT) and represent the District’s recommended parking numbers for the Union Station Expansion Project.

walkable and bikeable downtown. In this setting and with such rich multimodal access, private vehicles will play a limited role in the future Union Station.

With this accessibility in mind, and as part of the Parking Working Group, the District analyzed policies, case studies, and rationales that could help address appropriate parking numbers at Union Station in the year 2040 (the horizon year for the subject Project and NEPA process), taking into account future retail and office uses as well as long-term, short-term, and ADA-related parking at Union Station.

OP drew policy guidance from proposed amendments to the District's Comprehensive Plan, made as part of the current Comprehensive Plan update process, and from DDOT's Guidance for Comprehensive Transportation Review. District policies and guidance from these and other planning documents emphasize reducing the use of single occupancy vehicles, reducing parking, reducing greenhouse gas emissions, and enhancing multimodal transportation.

Unfortunately, after three sessions of the Parking Working Group, in which the District shared information about the policies, data, and analysis supporting substantially reduced parking, FRA remained unwilling to propose any reduction in the 1,575 spaces presented to NCPC for Preferred Alternative A-C.

OP cannot see a viable path to success for such an overparked project. A NEPA Record of Decision that includes so much parking will likely require future modifications to reduce the amount parking and deliver a viable project. To avoid such a time-consuming process, FRA should modify the existing Preferred Alternative or develop a new Preferred Alternative that substantially reduces parking, substitutes the difference in parking with additional land use programming, and integrates pick-up and drop-off (PUDO) facilities and related details for capacity, location, and design. We recognize that reducing the parking will impact PUDO and are prepared to collaborate with FRA, DDOT, and surrounding communities and developments to ensure an appropriate facility or facilities are dedicated to PUDO activity.

OP fully appreciates the need to ensure the long-term financial viability of Washington Union Station and believes that a recalibrated approach to parking can support and achieve multiple project benefits for its stakeholders. OP believes that developing uses such as hotel, office, and retail instead of parking could provide robust revenue streams to support operations. Although the retail at Union Station serves patrons of the station and is not destination retail for which customers drive and park, we understand that parking may present a challenge in terms of an existing lease agreement between USRC and commercial tenants at the station. OP stands ready to work with the project team on questions relating to lease terms and to identify the land uses. But the terms of a lease should not dictate critical land use and transportation decisions that will be felt for a century or more.

I look forward to continued engagement in the Union Station Expansion Project and will submit comments consistent with those in this letter in response to the DEIS when you release it for public comment.

Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Andrew Trueblood', with a long horizontal flourish extending to the right.

Andrew Trueblood

cc: John Falcicchio, Deputy Mayor for Planning and Economic Development
Jeffrey Marootian, Director, District Department of Transportation
Beverley Swaim-Staley, President and CEO, Union Station Redevelopment Corporation
Marcel Acosta, Executive Director, National Capital Planning Commission
Gretchen Kostura, Senior Program Manager, Washington Union Station, Amtrak