USDOT Federal Railroad Administration  
Attn: Amanda Murphy  
Environmental Protection Specialist  
Office of Railroad Policy and Development  
1200 New Jersey Ave., SE MS-20  
Washington, DC 20590

May 14, 2018  
Re: Washington Union Station Expansion Project

Dear Sir or Madam,

On Wednesday, May 9, 2018, at a regularly scheduled and duly noticed public monthly meeting of Advisory Neighborhood Commission 6C, with a quorum of six out of six commissioners and the public present, the above-mentioned item came before us. After review of the materials shared at the March 22 public meeting, the Commission voted unanimously (6-0) to object strongly to certain aspects of the proposals.

ANC 6C understands the need for expansion of Union Station to effectively support current uses and meet increasing demand. Likewise, we appreciate the enormous complexity of the undertaking and the difficulties inherent in designing a facility that provides many different functions and services in a limited space.

However, all design options presented will significantly (and needlessly) harm the surrounding neighborhood. The use of small, residential streets such as 2nd St. NE, K St. NE, and 1st St. NE for major traffic-generating functions such as pick-up/drop-off, parking access, and sight-seeing bus loading and unloading will increase traffic on nearby neighborhood streets and prevent clear and easy access to the station by pedestrians. The streets on the west and east side of Union Station (1st St NE and 2nd St NE) already experience challenges with motor vehicle traffic and pick-up/drop-off (at many of the same locations specified in the design options), and they cannot accommodate the sort of motor vehicle activity envisioned by these proposed designs. Given its central location in a vibrant and growing neighborhood, Union Station will see many visitors arriving on foot and bicycle, but each design option instead prioritizes motor vehicle access at all entrances. By surrounding the station with vehicle parking and loading zones, you will create a constant, dangerous ring of traffic around the station that will prevent easy access by pedestrians and cyclists and diminish the overall Union Station experience.

The expanded Union Station needs to deprioritize neighborhood residential streets for primary station functions such as sight-seeing buses, pick-up/drop-off zones, and parking entrances. Many of these functions could be accomplished in the parking garage instead. Pick-up and drop-off, including for ride-hailing services, would be especially appropriate in the parking garage, a space dedicated to motor vehicle traffic. The redesigned H Street bridge could also accommodate some of these services. Because the bridge will be rebuilt, an opportunity exists to redesign it specifically to fit services such as Metrobus, sight-seeing buses, and pick-up/drop-off areas, rather than forcing those functions onto existing neighborhood streets that cannot support them.
If car and bus loading were not located along 1st St. NE, the existing cycle-track would not need to be relocated from the east side of 1st to the west, which would create additional conflicts that will negatively impact the safety of cyclists. Relocating the cycle-track to the west introduces at least four additional intersections to the track, each one a potential for car-bicycle collisions. The designs also do not speak to how the cycle-track will continue north of the study area, i.e., whether it will be relocated to the west for its entirety or if it would cross First street to return to the east side eventually (a maneuver that is inherently dangerous and should be avoided at all costs).

All alternatives with underground parking place the entrance to the parking garage on K St. NE. This will cause an enormous increase in traffic and congestion on K St. as well as neighboring streets, all of which are entirely residential in both directions (east and west). K St. to the east will especially see a huge increase in use as visitors from Maryland drive in to park at Union Station. This increase in traffic will pose a significant danger to the residents nearby and undoubtedly result in a rise in pedestrian-involved motor vehicle crashes. Even the alternative without underground parking proposes K St. as an entrance for ride-for-hire vehicles. K St. and its residents cannot handle the amount of traffic that any of these uses will bring. Any motor vehicle entrances to Union Station must be located elsewhere.

ANC 6C has been actively working to address the existing traffic dangers on K St. NE for many years. In April 2016, the Commission requested DDOT perform a corridor traffic safety study because of the high volume of traffic and frequently observed incidences of speeding, red light running, and other dangerous traffic behaviors. The subsequent study produced recommendations for removal of rush hour parking restrictions to limit traffic volume and speeds, and addition of safety measures such as curb extensions to lessen pedestrian crossing distances. The Commission supported these recommendations at its November 2017 meeting and continues to work with DDOT to refine the design and proceed with implementation. By proposing to direct all Union Station parking traffic onto K St. NE, the Union Station Expansion project team is threatening to reverse all of the efforts of ANC 6C and the community to make this corridor safer for its residents.

ANC 6C firmly believes that the above described deficiencies and the overall prioritization of motor vehicle access to Union Station as presented in the proposed expansion project designs will have enormous negative effects on the surrounding neighborhood and must be redesigned. In continuing to focus on motor vehicle access, FRA and the Union Station Expansion design team are overlooking the opportunities presented by a major multimodal transportation hub that is already centrally located, well connected by public transportation, and within a livable, walkable neighborhood. The expansion project should create an experience that is accessible by all modes of transportation, without disturbing the peace and impacting the safety of its surrounding neighborhoods.

Thank you for considering these recommendations from ANC 6C.

On behalf of ANC 6C,

Karen J. Wirt
ANC 6C Chair