

September 28, 2020

Mr. David Valenstein
Office of Railroad Policy and Development
USDOT Federal Railroad Administration (MS-20 RPD-10)
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Public Comment to the Washington Union Station Draft EIS

Dear Mr. Valenstein:

The expansion of Washington Union Station (WUS) represents a project of national significance, and a project of great importance for the Capital Region of DC, Maryland, and Virginia. For this reason, the undersigned organizations strongly support the modernization and redevelopment of Washington Union Station—Amtrak's second busiest train station in the U.S., WMATA's busiest Metrorail station, and the busiest transportation hub in the region, serving more residents and tourists than the region's three airports combined. The existing train station achieves this even though it does not provide a consistent positive train or retail experience for its more than 37 million annual visitors, and its track configuration and platform capacity are unable to meet expected growth of the unified and integrated rail network our region is currently planning.

An opportunity of the magnitude presented by the WUS Expansion Project requires a bold vision, modern and innovative thinking, and shared expectations and commitment from numerous parties over many years to make the promise of the project a reality. As important, projects of this scope need the full support of key stakeholders to garner the political and financial underpinning required to make the project a reality. While the WUS Draft Environmental Impact Statement (DEIS) plans for a greatly enhanced regional rail network, it falls short of enabling a regionally integrated rail network and does not present a development and construction strategy for the project's invested stakeholders.

To ensure that all key stakeholders are actively supporting the project's Final EIS, and its construction, we strongly encourage that the Final EIS address the following issues:

Plan for through running trains for all MARC and VRE lines, not just the MARC Penn Line

The DEIS does not fully plan for an integrated regional rail network, which must be addressed before the Final EIS. The proposed operating plan in the DEIS only plans for future run-through of MARC's Penn Line service into Northern Virginia and excludes consideration of similar through run trains for MARC Brunswick and Camden services, as well as through runs of VRE's service beyond Union Station into Maryland. The proposed Draft EIS runs counter to recent planning and advocacy activities^{1,2}, and counter to recent Final EIS decisions made by FRA for other mega-projects on the Northeast Corridor³. The Final EIS should actively plan for cross-regional rail movements for all currently operating MARC and VRE commuter rail lines. This approach will maximize the benefits of a modernized and expanded rail network, better serve the super-region's private and public employers, and create good jobs for our region.

Identify development and construction options

A project of this magnitude will require sustained, accountable, collaborative, and invested leadership from numerous key stakeholders over the next two decades to fully realize the vision set

¹ [What's the market potential for MARC-VRE run-through service?](#), MWCOG, May 26, 2020.

² [Capital Region Rail Vision Announcement](#), Greater Washington Partnership, September 14, 2020.

³ [Capital Region Rail Vision Announcement](#), Greater Washington Partnership, September 14, 2020.

out in the Final EIS and Record of Decision, including the executives in DC, Maryland and Virginia, USDOT, USRC, Amtrak, MDOT and MTA, DDOT, Virginia DRPT, VRE, MARC, WMATA, intercity and charter bus operators, and the private air rights developer, Akridge, among others. We encourage the Final EIS to present various funding strategies and viable approaches to complete the construction of this project, from broadening USRC's responsibility managing this station and its expansion to a redevelopment compact with all project investors. This information will help the region's stakeholders focus attention on the potential roles and responsibilities for each agency to best support the construction of this important project.

As presented by NCPC, the DC Office of Planning, and others, the Draft EIS does not properly plan for intermodal connectivity and integration into DC's urban fabric, and we encourage the Final EIS to include revisions to the parking and bus programs, decreasing their overall footprint, and greatly enhance the pick-up and drop-off demand manage program to limit impacts on neighboring communities. Additionally, the plan must vastly improve safe connections, access, and parking for bicyclists.

The Washington Union Station project is a national and regional priority. It will allow for a more integrated and unified rail connection for the Northeast and the Southeast rail corridors, enable a more unified commuter rail landscape in the Capital Region, and unlock immense economic and housing development, and job creation for the region. In order for this project to successfully move forward, it is imperative that FRA addresses the important comments that have been offered to ensure we move forward, as one region in concert with the federal government, to realize the opportunity of a greatly improved Washington Union Station.

Sincerely,

Kate Bates
President & CEO
Arlington Chamber
of Commerce

Julie Coons
President & CEO
Northern Virginia Chamber
of Commerce

Jay Corbalis
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Jim Mathews
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