
January 10, 2020

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 23-year-old organization is to promote walkable, inclusive, and transit-oriented communities, and supportive land use and transportation policies and investments. We've been recognized for our role 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 have long monitored the planning for the future of historic Union Station, for expanded rail service, and for air-rights development above the tracks. We are strong supporters of expanding rail and transit, and appreciate the FRA's commitment to major improvements to the track, platform, and concourse quality and capacity. However, Union Station is one of our Capital's grandest public and historic buildings and we must be bold and visionary in our planning and design.

For that reason, we have very significant concerns about the above-ground parking structure and the amount of parking proposed. We believe that the amount of parking has driven too much of the design of the proposed concept and therefore, this commission should defer a decision today in order to seek further analysis, information about the parking and transportation modes, and consideration of designs with much reduced parking before signing off on the proposed preferred concept.

It appears that of the 2200 existing parking spaces, 1400 are monthly permit holders, another 100 are for rental cars, and another 300 to 400 are Amtrak users with the remaining a mix of short-term and daily users of which some may be for the retail and others using it to access other destinations in the neighborhood. Amtrak is reporting that just 8% of its passengers at Union Station park at the station, and the number has been declining. Taxi, Uber and Lyft are apparently the alternative of choice of those who might otherwise park. The provision of so much parking and such a large structure limits the opportunity for additional air-rights development, and will impact the viewshed and compromise the architectural aesthetics. Every parking space adds to vehicle trips in the neighborhood on DC's crowded streets.

NCPC's charter and extending the Legacy Plan includes viewsheds and the architectural integrity of our historic and monumental buildings. NCPC's transportation element of the NCPC comprehensive plan is, to quote: "built upon the principles of transit-oriented development and sustainability. As such, federal policies promote resource-efficient planning for travel (transit, biking, walking, and car/ van-pooling) and development (compact, mixed-use) to maximize federal workplace accessibility... and to minimize the impacts of federal worker's travel on the region. Regarding parking it states: "The parking policies and associated employee parking goals are intended to encourage a gradual shift from SOV commuting to transit, walking, biking, carpooling/vanpooling, vehicle-sharing, and teleworking." Adherence to your planning documents mandates extra scrutiny for a proposed 1575 space parking garage.

If considerations of financial revenue from parking or existing legal agreements are dictating this much parking, you must still identify alternative solutions. In the upcoming NEPA review such factors cannot be used to foreclose legitimate alternatives.

I also wish to relay concerns that the proposed westside greenway has been much reduced – there is strong community interest in beautiful and efficient

connection and public space from Massachusetts Avenue to the Metropolitan Branch Trail.

Another concern we share, and that the commission must ensure it has sufficient information to evaluate, is that the Main Hall of the historic station not be diminished because so many passengers are shifted to First, Second, and H Streets. We see both sides of this issue – we know the additional entrances provide increased accessibility, especially for those walking to the station or simply crossing from east to west, and are needed to meet the increased rail service demand, but we also don't want the Main Hall to become a museum of sorts. Any future concept must ensure that a robust volume of users continue to use the Main Hall.

I'll conclude by asking again for deferral to address the parking issue. It might be argued that this is just the concept stage and that the Commission will have other opportunities to review. But experience shows that advancement of a preferred concept can tend to lock it in, and now is the best opportunity to address the central issue and problem presented by assuming so much parking.

Thank you.

Stewart Schwartz
Executive Director