The Committee of 100 on the Federal City

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Comments of the Committee of 100 on the Federal City on the Scoping of the Long Bridge EIS

October 13, 2016

The Committee views the Long Bridge Environmental Impact Study as a critical transportation and urban development project that can result in increased transportation options for the Nation's Capital that will be sorely needed as the City and the Region continue to grow. The comments that follow reflect our concern that increased attention must be given to rail transportation in providing for increased personal and business travel in the region. We also recognize the need for adequate and safe freight transportation in and through the Region and suggest new ways that passenger and freight rail may be accommodated.

We are keenly aware that this study is being done at the same time as several other major rail studies that also are considering the use of the Long Bridge and the approaches to it from Union Station, the Virginia Avenue Tunnel and Alexandria VA. In this context, we have concerns as to how those studies are being coordinated among the several sponsors, which include the Federal Railroad Administration, the District of Columbia, the Commonwealth of Virginia, Amtrak, and certain local civic and development interests who are seeking to restore Maryland Avenue to its original right of way[1]. Chief among these issues is the current and future use of the Long Bridge, the technical and functional capacity of the Bridge, and the capacity constraints of the Bridge and its approaches. As is noted in these comments, there is inconsistent information among the several studies on these "facts' and there are indications that not all major stakeholders are always involved in the relevant studies[2]. These inconsistencies and coordination issues pose a major impediment to an effective study, and we urge the agencies to work to reconcile these matters.

[1] The restoration of Maryland Avenue to the L'Enfant Plan ROW is called for in the District's Maryland Avenue Southwest Plan and the SW Ecodistrict Plan.

[2] Currently, we know of the following studies, in addition to the Long Bridge Study, that are looking at some of the same trackage and access: three separate studies involving Union Station and two of these involve multimodal access to the Station, one involves rail access; the District's State Rail Plan; the VDRPT and FRA's Southeast High Speed Rail Study: Richmond to Washington, DC; on-going engineering studies for the VRE on access to DC. There also have been a number of recent studies covering part or all of the same real estate including: the VDRPT's 2006 Washington DC to *Richmond Three Track Feasibility Study*, the *VRE 2040 System Plan*; and the MARC Growth and Investment Plan.

Following are our specific comments on these key Long Bridge EIS issues:

1. Long Bridge must consider the potential increase in passenger demand from high speed rail and planned increases in commuter rail, including run-trough trains, which will increase estimated rail traffic.
2. The current estimates of trains using the Bridge now are not accurate and thus impact the 2040 estimates and capacity analysis.
3. When all passenger and freight demand factors are considered there is a need for at least a five track bridge, but the ROW only allows for four.
4. The EIS needs to evaluate two river crossings in order to accommodate future freight and passenger traffic.

The Limitations of the Long Bridge in the Context of High-Speed Rail Must be Addressed In This Study.

In 2006, the Virginia Department of Rail and Public Transportation (DRPT) issued its *Three Track Feasibility Study*[3] that addressed rail service between Richmond and Union Station.[4] The Study pointed out that "the Long Bridge across the Potomac River in Washington, D.C. imposed major constraints that would require substantially greater analysis and coordination with an expanded stakeholder base before a decision can be made as to if and when to proceed with a third track" (*Three Track Feasibility Study,* page 2-1). The study pointed out that elements of third track expansion had been constructed or planned over a substantial part of the route, but the Long Bridge constraints had yet to be addressed (*id.* page 5-10):

> "[T]he addition of third track capacity to the existing double track bridge over the Potomac River has not been programmed. DRPT anticipates the need to prepare a comprehensive EIS if a new crossing of the Potomac River is proposed."

To begin the preparation of such an Environmental Impact Statement in 2015, DRPT, together with the Federal Railroad Administration issued the *DC to Richmond Southeast High Speed Rail Scoping Summary Report* (page 1-1):

> The Federal Railroad Administration (FRA) and Virginia Department of Rail and Public Transportation (DRPT) propose passenger rail service and rail infrastructure improvements in the north-south travel corridor between Washington, D.C. and Richmond, VA. These passenger rail service and rail

[3] http://www.dc2rvarail.com/files/3214/6680/4418/Washington_DC_to_Richmond_Third_Track_Feasibility_Study.pdf

[4] The Study explained (Executive Summary, page 3) that the current Operating Agreement between CSX and VRE for the operation of commuter trains from Fredericksburg to Washington stipulates that a third track must be built for the entire VRE service area before additional commuter train frequencies can be implemented. The Operating Agreement further states that these improvements will be made at no cost to CSX.

infrastructure improvements are collectively known as the Washington, D.C. to Richmond Southeast High Speed Rail project (DC2RVA).

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The Project is part of the larger Southeast High Speed Rail (SEHSR) corridor, which extends from Washington, D.C. through Richmond, VA, and from Richmond continues east to Hampton Roads (Norfolk), VA and south to Raleigh, NC and Charlotte, NC, and then continues west to Atlanta and south to Florida.

While the DC to Richmond Southeast High Speed Scoping Summary Report included DC in its title, it in fact ended at the south end of the Long Bridge and did not address the Long Bridge or how to get to Union Station (http://www.fra.dot.gov/Page/P0729).[5]

The Report received extensive comments from Virginia agencies, counties and cities, but no comments from Washington, DC (*id.* pages 4-3 – 4-5). The reason for Washington DC not being involved is not known. One possibility is the fact that there was a separate Union Station study as indicated by the response to the public comment that the layover at Union Station to change locomotives is, and would continue to be, a major disincentive to rail travel in the corridor (*id.* Page 4-8):

> ***Response:*** *Under the current operations, the layover in Washington, D.C. is required to transfer between electric and diesel-electric locomotives. In the future, it is possible that a dual mode locomotive will be developed that allows for high speed electrified service in the Northeast Corridor to continue south of Washington with diesel-electric operations, eliminating the need for a locomotive change at Washington Union Station. New Jersey has begun to use such a technology, which would require further advancement to be applied to Virginia service. While operations within Union Station are not part of this Project, Amtrak and other stakeholders are conducting a separate project to develop and implement a Master Plan for Union Station. One of the goals of this separate project is to streamline rail movements in and out of the congested station.* (Emphasis added).

Even though Union Station is the subject of a separate study, trains would have to cross the Long Bridge to get to Union Station, and the major constraints imposed by the Long Bridge and the tracks leading to Union Station would still have to be addressed.

That means we now have the on-going study for high-speed rail from Richmond to Washington that does not include the Long Bridge and the on-going Long Bridge study that does not include high-speed rail.

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[5] The current website for this project, http://www.dc2rvarail.com/about/, a part of the 500 mile SEHSR project, now states that the northern terminus of the project is no longer Union Station, but the terminus is now defined as Arlington, Virginia.

The Number of Cross-River Train Trips Needs to Be Reconsidered

The study's quantification of the number of trains that will use the Long Bridge understates the number of trains that currently use the bridge and understates the number of trains that will use the bridge in 2040.

Current Usage

The 2006 DRPT *Three Track Feasibility Study*, stated that on average 81 trains/day came across the Long Bridge, sometimes peaking to 88 trains/day. What was presented in the September 14, 2016 scoping study, now ten years later, is a total of 74 trains/day. That does not appear reasonable - current level of usage of the bridge is not lower than it was ten years ago – it is higher. VRE has added 14 daily trains and Amtrak has added six daily trains[6]. The September 14, 2016 presentation shows CSX is operating five trains a day fewer than they were in 2013[7] however, there are methodological issues and, while the railroad industry suffered traffic declines due to temporary economic conditions in late 2015 to today, the longer term trends and the CSX investments show increasing traffic into 2040. This aberration needs to be described in the study.

The projected number of train trips that will use the Long Bridge in 2040 will determine the number of cross-river tracks that will be required to meet that demand[8]. The C100

[6] According to the 2006 *Third Track Feasibility Study*, (Chapter 1, page 3) CSX was operating 25-30 freight trains per day, and VRE was operating 14 trains per day and Amtrak operated an average of 18 intercity trains per day. The September 14, 2016 Presentation shows 32 VRE and 24 Amtrak trains now use the bridge.

[7] The 2013 Long Bridge Presentation quantified the number of CSX trains using the bridge in 2013 at 23 trains per day. The September 14, 2016 presentation quantifies 18 CSX trains per day, a lower number for CSX than was quantified in either the 2006 Third Track Feasibility Study or the 2013 Long Bridge presentation.

[8] Currently CSX is increasing the use of double-stacked container trains on its system. Existing height limitations are being resolved with the National Gateway Project that includes rebuilding the Virginia Avenue tunnel to provide two-way tracks and sufficient height for double-stacked container trains. But for now, and until the Virginia Avenue tunnel reconstruction is complete, only standard height freight trains can go through DC.

On a system-basis, over 40% of the total CSX carloads are moved by containers: https://www.csx.com/index.cfm/investors/aar-reporting/. But none of the double-stacked containers can come through DC – they are being re-routed around the City. How does this affect the current and near-term quantification of CSX trains using the Long Bridge?

CSX has argued that double-stacked container trains can carry more goods, and thus fewer trains will be required. But containers don't carry coal, petroleum, crushed stone, sand and gravel – they carry high-value goods, such as electronics, auto parts and consumer goods. Once the Virginia Avenue tunnel is complete and double-stacked containers come through the City, it appears that, in large measure, the current amount of freight traffic will increase and thus, the number of trains will increase. This scoping study should

respectfully submits that these projections must have a sound beginning point, based on actual current numbers and trends. There is no sound basis for the stated number of current CSX trains that use the bridge.[9]

Projected Usage in 2040 –CSX

Compared to the initial 2013 Long Bridge study, the number of CSX trains projected to cross the Long Bridge in 2040 has decreased from 46 to 42. But how was the increased capacity provided by the Virginia Avenue tunnel that will clearly be in service well before 2040, taken into account?

Another factor that will increase the number of CSX (and probably NS as well) trains is the much greater capacity of the expanded Panama Canal. 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 the 42 trains a day that is presented in this study.[10] In 2005, the FRA estimate of over 56 trains was 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

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conduct careful traffic analyses to quantify the effect of the shift to double-stack containers, and to determine how it will affect CSX freight traffic in 2040.

[9] A possible explanation for the variability and inconsistency of the CSX numbers dates back to December 2013. At an open house presentation, 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.

[10] 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.

facility, freight destined for Baltimore and points west will now come into Newport News and be transported through DC to points north and west. Much of that freight increase will likely be carried by CSX and may also be carried by Norfolk Southern. In other words, we will see a lot more freight coming through Washington, DC. This EIS needs to carefully consider how freight will affect passenger and commuter rail on tracks shared with CSX

Projected Usage in 2040 – High Speed Rail

This Long Bridge Study includes MARC, VRE, CSX, NS, and purports to encompass Amtrak. But it only addresses a part of Amtrak: Amtrak Regional and Amtrak Intercity. It does not address Amtrak Acela or any form of Amtrak high speed rail. For the purpose of determining the usage of the Long Bridge in 2040, the projected number of trains needs to include Amtrak's high-speed trains. Based on current published schedules,[11] between Washington, DC and New York Acela now operates hourly, between 5 AM and 8 PM northbound (16 trains), and from 6 AM to 9 PM southbound (16 trains) for a total of 32 trains per day. This means that by 2040 we can expect 52 high-speed trains between Washington and New York, but only 17 daily high speed trains will need to cross the Potomac River to proceed on to Richmond each work day[12].

Projected Usage in 2040 – MARC

The projected 2040 usage of the Long Bridge now includes 8 daily trains for MARC. But, according to MARC's *Growth and Investment Plan* (Sept 2007), by 2020, and continuing to 2040, MARC plans to have trains on the Penn Line cross the Potomac and

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[11] https://www.amtrak.com/ccurl/375/809/Northeast-Schedule-W02-091716.pdf

[12] Between in 2021 and 2022, Amtrak will retire its existing 20 *Acela* train sets and replace them with 28 new *Avelia Liberty* train sets that will have one-third greater seating capacity, operate at higher speeds and the new trains will operate half-hourly New York-Washington service at peak hours. Defining peak hours as ending at 9 AM and resuming at 3 PM means there will be 10 additional trains each way on workdays, for a total of 52 trains per day. As to how many will continue to Virginia will require careful analysis and consultation with Amtrak, but right now the EIS has no high-speed trains continuing to Richmond. For purpose of these comments, the number of high speed trains that will proceed Washington to Richmond will likely be similar to the number that proceed from New York to Boston. Both Richmond and Boston are state capitals and are similar in terms of the need for high-speed rail given institutions that attract high levels of visitors. Both are served by international airports and heavily congested interstate highways (Boston1-84 and I-90, Richmond I-95). Both are centers of finance and law with both being homes to federal Circuit Courts (Boston - USCA 1st Circuit, Richmond - USCA 4th Circuit), Federal Reserve Banks and other regional institutions. They are similar in size and population. The land area of Boston is about 48 square miles and Richmond is 60 square miles. Greater Richmond has a population of 1.26 million, and while the city of Boston has a population of less than a million, during the workday Boston has a population of 1.2 million persons.
Currently, 5 daily high speed trains travel between New York and Boston in each direction (https://www.amtrak.com/ccurl/53/1020/Northeast-Schedule-W04-091716.pdf) for a total of 10 trains per day, or about a third of the high speed trains that travel between New York and Washington. Applying this factor to the increased number of new high speed trains (52/day) would mean about 17 high speed trains will need to cross the Potomac each day in 2040.

continue to Alexandria. By 2040, MARC is projecting 52 round-trip trains on the Penn Line but not all of them will cross the Potomac and continue to Alexandria. For the purpose of this study, an estimate of 34 MARC trains crossing the Potomac each day should be used.[13]

By thru-running MARC through Union Station to Virginia and, likewise, running VRE through Union Station to Maryland, commuter rail could provide a useful increase in transportation capacity. Further, currently, VRE and MARC end their morning runs at Union Station, and then overcrowd the Union Station rail yard by parking their trains at Union Station until time for the evening rush hour out of Union Station. By thru-running MARC and VRE through Union Station, the overcrowding of the rail yard would be reduced and the efficiency of Amtrak operations would be improved.

The Need is for At Least a Five Track Bridge

In the initial Long Bridge study (December, 2013), the maximum capacity of a 4-track rail bridge was quantified at 187 trains per day.

2040 Build Level of Service (4 Tracks)

Period	Freight	Passenger	Total	Capacity	V/C
Peak	8	62	70	70	1.00
Off Peak	26	70	96	117	0.82
Daily Total	**34**	**132**	**166**	**187**	**0.89**

At the September 14, 2016 open house, the number of daily trains in 2040 is projected to be 192, thus exceeding the 187 trains per day at near capacity of a four track bridge and meaning a rail bridge with five or more tracks will be required:

[13] Currently, MARC trains have an average weekday ridership of over 36,000. Current plans of MARC call for ridership to increase to 75,000 daily riders by 2040 (*MARC Growth and Investment Plan Update* 2013 to 2050, September 9, 2013), which will require approximately twice the number of trains that MARC now operates on the Penn, Brunswick and Camden Lines. The Penn Line currently runs 26 round-trip trains on week days from Baltimore to Union Station and by 2040, there would be 52 daily round trip trains on the Penn Line but not all of them would thru-run to Alexandria. For purpose of these comments, let us make the same assumption that the number of MARC trains that will proceed to Virginia will be similar to the ratio of high speed trains that proceed from New York to Boston that amounts to about a third of the high speed trains that operate between Washington and New York. Thus there would be 17 roundtrips or 34 river crossing per work day

Train Operator	Current # Trains/Day	2040 # Trains/Day	Percent Increase
CSXT	18	42	133%
Amtrak	24	44	83%
VRE	32	92	188%
MARC	0	8	–
Norfolk Southern	0	6	–

Thus, even before corrections to the 2040 projections described above are taken into account, a four-track rail bridge will be inadequate. In fact, there will be 17 high-speed Amtrak trains and 34, rather than 6, MARC trains that are not reflected in the current 2040 projections, (even without any upward adjustment for CSX) for an increase of 45 trains in 2040, resulting in a total of 237 train crossing the Potomac in 2040. Thus some version of Option 8 – all of which contemplate five or more tracks - needs to be the focus of this study. [14] Additionally, adjusting the CSX usage upwards would indicate that a 6-track bridge will be needed in 2040, and with a bridge that size, it would appear prudent to plan on two bridges and ask the question about where to locate the second Potomac River crossing.

The Southwest Right of Way Cannot Accommodate More than Four Rail Tracks

The Southwest right-of-way limits the future commuter, passenger and freight rail that will cross the Potomac River. The rail tracks from Virginia are double-tracked across the Long Bridge and in Southwest until they reach 12th Street, SW 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 to the Virginia Avenue tunnel that is now being double tracked. Previous and ongoing plans assume that expansion of the Long Bridge and the provision of four tracks in Southwest for freight and passenger rail will accommodate freight, passenger and commuter rail.[15] *But because of the narrow width of the depression in which the*

[14] Using the 2013 capacity criteria that indicates four tracks can accommodate 187 trains, or about 48 trains per track, the 45 additional MARC and high-speed Amtrak trains will require an additional track on the new bridge.

[15] The current Union Station Expansion EIS process also ignores evaluation of the Southwest tracks. The Union Station Master Plan (July 25, 2012) contemplates tripling the number of rail users (p. 24), extending high speed rail to Virginia, North Carolina and the southeast United States (p. 22), and to accomplish this, Phase 4 of the Plan would provide 8 tracks within Union Station to serve high-speed rail to the south, bi-level VRE trains, and the Amtrak Superliner (pp. 4, 11). But the study area for the Union Station project

tracks are located along Maryland Avenue, the three Southwest tracks cannot be expanded to the 6 tracks that will be require to accommodate the level of 2040 rail traffic. Even if the Southwest tracks could be expanded to four tracks, the recent decision to enlarge the Virginia Avenue tunnel to permit two-way CSX operations will likely mean much greater CSX freight traffic on the Southwest tracks to the further detriment of passenger and commuter rail operations on the Southwest tracks. Separation of commuter rail and Amtrak from freight rail with a new, separate river crossing for freight would relieve these capacity constraints[16]. The Long Bridge EIS needs to address separation of freight from passenger and commuter rail south of Union Station.

The scope of this EIS encompasses most of the Southwest track (from the Long Bridge to Control Point Virginia Interlocking, near 3rd Street, SW) but does not address the fact that because of the narrow width of the depression in which the tracks are located along Maryland Avenue, the Southwest tracks cannot be expanded to four tracks using current rail design criteria. The alternative configurations for the replacement Long Bridge that were presented on December 5, 2013 all show depressed (Alternative 2) or underground Southwest 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. Not only is the 58-foot width limitation imposed by the 1901 statute, it is also constrained by development that has occurred to the edge of the depression[17]. If the Long Bridge is rebuilt or refurbished to connect with the existing Southwest tracks, the bottleneck and rail congestion will be shifted to the three Southwest tracks. Dense surrounding development makes widening the depression and adding a fourth track impossible unless some of the width can be reclaimed. Additionally, the concepts for adding a fourth track are based on the original width of Maryland Avenue, but a section of the original right-of-way of Maryland Avenue is currently closed. The Maryland Avenue Southwest Plan explained at page 1-8:

> The Avenue right-of-way has been formally closed between 9th and 12th Streets SW. Reestablishing the 160' wide Avenue will require the cooperation of multiple property owners.

No one has completely unraveled the adjoining multiple property ownerships in this

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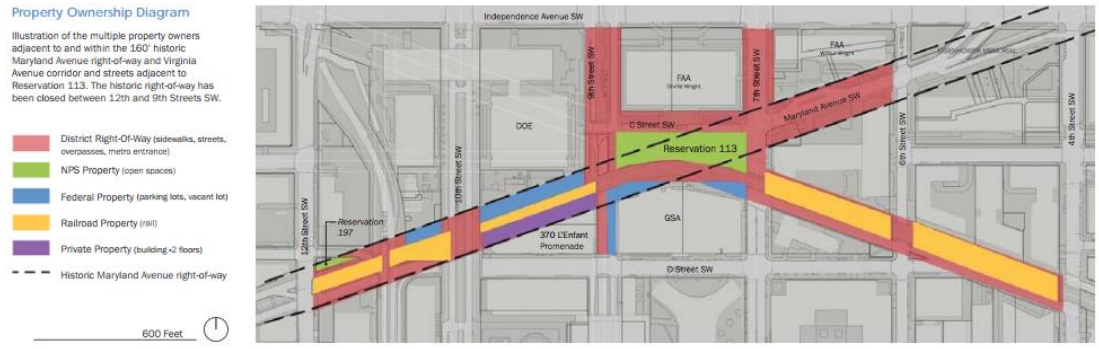
encompasses only the Union Station building, Columbus Circle in front to the station and the rail tracks north of the station. It fails to include the tracks south of the station. The tracks south of the station, beginning with the First Street tunnel, and including the Southwest tracks and the Long 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 both the Union Station Expansion Plan and this Long Bridge EIS.

[17] In specifying the section of the tracks that are 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.

section of Maryland Avenue, but this drawing illustrates the complexity of property ownership (Maryland Avenue Southwest Plan, page 1-9):



In evaluating the width required to add an additional Southwest track, the design criteria need to be clearly specified and evaluated in terms of operational feasibility and safety. If that can be done, the logical solution is a new two-track bridge for freight that reroutes freight away from the Southwest tracks and a new four-track Long Bridge to serve commuter and passenger rail that would use the expanded four-track Southwest tracks. This would allow separation of freight and passenger operations and scheduling, and expansion of Amtrak and commuter rail as planned in the Union Station Master Plan, the Maryland Avenue Southwest Plan, and the SW Ecodistrict Plan. It would reroute freight and thereby improve air quality, safety and security by rerouting CSX away from downtown, the monumental core and the U.S. Capitol.

The Study Needs to Evaluate Separate Freight and Passenger/Commuter Rail Crossings

One of the necessary changes is the need to examine the differences between freight and passenger rail operations. Currently, the operations of the Long Bridge and the Southwest 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 Long Bridge Study needs to evaluate the benefits of separating freight operations from passenger , commuter and high-speed rail operations and how those operational benefits affect capacity limitations of separate freight and passenger river crossings. The 1997 NCPC 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.

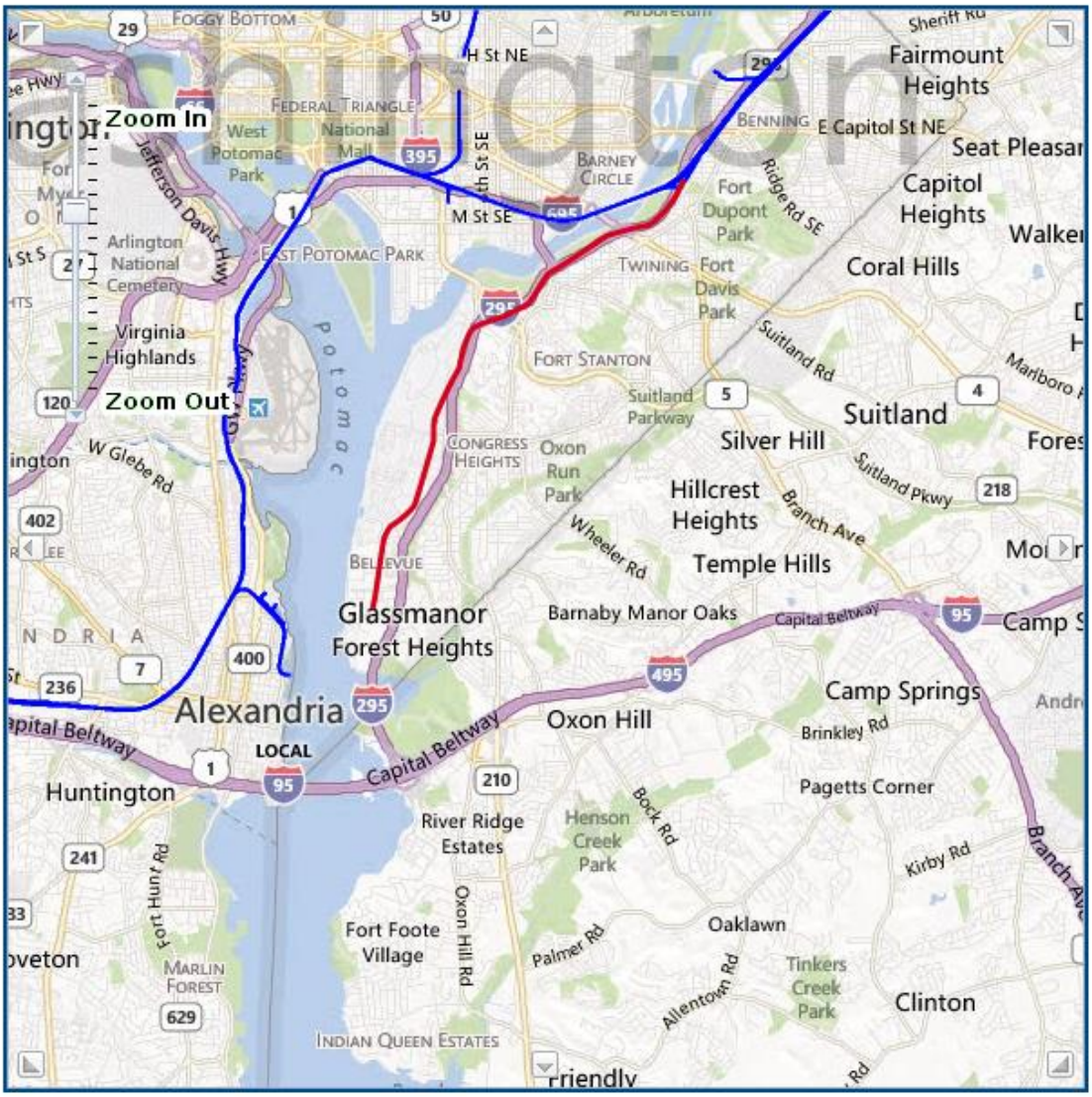
NCPC proposed a rail tunnel under the Potomac River between Virginia and Anacostia in their 1997 plan Extending the Legacy: Planning America's Capital for the 21st Century.

The NCPC proposal was a tunnel that would carry both freight and passengers. That alignment would be appropriate either for a tunnel or a bridge that would carry freight, leaving the Southwest tracks, the only means of accessing Union Station from the south, for use by Amtrak and commuter rail.

There are other opportunities for this alignment. For example, The Potomac River Generating Plant, owned by GenOn, just north of Alexandria has been decommissioned and in 2015 was undergoing demolition and environmental clean-up. 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 NCPC realignment would have connected, have been enhanced for visibility.

The Blue Plains Line largely follows the Anacostia Freeway after it leaves the Benning Yard skirting at points the Anacostia Park and residential and commercial property. 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 rail line is immediately adjacent to Interstate 295. There are no plans in the DC Comprehensive Plan for development along the CSX right-of-way, although it was the original location of proposed streetcar development. Those plans, however, have changed. The west side of the CSX right-of-way is I-295, with no space for development.



To reactivate the Blue Plains alignment, tunnel boring under existing rights-of-way may be more practical than attempting to reconstruct surface tracks, given redevelopment that has occurred and concerns of both neighborhood residents and base officials. Another possibility would be to lower the tracks and deck over them, like the Southwest 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. Still another possibility is to consider a tunnel under the Potomac branching off from the CSX main line just south of the airport. This tunnel could run under the Potomac to the Anacostia and

join the CSX alignment somewhere between the 11th Street Bridge and the rail yard where the rail Tunnel tracks cross the Anacostia River.

The possibility of using a tunnel boring machine for all or part of this work needs to be evaluated.

A new crossing could also facilitate the adoption of run-through passenger trains between Virginia and Maryland with the added benefit of opening up commute options for Wards 6 and 7. Stations could be located along the tracks at, and south of, Pennsylvania Avenue S.E. as were envisioned in the original Anacostia streetcar study, which proposed to use this ROW. For commuters from either state, transfers to Metrorail and bus could be made at Minnesota Avenue station. This would mean that a substantial share of run-through trains and possibly others would by-pass Union Station and L'Enfant. While this would cause some shifting in commute patterns, there are tremendous benefits. First, both of these stations are facing severe crowding issues and, second, the increase in transit opportunity for communities east of the Anacostia would be substantial. It should also be pointed out that for those commuting through the District to reach either state, station location is of no consequence. This final operational option also needs to be considered in the EIS as part of the second crossing analysis.

Conclusion

We find that the current Scoping analyses are incomplete in the assessment of current and future traffic and, thus, are not adequate as a basis for sound decision making on such an important project for the future of the District of Columbia and surrounding region. We respectfully urge the agencies involved to take a much closer look at traffic estimates.

Our assessment leads us to strongly recommend that two crossings of the Potomac River be considered as an option in the future phases of Study. Such an option would benefit both freight and passenger rail and provide the kind of flexibility in operation that the region increasingly needs and is very advantageous in emergencies.

Please contact Monte Edwards at 202-543-3504 or Monte.Edwards@verizon.net or Sarah Campbell at 202-841-6272 or sccampbell@verizon.net if you have questions or other concerns.