



## **Comments Concerning the Union Station Supplemental Draft Environmental Impact Statement**

July 6, 2023

The Committee of 100 on the Federal City provides these comments concerning the May 12, 2023, Supplemental Draft Environmental Impact Statement (SDEIS) that supplements the June 2020 Draft Environmental Impact Statement for the Washington Union Station Expansion Project. Washington Union Station is a historic national treasure, a potentially powerful economic driver for the city, a critical piece of the nation’s transportation infrastructure, and an indispensable asset to help our region solve our nation’s transportation challenges of the 21<sup>st</sup> century. These comments, together with the comments of others reveal critical issues that must be addressed to provide a competent, safe, environmentally responsible, and practicable expansion of Union Station that will better serve rail needs beyond 2040. The Committee of 100 has grave concerns about many key aspects of the proposal including (but not limited to) treatment of passenger and commuter rail operations, faulty analysis of environmental emissions and the impacts of those emissions on adjacent neighborhoods, decisions based on out of date and inaccurate data, as well as failure to account for how Amtrak, Mark and VRE plan to operate. We recommend strongly that this process not proceed to its conclusion until these issues are satisfactorily answered or corrected. These are neither minimal nor inconsequential matters and must be resolved before progressing to a Final Environmental Impact Statement.

### **Executive Summary**

The SDEIS assesses a proposed expansion of the Station proposed by Union Station Redevelopment Corporation (USRC) in coordination with National Railroad Passenger Corporation (Amtrak) that would cost \$8.8 billion and require 14 years to build. The SDEIS evaluates substantial and welcomed changes including (among others) restoration of the historic station house, revitalization of the commercial spaces, relocation of the parking garage, a below-grade bus garage, and other changes affecting vehicular transportation as well as bicycle and pedestrian access. However, in terms of rail operations, the proposal falls significantly short because of the SDEIS’ adoption of the outdated 2020 DEIS.<sup>1</sup> Even when this project began, those

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<sup>1</sup> SDEIS, App C3S, page 5-10 *Intercity and Commuter Railroad*  
“Amtrak, Metropolitan, MARC, and VRE operations in the Preferred Alternative are those described in the *Terminal Infrastructure (TI) Report* (Appendix B of the 2020 DEIS). “

data and projections were outdated and flawed, and now, three years later, are even more so. Consequently, the SDEIS falls short of meeting the projected needs of rail passengers and the project stakeholders. The Committee of 100 has repeatedly emphasized that rail transportation must enjoy “top” priority in any plan for the proposed Union Station Expansion Project. Therefore, major amendments are needed in the SDEIS to meet this goal. The following is a summary of the detailed comments that follow.

A. Data on which DEIS and thus the SDEIS are Based are Significantly Outdated

Many source documents on which the 2020 DEIS relied upon were prepared as early as 2013 and last accessed by Federal Railroad Administration (FRA) in 2017 and not reviewed by FRA in preparing the SDEIS. Thus, the SDEIS reaches its planning projections on faulty and now inaccurate and outdated data. This must be rectified.

B. Passenger Rail Projections Are Understated

MARC, VRE and Amtrak have all projected they will operate more trains and serve more customers. But the SDEIS does not account for these projections.

C. Separation of Passenger and Freight Rail Is Not Acknowledged

Plans have been developed by Amtrak, CXS, MARC, and VRE that will permit far greater volumes of passenger and commuter rail traffic by meeting the long-anticipated goal of not intermixing passenger and commuter rail with freight rail operations. This change in operations is ignored.

D. The Proposed Trackage is Inadequate for Projected Growth

Union Station was built with 33 tracks. In order to accommodate 30-35-foot-wide platforms, the SDEIS calls for 19 tracks. The need for more tracks must be evaluated, as well as whether such wide platforms are required.

E. Thru-Running Commuter Trains is Not Given Priority

MARC thru-running to Virginia and VRE thru-running to Maryland are inadequately addressed. No VRE trains to Maryland are proposed and only 8 MARC trains thru-running to Virginia are addressed. Track constraints on two MARC lines (Brunswick and Camden) largely prevent thru-running to or from those parts of Maryland are ignored. Alternative options that would allow more thru-running should be considered.

F. Planned Passenger Rail South of Union Station is Not Accounted For

The SDEIS assumes that Acela high-speed rail will have dedicated tracks and platforms within Union Station, serving only the north. We recognize that Amtrak has no plans for Acela south of Union Station, but Amtrak is planning to provide higher speed rail south of Union Station in the future. The SDEIS does not address how that will be accommodated within Union Station in terms of platforms and tracks.

G. Environmental Impacts are Seriously Understated.

The environmental impact calculations have such weaknesses as not identifying how the No-Action emission levels were obtained, not considering Construction emissions, and not considering emissions from increased switching use of the Ivy City rail yard (as discussed in section H). Correcting these weaknesses will change the increased nitrogen oxides (NO<sub>x</sub>) emissions levels resulting from the expansion project from below the EPA National Ambient Air Quality Standards' Conformity determination threshold to above it.

H. Harmful Diesel Emissions From Switching Operations are Ignored

Operation of the Ivy City Rail Yard is essential to the operations of Union Station. The switcher engines, critical to the “work” of the Station, are outdated and emit twice the harmful emissions of the combined operations of Amtrak, MARC and VRE at Union Station. But this critical issue is not addressed in the SDEIS because FRA wrongly defined the project area to exclude the Ivy City Rail Yard. The emissions from the Ivy City Rail Yard must be included. This critical environmental issue affecting Ivy City, Trinidad, and Gallaudet residents cannot be ignored. It is not separable.

I. Diesel Emissions Under the Proposed Deck are Not Accounted For

Decking over the tracks will result in an enclosed 20-acre “Train Shed”. The resultant train shed will inevitably trap significant levels of concentrated emissions from the diesel locomotives. Those concentrated emissions will affect the area within Union Station, and if fans are used to exhaust the emissions, they will inundate the air-rights development to be built on the deck as well as much of the North of Massachusetts Avenue (NOMA) and Capitol Hill neighborhoods. This must be mitigated and accounted for in the SDEIS.

J. Inadequate Revenue for Union Station Operations is Not Recognized

Currently, the Union Station Redevelopment Corporation provides operations, maintenance and historic preservation of Union Station. The great majority of the revenue to accomplish that comes from the parking garage. But the existing garage will be closed and then demolished resulting in no revenue during construction. And, after construction the revenue from the new, smaller garage - 450 rather than the 1600 parking spaces assumed in the 2020 DEIS— revenue will be greatly reduced. The SDEIS provides no discussion of how to replace this revenue stream.

K. Impacts on Neighborhood Multi-Modal Transportation Will be Adverse

Vehicular traffic flow within the station and the surrounding neighborhood is already poor. As renovations proceed, traffic is expected to get worse. Improving travel conditions are part of the traffic mitigation studies to be coordinated between USRC and DDOT. However, the traffic analysis reveals that several of the surrounding intersections will still experience unacceptable congestion. The Committee of 100 recommends more attention be devoted to traffic congestion, and that mitigation

should begin sooner rather than later. Improvements along North Capitol Street and in Columbus Circle should not be delayed. Continuous traffic monitoring around the station will be needed to identify adjustments at intersections as necessary.

L. Current Plans and Specification are Insufficiently Developed to Assess Project Impacts on the Historic Station and Neighborhood. Stakeholder Consultation Should Be Broadened. While it is agreed that the project will have an adverse impact on the historic station and immediate neighborhood, the details remain so general that effective comments on potential historic preservation impacts are not feasible at this time. To address this, a Programmatic Agreement has been proposed – however most of design process will exclude current stakeholders/consulting parties with decisions limited to signatories. Because so many details of the project are to be deferred to the future, this is wholly unacceptable and does not meet the intent of Section 106 of the National Historic Preservation Act in that it eliminates meaningful consultation. The Programmatic Agreement should include consultation with stakeholders as a part of the process.

### **Important Procedural Note**

Both the 2020 DEIS and this SDEIS were prepared by the Federal Railroad Administration (FRA). The Committee of 100 and others submitted comments to the FRA critical of how rail operations were treated in the 2020 DEIS.<sup>2</sup> The FRA did not respond to those comments and now, over three years later, the FRA proposes to not respond to those comments until after this proceeding is concluded and both the Final Environmental Impact Statement (FEIS) and the Record of Decision (ROD) are issued.<sup>3</sup> Under such procedures, neither the C100 nor others will have an opportunity to respond to how their comments concerning the 2020 DEIS or this SDEIS will be treated in the Final Environmental Impact Statement. The Committee of 100 strongly recommends that the Final Environmental Impact Statement needs to comprehensively address these concerns We respectfully request that the FRA provide a period of 60 days after issue of the FEIS to allow comments on the FEIS and then allow sufficient time for the FRA to fully respond to those comments in its Record of Decision (ROD) so that the FRA may validly certify, as required by Council on Environmental Quality’s National Environmental Policy Act regulations, in the ROD that it considered all of the alternatives, information, and analyses, and objections

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<sup>2</sup> The C100 comments and others, a total of over 100 comments were submitted on September 8, 2020. Because there has been no response to those 2020 comments, some of them are included in these comments, with appropriate updates.

<sup>3</sup> SDEIS, page xxi.

“Pursuant to the *Fixing America’s Surface Transportation Act* of 2015 (FAST Act), FRA plans to issue a single document consisting of the FEIS and ROD, which contains the Final Section 4(f) Evaluation and the Final PA. The FEIS will respond to all substantive comments received from the public and agencies on both the 2020 DEIS and this SDEIS.”

submitted by public commenters for consideration by the lead and cooperating agencies in developing the FEIS.<sup>4</sup>

## Comments Concerning Rail Operations

### A. Data on which DEIS and thus the SDEIS are Based are Significantly Outdated

The DEIS references the source documents it relied on in several sections.<sup>5</sup> But those source documents were prepared as early as 2013 and last accessed by the FRA in 2017 and not reviewed by FRA in preparing the SDEIS. The DEIS' conclusions and, thus, the SDEIS' conclusions are therefore outdated. The DEIS ignores three different plans for the rail system south of Union Station that will affect Union Station operations in the years encompassed by this EIS:

1. The plan that resulted from the December 2019 Agreement between CSX and the Commonwealth of Virginia that the Virginia Department of Rail and Public Transportation (DRPT) will build, own and operate the new two-track Long Bridge river-crossing as well as substantial CSX trackage in Virginia.<sup>6</sup>
2. The Long Bridge FEIS plans to add a fourth track between the Long Bridge and 12<sup>th</sup> Street SW (FEIS issued September 2, 2020).
3. The L'Enfant Station Expansion Plan will add a fourth track between 12<sup>th</sup> Street and the entrance to the First Street Tunnel. It is projected to be completed in 2029.<sup>7</sup>

These three plans will result in the long-sought separation of passenger and freight rail operation south of Union Station. This momentous change in rail operations will transform our rail system into a more modern, efficient and inclusive rail network that will better serve the DC region and

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<sup>4</sup> 40 CFR 1500.3(b)(4).

<sup>5</sup> Federal Railroad Administration. *NEC FUTURE Tier I Final Environmental Impact Statement*. [http://www.necfuture.com/tier1\\_eis/feis/](http://www.necfuture.com/tier1_eis/feis/). Accessed June 6, 2017.  
Virginia Railway Express. *2014. System Plan 2040*. <http://www.vre.org/vre/assets/File/2040%20Sys%20Plan%20VRE%20finaltech%20memo%20combined.pdf>. Accessed June 6, 2017.  
Maryland Transit Administration. 2013. *MARC Growth and Improvement Plan Update: 2013 to 2050*. [https://mta.maryland.gov/sites/default/files/mgip\\_update\\_2013-09-13.pdf](https://mta.maryland.gov/sites/default/files/mgip_update_2013-09-13.pdf). Accessed June 6, 2017.

<sup>6</sup> The Long Bridge EIS ROD states at page 2-1: "It is anticipated that the Project will become the responsibility of the new Virginia Passenger Rail Authority, which formed on July 1, 2020, once that body has the staff capable of administering the Project. Should there be a change in Project sponsorship, the new Project Sponsor will assume DRPT's responsibilities."

<sup>7</sup> The L'Enfant Station Expansion was originally planned for completion in 2023 (Long Bridge DEIS, page 3-16), but the completion date has been extended to 2029.

the East Coast rail network. But this dramatic change in rail operations is completely ignored in the Union Station SDEIS. In fact, the 2020 DEIS not only ignores that change in operation but states the contrary – that passenger and commuter rail operations south of Union Station will continue to be controlled by CSX (Appendix B, page 23):

*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]

This description of rail operations is wrong and the planning projections that result from it grossly understate the number of trains that will operate south of Union Station. The Virginia/DRPT and Long Bridge expansion projects are projected to be completed in five years (Long Bridge FEIS, page 1-7) and the VRE L'Enfant Station expansion by 2029. All three projects will be in service during the 14 years required for the Union Station expansion and must be taken into account in plans for the Union Station Expansion.

### **B. Passenger Rail Assumptions Are Understated**

A foundational element of the Union Station expansion must be anticipating and responding to predicted growth in passenger and commuter rail traffic over the next 17 years and beyond. Accurately forecasting that increase is critical. The estimates of the number of trains found on pages 24-25, Appendix A3, [*Final Concept Development and Evaluation Report*], are broken out among Service Providers (Amtrak, MARC, VRE) and further between Peak Hours and Full Day Totals. These projections are critical—underlying most every future physical and service decision covered by this important document. These numbers must be credible and based on documented data. Such appears not the case in the 2020 DEIS and by incorporation, the SDEIS. (1) Some are thinly sourced, if at all. (2) Those estimates provided are derived from varying projection dates—Amtrak's numbers are derived from *Operating Plans for 2030+* (which purports to project to 2039); MARC projections are based on data applicable only through 2029; and **no** documentable projections for VRE are cited whatsoever. (3) Projections cited in Table 7-1 of Appendix B, [*Terminal Infrastructure Report*] are apparently based on the estimates presented in Appendix A3. However, the 2020 DEIS does not explain how they were determined. Is there an algorithm that is not disclosed in the DEIS? The Table 7-1 projections appear low. There is no logical progression from the projections in Appendix A3 to the projections in Table 7-1 of Appendix B. MARC, VRE, and Amtrak each plan for significant increases in the number of trains at Washington Union Station over the next 20 years. The DEIS's numbers must be credible, well sourced, and within the same time frame. They are not.

### **C. Separation of Passenger and Freight Rail Is Not Acknowledged**

The plans and projects now in progress to separate passenger from freight rail operations south of Union Station will allow a very large increase in the number and frequency of passenger trains because they can operate faster and be spaced more closely if passenger and freight operations are not intermixed and controlled by CSX as is now the case on these SW tracks. New York City's Penn Station illustrates the benefits of separating passenger from freight operations. The track arrangement for Penn Station is similar to DC rail operations south of Union Stations, and like DC's First Street rail tunnels, is served by two tunnels (the North River Tunnels) under the Hudson River. In both cases, there are two tunnels with one rail track in each tunnel, one entering and one exiting the rail stations. The contrast is clear: DC's First Street tunnels now carry a total of about 6 trains per peak hour, under the control and scheduling of CSX,<sup>8</sup> whereas NYC's North River Tunnels accommodate up to 24 trains per hour in each direction, a total of 48 trains in a peak hour, requiring very precise scheduling and control. This passenger-only operation south of Union Station would allow an eight-fold increase in passenger and commuter rail traffic south of Union Station. It is essential to account for this capacity increase in planning the expansion of Union Station to accommodate trains arriving from and serving the south.

### **D. The Assumed Trackage is Inadequate for Projected Growth**

Because of the significant under-projections based on outdated assumptions and information, the DEIS Preferred Alternative assumes too few tracks – a total of 19 revenue tracks.<sup>9</sup>

Union Station originally had a total of 33 revenue tracks:<sup>10</sup>

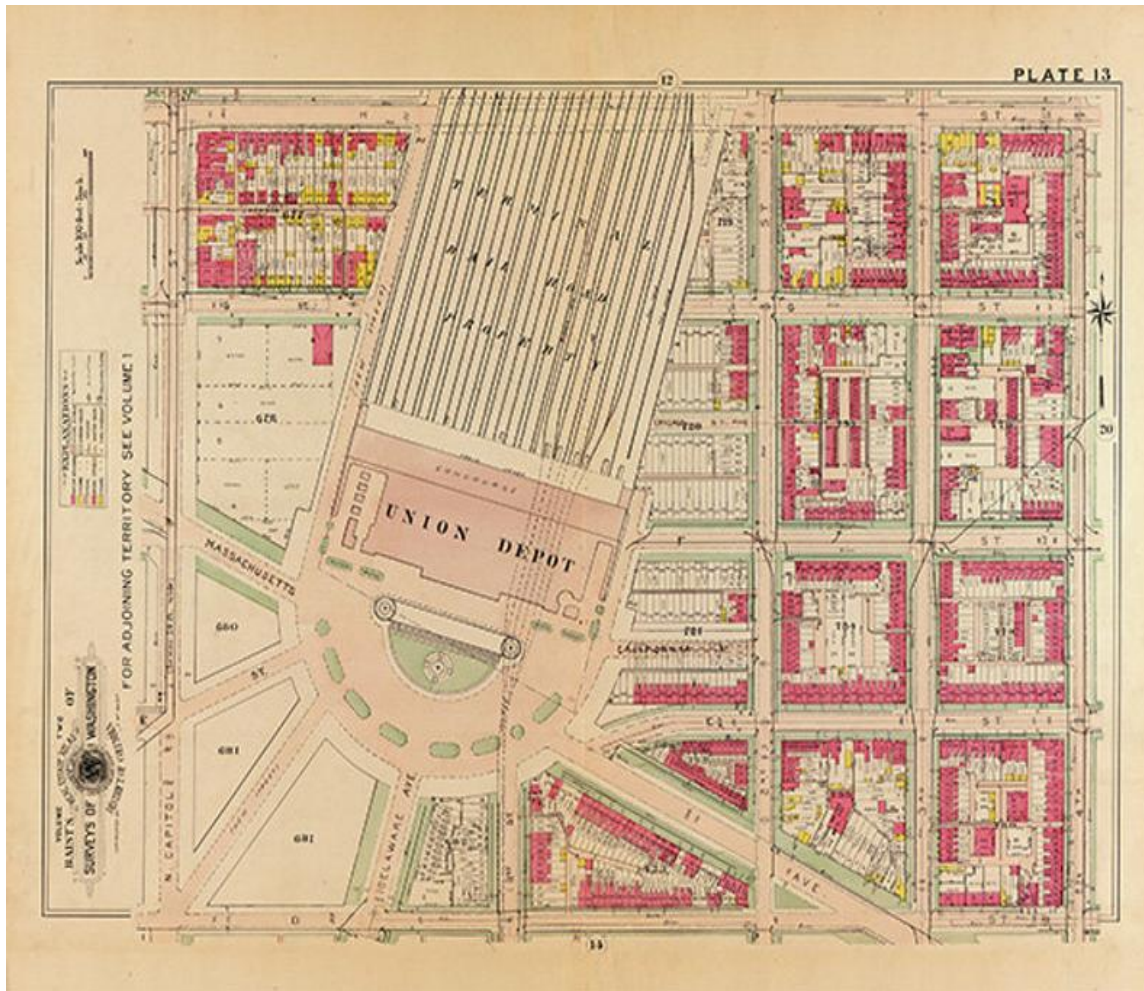
- 24 stub-end tracks ran north of Union Station on the upper level
- 9 run-through tracks on the lower level.
- 2 non-revenue tracks that terminate on the lower level that are labeled “mail tracks.”

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<sup>8</sup> As of 2016, during morning and afternoon peaks 6 passenger trains per hour depart or arrive at Union Station for points south. *DC Rail Plan*, page 3-35.

<sup>9</sup> SDEIS, Chapter 3, page 3-10: “...replace the existing tracks and platforms with 19 new tracks: 12 stub-end tracks on the west side and seven run through tracks on the east side, along with associated platforms.”

<sup>10</sup> *Union Station Historic Preservation Application*, page 8, dated 2012, jointly sponsored by C100 and DC Preservation League.



The DEIS' Preferred Alternative would provide only 19 revenue tracks:

- 12 stub-end tracks serving rail operations north of Union Station
- 7 run-through tracks.<sup>11</sup>

The reduced number of tracks is, in large measure, determined by the much wider platforms that are proposed. All of the current platforms are less than 20-feet wide, and many are obstructed by columns supporting the parking garage or the H Street Bridge. Widening the platforms to accommodate capacity growth and safety standards requires realigning and re-spacing the station tracks that reduces the number of revenue tracks<sup>12</sup> A key unaddressed issue in the plans, but must the platforms be as wide as 30 to 35 feet?<sup>13</sup>

<sup>11</sup> SDEIS, Chapter 3, page 3-10.

<sup>12</sup> 2012 *Union Station Expansion Plan*, page 3.

<sup>13</sup> DEIS, Appendix A-3a, pages 128-189.



Even Amtrak's *Union Station Master Plan* issued eleven years ago called for more tracks -- 22 -- and estimated that by 2030 those 22 tracks would be at capacity. The plan called for:

- 12 west-side stub tracks (page 13)
- 8 east-side run-through tracks under the First Street tunnel to points south would have to be reconstructed
- 2 new run-through tracks (p. 4 and 10) that by 2030 were estimated to be at capacity
- 6 - 9 new additional below grade tracks after 2030 to serve new rail operations north of Union Station.<sup>14</sup>

The DEIS eliminated the 2 proposed run-thru tracks and the 6-9 additional tracks proposed to accommodate new rail service <sup>15</sup>

Amtrak's *Union Station Master Plan* was issued in 2012. But by now, eleven years later, Amtrak, VRE and MARC have developed expansion plans that would greatly increase the number of trains and the number of rail passengers using Union Station, including plans for high speed rail south of Union Station.<sup>16</sup> The State of Virginia and VRE have recently acquired over 100 miles of CSX track, and will pay for, own and control the new Long Bridge Potomac River rail crossing, construct a new fourth track in SW and thru-run its trains through Union Station into Maryland. Likewise, MARC plans to run its trains into Virginia.<sup>17</sup>

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<sup>14</sup> 2012 *Union Station Master Plan*, page 13:

“Demand for rail services will rise to the level where the practical capacity of these facilities is reached. This could happen as early as 2030, depending on the pace of growth and investment in overall rail system capacity. To provide for this future capacity the Master Plan allows for the development of a new lower level of tracks and platforms in a zone beneath the west side stub tracks that can be excavated to create six additional station tracks (or up to nine if needed for additional capacity).

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The lower track level would be connected to the Northeast Corridor main line by means of a bored tunnel from Union Station northeast to the vicinity of the Anacostia River.”

<sup>15</sup> 2020 DEIS, page ES-9: “The nine eliminated preliminary concepts included below-grade tracks [the 2012 Union Station Master Plan proposed these below-grade tracks would be located in the area below the west-side stub tracks] that Amtrak determined it did not need to meet its operational requirements.”

<sup>16</sup> The Record of Decision for *Southeast High Speed Rail Washington, DC to Richmond Virginia*, issued September 5, 2019. Note that while the DC to Richmond High Speed rail plan included Washington, DC in its title, it in fact ended at the south end of the Long Bridge and did not address the Long Bridge or how to get to Union Station. ([http://dc2rvrail.com/files/3115/6803/2848/DC2RVA\\_ROD\\_05Sept2019.pdf](http://dc2rvrail.com/files/3115/6803/2848/DC2RVA_ROD_05Sept2019.pdf) ). The Long Bridge FEIS resolves that discontinuity. On the Virginia side, the new two-track bridge would “tie into the four tracks at RO Interlocking proposed by the concurrent DC to Richmond Southeast High-Speed Rail (DC2RVA) project.” (ROD at page 2-7). This high-speed rail plan for Virginia is connected to the SW tracks that serve Union Station, but high-speed rail south of Union Station is assumed to not exist in the Union Station DEIS.

### **E. Thru-Running Commuter Trains are Not Given Priority**

For a number of years, MARC and VRE discussed the benefits of thru-running VRE trains to Maryland and MARC trains to Virginia.<sup>18</sup> The Metropolitan Washington Council of Governments, Transportation Planning Board (TPB) issued a 2020 report prepared by Foursquare,<sup>19</sup> that run-through rail service would have a positive impact on the labor pool by expanding access both for businesses and employees<sup>20</sup> and could alleviate capacity issues on Metrorail as well as issues with crowding and congestion on platforms at Union Station and other busy transfer points.<sup>21</sup> The Foursquare Report further concluded that a substantial number of people travel each day in each direction between the MARC and VRE service areas, and in the future, the potential for run-thru trips will increase considerably.<sup>22</sup>

The DEIS and the SDEIS pay little attention to the critical thru-running commuter trains issue that will greatly increase the number of trains going through Union Station and reduce the need for MARC and VRE to find mid-day parking for their trains until they are needed for the evening rush-hour. It assumes that no VRE trains will thru-run when, in fact, VRE trains currently thru-run through Union Station to reach the Ivy City train yard where they are parked during mid-day, until their return to service for the afternoon/evening commute back to Virginia. VRE awaits only an agreement with Amtrak and MARC to thru-run to Maryland, and once that is accomplished, the VRE ridership using Union Station will increase substantially.

The DEIS assumes that only 8 of the MARC's 57 daily Penn Line trains will thru run to Virginia,<sup>23</sup> and that no trains from MARC's Brunswick or Camden Lines will thru run. The reason for not including trains from the Brunswick and Camden Lines is apparently because the DEIS does not assume any modification of the Brunswick and Camden line tracks coming into

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<sup>17</sup> High speed rail south of Union Station will be further enhanced by the recent announcement to extend high speed rail from Richmond to Raleigh. <https://www.usnews.com/news/best-states/virginia/articles/2020-09-21/grant-to-help-north-carolina-buy-rail-for-high-speed-service>.

<sup>18</sup> In May 2014, MARC and VRE announced they are planning a true regional rail partnership to thru-run MARC to L'Enfant Station and on to Virginia and to extend VRE from Union Station into Maryland. <http://www.nbcwashington.com/news/local/MARC-VRE-Discuss-Regional-Rail-Partnership-259457971.html>.

<sup>19</sup> *Market Assessment and Technical Considerations for VRE-MARC Run-Through Service in the National Capital Region*, Foursquare Integrated Transportation Planning, June 2020.

<sup>20</sup> Nearly three-quarters of the District's workforce commutes from outside the District while one-third of the District's residents reverse commute to jobs outside the District (DC State Rail Plan, page 4-2).

<sup>21</sup> Foursquare Report, page 13.

<sup>22</sup> *Id.*, page 42. Also, MARC is now developing a plan, scheduled to issue in July of this year, that will expand ridership on its Brunswick Line by 50%: <https://www.mta.maryland.gov/marc-brunswick-study>

<sup>23</sup> Eight MARC trains is the same number used for the early Long Bridge expansion studies that FRA adopts for this Union Station FEIS with no discussion or analysis.

Union Station. Only the Penn Line has direct access to the First Street Tunnel. The connecting thru-running tracks are practically inaccessible to MARC's Brunswick Line and to a lesser extent, the MARC Camden Line because of the current track configuration. For Brunswick and Camden Line trains to access the 1<sup>st</sup> Street Tunnel, trains must traverse the entirety of Union Station's "throat" from west to east over multiple interlockings.

MARC Service Area



The Committee of 100 recommends that the DEIS be expanded to evaluate how to reconfigure the Brunswick and Camden tracks so they can access the First Street Tunnel. Reconfiguration not only could permit Brunswick and Camden trains to thru-run to Virginia, but also would allow VRE trains to thru-run to substantial parts of Maryland. Because the Camden and Brunswick lines are owned by CSX, catenaries are prohibited, and the MARC trains on those lines use diesel locomotives. VRE will likely not convert from diesel to electric locomotives for some time. Thus, in terms of thru-running, the Brunswick and Camden trains could thru-run to Virginia and VRE could thru-run to serve College Park, Silver Spring, Rockville, Frederick, and farther west.

**F. Planned Passenger Rail South of Union Station is Not Accounted For**

The upper-level stub-end tracks (Tracks 7-20) are used by MARC and by Amtrak's Acela Express, Northeast Regional, Vermonter, and Capitol Limited trains (DEIS, Chapter 2, page 2-5).

The DEIS states that at least four (4) tracks must have 1200-foot platforms for future Acela HSR service (including future growth).<sup>24</sup>

The 2012 *Union Station Master Plan* (page 13):

“...provides that future tracks from the lower level of Union Station could be extended to the south, enabling extension of high-performance high-speed rail service to Virginia, North Carolina, and the Southeastern United States.”

High speed rail south of Union Station is not discussed or even acknowledged in the DEIS nor does it address efficiencies and greatly increased numbers of passenger and commuter trains that will result from separating passenger and freight operations south of Union Station. But it does take into account operational efficiencies and more frequent train service for passenger and commuter trains operating north, on the Northeast Corridor.<sup>25</sup> The DEIS recognizes the efficiencies of controlling the rail tracks north of Union Station for passenger operations (rather than inter-mixed passenger/freight operations) but does not recognize those efficiencies for tracks south of Union Station.

The Committee of 100 (as is likely the entire East Coast) is keenly interested in higher-speed, high-performance rail south of Union Station – not Acela high speed -- but higher speed than is now available south of Union Station. The C100 recognizes that Acela high speed is not possible south of Union Station in the foreseeable future, in large part because of the expense of electrification, the cost of new rolling stock, the need for curve and realignment improvements and other track improvements, the need to provide by-passes to avoid conflicts with freight operations, and other track upgrades. But with the recent actions of the state of Virginia and VRE to acquire over 100 miles of CSX tracks and build, own, and control a new Potomac River rail bridge, the track upgrades to accommodate higher-performance higher-speed rail will be practicable in the future and must be anticipated. And the higher speed can be achieved with the new Siemens ALC-42E dual powered locomotives that Amtrak will acquire for use on the NE Corridor (see subpart I) – they will provide the higher speed rolling stock. Thus, higher speed rail will be possible and likely south of Union Station in the future.

The Committee of 100 is concerned that plans for the expansion of Union Station, and the SDEIS, fail to address how this higher-speed high-performance rail south of Union Station will be accommodated in the track and platform configurations within Union Station.

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<sup>24</sup> 2020 DEIS, Appendix A-3, page 24.

<sup>25</sup> 2020 DEIS, Appendix B, page 23: “The 2040 simulation retains operating variability for trains arriving from the south, given assumed continued ownership and dispatch by freight railroads in the future. In contrast, the 2040 simulation assumes much more reliable operation for trains arriving from the north, given the significant NEC reliability investments represented by NEC FUTURE” [emphasis added].

### G. Environmental Impacts are Seriously Understated.

Throughout the SDEIS, the change in emissions is computed as:

$$\begin{aligned} & \text{Preferred-Alternative emissions} \\ & \text{minus} \\ & \text{No-Action Alternative emissions} \\ & \text{Equals: Change in emissions} \end{aligned}$$

Change in emissions is then compared to a threshold air quality standard to reach the conclusion that there is minimal or no adverse effect. This is the wrong way to look at the issue, as it is the actual, rather than the incremental emissions, that will be experienced. But the SDEIS uses the incremental change to determine whether the emissions exceed the *de minimis* air quality thresholds. Appendix C3S- Supplemental Environmental Consequences Technical Report, page 6-5 shows:

**Table 6-1. Preferred Alternative Mesoscale Inventory**

Source	CO	NO <sub>x</sub>	VOC	PM <sub>10</sub>	PM <sub>2.5</sub>
	tpy	tpy	tpy	tpy	tpy
Motor Vehicle Emissions	67.7	4.4	34.8	4.5	0.9
Locomotive Emissions	29.8	61.4	2.0	1.0	1.0
<b>Total Preferred Alternative Emissions</b>	97.5	65.8	36.8	5.6	1.9
No-Action Emissions	78.4	30.6	35.4	5.1	1.3
<b>Net Change in Emissions attributable to the Preferred Alternative<sup>1</sup></b>	19.1	35.2	1.4	0.5	0.6
<b>De Minimis Threshold<sup>2</sup></b>	-	100	50	-	-

1. Calculated by subtracting total No-Action Alternative emissions from total Preferred Alternative emissions.

2. Applicable only to NO<sub>x</sub> and VOC.

In the above table, the Motor Vehicle and Locomotive emissions for NO<sub>x</sub> under the Preferred Alternative are combined, resulting the total Preferred Alternative emission level of 65.8 tons per year (tpy), shown on the third line. The fourth line of the tables shows the No-Action Emissions level of 30.6 tpy that is subtracted from the Preferred Alternative emissions level to obtain the Net Change shown on the 5<sup>th</sup> line. But how the No-Action emission levels were obtained is not explained. This same methodology is applied to VOC and the Net Changes in each are then compared to the *de minimis* threshold levels for NO<sub>x</sub> and VOC, and because it is lower, the SDEIS concludes (Appendix C3S, page 6-5):

For both NO<sub>x</sub> and VOC, the net increase attributable to the Preferred Alternative (35.2 tons per year [tpy] of NO<sub>x</sub> and 1.4 tpy of VOC) is below the applicable *de minimis* threshold (100 tpy and 50 tpy, respectively), indicating that the proposed Federal activity would not cause new violations of the NAAQS, increase the frequency or severity of NAAQS violations, or delay timely attainment of the NAAQS or any interim milestone. Therefore, adverse indirect impacts on ambient air quality would be minor.

This incremental increase is combined with the estimated emissions that will occur during the 14 years of construction.<sup>26</sup> In the case of NO<sub>x</sub>, this results in 97.9 tpy. Because this total is below the *de minimis* level of 100, the SDEIS concludes that the Preferred Alternative would not cause any violation of the NAAQS.

Arithmetically this is correct, but it is the total of direct and indirect NO<sub>x</sub> emissions area caused by the Federal action that must be considered:<sup>27</sup> for NO<sub>x</sub> this would be 65.8 tpy for the Preferred Alternative from Table 6.1 plus the 62.7 tpy for the Construction emissions from Table 6-4, amounting to 128.5 tpy. This would exceed the NAAQ threshold level of 100 tpy - the *de minimis* air quality threshold for NO<sub>x</sub> would be exceeded.

Further, the combination of Preferred Alternative NO<sub>x</sub> emissions (65.8 tpy from Table 6-1) plus the Construction NO<sub>x</sub> emissions (62.7 tpy from table 6-4) do not include the total effect of the expansion. As explained in subpart H of these comments, the switch engine operations at the Ivy City Rail Yard are essential to the operation of Union Station and need to be taken in account in evaluating the proposed expansion of Union Station. The most recent quantification of the NO<sub>x</sub> emission at the Ivy City rail yard (Appendix B, attached to these C100 comments) amount to 112 tpy. If, as discussed in section H of these comments, the use of the Ivy City Rail Yard will likely double under the Preferred Alternative, then, assuming that NO<sub>x</sub> emission from the rail yard will, proportionally, double, the incremental NO<sub>x</sub> emissions from the yard would be 112 tpy. Combining the Ivy City NO<sub>x</sub> emissions increment (112 tpy) with the SDEIS' stated project Total Preferred Alternative NO<sub>x</sub> emissions increment (97.9 tpy) means that the NO<sub>x</sub> emissions would be as high as over 201tpy - far exceeding the NAAQ air quality NO<sub>x</sub> threshold of 100 tpy. . A refinement of the Ivy City Rail Yard calculation would compare the Yard's usage (and, hence, proportionally, NO<sub>x</sub> emissions) under the Preferred Alternative to the Rail Yard's use under the No-Action Alternative. With the emissions increment not considering the Rail Yard being just 2.1 tpy below the NAAQS threshold, an increase in Rail Yard usage of just 1.9% (= 2.1 / 112) or more under the Preferred Alternative, a highly likely outcome, would result in the project's exceeding the NO<sub>x</sub> threshold. The FRA should conduct such a detailed analysis in revising its SDEIS and adjust its conclusions accordingly.

<sup>26</sup> SDEIS, Appendix C3S, page 6-8.

Table 6-4. Combined Annual Operational and Construction NO<sub>x</sub> and VOC Emissions

Component	NO <sub>x</sub>	VOC
	tpy	tpy
Construction Emissions	62.7	7.7
Maximum Net Change in Annual Operational Emissions attributable to the Preferred Alternative	< 35.2	< 1.4
Maximum Combined Preferred Alternative Operational and Construction Emissions	< 97.9	< 9.1
<i>De Minimis</i> Thresholds	100	50

<sup>27</sup> [40 CFR 93.153\(b\)](#)

A similar analysis of the carbon dioxide (CO<sub>2</sub>) emissions is based on Table 7-5 of SDEIS Appendix C3S, below, and its associated narrative in Section 7.5.2.5, Summary of CO<sub>2</sub> Emission Estimates, as well as the narratives in Section 7.7.1.1, GHG (greenhouse gases) Emissions, (within Section 7.7, Avoidance, Minimization, and Mitigation Evaluation, within Section 7 Greenhouse Gas Emissions and Resilience), and in Section 8.7, Avoidance, Minimization, and Mitigation Evaluation (within Section 8, Energy Resources).

**Table 7-5. Total Estimated Changes in Annual CO<sub>2</sub> Emissions in the Preferred Alternative**

Source	CO <sub>2</sub> Emissions (Metric Tons/Year)	Percentage of 2019 Total Inventory	Percentage of 2032 Target
Stationary Sources -WUS	9,791	0.14%	0.21%
Stationary Sources -WUS	-6,859	0.1%	0.15%
Potential Federal Air Rights Development	3,661	0.05%	0.08%
Mobile Sources	9,247	0.13%	0.20%
Total Additional Emissions	15,840	0.22%	0.34%
Total Emissions No-Action Alternative	70,846 <sup>[39]</sup>	0.99%	1.54%
Increase relative to No-Action Alternative	22%	-	-

As the SDEIS table notes, the Preferred Alternative is estimated to yield a 22% increase in CO<sub>2</sub> emissions compared to the No-Action Alternative; representing about a quarter to a third of a percent of the District’s CO<sub>2</sub> emissions inventories in 2019 and 2032, respectively. While the relative inventory increases may be numerically modest, they must be viewed in light of the District’s related Carbon Free DC<sup>28</sup> and Clean Energy DC<sup>29</sup> plans that, together, set carbon neutrality as a goal to be met just five years after the 2040 planning horizon year for the Union Station Expansion. C100 concurs with the SDEIS Appendix Section 7.5.2.5’s note that, “In this context, any net increase in CO<sub>2</sub> emissions would be a major adverse impact.”

Accordingly, C100 supports the FRA’s proposal that the USRC prepare a Life Cycle Assessment of the project’s total GHG emissions and identify measures and strategies to reduce energy consumption and associated GHG as much as possible, using measures described in Section 8.7 and as appropriate, other such measures.

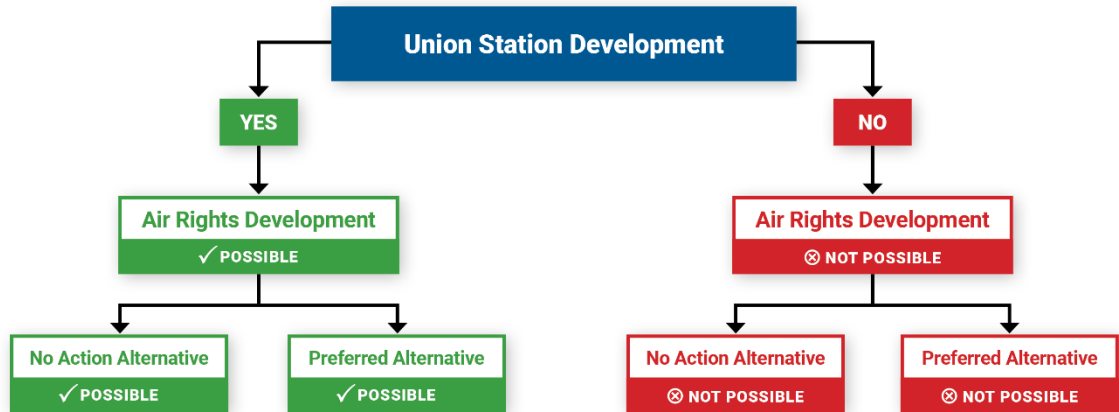
It should be remembered that, to build the Air-Rights development, a deck is needed above the rail tracks. Supporting the deck requires multiple support columns, the placement of which requires a defined configuration of rail tracks. In turn, the configuration of the new rail tracks requires the design and construction of the Union Station Expansion. In other words, **unless**

<sup>28</sup> <https://storymaps.arcgis.com/stories/034104405ef9462f8e02a49f2bd84fd9>

<sup>29</sup> <https://doee.dc.gov/cleanenergydc>



there is a Union Station Expansion, there can be no Air Rights development, as illustrated in the following flowchart.



### H. Harmful Diesel Emission From Switching Operations are Ignored

The Ivy City tracks are adjacent to New York Avenue. On the other side of New York Avenue are the Crummell School at Kendall and Gallaudet Streets, NE that is planned to be redeveloped<sup>30</sup> and residential developments such as the Ivy City Hecht Warehouse at 1401 New York Avenue, NE.<sup>31</sup>



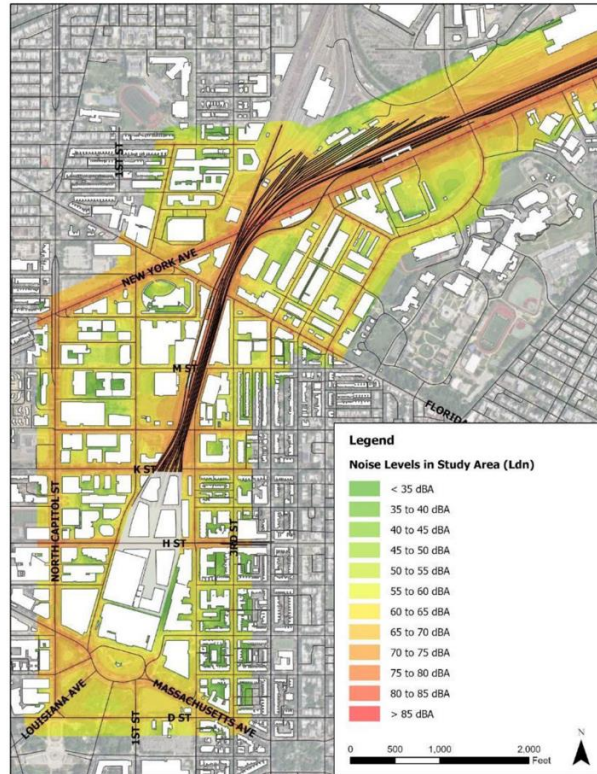
<sup>30</sup> DMPED is seeking proposals to redevelop Crummell School that, if implemented, would increase the number of people at the Crummell School site, who would be affected by air quality. [Mayor Bowser Hosts Annual March Madness | DC](#) (2021) - mentions Crummell School redevelopment. [Alexander Crummell School - Wikipedia](#)

<sup>31</sup> Hecht Warehouse at Ivy City apartments are already open. <https://hechtwarehouse.com/> [Hecht Warehouse at Ivy City is a pet-friendly apartment community in Washington, DC](#)



The 2020 DEIS acknowledges expansion of the Ivy City Rail Yard (Exhibit B, page 10), and the SDEIS includes noise and vibration emanating from the Ivy City Rail Yard (Chapter 5, page 5-70).

Figure 5-3. Preferred Alternative Operational Noise Levels



However, air pollution from diesel switchers is **not** included. Logically, this air pollution must be included. Noise and vibration end when the source is switched off, but air pollution persists and spreads. In its rules on power plant emissions EPA recognizes that polluted air moves from its source and uses a 3-mile radius to measure effects.<sup>32</sup> See EPA, Clean Air Power Programs, *Power Plants and Neighboring Communities*, [Power Plants and Neighboring Communities | US EPA](#). Certainly, the polluted air emanating from the nearby Ivy City Rail Yard must be included in an environmental impact analysis. DC’s Department of Environment and Energy (DOEE) has quantified the diesel emissions that result from switching and moving trail equipment to, from, and within the Ivy City Rail Yard,<sup>33</sup> the total emissions from switching is 10,024.7 tons per year.

<sup>32</sup> The three-mile radius dispersal area is for polluted air from power plants, with generally tall smoke stacks that result in wide dispersal areas. For the Ivy City Rail Yard, the dispersal area would be smaller, but would in all likelihood encompass the surrounding area at least as far as Ivy City, Trinidad,

<sup>33</sup> DOEE’s Excel spread sheets entitled “Ivy City Switcher Engine Emission COG” is included as Appendix A to these C100 comments.

**Emissions (tpy) from Diesel Switching at Ivy City Rail Yard**

<u>Pollutant</u>	<u>IvyCity-Amt</u>	<u>IvyCity-Mrc</u>	<u>IvyCity-Vre</u>	<u>Switching</u>
CO	14.1	9.7	3.0	26.8
CO <sub>2</sub>	5,142.8	3,622.4	1,112.8	9,878.0
NO <sub>x</sub>	62.2	38.9	11.9	112
VOC	4.1	2.9	0.9	7.9

The main reason for the high level of emissions from the Ivy City Rail Yard is due to the fact that most of the nine switcher engines are old (five of them are 1950’s models). Because of the challenges in starting the diesel engines and the need for warm-up prior to use, the switchers are started in the morning and idle all day. Most importantly, there is no discussion of what will happen to switching operations at Ivy City Rail Yard in 2030 and beyond when passenger and commuter rail operations are projected to more than double. *Appendix B fails to explain that diesel emissions from switcher activity will also likely more than double by 2030.*

DC’s Department of Environment and Energy (DOEE) has also quantified the diesel emissions that result from the operation of Amtrak, MARC and VRE within Washington, DC,<sup>34</sup> the total emissions from diesel locomotive operations is 4,868.7 tons per year.

**Emissions (tpy) from Diesel Locomotive Operations**

<u>Pollutant</u>	<u>Amtrak</u>	<u>Marc+VRE</u>	<u>Operations</u>
CO	3.7	8.9	12.6
CO <sub>2</sub>	1411.3	3380.4	4791.7
NO <sub>x</sub>	21.6	40.1	61.7
VOC	1.1	1.6	2.7

The plan to expand Ivy City Rail Yard to accommodate more VRE trains is described at page 10 of Appendix B of the 2020 Union Station DEIS.<sup>35</sup> The Appendix B description acknowledges the expansion is due to Amtrak needing to use rail yard space that has been leased by VRE. The

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<sup>34</sup> DOEE’s Excel spread sheets entitled “2020 Draft NEI DC Rail Inventory Summary” that provides the basis for the above table is attached to these comments as Appendix B. This is the DOEE report to NEI, the [National Emissions Inventory](#), prepared under the *Air Emissions Reporting Rule*. The report is done every three years. 2020 is the most current; it is marked draft because the 2020 NEI has not yet been published. The term “CSX Yard” refers to the Benning rail yard. Class I Line Haul represent the CSX emissions from CSX trains traveling from the Long Bridge, across SW, thru the Virginia Avenue Tunnel and on to the Benning Rail Yard and thus they do not pass through the Union Station train shed.

<sup>35</sup>[https://railroads.dot.gov/sites/fra.dot.gov/files/202006/Appendix%20B\\_Terminal%20Infrastructure%20Report\\_WUSDEIS\\_pdfa.pdf](https://railroads.dot.gov/sites/fra.dot.gov/files/202006/Appendix%20B_Terminal%20Infrastructure%20Report_WUSDEIS_pdfa.pdf).

expansion to accommodate VRE is immediately adjacent to New York Avenue (where the Circus Train used to park). There is no discussion of what will happen to switching operations at Ivy City Rail Yard in 2030 and beyond when passenger and commuter rail operations at Union Station are projected to more than double. Appendix B fails to explain that diesel emissions from switcher activity will also likely more than double.

Recall that the Crummell School space was recently proposed to be used for tour bus parking. Under the plan, passengers on carriers such as *Boltbus* and *Megabus* would be picked up and dropped off at Union Station, but the buses would idle in Ivy City until needed. Largely because of citizen outrage and opposition to the diesel emissions that the tour buses would produce, *Empower DC*, an activist group, filed a lawsuit on behalf of Ivy City residents. In rejecting the bus depot proposal, the judge expressed concern over the city's apparent failure to conduct an environmental impact assessment, in an area where people enjoy sitting on their porches and many residents suffer from respiratory problems.<sup>36</sup> This is the same community that is on the other side of New York Avenue from the Ivy City Rail Yard.

It is essential that FRA learn from the Ivy City court ruling forbidding location of the bus depot adjacent to the Crummell School in Ivy City due to environmental impacts. If diesel emissions from buses are a concern, why aren't diesel emissions from trains (that are expected to more than double with the Union Station expansion) a concern? And why doesn't that concern warrant a meaningful discussion in the Union Station Infrastructure report?<sup>37</sup> Diesel emissions from switching operations amounted to over 10,000 tons of pollutants per year in 2017 (more recent information is not currently available). That discussion should also address why diesel locomotives are being used for switching when Ivy City has electric catenaries that could power electric switching engines.<sup>38</sup> And battery powered switch engines that do not require electric catenaries are now in use in other rail yards.<sup>39</sup>

Appendix B, the Infrastructure Report of the November 2020 Washington Union Station DEIS, needs to be redone to competently address:

- Diesel emissions from increased activity at the Ivy City Rail Yard.
- Environmental benefits of using electric switchers at Ivy City Rail Yard.

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<sup>36</sup> [https://www.washingtonpost.com/national/health-science/ivy-city-tired-of-being-a-dc-dumping-ground-takes-on-gray-over-bus-depot/2012/08/12/7442e968-d804-11e1-b8ce-16e9caa8b86a\\_story.html](https://www.washingtonpost.com/national/health-science/ivy-city-tired-of-being-a-dc-dumping-ground-takes-on-gray-over-bus-depot/2012/08/12/7442e968-d804-11e1-b8ce-16e9caa8b86a_story.html) "Crummel School." Wikipedia; Internet; accessed 30 Sept. 2022.

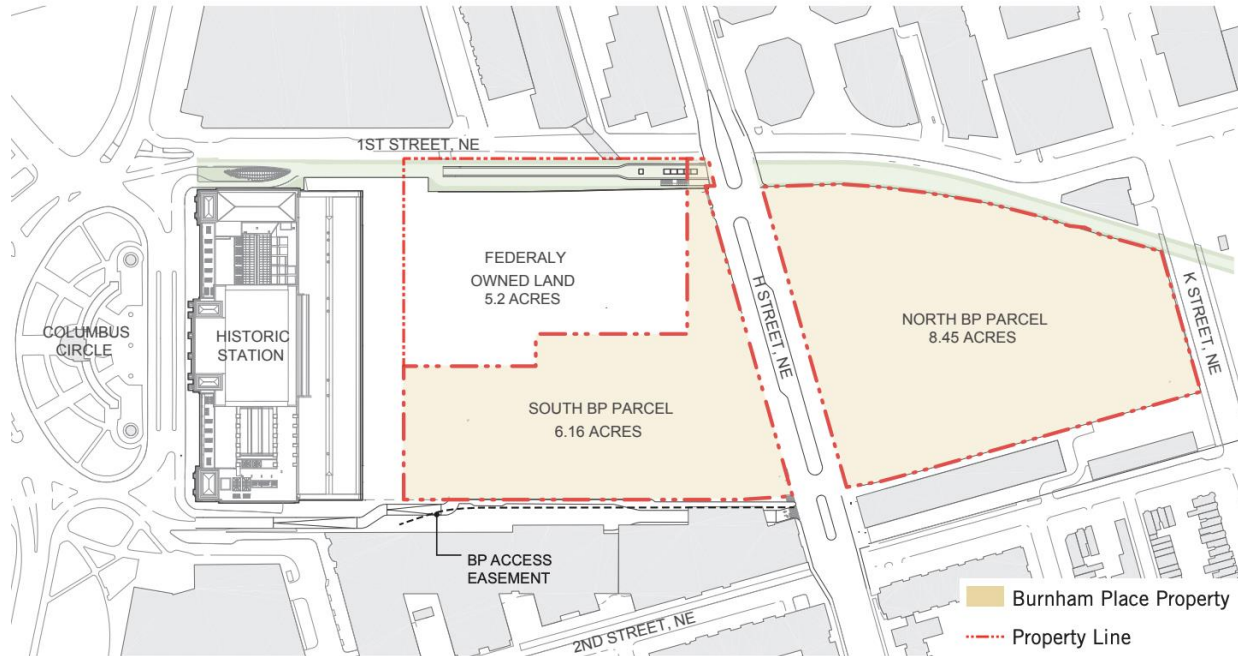
<sup>37</sup> Appendix B – Washington Union Station, Infrastructure DEIS Report, November 2019

<sup>38</sup> <https://electrek.co/2022/01/31/union-pacific-buys-ten-more-all-electric-locomotives-this-time-from-caterpillar-inc-s-progress-rail-investing-over-100-million-in-total/>

<sup>39</sup> Audi's factory in Ingolstadt, Germany is now using plug-in electric switching engines that recharge while at rest and run for up to 2 hours on its battery power. [autoevolution.com/news/audi-unveils-plug-in-hybrid-diesel-locomotive-to-be-used-in-ingolstadt-101547.html](https://autoevolution.com/news/audi-unveils-plug-in-hybrid-diesel-locomotive-to-be-used-in-ingolstadt-101547.html)

## I. Diesel Emissions Under the Proposed Deck are Not Accounted For

The Union Station Expansion will consist of decking over the tracks, extending north from Union Station, as far as K Street which, added to the current tracks under Union Station, results in a 20+-acre trainshed:



The 2012 design for the train shed required separation of the tracks for diesel and electric locomotive and provided for “heavily ventilated quarters” for the diesel locomotives.<sup>40</sup>

But the 2019 DEIS abandoned this design, without explanation, stating:<sup>41</sup>

A decision was made not to designate specific platform tracks for use by specific service, and there will be no distinction between passenger trains powered by diesel locomotives and those powered by electric locomotives. Early version of the Terminal configuration showed barriers or walls between the designated platform berths of trains using electric and diesel locomotives. The purpose of this barrier was to provide a means of isolating and ventilating the diesel exhaust, separating them from the remainder of the Terminal

<sup>40</sup> When announced in 2012, the HOK-designed train shed doubled the train capacity of Union Station and planned to separate diesel from electric train operations, stating: “The new train shed will house electric-powered trains, with diesel engines relegated to their own, more heavily ventilated, quarters beneath the station.” [https://www.architectmagazine.com/design/on-the-boards/amtrak-unveils-hoks-design-for-washington-d-c-s-union-station\\_o](https://www.architectmagazine.com/design/on-the-boards/amtrak-unveils-hoks-design-for-washington-d-c-s-union-station_o)

<sup>41</sup> **5.2.2.1** *Separation of Diesel and Electric locomotives. Appendix B – Washington Union Station Terminal, Infrastructure ERIS Report, November 2019*

that berthed electric powered trains. This can be shown in many of the superseded Terminal configurations (for example, between tracks #4 and #5 in Option 1).

The reason for abandoning this design is not explained. Nationally, diesel locomotives emit millions of tons of carbon dioxide annually and produce air pollution that leads to \$6.5 billion in health costs nationwide, resulting in an estimated 1,000 premature deaths each year. These deaths and adverse health impacts disproportionately affect communities that are located near rail yards and railways.<sup>42</sup> The greenhouse emissions that produce that pollution are more concentrated in enclosed structure such as train stations, train sheds and train tunnels.

Penn Station, the main rail station in New York City and the busiest transportation facility in the Western Hemisphere, is located below street level. Due to the lack of proper ventilation in the tunnels and station, only electric locomotives and dual-mode locomotives operating on electric power are allowed to enter Penn Station.<sup>43</sup>

The new Frederic Douglas Tunnel in Baltimore was redesigned in response to neighborhood protests that plans to replace the Baltimore and Potomac Tunnel with a new tunnel would result in air pollution from an exhaust shaft near a school and residential area.<sup>44</sup> In response to those concerns, a new tunnel will be built exclusively for electrified passenger rail service. It will accommodate Amtrak trains as well as all MARC Penn Line commuter trains, which will be electric powered.<sup>45</sup> This will preclude the need for a ventilation facility for harmful diesel train emissions on the edge of a residential neighborhood.<sup>46</sup>

The Preferred Alternative design in the current SDEIS for is a 20-acre enclosed train shed with exhaust fans to ventilate the space below the Akridge deck and the expanded train station

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<sup>42</sup> <https://newscenter.lbl.gov/2021/11/23/big-batteries-on-wheels-can-deliver-zero-emissions-rail-while-securing-the-grid/>

<sup>43</sup> *National Transportation Safety Board Docket Management System*. February 22, 2016. p. 209.

<sup>44</sup> Protesters rally against proposed Baltimore and Potomac Tunnel Project diesel vent outside elementary school – Baltimore Sun, Sep 04, 2018 <https://www.baltimoresun.com/maryland/baltimore-city/bs-md-ci-amtrak-tunnel-replacement-20180904-story.html>

<sup>45</sup> Amtrak and MARC propose to use Siemens ALC-42E dual-powered locomotives on the NE Corridor. They consist of an ALC-42 diesel-electric locomotive with an auxiliary power vehicle (APV) that contains a pantograph and transformers. On electrified tracks, the APV will draw power from overhead lines which will be fed to the traction motors in the locomotive. Outside electrified territory, the ALC-42E will function as a typical diesel-electric locomotive.

<sup>46</sup> The result will be that all Amtrak and MARC trains on the Penn line entering Union Station from the north will be electric powered. Page 3-29 of the 2020 Long Bridge EIS shows 44 Amtrak trains and 8 or more MARC trains would pass through Union Station and on to the SW tracks and new Long Bridge by 2040.

(SDEIS, App. C3S, page 5).<sup>47</sup> The fans would need to exhaust 30,000 cfm of concentrated diesel exhausts into the air rights development that will be built on the deck as well as much of the NoMa and Capitol Hill communities. If diesel exhaust from the Baltimore and Potomac Tunnel were so harmful and objectionable to the surrounding community that they required the design of a new electric-only tunnel, why should diesel exhausts from the 20-acre train shed be allowed to inundate the NoMa and Capitol Hill communities?

### **J. Inadequate Revenue for Union Station Operations is Not Recognized**

Monthly car parkers currently provide much of the income for the operations, maintenance and historic preservation of Union Station. Parking revenue sustains the Station's economic viability and supports USRC's continued preservation and use of the historic building (2020 DEIS, Appendix A6, pages 2-3):

*Parking at WUS provides more than 70 percent of USRC's operating revenue. It supports station retail, office, and event uses, which facilitate the operation of the station as part of the retail lease agreement and contribute to WUS's civic role as a vibrant public space and visitor destination.*

*Parking revenue is used for the preservation and rehabilitation of the historic station building. As a major reliable source of revenue, parking is needed for the continuation of station preservation and operation activities.*

Further, the 2014 Audit Report concerning Union Station, prepared by DOT's Office of Inspector General, explained that (page 2):

*DOT and FRA have relied on USRC to effectively manage Union Station. However, USRC has not adequately planned for Union Station's future.*

And the principal reason for this inadequacy is the fact that USRC has relied primarily on revenue from the parking garage to support its operation (2014 Audit Report, page 10):

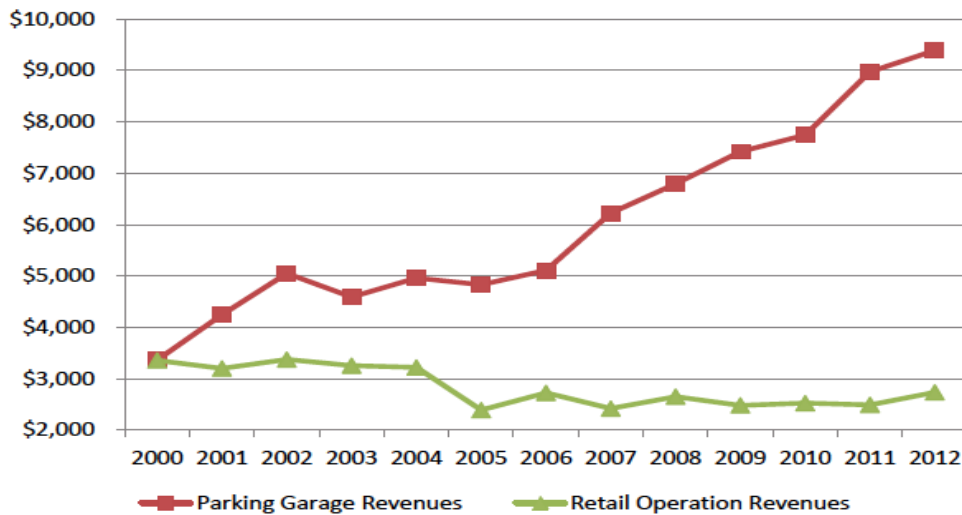
*While revenues from garage operations have increased, revenues from commercial operations have decreased over the past few years. Specifically, between fiscal years 2000 and 2012, parking revenues increased from \$3.4 million to \$9.4 million, while commercial operations revenues decreased from \$3.4 million to \$2.7 million (see Figure 1).*

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<sup>47</sup> The decking of those spaces covers over 20-acres and will be 70 feet high - a volume of (20 acres x 43,560 sq ft/acre x 70 ft high) = 61 million cubic feet. Three air change per hour would mean that the fans would have a total capacity of over three million cfm. For comparison Eastern Market's South Hall, with a volume of 544,00 cubic feet, uses roof-mounted exhaust fans that have a combined capacity of about 30,000 cfm to achieve 3 air changes per hour. Eastern Market requires 38 rooftop fans to accomplish this. If Union Station uses the same size exhaust fans, about 100 fans would be required.



**Figure 1. Parking and Retail Revenues for Fiscal Years 2000 Through 2012, in thousands of dollars**



The C100 supports the need for USRC to have a reliable source of income for its operations, maintenance and historic preservation activities. In the near term, no parking revenue will be available once the extant parking garage is demolished and for several years thereafter during the 14-year period of track realignment and deck construction.

A plan is needed for how to provide an alternative to parking revenue for USRC to continue to operate and maintain Union Station during the 14-year period the expansion is underway. Since the USRC is designated the Project Manager for the 14-year expansion – will the payment to USRC for serving as Project Manager also include a payment for USRC’s management and operation of Union Station?

In the future, parking revenue will be reduced once a smaller garage is built, but there will be about 80,000 square feet of new retail space that is estimated to produce \$8.2 -10.1 million annually (2020 DEIS, Appendix C – *Supporting Retail Information for Concept Development*, page C-10). After the Union Station expansion is complete, will USRC be able to use rental from the new retail space that for its operation, maintenance and historic preservation or will it be necessary to negotiate a new master lease with Ashkenazy Acquisition Corporation (or its successor)? It may be time to investigate charging train operators for use of the station as airports charge airlines.

## Comments Concerning Non-Rail (WMATA, Streetcar, Bicycle, Pedestrian, and Bus and Vehicle) Transportation

### Introduction

Overall, the analysis of transportation impacts on the preferred alternative for Union Station has been very thorough and the mitigation measures proposed are reasonable and reflect the need to continually monitor traffic in the vicinity of the station and make adjustments at intersections as necessary. Traffic flow within the station and the surrounding neighborhood is already poor, with significant delays and congestion throughout the day. As the renovation project proceeds, traffic is expected to get worse. Efforts to improve travel conditions are part of the traffic mitigation studies to be coordinated between USRC and DDOT. Specific comments on various areas are addressed below.

**Washington Metropolitan Area Transit Authority (WMATA) Metrorail:** Metrorail ridership during peak hours is already significant, with platform crowding during peak periods. The analysis projects that by 2040 demand for Metrorail service will exceed capacity during both the AM and PM peaks, causing even more crowding. The new concourses will improve horizontal circulation, but vertical circulation could become a major problem.

Mitigation measure No. 14, Table 7-1, proposes a new WMATA Station Access and Capacity Study to identify necessary improvements not developed by the Concourse Modernization Project. The Committee of 100 would encourage this study be done concurrently with the design for the Concourse Modernization Project to save time and money and to prevent problems in hampering vertical circulation created by the concourse modernization.

The next mitigation item, No. 15, refers to USRC engaging with WMATA about the proposed new core line, referred to as “Blue-Orange-Silver.” Nothing is explained about this, but according to news reports, this new tunnel would bring Metro’s Blue, Orange, and Silver lines to service Union Station. If this project proves viable, it will take many years and several billion dollars to build. The potential alignment for this new tunnel will need to account for and avoid the deep pile foundations (at least 150 feet) required for the new station concourses.

**DC Streetcar:** This section is confusing. Section 5.5.1.3 of the SDEIS states that the “Preferred Alternative would increase the passenger volumes *departing* from WUS by 361 in the westbound direction in the AM peak, and 44 in the PM peak.” But the Streetcar terminates at Union Station on the H Street Bridge just east of the existing parking garage. Is there a westbound *departure* demand to be met? The Streetcar can only move eastward from Union Station. [Italics added]

**Intercity, Tour/Charter and Sightseeing Buses:** A new bus facility will be built adjacent to the train hall and above the train level. An extensive study that examined six new bus stations has produced a design with 38-39 slips, their use optimized by using “dynamic management”, with 10 to 15 more slips available on the upper deck when needed, resulting in a facility significantly more functional and versatile than the existing bus facility. Entrance to the new bus facility will



be at the new east intersection on H Street NE. Exiting would be via the new west intersection, which is projected to experience LOS F during peak periods.

**Bicycles:** The overview of comments from the 2020 DEIS, Section 3.1, stated that improved pedestrian and bicycle connectivity would be an important part of a successful design. The four locations proposed for secured and covered bicycle parking (totaling 900 spaces), shown in Figure S-12, with two Capital Bikeshare stations (totaling 100 spaces) should satisfy those comments. Bicycle ramps, some shared with pedestrians, will provide additional connections from the front of the station to the deck levels and H Street. A large Bikeshare station on the east side of Columbus Circle, along the road to F Street, is not mentioned in the SDEIS. Will part of it remain after a pick up and drop off area for two vehicles is added?

Several of the specific recommendations for bicycles, such as providing protected bike lanes or paths, have been completed on many streets around the station since 2020, including the Greenway proposed for First Street NE. However, in some cases, the protective measures used have created obstacles for vehicles, causing delays.

**Pedestrians:** The need for additional pedestrian entrances on both the east and west sides of the station was apparent long before the proposed renovations. The new east and west entrances into the H Street Concourse, and entrances from H Street NE, should satisfy the comments in Section 3.1 of the 2020 DEIS. In addition, a pedestrian ramp (shared with bicycles) and a second bicycle ramp will connect the front of the station and First Street NE to the deck-level and H Street, helping to reduce congestion inside the historic station.

Internally, the additional concourses and widened walkways should provide sufficient carrying capacity, minimizing congestion except for the busiest peak period events. The vertical circulation must be improved as described before.

Outside, enlarging the plazas and consolidating the pedestrian crossings is a good idea that will help minimize conflicts with vehicles as volumes of both increase. Pedestrian queues at nearby crossings or pick up points will increase but should remain manageable. Overall, the proposed improvements should be able to safely satisfy the demand.

**Vehicle Parking and Rental Cars:** A new, single level, below-grade facility will be built for parking with a pick up and drop off zone under the train hall. This new pick up and drop off location is expected to handle approximately half of the demand, reducing the demand on Columbus Circle. The total number of parking spaces to be provided, up to 550, is below the parking demand calculated in the analysis, but is the maximum that can be located on one level. There are a number of buildings with parking lots on First Street NE that might be used, but no details are presented.

For rental cars, about 100 spaces will be reserved in the parking area. This is significantly below the demand estimate of 230, and lower than what is available presently. The rental companies will be left to develop off-site management schemes for the fewer spaces that will be available.

**For Hire Vehicles:** Five locations have been designated for passenger pick-up and drop-off. This should reduce considerably the congestion at the front of WUS and provide flexibility for passengers to access their trains or buses or to be picked up after arrival. The entrance for vehicles to the upper deck at the west intersection of the H Street Bridge will experience Level of Service (LOS) F during both AM and PM peak hours.

LOS is a qualitative measure of driving comfort and convenience, including speed, cost, traffic interruptions, and other factors. LOS A has practically no traffic. LOS C is considered the capacity of a street or intersection; any delays are minor. LOS F has very heavy traffic, significant delays, and may be gridlocked. Efforts to improve this condition and at the other intersections around Union Station are part of the traffic mitigation studies being coordinated between USRC and DDOT.

**Automobile and Bus Traffic:** Traffic conditions entering Union Station from Massachusetts Avenue NE, from H Street NE, as well as in the surrounding neighborhood are already poor, with traffic delays common during the day, not just during peak periods. Traffic approaching the station from the east on H Street NE suffers due to the mix of auto, bus, and the Streetcar when it changes lanes to go up the slope of the H Street Bridge to its terminus just east of the existing parking garage. Approaching traffic from the west queues up to turn right into the parking garage at both AM and PM peak hours which contributes to Level of Service (LOS) F at North Capitol Street and H Street NE. Ten intersections in the immediate area will suffer with LOS F during the AM peak (six are on North Capitol Street), and nine during the PM peak. The traffic analysis explains the significant increase in AM and PM volumes and the new distribution of traffic within the immediate area of the station. The intersection analysis describes the degradation of service to LOS F at six intersections, while service would improve at three intersections. The results are presented in Figure 5-2 and Table 5-17.

However, Table 5-17, the Summary of Traffic Impacts, is incomplete. Figure 5-2, the Levels of Service at Peak Hour, is a map of the area that shows the LOS for most of the intersections in the immediate neighborhood out to North Capitol Street and New York Avenue NE. Eleven intersections are omitted from the summary table without explanation, although they all have LOS of A, B or C. For example, Intersection Number 11 appears to be the ramp down to the underground parking but is not identified in the text. All of the intersections shown in Figure 5-2 should be listed in Table 5-17.

For city and commuter buses, some delays are expected to increase. The analysis shows that even though ridership is expected to increase, many city and commuter buses are estimated to continue operating under capacity. However, eight Metrobus routes would be over capacity, and overcrowding would get worse. With the additional traffic and increased delays, monitoring and adjusting intersection signal timing will become even more important.

As part of the intersection analysis that will be done as the project progresses, will the DDOT analyses consider Flexible Progressive Systems to manage the traffic signals at intersections along the major roads near Union Station?

The DDOT Bus Priority Program is examining various treatments to improve service, including bus only lanes, for North Capitol Street, H Street NE/NW, and Massachusetts Avenue NE/NW. Other strategies include modifying the bus routes to attract more ridership while reducing congestion on major streets.

Under the North Capitol Street Corridor Study (<https://north-capitol-st-dcgis.hub.arcgis.com/#project-overview>), existing conditions are being evaluated between Massachusetts Avenue and Missouri Avenue NW. Changes to pavement markings and improved signage for the North Capitol Street and Massachusetts Avenue NE/NW intersection have been proposed and are being evaluated. The final proposals should be implemented as soon as practical.

A signal and mobility study for the southern portion of the Study Area, at Louisiana Avenue and North Capitol Street is underway. The additional intersections along North Capitol Street to K Street should be added to this study since all of the intersections suffer with LOS F during peak periods.

Adjusting signal timing and other modifications at First and K Streets NE, North Capitol and G Street, and other intersections are presented in Chapter 7, Table 7-1, Mitigation Measures, item #28 and should be done as soon as practicable.

## **Comments Concerning Historic Preservation**

**Historic Preservation Plans are Insufficiently Developed:** The draft supplemental DEIS appropriately acknowledges the adverse effects to cultural resources as a result of the preferred alternative. These adverse effects include physical effects to the historic Union Station itself and to surrounding related structures, as well as substantial visual effects. To comply with the requirements of Section 106 of the National Historic Preservation Act, FRA is coordinating the review of these impacts upon historic properties as a part of the NEPA process – requiring the completion of a Programmatic Agreement to be included in the final Record of Decision. A proposed draft of that Programmatic Agreement was provided as a part of the Supplemental DEIS for comment.

Key to the Section 106 process is consultation with stakeholders. Although in this case consultation has been taking place for several years, because of the very conceptual nature of the expansion proposal, that consultation to determine the impact on historic properties and to mitigate adverse effects has only been able to be focused upon extremely general function and massing studies. A series of white box building and function envelopes on a diagram, therefore, are the only technical documents that consulting parties have been able to comment upon. Design, however, which is an integral part of evaluating the actual effects to a historic property, has not even been developed yet and is, instead, deferred to the Programmatic Agreement for “signatories” to consult upon at a future date.

**Broaden Stakeholder Consultation:** While we understand the need to defer consultation on design, we strongly object to this being limited only to the signatories of the Programmatic Agreement. Integral to the Section 106 process is stakeholder consultation. Reserving the right to comment upon the design only to signatories, therefore, does not in any way meet the spirit of meaningful consultation required under Section 106. This Programmatic Agreement should be altered to include stakeholder/consulting party participation throughout the design process

Mitigating adverse effects to historic properties is also a requirement of Section 106. The form that mitigation can take is essentially infinite – it can include a wide variety of strategies. Proposed in the Programmatic Agreement is, however, rather mundane mitigation including photo documentation, architectural salvage, and signage. In our view, given the potential adverse effects, mitigation should take a more direct form and include strategies to improve the historic station itself. The State Historic Preservation Office (SHPO) has suggested, for example, restoring natural light to the skylights in the historic concourse, improving the east and west terminations of the current retail concourse, or restoring the historic fountains in Columbus Plaza. All of these measures are much more meaningful and more directly would account for and properly mitigate adverse effects to the historic station.

These more direct mitigation strategies, in our view, take on even more meaning given the current state of affairs at the historic station. The consultation process began in what amounts to essentially a different era. Pre-COVID, the historic station house was a vibrant, albeit exceedingly retail enterprise. Today, countless storefronts and restaurant spaces are empty and the “landlord” has filed bankruptcy. We are concerned that this expansion project, which would substantially expand foot traffic to the rear of the station into a new structure, will exacerbate a decrease in use and foot-traffic to the historic station that needs to be examined now as an additional new adverse effect.

## **Conclusion**

The rail projects now in progress that affect Union Station are projected to be completed well within the 2040-time horizon of this project. Those projects, together with thru-running of commuter trains and separation of passenger/commuter rail from freight rail south of Union Station will greatly increase the number of trains that will need to access Union Station. Substantial revisions to the Preferred Alternative and the SDEIS are required to adequately address increases in future rail operations and the environmental impact of those operations.

The Committee of 100 respectfully requests that the Federal Rail Administration provide a period of 60 days after issue of the Final Environmental Impact Statement to allow comments on the FEIS and to then an additional period of time in order to evaluate and take those comments

into account in its Record of Decision so that the FRA may validly certify, as required by Council on Environmental Quality's National Environmental Policy Act regulations, in the ROD that it considered all of the alternatives, information, and analyses, and objections submitted by public commenters for consideration by the lead and cooperating agencies in developing the FEIS.<sup>48</sup>

Respectfully submitted,



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<sup>48</sup> 40 CFR 1500.3(b)(4).