



COUNCIL OF THE DISTRICT OF COLUMBIA

Committee of the Whole

PR20-0601 - Sense of the Council for a Hearing on the CSX Virginia Avenue Tunnel Project Resolution of 2013

Statement of

Monte Edwards

Wednesday, April 30, 2014

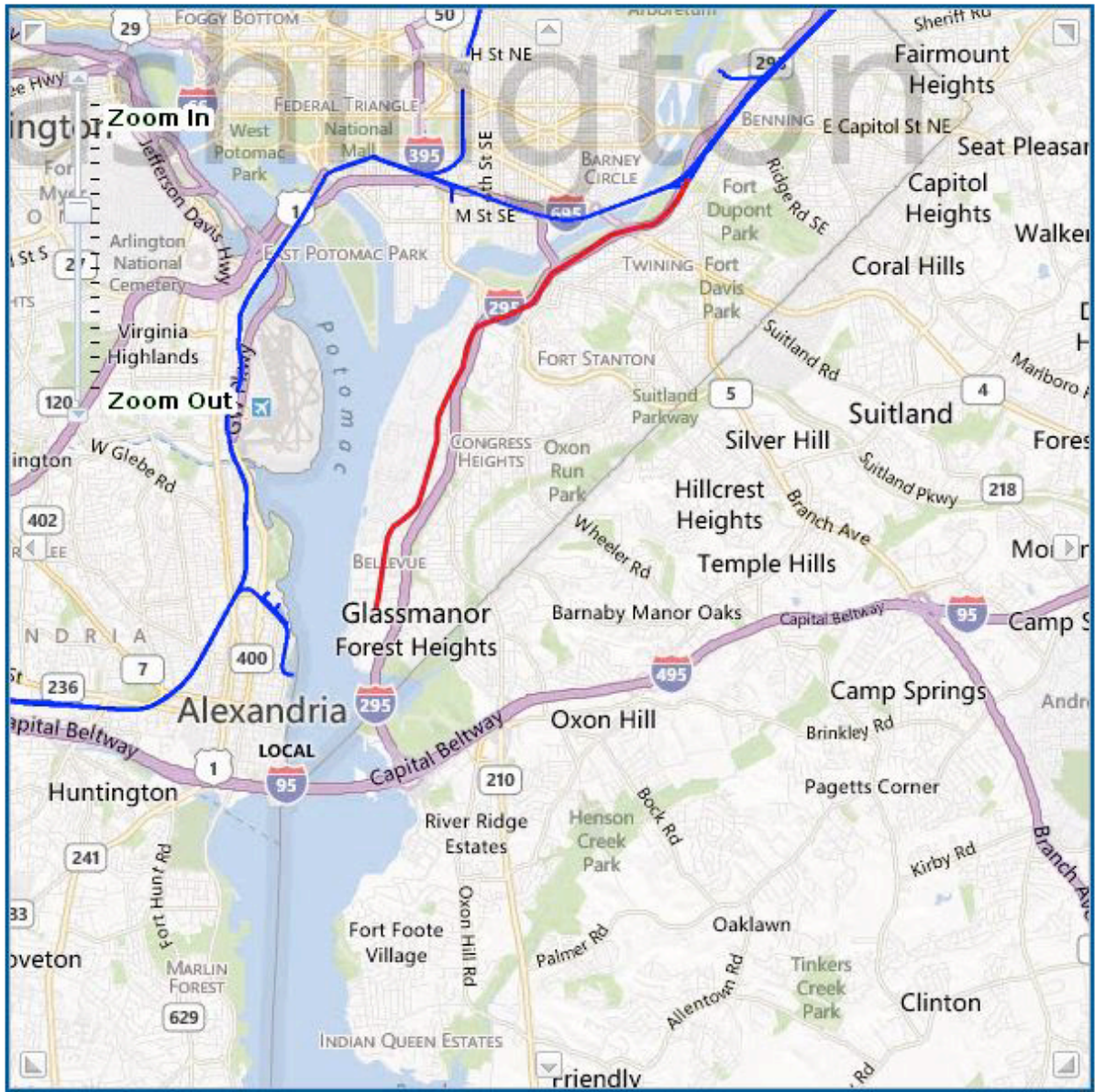
My name is Monte Edwards. I am the Vice-Chair of the Committee of 100 on the Federal City, here to testify about our concerns about the Virginia Avenue Tunnel Environmental Impact Statement (EIS) process and explain why the Draft EIS is inadequate and erroneous and must be redone.

The Draft EIS retained only three options for further investigation in the Final Environmental Impact Statement, all of which involve rebuilding a larger tunnel at, or adjacent to, the present location and continuing to run trains through that area while construction takes place (DEIS, page 3-27). The Draft EIS improperly limits the Area of Potential Effects to the immediate space surrounding the construction activity that would occur if the existing tunnel were rebuilt and enlarged, and limits the time frame to the projected time to accomplish construction of the enlarged tunnel. The failure to consider a range of alternatives stems directly from an overly narrow Statement of Purpose and Needs that focuses only on CSX's needs, ignoring impacts on other users of rail infrastructure as well as the priorities established by federal and local planning efforts. The Draft EIS's treatment of the Virginia Avenue Tunnel in isolation, rather than to establish logical termini for analyzing the project, compounds this problem. Finally, the analysis is hampered by the absence of data that is necessary for a meaningful evaluation of the comparative costs and benefits of alternative approaches.

The Draft EIS reinforces this narrow range of alternatives by erroneously assuming that there are no feasible options to reroute CSX trains away from the Virginia Avenue Tunnel either permanently to avoid having to rebuild the tunnel, or on a temporarily basis while the tunnel is being reconstructed. The Draft EIS fails to address the impact of this project on passenger and commuter rail, an issue of utmost importance to the future of DC's multi-modal transportation system; and it also fails to address potential re-routing options that would separate freight from

passenger and commuter operation:

- In 1997 the National Capitol Planning Commission in 1997 issued *Extending the Legacy; Planning America's Capitol for the 21st Century* that proposed a CSX river crossing between Virginia, south of National Airport, that would connect to the CSX line that supplied Blue Plains. That rerouting option was not even mentioned in the Draft EIS and thus analysis of that rerouting option was not addressed.



Legend

- CSX Rail Network
- Blue Plains Line

- The Draft EIS contains erroneous, false and misleading information about alternative routing on the Norfolk Southern tracks by describing 2005 track conditions rather than current track conditions that have undergone considerable upgrades, completed in 2010, that corrected all the deficiencies complained of in the Draft EIS. The inaccurate information contained in the Draft EIS precluded meaningful alternatives analysis as required under NEPA.

Enlarging the CSX's Virginia Avenue Tunnel project, rather than examining rerouting options that would separate freight from passenger and commuter rail operations, will preclude future needed increases in passenger and commuter rail service for DC.

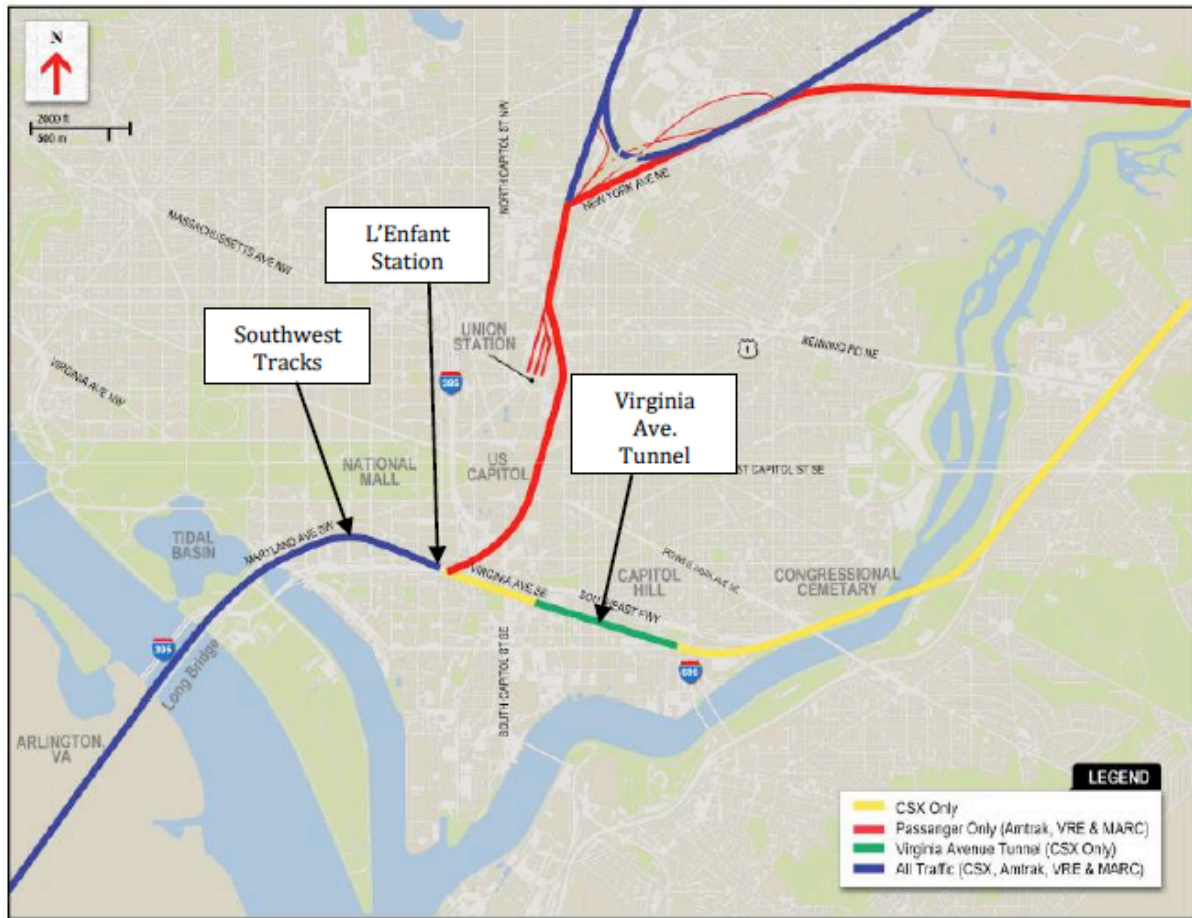
First, CSX owns and/or controls both the SW tracks and the Long Bridge that MARC, VRE and Amtrak must also use to bring commuters and passengers into and out of Washington. CSX will continue to give priority to its own freight traffic that will increase dramatically when the expansion of the Panama Canal is completed. The Metropolitan Washington Transportation Planning Board, in its Regional Transportation Priorities Plan adopted in January of this year, underscored this point:

Freight and passenger trains currently share the Long Bridge's two tracks, which is nearing its practical capacity during rush hours. The bridge's private owner, CSX, maintains the right to give priority to freight traffic over passenger traffic, limiting the scheduling ability and frequencies of passenger trains using the facility. This issue will only get worse as demand for freight and passenger traffic increase in coming decades. (RTPP, p. 29)

Second, current transportation plans and policies call for doubling the number of commuter and passenger trains (Union Station Master Plan); expanding the L'Enfant Train Station to serve more commuter trains and "through-running" MARC trains from Union Station to Alexandria (Office of Planning's Maryland Avenue Plan and National Capitol Planning Commission's SW Ecodistrict Plan); and expanding the Long Bridge to four tracks (DDOT Long Bridge Study). Yet all trains – freight trains from Virginia Avenue and passenger trains from Union Station – all converge at the existing three tracks between 12th St., S.W and the First Street tunnel that goes to Union Station. Additional tracks cannot be added to accommodate either more freight or passenger rail due to dense abutting development and other physical constraints. CSX refuses to electrify these tracks, forcing Amtrak and VRE to use diesel engines with their monument endangering emissions, and precluding high-speed rail south of Union Station.

This situation was addressed in yesterday's 2015 DDOT Budget Oversight Hearing in the broader context that DC is a growing hub for all kinds of rail transportation and thus the need for a comprehensive freight, passenger and commuter rail plan that would enhance Amtrak, VRE, MARC and CSX rail service; coordinate the different rail-related projects; and optimize the greatest public benefit from their operations.

Active Rail Lines within the District of Columbia



If CSX were to implement its locally destructive plans, the capacity for significant expansion of freight, commuter or passenger rail will be impossible. Without new thinking, CSX, the region's commuter rail and the East Coast's passenger rail system are headed for a pile-up in SW Washington.

The Committee of 100 recommends a solution with advantages for all parties to increase future rail capacity: separate commuter and passenger rail from freight rail by providing an additional Potomac River rail crossing for freight, and dedicate a rebuilt Long Bridge to commuter and passenger rail. The ongoing Long Bridge Study proposes to replace the existing two-track, 36-foot wide Long Bridge with a replacement bridge, that would provide four sets of rail tracks. The different alternative configurations would also provide streetcar, general purpose, pedestrian and bike lanes, with a width of up to 137-feet (Alternative 5). With that width, two parallel spans may be appropriate. Consideration should be given as to where to locate the second span in order to separate freight from commuter and passenger rail operation. A second rail crossing will eliminate any need for expansion of the Virginia Avenue Tunnel and free up funds to apply to a second Potomac River crossing.

DC is a growing hub for all kinds of rail transportation. The Draft EIS needs to be redone to correct its errors and deficiencies and to take into account these other rail initiatives in a manner that would enhance Amtrak, VRE, MARC and CSX rail service; coordinate the different rail-related projects; and optimize the greatest public benefit from their operations.

Thank you.