



July 6, 2023

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

RE: Washington Union Station Expansion Project – Supplemental Draft Environmental Impact Statement and Draft Section 4(f) Evaluation

Dear Secretary Buttigieg:

On behalf of the American Bus Association (ABA), I submit the following comments to the Supplemental Draft Environmental Impact Statement and Draft Section 4(f) Evaluation or SDEIS, issued by the Federal Railroad Administration (FRA) on May 12, 2023, in support of the Washington Union Station Expansion Project (the Project) proposal by the Union Station Redevelopment Corporation (USRC), in coordination with Amtrak.

The ABA is a trade association representing the private intercity bus/motorcoach industry along with the larger group tour and travel industry, for over 90 years. The ABA has over 3,800 members, including bus/motorcoach operators who operate nearly 65% of the equipment on the road, providing all manner of bus services, including scheduled service, charter and tour, commuter operations and airport shuttle service. The ABA's tour and travel members are tour and travel companies, convention and visitors' bureaus (CVBs), destinations and attractions, including many based in the District of Columbia, including the USRC and Amtrak. The ABA and its members play a vital role in promoting travel and tourism throughout North America, and particularly in the Washington, D.C. area.

The President & CEO of ABA, Peter Pantuso, recently served on the U.S. Department of Transportation's (USDOT or Department) National Advisory Committee on Travel and Tourism Infrastructure, which developed the National Travel and Tourism Infrastructure Strategic plan that the Department is currently in the process of updating. As you know, the purpose of the update is to support reviving the travel and tourism industry in the wake of the COVID-19 pandemic by promoting intermodal connectivity and investment across all modes of transportation.¹ The ABA believes the Project plays a key role in USDOT's revival effort, to serve as the premier model for intermodal

¹ Fed. Reg. Vol. 88, No. 106, Friday, June 2, 2023 – National Travel and Tourism Infrastructure Strategic Plan; Request for Comment.

redevelopment projects.

The ABA has closely followed the progression of the Project for the past 10 years, participating in multiple hearings, meetings and comment submission opportunities. The Project is a high priority for the group tour and travel industry due to its strategic location in the nation's capital, a premier travel and tourism destination and its impact on the local economy of Washington, D.C. We support ABA members' interest, including the USRC and Amtrak, in modernizing and expanding the National Capital Region's principal *intermodal transportation* hub to better serve the region. However, the *intermodal nature* of Union Station, and the need for the Project to *facilitate intermodal connections*, including connections between rail, transit, intercity bus, taxis, ride-share, and others forms of surface transport, cannot be overstated. The facilitation of intermodal connections between these various modes must be a priority of any modernization project. For this reason, ABA continues to participate in this environmental review process, strongly voicing the need for intercity bus operations, including parking, to remain robust and fully integrated in the facility as part of the final Project.

Initially, we commend FRA for pausing the National Environmental Policy Act (NEPA) process and responding to comments on the 2020 Draft Environmental Impact Statement and Draft Section 4(f) Evaluation by developing a new alternative and issuing the SDEIS. This action lends credibility to the federal environmental review process, ensuring public feedback and stakeholder input are validly considered and incorporated into the process, as intended by the statute. Because the Station plays such an important role in the national transportation network, even beyond its local importance to the D.C. area, it is critical for the development of this Project to account for the needs of a multitude of interests, not only in terms of transportation services, but also in terms of environmental sustainability and supporting equitable access for rural, underprivileged and minority communities. With these interests and goals in mind, and along with information provided by ABA in prior comment submissions in this matter, we offer the following additional comments and request the Project sponsors to reconsider the availability of motorcoach parking capacity, in support of environmental sustainability and equitable access goals for our diverse passenger population.

A. CAPACITY

Although ABA is pleased FRA and the project sponsors developed a new Preferred Alternative (PA) in the SDEIS, referred to as Alternative Action F, ABA believes it still does not meet the District's needs in terms of bus/motorcoach services. The new PA does include bus facility integration, and appears to provide for more direct intermodal transfers between bus and rail operations. However, based on the number of slips identified, parking and service forecasts, the PA still does not sufficiently provide for both current and future intercity bus needs for the District.

In previous comments,² ABA and its local tourism partners made specific recommendations to FRA regarding bus parking. Bus parking is a major challenge for the District, as it is used not only by intercity scheduled service operators, but also sightseeing operations, commuter bus operations, downtown shuttle bus operations and charter bus operations. Adequate parking facilities for these various operations are necessary for an urban environment to ensure safe bus/motorcoach operations³,

² ABA Comments, Sept. 28, 2020

³ One specific safety need parking facilities address is the ability provided for drivers to take a break within the framework of their DOT-mandated hours of service and garner needed rest and relaxation from their duties.

reduction of climate damaging emissions, and facilitation of traffic flow, particularly as the number of urban street users has multiplied. As well, sufficient parking facilities support critical revenue generation, both for Union Station and the District.

The USRC frequently notes the economic impact of motorcoach driven tourism is more than \$35 million annually, to Union Station. So, it is surprising the PA actually reduces Union Station bus vehicle parking, which will have a significant economic impact to its revenue stream. Further, Motorcoaches are responsible for an estimated \$810 million direct economic impact annually in the District of Columbia, and nearly 11,000 jobs.⁴ Many of the groups visiting Union Station for parking are charter operators, who are visiting on day trips, with their groups eating lunch or dinner within Union Station and then going on to their next stop location and returning to their origination point several hours away. For this reason, we note, in recent years USRC has increased its efforts to actively market the availability of parking slots for charter bus operators. Based on these facts, ABA does not believe the data relied upon in the SDEIS to support the PA is sound or accurately reflects the current of future parking needs for bus/motorcoach operations at Union Station.

Additionally, we note the SDEIS does not take into account the reduction of motorcoach parking inventory elsewhere in the District, which increases the reliance and need for bus/motorcoach parking at Union Station. George Mason University⁵ and the Metropolitan Washington Council of Governments⁶ have concluded studies demonstrating that more than 1,000 private buses pass through the District of Columbia on a daily basis. This number increases to over 2,000 buses per day during the peak tourism season, February through June. Yet, over time the District's motorcoach parking inventory has declined from a high of almost 800 bus parking spaces⁷ throughout the city to now less than 500⁸. While a few metered parking spaces have been added in recent years, the motorcoach parking inventory has decreased overall since 2016, and free parking has largely been eliminated. Further, less than half of this current inventory is close to drop-off points, convenient or easily accessible (10 minutes travel time or less) to the downtown core or the National Mall. Because bus/motorcoach parking demand is at a premium, locations like Union Station are essential to ensuring buses continue to visit. Washington needs safe places to park and drivers need time to rest, in-line with hours of service requirements. Union Station is perfectly positioned to fill this need. The Project must be considered holistically within the context of commercial motor vehicle operations within the entire District. We believe a dynamic management system at Union Station, per the PA, could be successfully implemented as a solution to the long-term problem of accessible, reservable parking for buses/motorcoaches operating in the downtown core. However, to be successful it must begin with a sufficient number of slips to manage appropriately.

⁴ Delpy Neirotti, L. (2002). *Bus Tours and Bus Passengers: Impact on Local Economies*. Washington, DC: George Washington University.

⁵ Margaret Daniels, P. G. (2015). *National Mall and Memorial Parks Tour Bus Study*. Washington, DC: National Park Service.

⁶ Cambridge Systematics. (2015). *Regional Bus Staging, Layover, and Parking Location Study*. Washington, DC: Metropolitan Washington Council of Governments.

⁷ DC Department of Transportation. (2011). *DC Motorcoach Action Plan*. Washington, DC: DC Department of Transportation.

⁸ <https://godcgo.com/motorcoach/> (updated 2017)

Also, an updated annual study by DePaul's Chaddick Institute⁹ of intercity bus operations chronicles a significantly higher percentage of annual passenger growth in the fixed route intercity segment than that cited in the SDEIS. The SDEIS projects 27% growth between now and 2040, yet the Chaddick Institute chronicles, despite the pandemic, a near 25% year-over-year passenger growth in the 2021-2023 period. Even if conservatively estimated, using the more traditionally aligned 5-8% growth range annually, it would show a 75% growth curve by 2040.

Anecdotally, we also note that at least 5 new intercity fixed route carriers entered the market over the past 4 years, and it would be imprudent to assume there would not be others during the timeframe through 2040. New intercity motorcoach destinations originating from Washington, DC, have started to emerge, including the Southern and Central Virginia oriented (ROX and Virginia Breeze), Nashville (Napaway), new options to New York City (the Jet) and potential for others in the wings to emerge (e.g. Charlotte, Orlando, etc.). A study of intercity curbside permits requests over the past 4 years in Washington, D.C., would provide a good assessment of bus service growth in the region, and provide a basis for evaluating future growth and parking slip space need at Union Station. Consider for example, New York City, where they have seen a significant increase in curbside intercity permits, increasing from around 400 in 2019 to nearly 750 permitted spots now. This is an example of the explosive growth potential for motorcoach operations. We believe that a survey of permitted curbside spots over time could be a key indicator for future growth (if there is opportunity for expansion) at terminal facilities.

Based on current operations and projections from publicly available data, we believe the PA does not provide sufficient parking facilities for bus/motorcoach needs serving the city, taking into account both scheduled and non-scheduled, public and private bus/motorcoach operations. ABA urges the sponsors to reconsider the PA and maintain and continue to provide for a minimum of 60 available bus/motorcoach slips to serve the needs of the District and beyond.

B. SUSTAINABILITY

Universally identified across federal agencies, the transportation sector is one of the largest contributors to greenhouse gas emissions. Federal legislation, policy and funding is being directed toward this challenge on an unprecedented scale.

One of the most underappreciated benefits of motorcoach travel is environmental sustainability. In traveling by motorcoach, on average 35 to 40 cars are displaced from roadways, with a load of 55 passengers who decide to ride the bus rather than drive. This benefit is multiplied with double-decker motorcoaches capable of carrying up to 81 passengers. Further, these benefits are enhanced by the evolution of more environmentally friendly fuels, such low-sulfur diesel fuel and more restrictive emissions requirements.

As the SDEIS is intended to evaluate the environmental impacts of a project, environmental sustainability should be accorded significant weight. Under this consideration, the environmental benefits provided by bus/motorcoach travel through a reduction in congestion and pollution, particularly in a congested urban area, should not be underestimated. Travel by "green modes," particularly in light

⁹ Schweiterman, Joseph. (2022). "[Routes to Recovery: 2022 Outlook for the Intercity Bus Industry](https://las.depaul.edu/centers-and-institutes/chaddick-institute-for-metropolitan-development/research-and-publications/Documents/2022%20Outlook%20for%20the%20Intercity%20Bus%20Industry,%20v1.2%20(1).pdf)." February 24, 2022. Chaddick Institute. [https://las.depaul.edu/centers-and-institutes/chaddick-institute-for-metropolitan-development/research-and-publications/Documents/2022%20Outlook%20for%20the%20Intercity%20Bus%20Industry,%20v1.2%20\(1\).pdf](https://las.depaul.edu/centers-and-institutes/chaddick-institute-for-metropolitan-development/research-and-publications/Documents/2022%20Outlook%20for%20the%20Intercity%20Bus%20Industry,%20v1.2%20(1).pdf)

of current climate concerns, should be encouraged. Motorcoaches are the greenest and most efficient form of surface transportation.¹⁰ Motorcoaches realize 239.8 passenger miles per gallon, as compared to 85.2 passenger miles per gallon for Amtrak and 27.9 passenger miles per gallon for cars. Motorcoaches also release only 43 grams of CO₂ per passenger mile, as compared to 147 grams for Amtrak and 368 grams for cars. Motorcoach emissions and fuel economy are continuing to improve, particularly in light of the Environmental Protection Agency's (EPA) on-going efforts through updates to emission requirements and the Greenhouse Gas Phase 3 rulemaking. These requirements have had a significant impact on new engines beginning in 2021, and will continue to do so for generations. These vehicles were designed to have a 24% or greater reduction in their already low CO₂ emissions. Yet we note, neither the DEIS and the SDEIS addressed or took into account these various emission improvements or EPA requirements. Nor did the documents credit or acknowledge the bus/motorcoach operations for the pollution and congestion reduction benefits achieved by removing so many cars from the road. These calculations and environmental benefits should be both identified and incorporated into any final EIS.

Also, as previously mentioned, motorcoaches emit the lowest average amount of grams of CO₂ per passenger mile of any mode including Amtrak, transit buses and single passenger vehicles. However, when there is insufficient parking available, forcing buses/motorcoaches to circulate the city streets in "creep mode" (roaming around the city streets at low speed), both traffic and the air quality of is negatively effected. Buses operating in creep mode use more fuel (generally double) and emit at least 50% more nitrogen oxides (NO_x) when driving at low speed in urban traffic than when idling. This adds more than 375 gallons more fuel burned and emissions of more than 22 pounds of excess NO_x annually, for only one hour/day of circulating¹¹. The District has a strict 3 minute idling law, and thanks to the success of annual outreach efforts by ABA, the DC Department of Transportation, Union Station and Destinations DC, the motorcoach industry is very familiar with the law and rarely found to be out of compliance. Parking eliminates idling for motorcoaches and improves safety. We would suspect that the same cannot be said for Amtrak or transit bus operations. Motorcoaches would gain a significant environmental benefit by being afforded increased parking locations.

Further, with the interest in zero emissions commercial vehicles and efforts to transition commercial fleet operations on an unprecedented timeline, we do not see similar reflections or acknowledgement of these types of operations integrated into the Project. We strongly recommend the SDEIS address this consideration. The current Administration recently published proposals encouraging adoption and incorporation of such technology into commercial fleet operations by 2040 if not earlier (EPA-HQ-OAR-2022-0985 – Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles—Phase 3). These vehicles are currently available for commercial purchase and are being steadily incorporated into an increasing number of fleet operations.

Every motorcoach visiting Union Station contributes to the goal of improving the environment, whether by taking cars off the road and reducing congestion, or by improved air quality. ABA believes the SDEIS needs to take these benefits into account and encourage greater use of travel by bus/motorcoach by ensuring the final PA provides sufficient parking facilities.

C. EQUITABLE ACCESS

¹⁰ Union of Concerned Scientists. (2008). *Getting There Greener: The Guide to Your Lower-Carbon Vacation*. Cambridge, MA: Union of Concerned Scientists.

¹¹ Lowell, D. (2008). *Updated Comparison of Energy Use and Emissions From Different Transportation Modes*. Concord, MA: MJ Bradley & Associates.

Throughout the duration of this Administration, equitable access for the diverse populations throughout America has been a focus for a variety of initiatives including transportation. Following the publication of Executive Order No. 13985 (EO 13985), this has increasingly been put into practice through the policies encompassed in the Inflation Reduction Act (IRA), the Infrastructure Investment and Jobs Act (IIJA) as well as the Bipartisan Infrastructure Law (BIL). A fundamental tenant included in each of these pieces of legislation is that transportation infrastructure has great potential to build community wealth and strong local economies and support long-time residents and businesses. We believe that the same holds true with Union Station. The passengers carried historically by fixed route intercity bus providers trend towards being predominantly drawn from underserved communities¹², including serving as the only form of interstate transportation to people residing in rural communities.

Motorcoaches and intercity fixed route transportation have a place at Union Station. It provides an opportunity for the station to live up to the principles incorporated in EO 13985, but also to the principle of access for all that permeates throughout the federal government today. For example, although this is an FRA-led project, within the recently updated circular for joint development (FTA 7050.1B) from the Federal Transit Administration (FTA), it states that one of their major goals is to “enhance the effectiveness of public transportation and be related physically or functionally to public transportation, or establish new or enhanced coordination between public transportation and other transportation.” We hope that this project will embrace that ideal, especially since public transportation is included in the project plan and intercity buses often provide public transportation. Whether it is working under contract to public transit agencies, operating via a working relationship with Amtrak as Amtrak Thruway Service providers, standing in the shoes of the airlines/rail/transit in the case of a breakdown or providing a “bus bridge” shuttle or daily commuter bus service, motorcoaches participate as public transportation providers.

We believe that in providing service to underserved communities, as evidenced by the recent expansion of service linking rural areas to Washington DC’s Downtown core through the Virginia Breeze¹³, there is more opportunity for innovation that will emerge in the coming years. It’s with an eye towards this innovation that we ask the Project not to reduce the Union Station Bus Deck footprint below 60 spaces. Finally, we are confident that motorcoaches can spur economic development for underserved communities, bringing people to needed employment, spurring innovation and attracting tourist investment. We hope that this intermodal project will continue to encourage each of those ideals outlined in EO 13985 as well as continue to support small-family owned businesses in supporting motorcoach operations and growth.

In closing, we have high hopes for a redesigned Union Station and would like it to serve as the crown jewel in facilitating future motorcoach passenger growth (as highlighted in the National Travel and Tourism Infrastructure Strategic Plan 2020-2024) and promoting intermodalism as well as public-private partnership. We do believe that the Project currently relies on bad data, ignores current growth trends, minimizes consideration of the environmental and economic benefits that the motorcoach industry provides, and potentially limits equitable access to all populations. **The ABA supports a plan for Union Station that includes a Bus Deck with at least 60 slots for motorcoaches and an indoor passenger staging area immediately adjacent to the Bus Deck.**

¹² <https://www.jtlu.org/index.php/jtlu/article/view/419> (2015)

¹³ <https://ggwash.org/view/86290/virginia-defies-odds-with-new-intercity-bus-route> (2022)

We appreciate your willingness to listen to public comment and work with your existing tenants to craft a design that is workable for current operations and hope that you will continue to listen to help shape operations in the future, 2040 and beyond. We believe that this is the most successful avenue to make sure that future growth is considered for all of our passengers including those who view the motorcoach as the only affordable and environmentally responsible way to travel.

The bus industry appreciates your interest in continuing to provide intermodal opportunities for the entire passenger transportation industry, but we hope that you won't forget the charter and tour bus segment in the intermodal redevelopment plan. Thank you for the opportunity to provide comment, and for your partnership and engagement throughout this process. We also would like to thank the USRC and the Bus Parking Deck personnel for being a valued member of our Association and an active participant in outreach to the over-the-road bus industry.

Sincerely,

A handwritten signature in black ink, appearing to read "Brandon Buchanan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Brandon Buchanan
Director of Regulatory Affairs