



Thursday, July 6, 2023

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Office of Federal Railroad Policy and Development
USDOT Federal Railroad Administration (MS-20)
1200 New Jersey Avenue, SE Washington, DC 20590

Re: Comments on Washington Union Station Expansion Project SDEIS

On behalf of the Washington Area Bicyclist Association (WABA) and our 6,000 members in the Washington Region, I am pleased to write with enthusiastic support for Preferred Alternative F for the Washington Union Station Expansion Project as outlined in the Supplemental Draft Environmental Impact Statement.

This new design will transform DC's intercity, regional, and local rail and bus facilities into a first-class multimodal hub worthy of our Nation's Capital. Preferred alternative F addresses many of the concerns WABA raised at previous stages of planning. Revisions to right-size on-site car parking, prioritizing convenient, safe access by walking and biking with new connections to the trail, bike lane, and sidewalk networks, and new bicycle parking and Capital Bikeshare stations are major improvements which will make walking, biking, and transit the preferred choice for arriving at the station.

While we support the preferred alternative F as the best design option to move forward, we would like to raise some negative impacts to bicycle and pedestrian safety and possible mitigations for inclusion in the final EIS and final design.

Must Provide Safe Accommodations for First St Cycletrack and Met Branch Trail

Chapter 5.13.3 (p. 5-104) details construction impacts to the First Street NE cycletrack and the Met Branch Trail on Second Street, proposing to close facilities for a combined 5+ years during Phases 1 and 4. The DEIS notes that only a small portion of the eight-mile Metropolitan Branch Trail will be impacted. Yet, like removing a 1-foot section of a mile-long pipe, dismantling one block in a regional multi-use trail is extremely disruptive to the thousands of daily users who rely on the trail for a safe, direct route. Any proposed closure or detour of the Met Branch Trail or First Street Cycletrack must provide a safe accommodation for trail users that offers a comparable level of safety, as required by DC law and DDOT regulations.

While we understand that construction necessarily must occur to modify these facilities, closure and detour to an alternate street are a course of absolute last resort. We welcome a collaborative discussion on options for safe accommodations on First St NE. Safety of vulnerable road users around this construction site must be the first priority throughout this construction project.

Mitigate Bicycle Conflicts at the First St. Loading Dock

Under the existing design, the First Street two-way protected bike lane, a high-volume branch of the regional Metropolitan Branch Trail, runs directly in front of the First Street loading dock. Delivery trucks persistently park in or blocking the protected bike lane and sidewalk rather than use the loading dock, interrupting the otherwise safe, low-stress bicycle route for thousands of daily trail users. This forces bicyclists to dismount, climb the curb, and enter the travel lane to continue on. This constant conflict puts the most vulnerable road users at risk, and persists as a daily structural reality of commercial operations under the current design. It should be mitigated as part of the station redesign.

As a mitigation, the protected bike lane and loading dock should be redesigned to eliminate this conflict, including widening the bike lane and adding permanent, substantial mid-lane barriers to prevent entry by vehicles. As other loading docks are brought online, other loading docks should be prioritized for daily activities.

Provide Secure, Longer term Bicycle Parking

We appreciate the inclusion of multiple locations for short term bicycle parking within the station design. With planned connections to the bicycle network, bicycling to an intercity train or bus will be convenient, but passengers need a dependable, secure facility to leave their bicycle behind without concerns about theft. A secure bicycle parking facility should have controlled access, continuous monitoring by staff and video, and be accessible with a step-free, roll-in, access point from either First or Second Street. Additionally, an area should be designated for bicycle assembly/disassembly, including tools (e.g. a fix-it stand) to support tourism by bicycle and train.

Upgrade the First St. Protected Bike Lane

The two-way protected bike lane on First Street NE was first installed in 2013 as an extension to the Metropolitan Branch Trail. While appropriate for the time, it was largely retrofitted into an existing street design and does not meet modern standards for bike lane width or buffer width. The current design will not accommodate expected future user volumes and should be upgraded. The 2-way protected bike lane should be widened to 12' (6' each way), at least a 3' buffer, and a permanent, durable barrier from traffic. Eliminating the existing west side on-street parking provides the needed width.

The proposed First St. NE garage entry/exit will cross the protected bike lane, creating four new conflict points from turns in and out of the garage – a significant negative impact to safety. To mitigate this conflict, minimize the garage entry width to 22' and use no greater than 15' curb radius to encourage slow turns in/out of the garage and to maximize visibility. At garage entrances, repurpose some of the proposed west side pickup-dropoff zone to bend the sidewalk and bike lane out away from the wall and garage entrance to increase visibility of approaching bicyclists and pedestrians.

Create Seamless Bicycle Circulation and Connections at Columbus Circle

The SDEIS notes that the front of Union Station will remain the main access point for pedestrians and bicyclists, yet, the proposed roadway reconfiguration is entirely oriented towards automobile and pedestrian circulation, not bicycles. Moving ahead with this design would be a missed opportunity for bicycle access to the station and leave a permanent hole in DC's bicycle network. To access or traverse this space, people who bike need safe, protected lanes, dedicated for bicycles. To mitigate this negative impact:

- Collaborate with DDOT to add a curb-separated protected bike lane on Massachusetts Ave between North Capitol St to 2nd St NE,
- Collaborate with DDOT to add a direct, intuitive, safe bike connection from the 1st St. NE protected bike lane to planned protected bike lanes on E St. NE and Louisiana Ave, with elements of a protected intersections, and
- Designate a 2-way east-west bicycle connection north of the Union Station fountain to directly connect First Street and the F Street Met Branch Trail that avoids conflicts with vehicle traffic.

Upgrade the Metropolitan Branch Trail on the East Side

The regional Metropolitan Branch Trail runs along both First Street, as an in-street protected bike lane, and on Second Street as a sidewalk-level multi-use trail. The trail is not yet fully built out and does not offer seamless connections to the rest of the network.

Between G Street NE and K Street NE, the Second street trail is merely a signed route on the sidewalk. Under alternative F, this area is designated as a pickup, dropoff area on narrow sidewalks, but does not appear to note the multi-use trail. The trail should be redesigned, widened, and rebuilt to modern multi-use trail standards from G to K Streets NE with appropriate design to reduce conflicts in front of the Second Street concourse entrance.

At Columbus Circle, the Met Branch trail stops just short of making useful connections at the bottom of the ramp at F Street near the existing Capital Bikeshare station. This sidewalk space should be redesigned to extend the multi-use trail up the hill to connect to Massachusetts Ave.

WABA empowers people to ride bikes, build connections, and transform places. We envision a just and sustainable transportation system where walking, biking, and transit are the best ways to get around. We believe that moving ahead with preferred alternative F with the above mitigations will help achieve that vision for Washington Union Station.

Please contact Garrett Hennigan at garrett.hennigan@waba.org or 202-656-3078 for follow-up.

Thank you for the opportunity to comment.

Garrett Hennigan
WABA Organizing Manager