

**Comments Pertaining to the
ANACOSTIA STREETCAR EXTENSION
Draft Environmental Assessment and Section 106 Review**

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Laura M. Richards, Esq.

Marilyn J. Simon

Frank Vespe

Dr. Beverley Wheeler

Bill Wright

Evelyn Wrin

945 G Street, N.W.

Washington, D.C. 20001

202.681.0225

info@committeeof100.net

Brigid Hynes-Cherin, Regional Administrator, Region 3,
Federal Transit Administration
Joseph C. Lawson, Division Administrator, Federal Highway Administration
Terry Bellamy, Director, DC Department of Transportation

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The Committee of 100 welcomes the opportunity to submit the following comments on the Anacostia Environmental Assessment and Section 106 Review.

EXECUTIVE SUMMARY:

I. ALTERNATIVE #4

A. Alternative 4 needs more work to assess impacts along the narrow Shannon Place. In general, this alternative would better serve the community's residences, businesses, institutions and facilities than would Alternative 9.

B. Alternative 4 would encourage future land use consistent with the Comprehensive Plan.

C. Alternative 4 would bring the streetcar through the heart of the community.

D. We are skeptical of the extent to which community leaders participated in the community engagement process that scored each alternative.

II. THE ENVIROMENTAL ASSESSMENT CONTAINS ERRORS AND OMISSION THAT PRECULDE MEANINGFUL ANALYSIS

A. The track lengths cited in the Environmental Assessment are not correct.

B. Capital and operating costs of the alternatives are wrong.

C. The ridership potential is grossly underestimated.

D. A revised environmental assessment is required.

III. OVERHEAD WIRES – (Section 106 analysis of impact on historic resources)

- A. Overhead wires are highly detrimental to the visual environment, particularly in Historic Anacostia.
- B. The Environmental Assessment and Section 106 review neither acknowledge nor comply with the law.

IV. CSX TRACKS

- A. The CSX ROW is more valuable as a freight route than as a streetcar route.
- B. There is neither economic nor operational justification for acquiring the CSX right-of-way.

V. COMMENTS ON PUBLIC INVOLVEMENT PROCESS

- A. The Environmental Assessment and Section 106 contracts should have been separated.
- B. Both the EA and Section 106 public sessions were virtually devoid of meaningful community group discussion and cannot be said to have provided “a reasonable opportunity to comment.”

CONCLUSION: The errors and omissions, and the resultant inadequate and meaningless analysis contained in the Draft Environmental Assessment, require the preparation of a revised Draft Environmental Assessment.

I. ALTERNATIVE #4

After discussing nine initial alignment alternatives plus a no-build alternative to accomplish the purposes and needs of the streetcar system, the EA narrows the alternative alignments to two options:

1. Alternative 4 would run along Martin Luther King Ave. and Shannon Place, SE that runs through the heart of the Anacostia Historic District.
2. Alternative 9 would use the CSX right-of-way that is located between I-295 and some commercial and light manufacturing properties.

A. Alternative 4 needs more work to assess impacts along the narrow Shannon Place, but in general, it would better serve the community’s residences, businesses and community institutions and facilities than would Alternative 9.

Shannon Place is a narrow 30 ft. street and parking would have to be removed on one side if the streetcar were to run one way here. The loss of parking could be partially relieved if new buildings were required to provide underground parking so that the street could better accommodate the streetcars.

However, under the new zoning code (ZRR) proposed by the DC Office of Planning, developers who provide more than the reduced amount of parking – 50% of what they now are required to provide -- would be penalized because it is proximate to a transit line. The failure of the EA to point out this unanticipated consequence of the ZRR would be to preclude adequate underground parking in this transit zone and incur hardship for those who work in the area but live outside and cannot access the site by public transportation.

B. Alternative 4 would encourage future land use consistent with the Comprehensive Plan.

Development effects are strongest along a streetcar route. (EA, page 33):

The Comprehensive Plan indicates that future land use in the Study Area would be focused on moderate-density commercial development along Martin Luther King Jr. Avenue SE. The majority of future land uses for the area east of Martin Luther King Jr. Avenue SE would continue to be moderate-density residential. The southern portion of the Study Area adjacent to Anacostia Metro Station is planned to have more mixed land uses (DC Planning Future Land Use Map, 2007).

There is no mention in the Comprehensive Plan of development west of the Martin Luther King, Jr. Ave/Shannon Place corridor, along the CSX corridor. In fact, the west side of the Alternative 9 alignment is I-295, with no space for development.

C. Alternative 4 would bring the streetcar through the heart of the community.

This would allow for the most positive impact without the problems associated with double-track on Martin Luther King Jr. It provides access to the residential communities on Shannon Place and east of Martin Luther King, Jr. Ave. It brings highly developable land into play: large lots along Shannon and north of Martin Luther King Jr. Ave. offer interesting redevelopment opportunities (Appendix I, pages 20, 29).

Alternative 9 would ignore the heart of the community entirely and thus would not serve the residential communities and would provide either no access or a quarter-miles walk to business and community amenities along to Martin Luther King Jr. Ave. There would be little to no economic development opportunities because the route would be adjacent to I-295 with highway frontage (id., pages 21, 32)

D. We are skeptical of the extent to which community leaders participated in the community engagement process that scored each alternative.

The EA states that community feedback at a December 2, 2010 Community Leaders briefing and at a January 12, 2011 Public Kick-Off ranked Alternative 4 higher than Alternative 9 on the basis of land use, population served, economic development and potential for transit-oriented development, and rider benefits. However, we heard from a number of residents and leaders in Old Anacostia that they did not feel that the process had been inclusive or open to real dialogue amongst participants; and that DDOT's consultants were neither knowledgeable about community planning issues nor open to understanding why many residents who did not want to see a streetcar service in their community at all. This confirmed some of our own observations as well. (See below: V. Comments on Public Process)

II. THE ENVIROMENTAL ASSESSMENT CONTAINS ERRORS AND OMISSION THAT PRECULDE MEANINGFUL ANALYSIS

A. The track lengths cited in the Environmental Assessment are not correct.

Alternative 4 is described as having a track length of 1.35 miles and Alternative 9 as having a track length of 0.58 miles. But a substantial part of Alternative 4 runs on two parallel streets: Martin Luther King Ave. and Shannon Place. The length of CSX right-of-way occupied by Alternative 9 is about a half a mile, plus 600 feet for the curved bridge approach, but the full distance is double tracked. The actual measured length of track from the drawings for the two alternatives:

Alternative 4: 1.57 miles

Alternative 9: 1.16 miles

This mistake not only gives the erroneous impression that the shorter CSX route should be cheaper to build, but also biases the operating cost estimates; since they are based on track length, with an estimate

of \$5.1 million/year to operate for Alternative 4 compared to and \$3.4 million/year for Alternative 9. (EA, p.18).

C. Capital and operating costs of the alternatives are wrong.

The Environmental Assessment explains that both the “bottom up (deterministic)” and “top down (stochastic)” approaches are used for these estimates. The “bottom up” approach totals the cost of each component of a category. The “top down” approach provides an order of magnitude cost based on data from projects that are similar in nature, where the cost is divided by a unit of measure and applied as a unit cost (Appendix K, page 8). The costs are computed in terms of construction cost per mile (id. p. 34). But if the unit of measure - the length of the track – is wrong, then the cost comparison is wrong.

Comparing the erroneous length of track with the lengths shown on the drawings indicates that the cost of Alternative 9 is off by a factor of two to one:

	<u>Erroneous length</u>	<u>Measured Length</u>	<u>Percentage Error</u>
Alternate 4	1.35 miles	1.57 miles	14%
Alternate 9	0.58 “	1.16 “	50%

With the correction of this error in track length, the difference needs to be translated into comparative capital and operating costs of Alternative 4 and Alternative 9.

Appendix K describes the methodology for computing capital costs, but does not define the "Base Year Dollars Unit Cost" or the costs in terms of unit costs per mile of track. The Environmental Assessment needs to quantify the corrected capital costs of Alternative 4 and 9 in the format presented in the worksheet at page 34 of Appendix K. (Note: The worksheet on page 34 of Appendix K shows a construction cost per mile (apparently excluding the cost of streetcars, professional services, land and right-of-way of \$29,952,000. This bears no relationship to the construction costs shown in Table ES-4 of \$25,518,546 for Alternative 4 and \$16,027,431 for Alternative 9 (EA, p. ES-8).

Operating costs are described at page 18 of the Environmental Assessment:

Operating cost estimates were developed using a DC Streetcar Program estimate of \$216.00 per revenue hour. The operating plans for the proposed streetcar service for these alternatives assumes three streetcars on 10- minute headways, seven days a week, with hours of operation consistent with the DC Streetcar Program assumptions. The track length of Alternative 4 is approximately 1.4 miles. The operating cost for Alternative 4 is approximately \$5.1 million/year. Alternative 9 is shorter (approximately 0.6 miles) with a higher operating speed reducing the operating cost to \$3.4 million/year."

But there is no explanation of the basis for the \$216 per revenue hour. Neither is there any explanation of how revenue hours are related to track length. The Environmental Assessment needs to provide corrected estimates of the operating cost for Alternative 4 and Alternative 9.

C. The ridership potential is grossly underestimated.

Members of C100 who have participated in numerous Environmental Assessment meetings have repeatedly raised the issue of streetcar service to the Department of Homeland Security (DHS). This major center, anticipated to employ over 14,000 people on the West Campus and the FEMA installation on the East Campus, will generate substantial auto traffic unless public transportation is easy and convenient. To meet the needs and purposes of the Anacostia streetcar line, a link to DHS and the St. Elizabeth’s campus is imperative.

This underscores the limited segmentation analysis provided in this Environmental Assessment that is based on ridership potential of 3, 550 people for Alternative 4 and 2,002 people for Alternative 6 9 EA, page ES-7, Table ES-1). In fact the ridership will be at least four times greater to serve workers at DHS, the Coast Guard and the redeveloped St. Elizabeth's campus.

D. A revised environmental assessment is required.

As explained above, meaningful analysis of the Environmental Assessment is not possible because the track lengths are wrong, the capital and operating costs are wrong and the estimated population that would be served by this segment of the streetcar system is wrong. 40 C.F.R. §1502.9 (a), require, that when a "draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion."

III. OVERHEAD WIRES – (Section 106 analysis of impact on historic resources)

A. Overhead wires are highly detrimental to the visual environment, particularly in Historic Anacostia.

We continue to have substantial concerns about the impact of overhead wires, particularly on the streets in Historic Anacostia, and on DDOT's failure to comply with the law mandating study of alternatives to overhead wire propulsion.

The Section106 analysis describes an overhead catenary system of wires and supports, with poles on the sidewalks, and cantilevered arms about 25 feet above the tracks. Support poles would be located every 100 feet, with shorter spacing along curved segments (EA pages 53-54), essentially replicating the unsightly arrangement DDOT has installed on H Street/Benning Road.

We take issue with the Environmental Assessment that, since wires exist already along some of the streets in Alternative 4, the presence of stanchions and streetcar wires will have no detrimental effect (EA, p. 28 and pp. 54-56). In fact, MLK Avenue is not littered with utility wires as verified by the photos of historic buildings included in the SHPO's report and by field observations. Further, the city has announced an ambitious program to place utility lines underground throughout the city at the same time as plans are proceeding to add overhead wires tethered to outdated streetcar technology.

Below are two photographs of streetcar poles and wires along H St. and Benning Road that illustrate the negative impact these elements have on the streetscape.



Benning Rd., NE –streetcar stanchions and wires – (Photo: Meg Maguire)



H St. NE – streetcar stanchions and wires – (Photo: Meg Maguire)

B. The Environmental Assessment and Section 106 review neither acknowledge nor comply with the law.

Absent further authorization from Council, the installation of overhead wires to power streetcars is only permitted along the H Street/ Benning Road segment (DC Code §9-1171):

Aerial wires for streetcars.

(a) Notwithstanding any other law, the Mayor is authorized to install aerial wires in accordance with this chapter for the sole purpose of powering or supporting wires that power streetcar transit where aerial wire power is necessary or, in the Mayor's determination, is more feasible than other currently available forms of propulsion.

(b) The installation of aerial wires authorized by this section is limited to the H Street/Benning Road streetcar transit line, between the intersection of North Capitol Street and H Street, N.E. on the west and the Anacostia River on the east until the requirements of §9-1173 are met.

Before overhead wires can be installed in other parts of the City, the requirements of DC Code §9-1173 must be met:

Aerial wire planning requirements.

(a) Prior to the expansion or construction of aerial wire-powered streetcar transit beyond the H Street/Benning Road line, authorized pursuant to § 9-1171, the Mayor shall develop a plan for the use of aerial wires for each phase or extension of the streetcar transit system and submit the plan to the Council, along with a written report that includes:

(1) An evaluation of the impact of aerial wires on federal property, including federal buildings and infrastructure; commemorative works of art, as that term is defined in 40 U.S.C. § 8902(1); congressionally mandated historic districts; historic properties as defined in section 301(5) of the National Historic Preservation Act, approved December 12, 1980 (94 Stat. 3001; 16 U.S.C. § 470w(5)); and the vistas, streets, avenues, and public reservations identified as contributing elements of the L'Enfant Plan of the City of Washington.

(2) The possible effect, including the visual effect, of aerial wires on the character of any historic district, including comments, if any, from the State Historic Preservation Officer;

(3) All applicable review requirements pursuant to District and federal law;

(4) Designation of any additional wire-free zones within the proposed phase or extension, as identified in coordination with impacted agencies and authorities; and

(5) The feasibility of using non-aerial power as a means of propulsion for the phase or extension. [Emphasis added]

DDOT has not submitted to Council the required Report of the impact of aerial wires on the Anacostia Historic District and the feasibility of using non-aerial propulsion technology to power the streetcars that would operate on the Anacostia Extension. –The EA acknowledges the Mayor's 2012 Powerline Underground Task Force that is working with utilities and communication companies to implement a multi-year undergrounding program, but fails to recognize what that implies in terms of streetcar overhead wires.

Before the Section 106 analysis is completed and considered, the propulsion feasibility analysis required by DC Code §9-1173 (a)(5) must be submitted to Council and subjected to hearing. The report to

Council will likely be in part based on the assessment of advances in propulsion technology that was provided as Appendix C to the Union Station to Georgetown streetcar study:

http://www.unionstationtogeorgetown.com/images/pdfs/AA%20Report/Appendix%20C_Propulsion%20Report.pdf

The report to Council needs to address the physical conditions (grades, curves, weather conditions, etc. that will be encountered on this Anacostia Extension and evaluate how they compare to the physical conditions of already installed systems, the installed and operating costs of the in-service systems and the actual maintenance and reliability experience of the systems now in service.

IV. CSX TRACKS

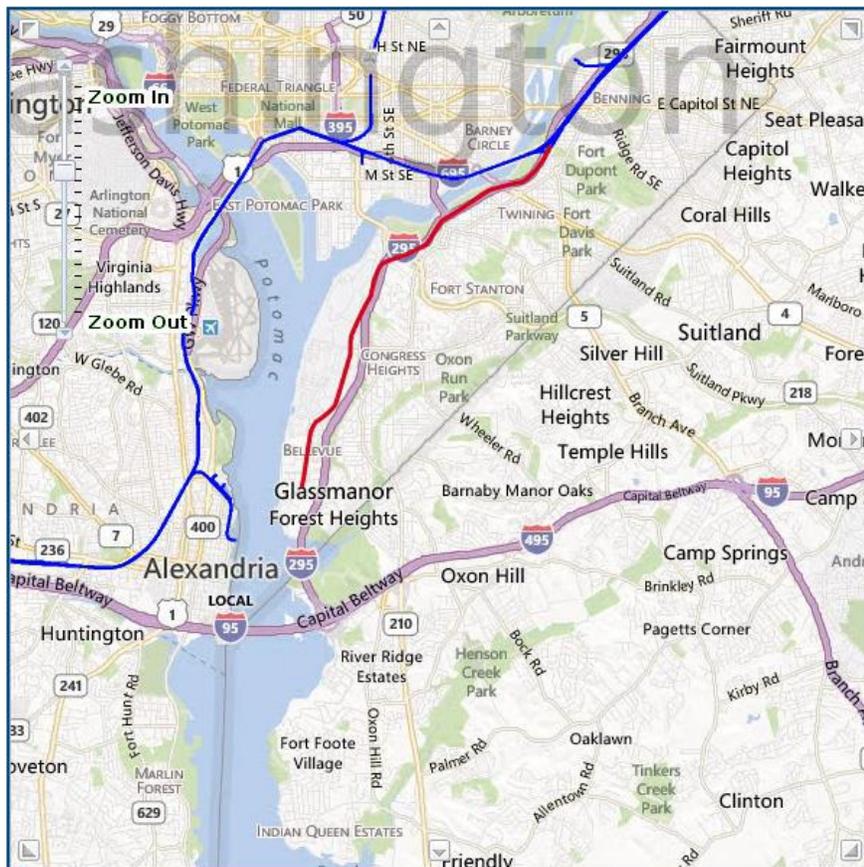
A. The CSX ROW may be more valuable as a freight route than as a streetcar route.

The segment of CSX right-of-way that is being considered as Alternative 9 has a long history of freight service to and through the region and this option should be retained as the District plans for expanded rail services to the region. Between 1874 and 1906¹ this was the main north-south line of the B&O railroad.² . 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 Shepherd's 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 traffic until service to Blue Plains ended in 2001.

¹ At Shepherds Landing, 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 and trackage rights to reach its railroad connections in Alexandria.

<http://ctr.trains.com/en/Railroad%20Reference/Operations/2001/12/The%20history%20of%20Baltimore%20and%20Ohio%20Shepherd%20Branch.aspx>

² The 6 miles of B&O's line (now owned by CSX) † south of Benning Yard evolved into the Shepherd Branch that delivered coal to the furnaces of Saint Elizabeth's Hospital Complex, sewage treatment chemicals to Blue Plains, and tank cars of aviation fuel to the Bolling Air Force Base.(id.)



Legend
 — CSX Rail Network
 — Blue Plains Line

While the CSX tracks are unused³, the right-of way exists. NCPC proposed this as an alignment to separate freight from commuter and passenger rail⁴, and the right-of-way is currently proposed as one of several alternate freight routes to separate freight from passenger and commuter rail operations in the Virginia Avenue Tunnel EIS proceeding⁵ and will also be evaluated in an upcoming DC Rail Plan. To use the 0.58-mile segment of that 6-mile Shepherd Branch right-of-way to implement Alternative 9 would be to preclude potential future use of that right-of-way as a CSX route that would separate freight from commuter and passenger rail. Separation of freight from commuter and passenger rail operation would enhance Amtrak, VRE, MARC and CSX rail service and optimize the greatest public benefit from their operations.

B. There is neither economic nor operational justification for acquiring the CSX right-of-way.

The estimated cost of the 0.58-mile segment is \$16 million, or \$26.6 million per mile. And DDOT is interested in the full 6 miles of the CSX right-of-way (EA, page 16):

³ The tracks are in disrepair and attempting to reconstruct surface tracks may not be practicable, given subsequent redevelopment. One 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.

⁴ 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*.

⁵ <http://www.virginiaavenuetunnel.com/project-resources/>

The District does not currently (September 2013) own or otherwise control the CSX railroad right-of-way. Negotiations with the railroad for approximately 6 miles of right-of-way are ongoing and the estimated cost could change.

Would the cost estimate of \$26.6 million dollars per mile apply to the entire 6-mile length, for a cost of \$160 million for DDOT to acquire the CSX right-of-way? Why would DDOT be interested in the southern part of the CSX right-of-way located inside the Joint Base Anacostia-Bolling (JBAB) military base? That southern segment represents about half of the 6-mile length and would be inaccessible for streetcar use due to security concerns. In addition, DDOT has already constructed the Anacostia Initial Line, Commissioning and Testing Track, and its Operations and Maintenance Facility, just outside the perimeter of the military base and roughly parallel to the CSX right-of-way.

V. COMMENTS ON PUBLIC INVOLVEMENT PROCESS

A. *The EA and Section 106 contracts should have been separated.*

We do not believe that the Section 106 review process is best served by being lumped together under a large contract that covers both the EA and Section 106. A firm more familiar with the visual context within which historic preservation laws apply should have been chosen for this aspect of the study. This lack of preservation expertise is evident in the final report where Section 106 is treated almost as an afterthought to the main contract.

B. *Both the EA and Section 106 public sessions were virtually devoid of meaningful community discussion and cannot be said to have provided “a reasonable opportunity to comment.”*

All of the planning sessions we attended on the EA and Section 106 required that attendees go to separate locations to view and comment on various alternatives and then, to depart without group discussion.

Initially, there were 10 alternatives but **no planning context or basic information about site feasibility was provided for any of them.** They were just lines on a map. Neither the inexperienced and largely uninformed staff nor the engineering consultants, who were at easels at each station, could answer even the most basic questions about current or future land use and key development opportunities that would affect one’s choices for routes. Many staff seemed to be new to the team and unfamiliar with Anacostia. This rendered the exercise both frustrating and a near waste of time. Questions could be raised only by individuals and posted on sticky notes, but no answers were forthcoming after the meeting.

Further, the consultants seemed to have no understanding of the laws that require an assessment of alternative technologies before proceeding beyond H St./Benning Rd. and dismissed concerns about overhead wires. This astonishing omission is apparent in the Draft Environmental Assessment (see our extensive discussion of the law above).

C100 letters to DDOT pointing out these shortcomings and calling for a modification to the process were not answered and, as far as we could tell, no changes were made to the meeting format in Anacostia. In contrast, the first meeting held for the Benning Road extension to Minnesota Ave. provided a different format. Knowledgeable people staffed the breakouts and everyone came together at the end for a useful discussion, clarification of facts, sharing of information, and an opportunity to hear from those who know their community best.

DDOT’s meetings in Anacostia wasted many opportunities to let people engage with each other, hear both the wisdom and frustrations of community members, and work together to build on community knowledge towards a common definition of opportunities and obstacles. We strongly urge DDOT to adopt as policy the more successful format to which we refer above.

CONCLUSION: The errors and omissions pointed out in the Committee of 100's response to the Draft Anacostia Environmental Assessment, and the resultant inadequate and meaningless analysis, require the preparation of a revised Draft Environmental Assessment.

We welcome the opportunity to meet with DDOT, FTA and FHWA to discuss further the comments in this submission.

Submitted by:



Monte Edwards
Vice Chair



Meg Maguire, Chair
Transportation Subcommittee

Submitted to:

Ms. Cerce Torruellas
Senior Transportation Planner
DDOT
55 M St., SE
Suite 500
Washington, DC 20003

cc:

Councilmember Mary Cheh
Councilmember David Grosso
Council Chair, Phil Mendelson