

The Committee of 100 on the Federal City



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VIA Email:

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Ms. Michelle Fishburne
Office of Railroad Policy and Development
Federal Railroad Administration
1200 New Jersey Avenue SE.
Washington, DC 20590

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RE: Comments on the Scope of Union Station EIS

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Dear Ms. Fishburne:

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The Committee of 100 is pleased to have the opportunity to participate in the Union Station EIS process and to submit formal comments on the scope of the study. Several members of the Committee participated in the December 7 public meeting and provided comments at that time. We look forward to working with you, other FRA staff, and the project consultants on this exciting project. In summary we believe that the scope should be broader to ensure the important role Union Station plays in the City and region is maintained. Key issues are as follows:

We concur with the Rail Needs and Community Needs specified on the Boards displayed at the public meeting. However, we also believe that preservation of the majesty of Union Station is a fundamental need. The building was preserved by an Act of Congress in 1981 due to its national historical significance, its pre-eminent architecture, and its social and economic importance to the Nation's Capital. These reasons remain valid and important issues into the 21st Century.

The rail transportation role of Union Station is limited by capacity constraints imposed by the Long Bridge and the SW rail tracks to the south of the station, and these constraints are the key reasons for the limits on Virginia commuter rail and passenger ridership south of Union Station. If the capacity of the Long Bridge isn't expanded as the capacity of the Virginia Avenue tunnel increases, then any major expansion of freight service will inevitably come at the expense of passenger rail service, with real limitations on the use of Union Station and serious impacts to regional transit service.

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We agree as stated in the December 7 meeting materials that access to the station by all modes both vehicular and non-vehicular is constrained. The Committee also believes that needs for improved access must be a primary factor in the development of the study area, so that the development does not overwhelm the transportation function and diminish the importance of the station as a national and local landmark in the future.

The Committee also believes that the study must address potential impacts to the historic and vibrant neighborhood to the east of the station. In addition to their historic and community significance, from the reopening of the Station in 1988, these neighborhoods have played an important role in supporting the economic viability of the Station. A role that was not envisioned in the original market studies for the development.

Following are our specific concerns and recommendations for the scope of the effort:

Rail Operations

1. The scope of the project is too narrow. As depicted on the information boards presented at the December 7 public meeting, the study area for the project encompasses only the Union Station building, Columbus Circle in front to the station and the rail tracks north of the station. However, it fails to include the tracks south of the station. The tracks south of the station, beginning with the First Street tunnel, and including the SW tracks and the Long Bridge, are essential to future expansion of Amtrak and commuter rail operations south of Union Station and need to be included in the scope of the Union Station Expansion Plan.

2. To ensure continued support for the growth of commuter rail in the region, the study needs to model several commuter and passenger rail expansion scenarios, including the complete build-out projections of Amtrak, VRE and MARC to ensure that they are feasible given the doubling of CSX freight service. The rail operations in DC consist of freight (CSX and NS), passenger (Amtrak) and commuter (MARC, VRE and Amtrak Virginia¹). Except for the NE Corridor and the First Street tunnel, commuter and passenger rail in DC operate on tracks owned by CSX. Once Amtrak, VRE and Amtrak-Virginia leave Union Station heading south they emerge from the First Street tunnel, and then use the CSX-owned SW tracks and cross the Potomac on the CSX-owned Long Bridge. CSX controls schedules and priorities that result in frequent delays of passenger and commuter rail schedules.

Currently, MARC trains have an average weekday ridership of over 36,000 and VRE has a daily average ridership of about 18,000. Current plans of MARC call for ridership to increase to 75,000 daily riders by 2040 (*MARC Growth and Investment Plan Update 2013 to 2050, September 9, 2013*). VRE projects they will be able to carry up to 50,000 weekday passenger trips by 2040 (*Virginia Railway Express System Plan 2040 Brochure, March 27, 2014, page 3*). The total amounts to 125,000 riders per day, or five times the number of commuters that the new Metrorail Silver line can carry. 3. To fully evaluate service needs at Union Station, the study needs to assess both multi-modal facilities that serve commuter rail and are at or near capacity now: L'Enfant Station and Union Station. MARC has instituted reverse commute and weekend service. In the future, VRE plans to "thru-run"

¹ Amtrak Virginia, in partnership with the Virginia Department of Rail and Public Transportation, operates nine daily round trip trains between Washington DC and Richmond, two daily trips between Washington DC and Lynchburg, and one daily trip between Washington DC and Charlottesville (page 3-19, Virginia Statewide Rail Plan, November 2013).

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trains from Virginia through Union Station and in to Maryland. In May of last year 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-259>).

The SW Ecodistrict Plan recommends expanding the L'Enfant Station to accommodate this increased commuter rail traffic.² This, combined with increased Amtrak traffic south of Union Station, would require additional tracks just between Union Station and L'Enfant station, whether by expanding the First Street Tunnel or by constructing a new tunnel. The Union Station Expansion Plan needs to support and reinforce the future transit plans of MARC and VRE, and thus needs to encompass L'Enfant Station and rail facilities south of Union Station.

While the Maryland and Virginia communities have similar characteristics in terms of commuters who work in DC, the two-to-one difference in MARC versus VRE ridership (MARC: 36,000+, VRE: 18,000) demonstrates an infrastructure problem that needs to be addressed in the context of the Union Station Expansion Plan. Capacity constraints imposed by the Long Bridge and the SW tracks are the key reasons for the difference in Maryland versus Virginia commuter rail ridership.

4. The SW tracks and the Long Bridge create bottlenecks today and obstacles to future commuter, passenger and freight rail that will cross the Potomac River. Previous and ongoing plans assume that expansion of the Long Bridge and the provision of four tracks in SW for freight and passenger rail will accommodate freight, passenger and commuter rail. *But because of the narrow width of the depression in which the tracks are located along Maryland Avenue, the three SW tracks cannot be expanded to four tracks.* Even if the SW tracks could be expanded to four tracks, the recent decision to enlarge the Virginia Avenue tunnel to permit two-way CSX operations, will likely mean much greater CSX freight traffic on the SW tracks to the further detriment of passenger and commuter rail operations. Separation of commuter rail and Amtrak from freight rail with a new, separate river crossing for freight would relieve these capacity constraints³. The Union Station Expansion Plan needs to address separation of freight from passenger and commuter rail south of Union Station.

5. The capacity constrained 2 and 3 rail tracks south of Union Station cannot be justified when the same rail operations north of Union Station require 7-8-tracks. These comments have discussed the physical constraints and the growth projections, but there is a simpler way to understand both the problem and the kind of solution that is needed. There are commuters in Maryland just as there are commuters in Virginia that would use commuter rail. Amtrak wants to expand high-speed rail south of Union Station. The infrastructure north of Union Station

² *The SW Ecodistrict Plan, A Vision For a More Sustainable Future*, National Capital Planning Commission, January, 2013, page 19.

³ In 1997, NCPC proposed a rail tunnel under the Potomac River between Virginia and Anacostia in their plan, *Extending the Legacy: Planning America's Capital for the 21st Century*. In Virginia, the tunnel was proposed to begin south of National Airport and in Anacostia, the alignment would follow the Shepherds Branch tracks.

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can provide a useful framework with which to consider what is needed south of Union Station. North of Union Station MARC operates on shared tracks with CSX and Amtrak:

- The Brunswick line operates on the 2-track CSX Metropolitan Subdivision,
- The Penn Line operates on the 3-4-track Amtrak NE Corridor tracks, and
- The Camden line operates on the 2-track CSX Capitol Subdivision

There is a significant interdependence between the Union Station Expansion Plan, and the SW Ecodistrict Plan. They both address or need to address how to greatly increase the capability of moving a lot more people using commuter and passenger rail.

Historic Significance

The Committee of 100 is also concerned about how the restricted study area will prevent thoughtful consideration of the expansion's impact on historic resources. We understand that the Section 106 process will be central to assessing the impact the project will have on these resources, and we see the statement on page 4 of the Expansion Project Guide that "FRA intends to coordinate the Section 106 process with the NEPA process." Unfortunately, the overly narrow boundaries of the study area will prevent the EIS from the accurate and comprehensive evaluation of impact that NEPA requires.

The limitations of the EIS are clear when it is compared to the Washington Union Station Preservation Plan. Released in the fall of 2015, this plan was created for four organizations deeply involved in future developments around the terminal: the Union Station Redevelopment Corporation, Amtrak, Akridge, and Union Station Invesco. As the Expansion Project Guide notes, the first two are the ones proposing this project.

While the EIS suggests a study area limited to Columbus Circle and station building and the yards north to L Street NE, the Preservation Plan considered the area extending north to New York Avenue. In addition, the plan recognized a secondary study area south from L Street that extended several blocks around the terminal.

This latter approach is a far more accurate way to evaluate how the proposed expansion will affect historic resources. Throughout its history, Union Station has profoundly affected areas beyond its immediate boundaries. In the years before World War II, station operations led to construction of the Post Office immediately to its west, development of the warehouses to its northwest, and changes in the residential neighborhoods to its east. The station's 1988 rehabilitation helped inspire new office and residential construction to the northwest and new commercial development east along H Street, not to mention significant investment in residential properties to the east. There is no reason to think that the expansion of Union Station now under consideration will not have similar effects. The EIS study area should therefore be significantly enlarged in order to capture how this project will affect historic resources in those areas.

Intersection of Station and Development Planning

While we were advised at the December 7 meeting that this analysis is being coordinated with the announced major development plans, we continue to have concerns regarding how the "whole" will be envisioned and

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realized. It is a major concern of the C-100 that the magnificence of the Union Station as a major landmark in the Nation's Capital will continue to be honored and preserved for future generations, as the Congress so wisely provided in the 1981 legislation.

Transit, Bike, and Pedestrian Access

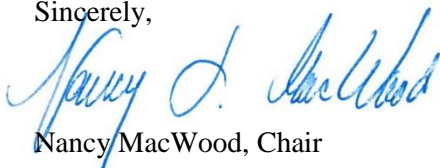
As the current project scope suggests, to maintain the Station's role as a regional transportation center, as a tourist hub, and as a retail destination, much improved access by all means of transportation is needed, particularly between the station and the neighborhoods and offices to its east and west. Today, primary pedestrian, taxi, and bicycle access is from the south (main entrance) and southwest entrances. Access to and from the office and residential developments to the west and northwest are limited to the small Metrorail entrance, which is highly congested at peak commuter and lunch periods. Access from the east is especially constrained, although an additional access point at the east end of the Amtrak concourse was anticipated in the redevelopment plans of the 1980's, but never materialized. Access from the east and north needs to be increased to meet future requirements, particularly as development increases and expands north.

To assess these needs, the project location map provided at the December 7 hearing should be expanded, as access issues extend beyond those artificial borders. For example, the intersection of Massachusetts and First Street NE is a hazard to pedestrian safety made worse by the concentration of public buses on the south-eastbound side of the intersection. Given poor visibility of traffic signals for southbound pedestrians and the attraction of waiting buses on eastbound Massachusetts, there is a high potential for pedestrian-vehicle conflict that only increases with more activity at the station. Movement of transit stop locations to alternate sites south and west of the project boundary line and including increasing use of the Union Station bus level, need to be considered in the plan.

The opening of the old H Street underpass for transit or vehicular access has come up periodically for years. Various reasons have been given why it cannot be reopened to public use – but no clear or public analysis has been proffered. We hope that this important potential access point can be analyzed and, if not feasible to address any of the access issues, the reasons clearly stated for the benefit of public understanding.

Thank you again for the opportunity to comment at this stage and participate in this important endeavor.

Sincerely,



Nancy MacWood, Chair

Cc: Mayor Muriel Bowser
Council Chairman Phil Mendelson,
Councilmember Mary Cheh
Director Leif Dormsjo