



**Submitted Electronically**

July 6, 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 and Commission Members,

The Washington Area Bicyclist Association (WABA), the region’s leading bicycle advocacy organization with over 6,500 members across DC, Maryland, and Virginia, is proud to support the Federal Rail Administration (FRA)’s revised concept for the Washington Union Station Expansion Project (SEP). We believe that the FRA’s revised concept shows far more focus on safe, convenient access for bicyclists and pedestrians, and that the new project vision is poised to create an exceptional multimodal experience that truly enhances and promotes access for all.

In our public comments on the Draft Environmental Impact Statement (DEIS) provided in September 2020, WABA aligned with key stakeholders to push the FRA to revisit the DEIS preferred alternative, update the project vision to reduce conflicts with vehicles in and around the station, and minimize the number of people driving to and from and parking at the station. Thanks to the work done by the FRA and SEP project team to listen to, and incorporate stakeholder concerns with the DEIS alternative, WABA believes the SEP now presents a compelling promise for a once-in-a-generation expansion of regional connectivity for train and bus that is well-accessed by walking and biking. WABA believes these improvements to the revised concept create a bold vision that will garner strong, broad stakeholder support, and that with the right attention to details from the FRA

through the end of the environmental review process, the SEP will dramatically improve safety and mobility for people accessing and moving around our nation's capital for decades to come.

**WABA believes the following four elements in the FRA's revised concept show significant, but incomplete improvements for people who bike, scooter and walk in our region:**

- 1) The plan shows great potential for improved bicyclist and pedestrian connections to and around Union Station with opportunities for better north-south connections on the west side, center axis and east-west over the railyard.** WABA applauds the FRA's revised concept's incorporation and focus on the quality of multimodal connectivity, as well as the future station's urban design and integration with its surroundings. The new plan reimagines the station's west vehicle ramp as a dedicated pedestrian and bicycle space, creates a new center axis through the proposed air rights development, and promises east-west bicycling connections along H Street. . This change will provide helpful access for bicyclists from Columbus Circle to H Street, and improves safety and connectivity adjacent to the station. WABA encourages FRA to design these ramps and connections with wide, continuous, unobstructed and separated spaces for bicycling and walking to ensure that the station is always easily accessible by high volumes of bicycle users.

Safe, secure bicycle parking, as well as ample bikeshare and micromobility stations and programming are not readily recognizable components of the current public materials for the FRA's revised concept. WABA believes this is a missed opportunity, and we encourage the FRA to document its commitments to prioritize ample, safe bike parking and shared micromobility vehicle access in the Final EIS. This could include the FRA documenting the parking (both short and long term), bikeshare facility locations, and the operational strategy to provide access and parking to the station from all sides for people who bike, roll and walk. The improved experience adjacent to 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.

- 2) **The revised concept better prioritizes access for people over cars by reducing the size of the vehicle parking facility, and shifting it underground.** In 2020, WABA joined a broad group of stakeholders in our public comments to the DEIS and expressed our opposition to the DEIS alternative's oversized and poorly located vehicle parking facilities. Today, WABA is thrilled to see that the FRA's revised concept prioritizes people over cars by reducing the proposed station parking and rental car facility size by nearly two-thirds, and shifts the parking facility underground, beneath the rail concourse level. The change in size acknowledges the District of Columbia Office of Planning's recommendations to right-size the facility given recent trends and traveler preferences, and the shift to below-grade optimizes civic and urban design elements at the air rights level. As design moves forward, WABA encourages FRA to continue seeking opportunities to minimize parking on-site and maximize space and investment devoted to car-free access and a convenient transit experience.
- 3) **The FRA's revised concept has a plan for PUDO that, if properly designed and enforced, could dramatically reduce conflicts with pedestrians and bicyclists around the station.** The revised concept's new parking and pick-up/drop-off (PUDO) facility plans represent a welcome shift from the DEIS. The plan intends to maintain the station's ability to accommodate the demand for taxi, Uber, Lyft, and private pick-up and drop-off by shifting the majority of PUDO activities underground. Moving the majority of PUDO trips below-grade could remove PUDO activity on side and surface streets, creating fewer conflicts or hazards between people driving cars, riding bikes, and walking.

While overall encouraging, we are concerned that without rigorous design and active management the new underground and elevated PUDO zones will go relatively unused compared to the greater perceived convenience of Columbus Circle, First Street, Second Street, and H Street NW where conflicts with people on foot and bike are harder to mitigate. We encourage FRA to provide additional detail on curbside design, PUDO operations, and enforcement in the FEIS including plans for shifting PUDO behavior to the below-grade facility and for minimizing PUDO conflicts at the

surface level through roadway design, traffic calming, and separated bike lanes. Additionally, the FRA's revised concept appears to do little functionally to Columbus Circle other than focus on enhancing its efficiency and efficacy as a PUDO facility. WABA encourages the FRA to enhance multimodal access in Columbus Circle by removing some or all PUDO capacity, repurposing the road space for walking and biking, and routing PUDO to other access points.

- 4) The revised concept creates a more efficient bus facility that treats bus riders with dignity and realizes the opportunity for enhanced multimodal service at Union Station.** The proposal now incorporates a high-capacity, intercity and charter bus facility that is centrally located, and provides an attractive and safe waiting and boarding experience that is fully integrated with station amenities. The plan efficiently connects bus passengers to Metrorail, bike parking and shared micromobility services to promote multimodal travel connections. The new approach prioritizes bus passengers and ensures all riders, regardless of which mode(s) they are using for their trip, will be treated with a first-class customer experience at the new Union Station. WABA encourages FRA to continue working with WMATA, DC Circulator, and DC Streetcar planners to ensure this plan creates the most intuitive, direct, and convenient transfer experience for surface transit passengers into the new station.

As is evidenced by our comments above, WABA is very encouraged by, and grateful for, the progress made by the FRA and SEP project team to address stakeholder comments in the revised concept. As the FRA and SEP project team continues the environmental review process, WABA hopes to see more definition around project details such as bike parking and bikeshare facilities, PUDO operations, ADA enhancements, and run-through for commuter rail, in the forthcoming FEIS.

**Also, we strongly encourage the project team to include more passenger seating in Union Station. A Union station that is welcoming for all users must have adequate seating throughout the station.**

The Washington Union Station Expansion Project is of critical and significant importance to the region, and WABA is dedicated to ensuring the success of this project. WABA believes the revised concept incorporates a host of meaningful improvements for people who walk, scooter, and bike into the overall vision of Union Station's expansion, and we look forward to rallying the region around this incredible opportunity to transform Washington Union Station.

Sincerely,

Jeremiah Lowery  
Director of Advocacy  
Washington Area Bicyclist Association