



**Comments Pertaining to the
State Rail Plan
Presentation At the June 7 Public Meeting**

July 8, 2016

The Committee of 100 on the Federal City (C100) is pleased to have the opportunity to comment on the progress of the State Rail Plan as demonstrated at the June 7 public meeting. We applaud the DDOT for the progress it has made in addressing an often-overlooked transportation issue and for the Vision that it has articulated in the materials provided at the public meeting. We appreciate that railroad projects do not enjoy the same dedicated funding as road and bridge projects and therefore look forward to working with and supporting DDOT in its efforts to advance the rail mode and better coordination between rail and other modes of transportation.

As we move forward, C100 offers the following key points about the planning effort and information provided to date, which are followed in turn by more detailed comments on the materials presented at the June 7 meeting:

1. The Vision should drive the plan. In describing planning purposes, we urge DDOT to more clearly identify the role of rail transportation in terms of the Vision, in addition to describing the current role of rail in the District.
2. Projects presented should be evaluated as those most likely to fulfill the Vision. We are concerned that the plan appears to be compiling private and public projects that are currently planned without taking an independent view of what is needed to fulfill the Vision. We also believe that the plan should be derived from the Vision first before moving to identify funding sources, which by funding category can limit the plan ideas.
3. Communities that would be affected by any projects listed in the report should be involved at this stage, not later. The boards presented indicate a regular communication with rail owners and providers and certain other transportation and planning institutions, but with very few encounters with the communities directly affected. The only neighborhood organizations noted on the boards were ANCs 5A, 5B and 6-D and Parkside. We appreciate that C100 has been included in the outreach and feel that both the process and the support for rail investments would benefit from more direct contact with Wards 5, 6, and 7 ANC's and civic organizations.

4. An analysis of the data by jurisdiction, rail use and organizational representation would make it more meaningful. We were pleased to see the attention given to the on-line survey and the extent of the response (did they count hand written at first public meeting?). The Committee suggests that the reporting of responses would be much more useful to the public and decision-makers if more demographic information was provided with the results. For example, about half the responses were from commuter rail users; what proportion of those and of the total 1067 were District residents? We also are not clear what proportion may be organizational responses, as were the Committee's submission.
5. Information on Shepherd's branch and Potomac Ave. should be included in the history. The information on the history of rail in the District was very useful, but did not include the Shepherd's branch or the Potomac Ave. branch. The Shepherd's branch still is physically present, and the Potomac branch (may go by another name) was still evident until the closing of the cement plants along Potomac Ave. and the construction of the Ball Park.
6. Capital project improvements should be included in subsequent planning documents. The statistics provided indicate that the District is clearly a doormat for pass-through freight traffic currently, representing 1 to 2% of the District's freight tonnage. We strongly believe that freight rail can play a bigger role in transporting the tremendous amount of goods and services consumed daily in the District and in the process generating jobs and improving quality of life for District residents. It is important that those possibilities be promoted by including capital project improvements in subsequent planning documents.
7. C100 strongly favors an enhanced use of commuter and intercity passenger rail for District residents, commuters, and visitors to the Capital. We argue for more attention to reverse commuter rail that could be provided by the several run-through services being discussed by Maryland and Virginia transportation agencies, and by consideration of the use of the CSX Virginia Avenue tunnel's new capacity to provide commuter rail options to the east side of the Anacostia and Ward 6 neighborhoods that does not now exist.
8. In general, the data provided regarding projected freight and passenger rail traffic is not always well documented or explained. We note that Amtrak train service paid for by Virginia does not seem to be included in the numbers. We also note that projected freight volumes resulting both from the increase in capacity from the CSX Virginia Avenue project and from increased traffic at east coast ports from the expansion of the Panama Canal are not included.
9. Finally, the Rail Plan has a number of critical deficiencies that must be addressed:
 - Provide details on how to deliver more of DC's freight by rail rather than truck.
 - Quantify the number of trains/tons of freight projected to pass through the Virginia Ave. Tunnel as a result of its expanded capacity, double-decker trains and greatly expanded traffic generated by expansion of the Panama Canal;

- Compare the extensive rail infrastructure north of Union Station with the much less extensive infrastructure south of Union Station to determine what additional river crossings or new rail capacity might be needed;
- Provide detailed statistics on the number of non-DC cars that commute into the District on a given workday and show how this number might be significantly reduced by increasing commuter rail under various scenarios.
- Recognize and enumerate quality of life in neighborhoods surrounding each of the potential freight transfer facilities.
- Clearly recognize the current bottleneck in the SW where four tracks merge into three tracks before the Long Bridge, and determine realistically if there is any possibility for addition of a fourth track in SW. (Note: C100 has called repeatedly for an answer to this situation. This problematic section of tracks has not been included in the project scope of the Long Bridge, the VA Ave. Tunnel expansion, or the Union Station expansion plan.)

Other points of clarification are noted in the discussion of each board found in the following section of this document.

Board B- Introduction

PLAN PURPOSES

In explaining the purpose of the Rail Plan, near-term purposes (that need to be addressed in preparing the Rail Plan) are mixed with purposes that will hopefully be achieved as outcomes of the Rail Plan.

On the first point, the plan needs to first identify the role of rail transportation, rather than merely describe the role of rail transportation.

The second point: *Educate the public on the importance of passenger and freight rail* requires that the plan correctly identify that importance as a basic element before the Rail Plan can be developed. Educating the public will follow after the Rail Plan is developed.

The third point, *identifying and addressing the issues facing rail operations*, is the basic requirement of the plan: to first identify the issues and then to address the issues.

The fourth point, that the plan should *serve as a road map for improving/expanding rail service* is the desired out come, if plan is properly developed.

The fifth point, *identifying funding sources and alternatives* requires that a Rail Plan be developed first, and then identify what needs to be funded and how they will be funded because items like how to pay for a new rail bridge is very different from funding an office of rail safety.

The last point, *to meet Congressional requirements for federal funding* should not be merely a goal or purpose, but rather should be requirement of the Rail Plan.

Plan Elements

The C100 agrees that all of the listed points should be elements of the DC Rail Plan

Board C – Plan Process

WHAT IS COVERED BY THE RAIL PLAN?

CSX, NS, MARC, VRE, Amtrak - Acela, Amtrak - Regional, and Amtrak –Long Distance are named. Amtrak-Virginia is not named, but may be included in Amtrak-Regional. The Rail Plan needs to state whether and how Amtrak-Virginia is accounted for in the Rail Plan.

WHAT ARE THE KEY STEPS?

The first step, Vision, Goals and Objectives, apparently resulted from DDOT’s meetings with stakeholders. These are very general and hard to argue with. C100 supports them except for the capacity goal: that should be modified to relate only to passenger rail.

The second step, summarizing rail infrastructure and assessing the performance of rail transportation lines is apparently where we are now and will be the intended focus of our comments concerning the June 7 presentation.

The third step will involve further stakeholder meeting to review data, including performance data. Outreach needs to engage residents, ANCs, civic organizations and local businesses and not rely so much on institutional actors and transportation providers.

The fourth step appears to identify the elements of the completed Rail Plan: List of Projects, Prioritization and ideally, a Funding Plan.

Board D: BUILDING THE PLAN WITH STAKEHOLDERS

This board details the meetings that have taken place to date, in an effort to:

- Obtain technical and policy information from stakeholders that could affect facilities, operations, or other aspects of rail investments;
- Identify District rail system needs and opportunities - The CSX line through Ward 7 should be considered for commuter rail service, particularly in planning run-through service. The most likely stations would be Minnesota and Benning Metro. Deanwood Metro or a new station at the yards between East Cap and Pennsylvania Avenue should also be considered; and
- Receive review and comment on the District State Rail Plan - This indicates that the only non-institutional groups the study team has met with are C100, ANCs 5A, 5 B and 6D, and Parkside community, hardly the list of communities affected by rail in DC. Were outreach efforts made to seek comments from others? The study team needs to meet with ANCs and community associations in Ward 5, 6, 7, and 8 (all wards through which rail operates now or in the future).

Board E: SURVEY RESULTS

During early 2016, the study team conducted a survey to help shape the development of the draft vision and goals for District of Columbia’s passenger and freight rail system and received 1,067 responses, with half of the respondents indicating they are regular users of commuter rail. The C100 participated

and provided a 12-page response, pointing out that C100 was an organization, rather than a rail user. How was our response taken into account? Did other organizations also respond to the survey and how were their responses treated? In view of the limited non-institutional outreach, will the study team seek survey responses from community associations and ANC's?

The reported primary issues, opportunities and challenges appear to be similar to those that C100 supports, such as:

- “Concerns about connectivity and new stations were most prevalent (25% of comments) among respondents regarding passenger rail issues and opportunities. Recommendations mentioned multiple times include an infill MARC Brunswick line station at Fort Totten connecting with WMATA, through-running of MARC/VRE services, and an additional MARC station in Ivy City. Also frequent were comments on expansion and services...”
- “Respondents noted concern with commuter rail operations and capacity, and passenger rail priority when operating on host railroads.”
- “Respondents’ freight-related concerns were mainly focused on community safety and the impact freight rail has on adjacent communities. Many references to hazmat hazardous materials and, accidents and vibrations were sources of numerous recommendations for rerouting and bypassing freight traffic around the District. Capacity, often relating to passenger service, was also a frequent “reason for rerouting suggestions.
- “Respondents mentioned the Long Bridge most frequently as an opportunity and concern with many recommendations involving the removal of most freight traffic from the bridge (calling for consideration of rerouting possibilities).”

This is a qualified endorsement of the above comments because information on this board is congested so that comments were not always clear as to whether they related to freight or passenger rail. In endorsing these comments, C100 needs to be clear that comments about more capacity for commuter or passenger rail do not get construed as relating to freight.

Board F: THE HISTORY OF RAIL IN THE DISTRICT

This traces the history of rail from the first rail line in 1835 up until the initiation of Acela service and electrification of the NE Corridor in 2000. The history contains no mention of Shepherds Branch. The C100 understands that the study team is considering three options for Shepherds branch: reuse, repurpose or abandonment. C100 has advocated, as one option to separate freight from passenger and commuter rail,¹ reuse as a freight-only ROW. For the purpose of this section, the Rail Plan needs to include a description of Shepherds Branch:

The 6 miles of B&O's line (now owned by CSX) south of Benning Yard evolved into the Shepherds Branch. The Shepherds Branch segment of CSX's right-of-way has been used for freight service to and through the region going back to 1874. Between 1874 and 1906 this was the main north-south line of the B&O railroad. Up until 1906, B&O ferried its traffic across the river on car floats. In 1906, the rival railroads reached a compromise that granted the B&O use of the Long Bridge to

¹ Another options to separate freight from passenger and commuter rail operations would be re-routing of freight west of Baltimore and DC. . You can see on this national rail map that can be enlarged to see any rail line in the US: <http://cnebusiness.geomapguide.ca/>

reach its railroad connections in Alexandria. The Blue Plains sewage treatment plant, located at the end of the branch, opened in 1938 and received its chemicals from this line. During WW II, a bridge, complete with movable span, connected Shepherds Landing with Alexandria. After World War II the bridge was dismantled and freight traffic levels decreased. Planes no longer flew from the military airfields and St. Elizabeth's Hospital stopped using coal. Only the Blue Plains sewage plant still needed rail deliveries until service to Blue Plains ended in 2001.²

The study team also needs to revisit the DC state rail plan, done with FRA funding in 1984 or 1985, including discussion of an active rail line in SE/SW that no longer exists.

Board G: THE DISTRICT'S RAIL NETWORK MAP

This shows, as inactive lines, both the Shepherds Branch and the rail line to which it formerly connected in Alexandria. A new river crossing to reconnect the Shepherds Branch line to Alexandria needs to be addressed in the Rail Plan.³ A tunnel would be a possible option to cross the Potomac River to connect to the Shepherds Branch. At this point the Potomac is about 30 feet deep. A bridge would also be a viable option, because we know that a bridge existed at this location during WW II. The Shepherds Branch tracks would have to be converted to double-tracks and probably depressed (similar to the below-grade configuration of the Maryland Avenue tracks and the CSX tracks north of Benning Yard) to accommodate roads and other development that has occurred.

The Blue Plains Line bypasses the heart of the Anacostia community entirely. The southern part, which represents about half of the 6-mile length, is located inside the Joint Base Anacostia-Bolling (JBAB) military base, and north of the military base the line is immediately adjacent to Interstate 295. It is located between I-295 and some commercial and light manufacturing properties. There are no plans in the DC Comprehensive Plan for development along the CSX right-of-way. The west side of the CSX right-of-way is I-295, with no space for development.

Board H: FREIGHT RAIL

The Rail Plan needs to address how to deliver more of DC's freight by rail rather than truck. DC is essentially a pass-through for rail freight: less than 2/10 of one percent of the freight that moves through DC is delivered or has its origin in DC. The 54,000 tons of rail freight delivered or having its origin in DC requires 2,700⁴ trucks, or on average, only seven trucks a day. The total truck freight that moves through DC is delivered to DC, has its origin in DC, or moves from place to place within DC amounted to over 27 million tons in 2011 and is expected to grow by 75% from 2011 to 2040 to over 47 million

² The tracks are in disrepair and attempting to reconstruct surface tracks may not be practicable, given subsequent redevelopment. A viable 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

³ NCPC proposed 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*.

⁴ Using the freight tons-to-truck loads conversion quantified in the first point (20 tons per truck load)

tons.⁵ That will require 2.35 million trucks or, on average, over six thousand trucks per day. This is the number of truck trips to merely carry the freight, and like rail, trucks also run empty, that further increases the number of truck trips within DC.

The board states: “District is a junction of CSX freight lines connecting the Northeast, Southeast, and Midwest... The District rail lines are an important component of the National Gateway Project, which will allow double stack intermodal trains to divert freight from highway to rail.” The board should quantify the number of trains or tons of freight that are projected and should be explicit that the Virginia Avenue tunnel will double the capacity of the tunnel and note that the expanded Panama Canal has now become operational and will increase the amount of rail freight through DC.

The DC Rail Plan needs to provide long term projections of the number of trains that CSX will likely operate after the Virginia Avenue tunnel is rebuilt and after CSX begins to carry the increased freight that will result from the Panama Canal expansion. According to the FHWA’s 2011 Freight Analysis Framework (FAF) forecasts, overall freight tonnage would increase by 50 percent in 2040 from 2010 levels. This is not a projection of the increased freight that CSX will carry, but rather freight rail in total. With the Panama Canal expansion, and the fact that initially only the New York/Newark and Newport News ports will be able to accommodate those larger container ships, a substantial part of the increased freight will travel over the CSX tracks. (CSX stated in the Virginia Avenue Tunnel DEIS at p.2-6):

As the largest freight railroad company on the east coast, CSX is anticipating the impact of the expanded Panama Canal on freight transportation demand from east coast ports, and is anticipating the need to carry a greater amount of freight between east-coast ports and Midwest markets.

But CSX has not quantified that increase of “freight transportation demand” and has elected not to provide information about the number of CSX trains that are projected after the Panama Canal expansion is completed when the number of CSX trains is likely to exceed 56 a day.⁶ The estimate of over 56 trains is based on CSX’s 2005 growth prediction, without considering the Panama Canal expansion. It is an understatement of what will happen after CSX begins carrying increased freight when the larger container ships begin arriving at Newport News and Newark/New York. Originally, Baltimore was preparing its harbor to receive the larger Panama ships, but since CSX could not get approval of the intermodal transfer facility, freight destined for Baltimore and points west will now come into Newport News and be transported through DC to points north and west. That freight increase would likely be

⁵ *District of Columbia Freight Plan Update (2014)*, Freight Subcommittee Presented by Eulois Cleckley, District Department of Transportation, May 8th, 2014.

⁶ In 2005, the Federal Railroad Administration issued its Report to Congress: Baltimore’s Railroad Network: Challenges and Alternatives, and projected that 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 doubling the capacity of the Virginia Avenue Tunnel or from expansion of the Panama Canal.

carried by CSX on double stacked container trains, resulting in heavier loads, requiring double locomotives.

In other words, we will see a lot more freight and a lot more diesel emissions in the near future. We need to reconsider how freight can be re-routed (either around or through the District), compared to how it will affect passenger and commuter rail on tracks shared with CSX.

Board I: PASSENGER RAIL

This board presents ridership and number of daily trains for Amtrak, MARC and VRE⁷ and the projected rate of growth. To obtain projected ridership levels for MARC and VRE, C100 looked at their long-range plans. MARC's plan shows that ridership will 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 if the Long Bridge and SW track constraints can be removed (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. The Silver line can move a significant number of commuters, but commuter rail has a much greater potential, and its potential capacity needs to be evaluated in developing the DC State Rail Plan. Further, there are potential commuters in both Maryland and Virginia that would use commuter rail were it more available.

Comparing the rail infrastructure north of Union Station with the infrastructure south of Union Station can provide a useful framework in which to consider what is needed south of Union Station. Amtrak wants to expand high-speed rail 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

The capacity constraint of a mere 2 and 3 rail tracks south of Union Station cannot be ignored or passed over when the same rail operations north of Union Station require 7-8 tracks. This is a central problem that the Rail Plan must address.

The Rail Plan should include explicit discussion of congestion caused by commuter vehicles, illustrated on appropriate maps, and recognize that most of the congestion in DC is from non-DC cars that

⁷ This board does not specifically include Amtrak-Virginia. Amtrak, 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). The Rail Plan needs to specify how current and projected ridership of Amtrak –Virginia is taken into account.

contribute heavily to pollution and congestion. Seventy-five percent of the cars on DC’s streets during the daytime are non-DC cars. Several Metrorail stations in downtown DC are at or near capacity and even with planned improvements, their capacity will soon be exceeded. The bridges that bring Metrobuses, commuter buses, intercity buses and private vehicles in from Virginia are badly congested during rush hour. The Rail Plan needs to describe the important contribution that commuter rail can provide to greatly reduce these problems. Commuter rail is the most efficient and cost-effective means of doing so. Providing practical alternatives to automobile commuting should be the overriding theme of the Rail Plan.

Board J: RAIL ISSUES, NEEDS, AND IMPROVEMENTS- Part 1

Identifies 7 issue areas and assigns “goals” to them:

1. Safety Initiatives (s, q)
2. Long Bridge (r, e, o)
3. L’Enfant Station (o, r)
4. Washington Union Station (o, e, r)
5. New Commuter Rail Station (e, q)
6. Virginia Avenue Tunnel (r,o)
7. Freight Facility (e)

Each area is assigned a goal, indicated by symbols, but C100 has substituted letters that we think are more clearly understood: s. Safety and security, o. Operational Flexibility, r. Rail capacity, e. Economic opportunity, q. Quality of life

The depiction in the first chart on Issues, Needs and Improvements is too simplistic and therefore is misleading for several categories of improvement. We have redone this chart to show whether the benefit comes from/to freight or passenger rail. In some cases, a benefit to one is a dis-benefit to another. The answers indicated in the cells may not be what the agency had in mind, but in the absence of information on responsibility and which modes benefited, we suggest the following:

Improvement	Benefit	\$ Responsibility	Passenger	Freight
Safety Initiatives	SS and Q	DDOT, Owing railroads and agencies	Depends on improvement, but generally both	Depends on improvement, but generally both
Long Bridge	R, E & Q	CSX, 3 rail agencies	Yes	Yes
L’Enfant Station	O & R	VRE, MARC*	Yes	No, except for new layover track
Union Station	O, E, R	USRDC, 2 Commuter rail agencies, Amtrak	Yes	No
New Commuter Rail Station	E & Q	Commuter rail agency	Yes	No, may be a disbenefit depending on design
Virginia Avenue Tunnel	R & O	CSX	No	Yes
Freight Facility	E & Q	Owing railroad	No	Yes

LEGEND

Each area is assigned a goal, indicated by letters:

- S Safety and security
- O Operational Flexibility
- R Rail capacity
- E Economic opportunity
- Q Quality of life

C100 generally agrees with the identified issues, needs and improvements, but for item 7, Freight Facility, we would add “quality of life,” because a facility that would transfer freight from rail to truck would increase rail freight deliveries and thereby reduce the number of trucks that are now making those deliveries and thus reduce congestion and improve air quality.

C100’s additional concern with this Board is that while “rail capacity” is both an *issue* and a *need* that we can all agree affects the Long Bridge, L’Enfant Station, and Washington Union Station, it is an *issue* and a *need* that is uniquely related to passenger and commuter rail in providing an alternative to commuters and travelers current reliance on automobiles, overburdened Metro and congested streets and crowded bridges. That *need* can be satisfied by separating freight from passenger and commuter rail and the *issue*, indeed, the paramount issue of this Rail Plan, is to develop the vision of how to accomplish that.

The Long Bridge Study (mentioned on this Board J) is looking at a new bridge, with at least double the number of rail tracks, but *no one is addressing how to deal with the existing three SW tracks between the Long Bridge and the two-track First Street Tunnel* that provide the only access to Union Station from the South. Except for the NE Corridor, commuter and passenger rail in DC operate on tracks owned by CSX. The Long Bridge and the SW tracks between the Long Bridge and the First Street Tunnel pose particular constraints that limit Amtrak operations south of Union Station and restrict VRE to moving about half the number of commuters serviced by MARC (VRE has an average weekday ridership of 17,900, compared to 33,696 for MARC). All trains running through the city south of Union Station converge just north of the Long Bridge at a set of three SW tracks between 12th Street, SW and the First Street Tunnel. At this point passenger and commuter rail go north toward Union Station and freight goes east towards the Virginia Avenue Tunnel. Even at current levels of use, the tracks are insufficient to meet existing demand. One train frequently has to wait for another to pass before continuing on its way. Because of the narrow width of the depression in which the tracks are located along Maryland Avenue, it is questionable whether the three SW tracks can be expanded to four tracks. Dense surrounding development makes widening the depression and adding a fourth track problematic and the feasibility of that expansion must be addressed in the Rail Plane.

The Rail Plan needs to address alternatives for separating freight from passenger and commuter rail operations and in doing so, needs to step back and take a fresh, comprehensive look at rail infrastructure south of Union Station. 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, together with the increased freight that will result from the enlarged Panama Canal that is now in service, will likely

mean much greater CSX freight traffic on the SW tracks to the further detriment of passenger and commuter rail. Separation of commuter rail and Amtrak from freight rail with a new, separate river crossing for freight would relieve these capacity constraints.

Board K: RAIL ISSUES, NEEDS, AND IMPROVEMENTS- Part 2

1. Safety Initiatives

Although not stated, this board applies to freight. It specifies what moves through DC and what does not. It identifies safety related needs for freight rail:

- Quantifying risks of rail related incidents
- Enhanced rail safety education
- Refine rail safety and rail emergency response plans
- Provides data on rail accident/incidents, 2000- 2014

This information calls for the creation of a rail safety oversight office. The Rail Plan needs to evaluate where to house such a function and how that function relates to rail planning. Based on information currently available, C100 suggests that as a starting point, the rail safety function should be separated from the rail planning function: rail planning would become a part of DDOT (perhaps combined with streetcar planning) because that is the organization for transportation funding in general, but safety oversight belongs somewhere else.

2. Long Bridge

Describes 2015 Phase I Study:

- Sole rail river crossing
- 31% of freight operates below allowable speed
- Several alternatives considered – cost estimates of alternatives quantified
- Expanding bridge to four tracks reduces freight train delays to 5% in 2020 and 6% in 2040.

Phase II Study underway and the DEIS is anticipated fall of 2016

VRE has considerable concerns about the Long Bridge and has explained that it is a key capacity bottleneck on the VRE system (*the link: <http://vre.org/projects-plans-facility/plans/2040/>*):

Without these significant capacity investments, the VRE growth potential will be limited and long-term system capacity still constrained. However, with increased Long Bridge corridor capacity, the full ridership potential of expanded service can be realized.

C100 has reservations about the practicability and scope of the Long Bridge Study, as explained in our comments concerning the Phase I Study that are attached.

Board L: RAIL ISSUES, NEEDS, AND IMPROVEMENTS - Part 3

3. L'Enfant Station

C100 agrees that expanded passenger service is restrained by its single platform and the desirability of additional VRE service and the potential introduction of MARC service requires enhanced station capacity. The C100 supports VRE's proposal to lengthen the current platform and construct an

additional track north of the platform - requires modifications to adjacent WMATA station and the construction of a crash wall.

The Board identifies two OP/NCPC Plans for expansion of L'Enfant, both of which C100 supported:

Maryland Avenue Southwest Plan identifies the best land-use mix, transit connectivity approaches, and reconstruction alternatives in order to guide future plans, agendas, and urban design.

Southwest Ecodistrict Plan, recommends additional residential development to meet the District's housing goals and to create future opportunities that support redevelopment of Maryland Ave.

Both the Maryland Avenue SW Plan and the SW Ecodistrict Plan advocate increasing the size and capacity of L'Enfant Station and direct interconnection with L'Enfant Metro Station, but ignore the inadequacy of the two-track First Street Tunnel that provides the only access to Union Station from the south and the only rail connection between Union Station and L'Enfant Station.

4. Washington Union Station

The Board identifies the issues that are now being addressed by the Union Station Expansion Plan:

Need additional mid-day storage for MARC and VRE

Pedestrian bottlenecks on concourses, gates and corridors

Station must retain different platform configuration, stub and through tracks and electric power for some, but not all tracks.

Metrorail station capacity is restrained with overcrowded conditions at the platform and entrances

The Union Station Master Plan seeks to reconstruct the station's tracks and platforms for added capacity, activate real estate assets above and below track levels for mixed uses and station functions, and implement short-term projects to increase capacity and improve the passenger experience.

C100 agrees with these issues, but maintains that the Rail Plan needs to also address the tracks south of Union Station, beginning with the 2-track First Street tunnel and the SW tracks that connect to the Long Bridge. The study area for the Union Station project encompasses only the Union Station building, Columbus Circle in front to the station and the rail tracks north of the station. 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. The SW Ecodistrict Plan recommends expanding the L'Enfant Station to accommodate this increased commuter rail traffic. 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.

C100 has raised these and other issues in its comments about the Union Station Plan that are attached.

5. New Commuter Rail Station

One or more new commuter rail stations would improve regional mobility for District residents and commuters. Additional commuter rail station(s) in the District would relieve congestion at Union Station commuter rail facilities as well as WMATA's Red Line Station. C100 is in general agreement with DDOT's list of potential station sites:

- Benning Yard
- East Potomac Park
- Fort Totten
- Michigan Avenue
- Minnesota Avenue
- New York Avenue
- Rhode Island Avenue
- South Dakota
- South Dakota at New York
- Union Market

C100 encourages the study team to continue to work with MARC, VRE, and CSX to open up the commuter rail system to DC communities in Ward's 5 and 7.

Board M: RAIL ISSUES, NEEDS, AND IMPROVEMENTS - Part 4-Freight Needs

6. Virginia Avenue Tunnel

This Board differs from the style and tone of the other presentation and appears to be from the CSX promotional material for the CSX National Gateway Initiative. C100 does not disagree that rail is a better way to move freight than trucks, just as commuter rail is a better way to move commuters than automobiles and buses. The main problem with the information on this board is that it describes national benefits of freight rail. For the purpose of the Rail Plan, we need to identify DC-specific benefits and impacts and a similar benefit impact analysis needs to be prepared for commuter and passenger rail.

7. Evaluation of Potential Intermodal/Transload Facilities

Currently the District does not have any such facilities as nearly all freight traffic in the District travels through DC. The C100 agrees that an intermodal facility could serve the District's consumer demands handling intermodal container transfers between trucking and rail and a transload facility could support the movement of numerous commodities via rail for companies and industries that do not have direct rail access by facilitating truck/rail transfers.

Sites being evaluated that would accommodate intermodal and transload facilities:

- Brentwood/
- Eckington
- Near Benning Yard
- Near Ivy City
- Pepco
- Takoma-Totten

There are equity issues involved in siting these facilities and the facility must be acceptable to the community in which it is located. The plan needs to identify the “Near Benning Yard” site they are considering. The study team should also consider breakdown of freight into smaller loads that could be handled by one of the new Uber- like freight companies.

Board N: RAIL ISSUES, NEEDS, AND IMPROVEMENTS – Visions and Goals

VISION

The C100 supports the vision that “District of Columbia will preserve and enhance our rail transportation system to move people and goods to, through, and from the Nation’s Capital in a manner that encourages economic opportunities while fostering safe, secure, sustainable, and reliable transportation choices” and agrees that “The vision will be realized through an integrated process of planning and implementing improvements in the rail system as it intertwines with the economy, [the] environment, and communities of the District, continually engaging business and resident stakeholders, and the owners and operators of rail service. The rail system vision is expressed across five specific goals.”

GOALS

1. Enhance Safety and Security

Facilitate appropriate and effective rail oversight to safeguard general public and critical infrastructure.

Support maintenance and upkeep of rail infrastructure in the District to highest standards to maintain a state of good repair.

Provide rail safety planning, emergency response and education at the community level.

Maintain appropriate rail perimeter control to minimize community impacts.

C100 supports the safety and security goal, but as stated in commenting on Board K, the study team needs to address whether the organization that would implement this goal should be a part of the rail planning function or should be a separate office.

2. Increase Operational Flexibility

Work with regional rail stakeholders to identify and address chokepoints in the rail network to minimize operational delays and improve efficiency.

C100 recommends that his goal should specifically relate to passenger rail; CSX and NS can manage their own freight improvement projects, but DDOT will need to work with the MARC, VRE and Amtrak to achieve this objective for passenger and commuter rail.

3. Provide Added Rail Capacity

Facilitate rail capacity enhancement projects to augment the ability to move people and goods to and through the District.

Support improvements in station rail and person capacity along with horizontal and vertical circulation to allow seamless connectivity to other modes of transportation.

Encourage investment in terminal yard capacity to meet service needs.

C100 is not clear whether these goals apply to passenger or freight. The C100 asks that the Rail Plan emphasize the people movement and local intermodal projects related to freight. CSX is and will be focused on freight movement.

4. Grow Economic Opportunity

Identify industrial, intermodal, or freight rail service opportunities to capitalize on rail service in the District for economic growth and equitable development outcomes.

Use passenger rail service and station enhancements as anchors for mixed-use and commercial development.

C100 suggests that by providing increased commuter rail as a practicable alternative to automobile commuting, congestion will be decreased, parking will become more available, which in turn will enhance the economic viability of the City

5. Improve Quality of Life

Promote rail as a means to move passengers and freight in a way that sustainably improves and protects environmental quality and natural resources in the District.

Utilize rail infrastructure to improve multimodal accessibility to community destinations.

Support rail projects that are of high visual quality and celebrate the historic role of rail in the District.

C100 agrees that rail for both freight and passengers is more efficient than cars, trucks or buses to move people and freight. To the extent that passenger and commuter rail can operate on electric power south of Union Station, as it does on the NE corridor, diesel emissions within the City would be reduced, which can be achieved if freight rail operations were separated from passenger and commuter rail operations.

Board O: RAIL ISSUES, NEEDS, AND IMPROVEMENTS – Projects and Initiatives

In general, this Board is confusing and introduces several new concepts for the first time. As a minimum, it needs more explanation of several of the entries and needs to identify which items apply to freight and which apply to passenger and commuter rail:

Under DISTRICT-WIDE PROJECTS, C100 has the following questions and concerns:

- Where are AIR RIGHTS DEVELOPMENT OVER VARIOUS RAIL LINES being planned or contemplated?
- What is meant by RAILBANKING OF INACTIVE RAIL SPURS? Do they mean conversion to hike and bike, or other transportation purposes, or something else

Specific projects are depicted on a map, some of which have been described on previous boards and some of which appear for the first time. Explanations need to be provided about these projects and what is the anticipated or projected funding. For example:

- SHEPHERD BRANCH, DEACTIVATION
- FREIGHT BYPASS - DC TUNNEL ALIGNMENT (INDIAN HEAD AND DAHLGREN ALTERNATIVE ALIGNMENTS FARTHER SOUTH)

- HIGH SPEED RAIL TUNNEL CONNECTING UNION STATION TO THE SEHSR CORRIDOR
- MICRO-YARD TO SERVE WASHINGTON, DC CHAPTER OF THE NATIONAL RAILWAY HISTORICAL SOCIETY [*apparently at Union Station*]
- NEC FUTURE NORTHEAST CORRIDOR TRACK EXPANSION WITHIN THE DISTRICT
- NEW CONNECTION BETWEEN CSX AND NORTHEAST CORRIDOR

POLICY AND PROGRAMMING INITIATIVES

C100 notes in particular the separate entries for rail safety office, rail emergency response and whether rail planning should be separate from safety and rail operations. RAIL SAFETY AND RAIL EMERGENCY RESPONSE PLANS should also include community education on same, as stated in earlier boards. LAND SWAPS need explanation. REGIONAL RAIL PLAN provides opportunity to coordinate with the other relevant rail and transit agencies. REVERSE COMMUTER OPTIONS as well s trough-running of MARC to Virginia and VRE to Maryland will result in a regional commuter rail system that will be more widely utilized. INTEROPERABILITY BETWEEN MARC, VRE, METRO, AND AMTRAK FARES will enhance the likelihood that commuters will use these services. RAILROAD NOISE AND VIBRATION POLICY will be welcome and should it also include at least a discussion of train speeds?

Conclusion

There is further work to be done in developing this phase of he DC Rail Plan and the Committee of 100 welcomes the opportunity to meet with DDOT to discuss these comments. The following Committee of 100 members will be involved in the continuing discussion of the DC Rail Plan:

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