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Ms. Lezlie Rupert
Program Manager, Long Bridge Study
DC Department of Transportation
100 M Street, S.E., Suite 1200
Washington, D.C. 20003-3515

Subject: Long Bridge Study

Dear Ms. Rupert:

I appreciate the opportunity I had to speak to you and Mr. Siaurusaitis at the December 5th public meeting concerning the Long Bridge Study. As you may recall, we discussed the fact that the study area extends from the Alexandria Metro Station on the Virginia side to the L'Enfant rail station on the District of Columbia side, a distance of about 8 miles. This should provide an opportunity to evaluate alternative river-crossing locations that would hopefully be able to separate commuter and passenger from freight rail operations. After the meeting, I sent Mr. Siaurusaitis an email describing the NCPC proposal for a rail tunnel under the Potomac River between Virginia and Anacostia in their 1997 plan *Extending the Legacy: Planning America's Capital for the 21st Century*. NCPC proposed a tunnel that would carry both freight and passenger trains. The freight segment could be either a tunnel or a bridge that would connect with the rail right-of-way that extends from Blue Plains to the Benning rail yard. That alignment would carry freight around the downtown, monumental core, leaving the SW tracks for use by Amtrak and commuter rail, and allowing electrification of those tracks.

Since the December 5th meeting, I have had an opportunity to review the materials presented at the public meeting and have concerns about the shared SW tracks and the differences between the number of cross-river train trips quantified in the Long Bridge Study and the data that is publicly available.

SW Rail Tracks

The rail tracks from Virginia are double-tracked across the Long Bridge, until they reach 12th Street, S.W. where they become triple-tracked, with double-tracks for passenger and commuter trains branching off to the north to Union Station through the First Street Tunnel. Double tracks for freight trains continue east until they become a single track entering the Virginia Avenue Tunnel. CSX uses the SW tracks to access the Virginia Avenue Tunnel. Passenger and commuter trains use those same SW tracks to access

Union Station. These SW tracks provide the only means for passenger and commuter trains to access Union Station from the south and for trains originating at Union Station to travel south.

The alternative configurations for the replacement Long Bridge that were presented on December 5th all show depressed (Alternative 2) or underground SW tracks (Alternatives 3, 4 and 5), four tracks wide, requiring a width of 64 feet. But that is not possible. The width of the existing Maryland Avenue depressed rail alignment can be no more than 58 feet, allowing for only three sets of parallel tracks.ⁱ Not only is this limitation imposed by the 1901 statute, but it is also constrained by development that has occurred to the edge of the depression. If the Long Bridge is rebuilt or refurbished to connect with the existing SW tracks, the bottleneck and rail congestion will be shifted to the three SW tracks.

The logical solution is a new two-track bridge for freight that reroutes freight away from the SW tracks and an extended refurbishment of the current bridge to serve commuter and passenger rail. This would allow separation of freight and passenger operations and scheduling, electrification of the SW tracks, and expansion of Amtrak and commuter rail as planned in the Union Station Master Plan and the SW Ecodistrict Plan. It would reroute freight and thereby both obviate the need to rebuild the Virginia Avenue tunnel and improve air quality, safety and security by rerouting CSX away from downtown, the monumental core and the U.S. Capitol.

Number of Cross-River Train Trips.

The data contained in the information presented at the December 5th public meeting was compared to publicly available information. In the case of the number of commuter and Amtrak train trips each day, the published weekday train schedules closely match the current number of trips used in the study. For the projected data, the Union Station Master Plan, Washington, DC, July 25, 2012, Executive Summary, page 2, projects commuter and Amtrak rail operations would both double by 2040. Again, the projected public data closely matches the projected data presented in the Study.

However, the Study appears to considerably understate the number of daily freight trips. In the Virginia Avenue EIS proceeding, CSX elected not to provide information about the number of daily CSX trains that are projected over the Long Bridge, the SW tracks and through the Virginia Avenue Tunnel.ⁱⁱ In the Long Bridge Study, I understand that CSX again declined to provide the number of daily train trips, but rather required DDOT and their consultant, Michael Baker, to convert raw freight tonnage to estimate the number of trains required to carry that freight. As shown in the table below, the differences between public data and study data are considerable.

Number of Cross-River Train Trips per day

	<u>Present</u>		<u>Projected</u>	
	Public Data	Study Data ⁱⁱⁱ	Public Data	Study Data ³
Commuter Rail	40		80	
Passenger Rail	24		48	
Total	64 ^{iv}	56	128 ⁴	132
Freight Rail	33 ^v	23	56 ⁵	34
Total	97	79	184	166

Comparing this information with the maximum capacity of the exiting two-track Long Bridge and a rebuilt, four-track bridge:

	Present		Projected	
	Public Data	Study Data	Public Data	Study Data
Total trains	97	79	184	166
2-Track Capacity	96	96		
4-Track Capacity			187	187

The figures indicate that even the new four-track bridge will barely provide the capacity needed for the Amtrak, VRE and CSX trains that are projected to use the rebuilt bridge. Both the Office of Planning’s *Maryland Avenue Plan* and NCP’s *SW Ecodistrict Plan* recommend that MARC trains though-run from Union Station to Alexandria. If more than three MARC trains attempt to use the projected four-track Long Bridge the capacity will be exceeded.^{vi} If the goals and objective of the *Maryland Avenue* and the *SW Ecodistrict Plans* are to be realized, something in the Long Bridge Study needs to change.

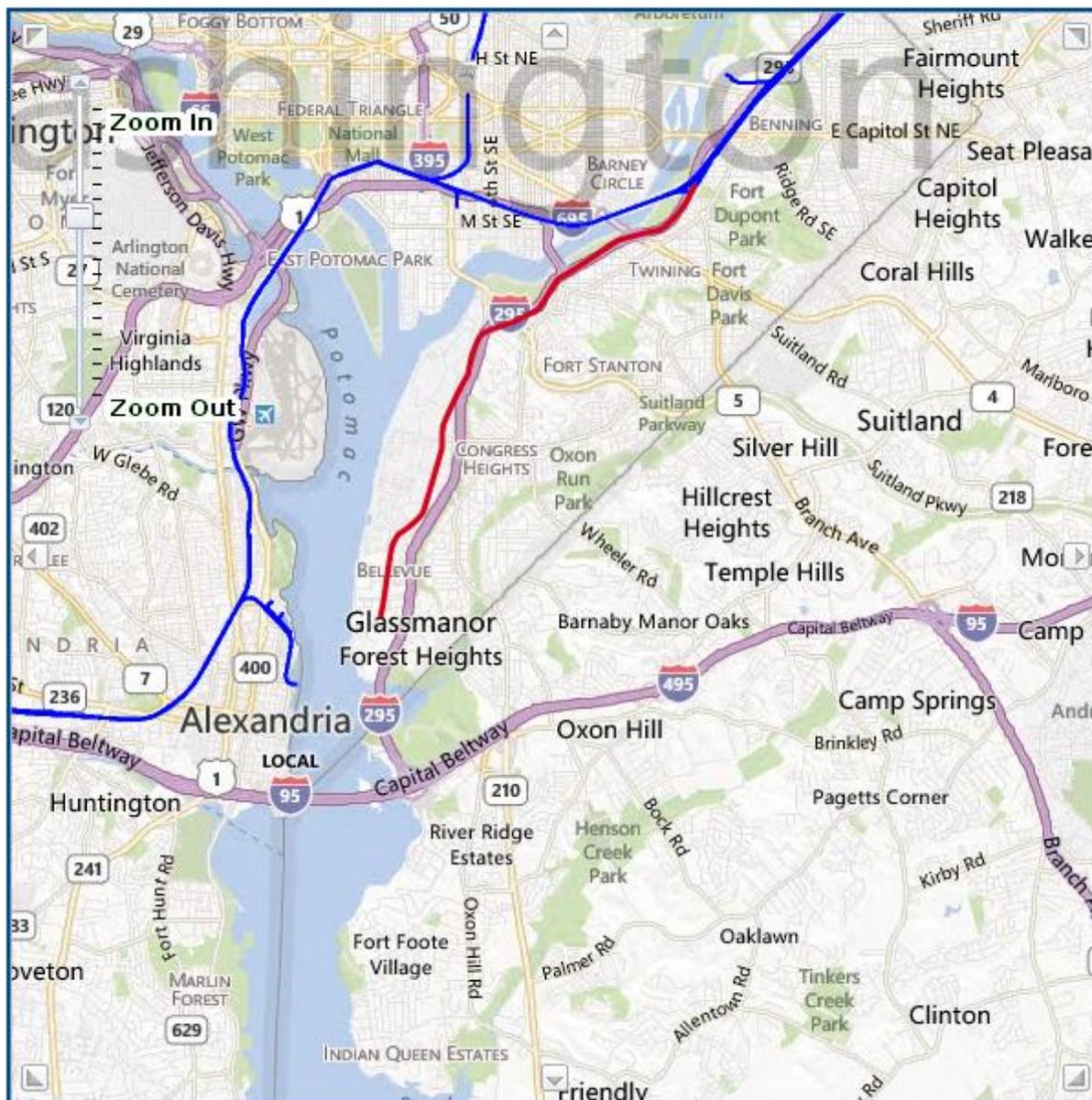
One of the necessary changes is that the Study needs to examine the differences between freight and passenger rail operations. Currently, the operations of the Long Bridge and the SW tracks are controlled by CSX. CSX designs their rail lines for freight loads, not for passenger loads. Freight operations are typically slower and less time-critical than passenger rail. As a result, signaling, scheduling, platforms, speed and logistics generally are optimized for CSX's freight operations. The Study needs to evaluate the benefits of separating freight operations from passenger and commuter operations and how those operational benefits affect capacity limitations of separate freight and passenger river crossings.

Separate Freight and Passenger/Commuter Rail Crossings

A common theme running through the points discussed in this letter is the need to separate freight and commuter/passenger rail operations. As pointed out at the beginning of this letter, the 1997 NCP proposal for an alternate rail crossing needs to be evaluated as an essential part of the Long Bridge study. Opportunities for other alignments may have presented themselves since that 1997 proposal and they also need to be identified and evaluated. For example, The Potomac River Generating Plant, owned by GenOne, just north of Alexandria has been decommissioned and is currently undergoing demolition and environmental cleanup. This location provides a clean slate for constructing the Virginia side of a new Potomac River crossing.

The current track configuration is depicted on the CSX website. Just north of Alexandria a spur line heads to the Potomac River, to serve Robinson Terminal.

The two short stubs off of that spur line were used to serve the Potomac Generating Plant. On the Anacostia side, the rail tracks that served Blue Plains and other customers, the same tracks to which the 1997 NCP realignment would have connected, have been enhanced for visibility.



- Legend**
- CSX Rail Network
 - Blue Plains Line

To reactivate the Blue Plains alignment, tunnel boring under existing rights-of-way may be more practical than attempting to reconstruct surface tracks, because of redevelopment that has occurred. Another possibility would be to lower the tracks and deck over them, like the SW tracks along a part of Maryland Avenue or perhaps a Virginia Avenue type of shallow tunnel in order to coexist with the development that has occurred in this area. The possibility of using a tunnel boring machine for all or part of this work needs to be evaluated. These are some of the alternate routing variables that need to be addressed in the Long Bridge Study.

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I look forward to hearing from you about how the Long Bridge Study can be expanded to comprehensively address the concerns I have expressed in order to achieve the stated purpose of the Study:

(<http://longbridgeproject.com/purpose/>)

“The purpose of this project is to complete a comprehensive study of the Long Bridge to include identification of short-term needs and long-term capacity improvements, identify and analyze alternatives that meet the short- and long-term multi-modal needs, and identify, collect, and evaluate data in support of the recommended improvements. Multi-modal needs include analyzing future operating requirements of high-speed and intercity passenger rail, commuter rail, transit, bike and pedestrian, and freight services.”

Sincerely,



Monte Edwards
Vice-Chair

Cc: adam.denton@dot.gov
vsiaurusaitis@mbaker.com

ⁱ In specifying the section of the tracks that were open and below grade along Maryland Avenue, Section 6 of the 1901 statute (31 Stat. 767) was precise, stating that the space to be used where the "tracks are depressed on Maryland Avenue shall not exceed fifty-eight feet between the inside faces of the parallel retaining walls, measured at the level of the said tracks, as shown on said plans and profiles."

ⁱⁱ Submitted May 21, 2012 On Behalf of the Committee of 100 and available on the Virginia Avenue Tunnel website (<http://www.virginiaavenuetunnel.com/public-involvement/>):

Requests For Information

1. What is the projected number of trains that will traverse the tunnel each day (north/south) after the tunnel is completed? Five years after completion?
2. What is the amount of fuel consumed to cross from the Potomac to the Anacostia for an average freight train?
3. What is the average emissions of the CSX locomotive fleet to pull an average freight train in terms of units of NOx and particulates and other emissions expressed per unit of fuel and per mile at the speeds the trains will traverse the tunnel after it is rebuilt?

Response:

CSX : CSX is not allowed to respond to such requests until they have been approved by DDOT.

DDOT: The requests are outside the scope of the proceeding.

ⁱⁱⁱ The Michael Baker consultant that prepared the Long Bridge Study projections explained that CSX insisted on a nondisclosure agreement under which only Michael Baker would be allowed to see the freight projection data, and Michael Baker was required to "sanitize" the data for any public use. What CSX gave Michael Baker was not the projected number of trains, but rather the amount of freight, by category and by tonnage. Michael Baker thus had to convert that into the number train cars required to haul that amount of freight, and estimate the number of train cars and locomotives that would make up a single train. How they took into account the empty train cars (a train car travels loaded in one direction and then returns empty) was not explained.

^{iv} For passenger and commuter rail, the "Public Data - Projected" is based on the Union Station Master Plan, Washington, DC, July 25, 2012, Executive Summary, page 2, that projects Commuter and Amtrak rail operations would both double by 2040.

The currently published Amtrak and VRE train schedules were used for the "Public Data – present”:

Amtrak is currently running 24 one-way train trips per weekday between Union Station and Alexandria. Doubling that number, as the Union Station Expansion Plan projects, would mean 48 trips each weekday. VRE operates 11 round trip trains on the Fredericksburg Line and 9 on the Manassas Line; for a total of 20 VRE trains (a total of 40 trips a day). Doubling that would mean 80 cross-river VRE commuter trains each weekday. The figures in the above table do not take into account additional commuter trains that would result from the SW EcoDistrict proposal to through-run MARC trains from Union Station to Alexandria.

^v In the Virginia Avenue DEIS, CSX refused to provide projections. The “Public Data – Projected” figure of 56 trains a day was obtained from the 2005, Federal Railroad Administration Report to Congress: *Baltimore’s Railroad Network: Challenges and Alternatives*, that projected the number of CSX trains traveling between Washington and Baltimore will increase from 33 trains a day in 2012 to a high of 56 trains a day in 2050. Page 4-13. This projection, performed in 2005, did not take into account the increased freight that will result from expansion of the Panama Canal.

^{vi} MARC presently operates three lines into and out of Union Station. There are 52 weekday trains on the Penn Line, 18 on the Camden Line and 18 on the Brunswick Line.