

**VIRGINIA RAILWAY EXPRESS**

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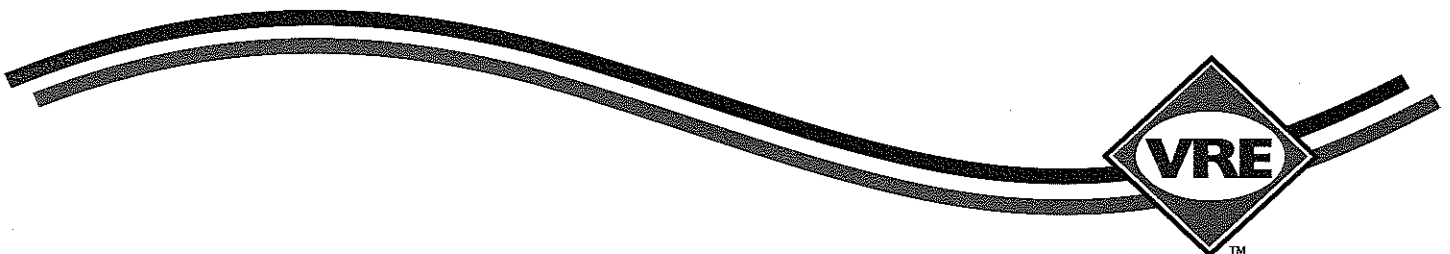
September 23, 2013

Faisal Hameed, Ph.D., Manager  
Project Development & Environmental Division  
District Department of Transportation  
55 M Street SE, Suite 400  
Washington, DC 20003

Dear Mr. Hameed:

Please accept the following comments from the Virginia Railway Express (VRE) on the Virginia Avenue Tunnel Reconstruction Project Draft Environmental Impact Statement (DEIS). The DEIS is comprehensive in its assessment of the potential impacts of the tunnel reconstruction within the limits of disturbance (LOD) for the construction and areas immediately adjacent to the LOD. However, it overlooks other potential impacts to rail operations, including passenger/commuter rail operations, within the southwest Washington, DC segment of the CSX freight rail corridor (i.e., from the Long Bridge to the western tunnel portal) that may result from the tunnel reconstruction. Specific comments and concerns on this subject are summarized below.

- The DEIS provides a minimal discussion of passenger rail operations, including VRE commuter rail operations, that utilize the CSX rail corridor west of the tunnel. VRE is a vital part of the greater Washington, DC regional public transit network and carries approximately 19,000 trips per day between northern Virginia and the District. The CSX SW DC rail corridor provides the only means for VRE commuter rail trains to access Washington Union Station from Virginia and for all passenger trains originating at Union Station to travel south. While passenger trains diverge from the CSX corridor near 1<sup>st</sup> Street SW, approximately a half-mile to the west of the tunnel's 2<sup>nd</sup> Street SE portal, the bottleneck in the rail network created by the existing tunnel can also cause delays for commuter rail traffic as far west as the Long Bridge and into Virginia due to freight trains waiting to pass through the tunnel. The analysis of environmental consequences should assess the potential for construction activities related to the selected alternative to result in service disruptions to both freight and commuter rail operations throughout the entire CSX SW DC rail corridor and mitigation measures that will be implemented during construction to address any adverse impacts.
- The DEIS indicates CSX operates between 20 and 30 freight trains through the tunnel each day and notes the tunnel reconstruction will support expected increases in future freight transportation. No estimate of the number of trains or order of magnitude



increase in future freight traffic (i.e., additional trains beyond the current 20-30 trains per day and/or increased length of trains) is provided, however. Due to the shared freight-passenger rail use in the CSX rail corridor, increases in freight volumes may adversely affect existing and future passenger rail operations due to increased interference between freight and passenger train operations. This potential impact should be evaluated and documented in the EIS.

- Similarly, the DEIS discussion of Other Governmental Plans and Actions does not reference the VRE Strategic Plan, completed in 2004. The Strategic Plan outlines a long-range, incremental strategy to grow VRE ridership over a 20 year period, including increasing the number of trains operated. VRE is currently preparing a System Plan to update its long-range growth strategy. The System Plan builds upon the 2004 Strategic Plan and will provide a framework for VRE system investments through 2040. While the System Plan will not be complete until December 2013, analyses completed to date indicate sustained, long-term demand for commuter rail service between the outer reaches of northern Virginia and Washington, DC employment areas that supports additional weekday VRE trains that would share the SW DC rail corridor with freight trains.
- The DEIS concludes the project is not anticipated to result in indirect effects or contribute to cumulative impacts to the community. Since the DEIS does not discuss any potential effects of the project on commuter rail operations within the tunnel rail corridor, that conclusion is uncertain. Potential effects to commuter rail operations as a result of the tunnel reconstruction and future freight rail operations should be evaluated to confirm there will be no direct or indirect effects or cumulative impacts.

Thank you for the opportunity to comment on the DEIS. If you have any questions about these comments, please do not hesitate to contact me.

Sincerely,



Christine Hoeffner  
VRE Planning Manager

CC: Mr. Michael Hicks, Federal Highway Administration  
Mr. Jay Westbrook, CSX Transportation, Inc.  
Mr. Christopher Murphy, District of Columbia, Executive Office of the Mayor  
Representative Eleanor Holmes Norton