The Committee of 100 on the Federal City

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Comments Concerning the

Long Bridge Project
Preferred Alternative Selection as Presented on November 29, 2018

January 9, 2019

The Committee of 100 on the Federal City (Committee) is pleased to comment on the progress of the Long Bridge Environmental Impact Study (referred to herein as the "Long Bridge Project") preferred alternatives described at the November 29 public meeting. We applaud the Federal Railroad Administration (FRA) and the District Department of Transportation (DDOT) for addressing this critical bottleneck in the rail transportation system. The Committee views the Long Bridge Project as a vital transportation and urban development project to meet the increased freight and passenger/commuter needs of our growing region, providing alternatives to truck deliveries and vehicular congestion in the region. However, as we have expressed in prior comments on this Project, we believe that there are significant flaws in data projections leading to an underestimation of needed capacity and a failure to consider alternatives to meet that capacity.

The current regional passenger and commuter rail system is severely constrained, limiting rail speed, reliability and competitiveness of trains with vehicles. Decades of underinvestment are largely to blame. This is particularly true of the transportation system south of Union Station, because of the constraints imposed by the Long Bridge and the SW rail tracks. 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 to help expand much needed commuter/passenger rail:

<u>To the north:</u> 7-8 rail tracks

- The Brunswick line operates on the 2-track CSX Metropolitan Subdivision
- The Penn Line operates on the 3-4-track Amtrak NE Corridor tracks
- The Camden line operates on the 2-track CSX Capitol Subdivision

<u>To the south:</u> 2 and 3 rail tracks

- Leaving Union Station, two tracks enter the First Street Tunnel

- West of L'Enfant Station the two tracks join the three CSX tracks
- The three CSX tracks proceed SouthWest to the Long Bridge
- Over the Long Bridge there are two tracks

The Committee offers the following key points on preferred alternatives presented at the November 29 meeting, as well as the VRE L'Enfant Station that is shown as part of the Study Area for this Project.

We recommend that the Long Bridge Project:

- Correct the outdated information used to project future need and recalculate the projections of future need. Anomalies in the data appear to be leading to a serious underestimation of needed rail capacity.
- Examine an additional river crossing for rail traffic. While future traffic would require more than four rail tracks at the Long Bridge river crossing, only four tracks are feasible because of infrastructure on either side of the river.
- Examine re-routing some freight operations. While the SW tracks need to be increased from three to four tracks, there is not enough width in the depressed right-of-way to accommodate the spacing between tracks required for all freight rail operations. However, the Committee endorses the four tracks depicted in the SW corridor at the November 29th Public Meeting, so we are hopeful a potential solution is possible. The future increase in traffic will inevitably result at least in a bottleneck, and possibly, at worse, unsafe distance between trains as they pass.
- Determine if the additional ROW needed between 9th and 12th Streets can be obtained.

These recommendations are discussed in greater detail below.

Four Rail Tracks at the Long Bridge River Crossing Will Not Have the Capacity for Future Projected Growth in Traffic

The preferred alternatives provide four rail tracks across the Potomac. 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 was projected to be 192:

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	–

The November 29, 2018 Public Meeting continues to project cross-river train usage of 192 trains per day in 2040 (Presentation Board 7 of 16), but again offers no explanation of how this will be acceptable, when it exceeds the maximum capacity limit of 187 trains per day for four tracks.

Train Operator	Current # of Trains per Day	2040 # of Trains per Day	Percent Increase
VRE	34	92	171%
MARC	0	8	--
Amtrak	24	44	83%
CSXT	18	42	133%
Norfolk Southern	0	6	--
Total	76	192	

A considerably more serious concern is that the 192 trains per day projection is too low. The June 19, 2018 *Alternatives Development Report for the Long Bridge* projects that "By the forecast year of 2040, passenger and freight train volumes are expected to increase by 150 percent." (section 2.1). The footnote explains:

> Expected train volumes in 2040 were established based on input from CSXT, VRE, Amtrak, NS, and MARC, as well as DRPT's *DC to Richmond Southeast High-Speed Rail (DC2RVA) study"*

However, DRPT and FRA's *Southeast High-Speed Rail Study: Richmond to Washington, DC* is out of date and was most recently updated in the VDRPT's *2006 Washington DC to Richmond Three Track Feasibility Study.* 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. Inexplicably, 12 years later, the Long Bridge Project cites a total of 76 trains/day that currently use the Long Bridge. It is not reasonable to assume that the current level is lower than it was 12 years ago but rather that it should be higher given that VRE has added 14 daily trains and Amtrak has added six daily trains [1].

CSX Projected Usage Fails to Account for Demand from Panama Canal Expansion

The November, 2018 presentation shows CSX is operating five trains a day fewer than they were in 2013;[2] however, while the railroad industry suffered traffic declines due to temporary economic conditions in late 2015, the longer-term trends and the CSX investments show increasing traffic into 2040. This aberration needs to be described in the study. CSX has claimed that they will use double-stacked trains, and there "may" be fewer trains but longer ones with more cars. But, 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:

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[1] 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 November 2018 Presentation shows 34 VRE and 24 Amtrak trains now use the bridge.

[2] The 2013 Long Bridge Presentation quantified the number of CSX trains using the bridge in 2013 at 23 trains per day. The November 2018 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.

> 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 resulting in the number of CSX trains far exceeding 42 a day. The estimate of 42 trains per day does not take into account 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 Canal 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 carried by CSX on double stacked container trains, resulting in heavier loads.

The C100 respectfully submits that the projections for this Study must have a sound beginning point, based on actual current numbers and a realistic projection of future trends. There is no sound basis for the stated number of current CSX trains that use the bridge and the 2040 projection is without basis. The Committee of 100 submits that we will see a lot more freight in the near future and thus we need to reconsider how freight can be re-routed on a new river crossing to minimize congestion on the expanded Long Bridge.

<u>MARC Projected Usage Should be Adjusted Upwards</u>

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 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.[3]

[3] 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

Amtrak Rail Projections Fail to Consider High Speed Rail

The Long Bridge traffic projection only addresses a part of Amtrak: Amtrak Regional and Amtrak Intercity. It does not address 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 future Amtrak high-speed trains. The DC2RVA Tier II Draft EIS, Sept 2017, states that by 2025 there will be four new round-trip Interstate Corridor trains and five new round-trip NE Regional trains that will continue south to Norfolk, Newport News and Richmond. It does not mention high-speed trains.

In earlier comments, the Committee of 100, using publicly available information, provided such a projection. 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, we should assume that the number of high-speed trains that will proceed to Virginia will be similar to the number that proceed from New York to Boston. Currently, that number is 5 daily trains 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.

The Proposed 4-track Bridge Will Become Inadequate for Future Freight and Passenger/Commuter Rail Operations

The new four-track Long Bridge will not be able to accommodate up to 17 high-speed Amtrak trains and up to 34, rather than 6, MARC trains. Thus, even without any much-needed upward adjustment for CSX in 2040, there will be an estimated 45 more passenger/commuter trains than the study accounts for. Therefore, additional cross-river track capacity will be needed. But with the limited track capacity in Virginia and the constrained ROW in DC that allows for only four tracks, the four-track Long Bridge

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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 the potential of up to 17 round trips or 34 river crossings per work day.

Expansion proposed in this study appears to be all that can be accommodated at this location, from an engineering perspective, but inadequate to accommodate projected rail demand. To accommodate the most likely amount of train traffic the study needs to address where to locate an additional two track Potomac River rail crossing for freight and potential additional passenger rail.

Four SW Tracks Cannot Accommodate Modern Rail Operations

Between 9th and 12th Streets, the width of the area controlled by the railroad appears to be 58 feet – the width that Congress authorized in 1901.[4] Rail design criteria would mean a corridor 60-feet wide at a minimum would be needed to meet modern operating standards. Perhaps FRA, DDOT and CSX will be able to acquire the additional two feet or more from the adjacent landowners between 9th and 12th Streets to allow four freight tracks to be installed?

Four SW Tracks Will Require Careful Engineering in the Narrow Corridor

The CSX track spacing requirement is 15 feet between track centerlines. That would mean that four tracks would require 60-feet, requiring only a minor deviation to fit four tracks in the available 58-foot width. Thus, while the proposed four tracks in the SW ROW for the portion that is not decked over appears to be feasible for passenger, commuter rail, and freight it will require careful design and construction to minimize operational interference between freight and passenger rail. [5] A portion of the SW tracks are already decked over at the circle at the Mandarin Oriental Hotel and the tracks as far east as 12th Street. Further, both the *Maryland Avenue SouthWest Plan* and the *SW Ecodistrict Plan* call for the tracks along Maryland Avenue to be decked over and restored to vehicular usage, and the rail tracks to be in a tunnel. The DDOT staff needs to determine from the DC Office of Planning whether the decking-over of Maryland Avenue is likely to occur. As additional freight, passenger and commuter rail develop,

[4] In specifying the section of the tracks that were 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"

[5] The proposed track spacing should be reviewed by the DC Department of Energy and the Environment (DOEE), D.C. Law 21-254. Rail Safety and Security Amendment Act of 2016, Section 108c (c): The Director may engage in investigative and surveillance activities related to the safety of facilities, equipment, rolling stock, and operations of railroads and railroad carriers operating in the District and may take enforcement actions, to the extent permissible under 49 U.S.C. § 20101 *et seq*.), or any regulation issued thereunder.

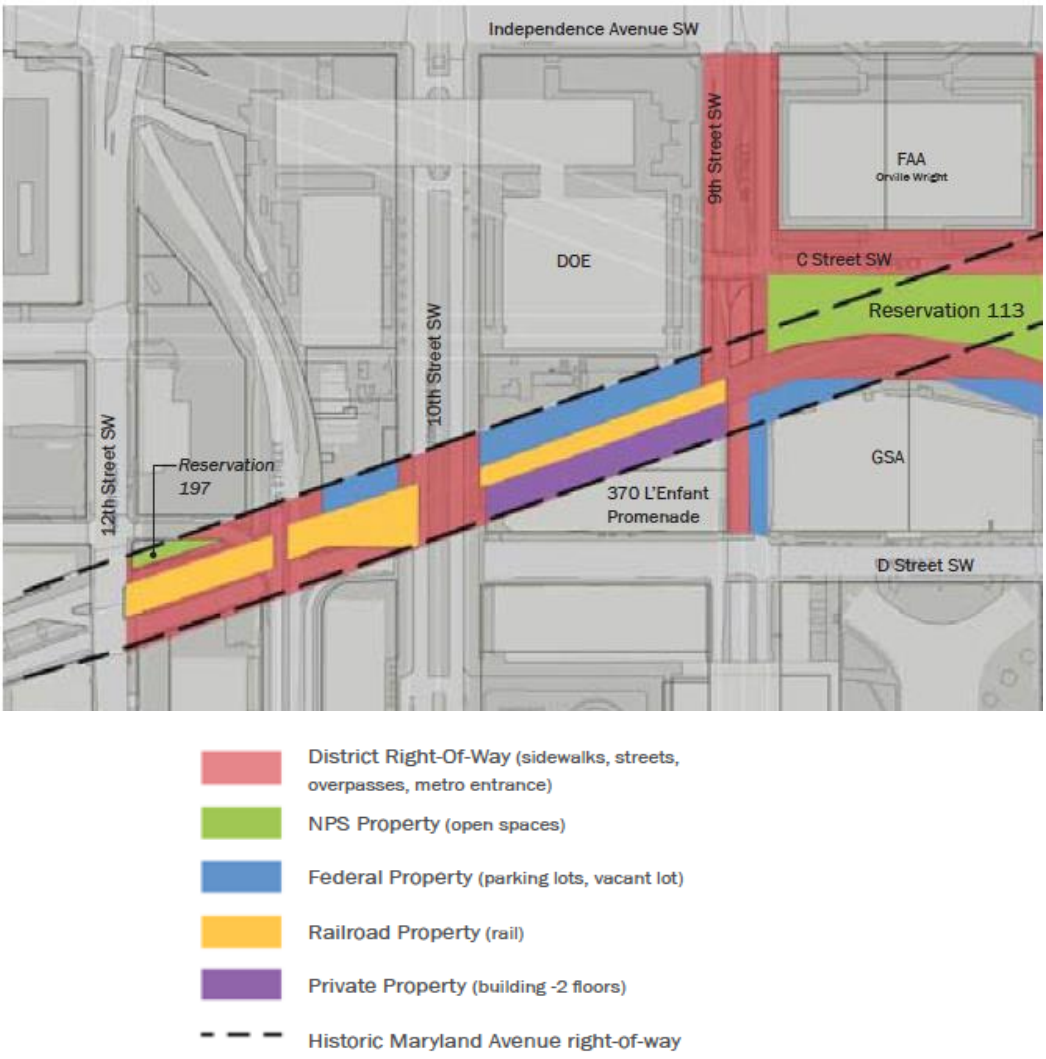
additional cross river capacity will be needed. Thus, some freight could be re-routed, and the four-track expansion would remain a welcome improvement for commuter and passenger rail.

Can the Existing SW Rail Right-of-Way be Widened?

According to the *Maryland Avenue Southwest Pla*n, (District of Columbia Office of Planning, April 2012), 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 (see map on page 1-9).

An extract of that map (*id.*, page 1-9) shows how that right-of-way has been compromised:



Note that at the time the Maryland Avenue Plan was prepared, the right-of-way between 10th and 12th Streets was not compromised by structures, but rather by DC sidewalks, streets, and a federally owned vacant lot. Also, the Plan was focused on how the roadway ROW, rather than the rail ROW, had been reduced. Most of the rail portion actually appears to be wider than 58-feet. Between 9th and 10th Streets, there is a 2-story private building on the south side, but on the north side is a federally owned vacant lot. The rail-controlled portion of the right-of-way appears to be restricted to 58-feet only for the portion between 9th and 10th Streets. Therefore, before designing rail tracks to fit into that one-block length of the 58-foot width between 9th and 10th Streets, the possibility of acquiring a portion of the adjacent property needs to be explored. Assuming the 2012 property ownerships still exist, it appears possible to widen the corridor with minimal property acquisition.

Study the Benefits of Separating Freight Operations from Passenger/Commuter Rail Operations

The Study needs to address the differences between freight and passenger rail operations. Currently, the operations of the Long Bridge and the SW tracks are controlled by CSX. Freight operations are typically slower and less time-critical than passenger rail. As a result, signaling, scheduling, platform heights, speed and logistics generally are optimized for CSX's freight operations. CSX requires that trains traveling on the SW tracks and the Long Bridge use diesel locomotives because the overhead wires for electric would interfere with tall freight loads. This is the reason for the long lay-over at Union Station of Amtrak through trains, because of the required change of locomotives. <u>The Study needs to evaluate the operational benefits of separating freight operations from passenger/commuter operations to see how those operational benefits affect capacity limitations of separate freight and passenger/commuter river crossings.</u>

Separate Freight and Passenger/Commuter Rail Crossings

A common theme running through these comments is the need examine the benefits to separating freight and commuter/passenger rail operations. The 1997 NCPC proposal for an alternate rail crossing needs to be evaluated as an essential part of the Long Bridge study. 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 for a tunnel that would carry both freight and passengers. We also know that during World War II a rail bridge existed between Alexandria and what is now the Blue Plains plant. New alignments that would be

appropriate either for a tunnel or a bridge that would carry freight, or freight and passenger traffic, which would improve freight flow through the District should be examined.

L'Enfant Station Must Be Expanded to Accommodate Additional Traffic

The Study Area for this Project encompasses VRE's L'Enfant Station[6] but the Plan does not offer any alternative improvements or other changes for the station. Expanded passenger service is constrained by L'Enfant Station's single platform. 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 Office of Planning and NCPC Plans address capacity constraints at L'Enfant Station:

> *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 providing direct interconnection with L'Enfant Metro Station. An expanded L'Enfant commuter rail station would serve VRE, thru-running MARC and Amtrak commuters with convenient access to the L'Enfant Plaza Metro Station with Blue/Orange/Silver and Yellow/Green Line service. <u>The Committee of 100 urges the Long Bridge Project to address L'Enfant Station and to recommend alternatives to address capacity constraints and provide the needed interconnection with Metro to take advantage of the station's advantageous location.</u>

Conclusion

The Committee of 100 on the Federal City recommends that the Long Bridge Project Study be substantially revised to address several substantive flaws:

- It is inaccurate in its under-projection of future rail usage.

[6] While the Study Area for this Long Bridge Project encompasses L'Enfant Station, the "Project Area" as defined by FRA/DDOT does not – it ends east of L'Enfant Station, at "LE Interlocking." L'Enfant Station needs to be addressed at this phase of the Long Bridge Project.

• It is incomplete in failing to address an additional river rail crossing.
• It fails to explain how the width of the SW right-of way will be engineered to provide the four tracks proposed and the kind of rail tracks it can accommodate.
• It fails to address needed improvements to the VRE L'Enfant Station.

Respectfully submitted,

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