



## **Comments and Recommendations Concerning**

### ***The SW Ecodistrict Plan: Creating a More Sustainable Future*** **(Public Review Draft, July 2012)**

**September 10, 2012**

The Committee of 100 on the Federal City (C100) is pleased to submit comments and recommendations on the Southwest Ecodistrict Plan. For more than eight decades the Committee of 100 has advocated for responsible planning and land use in Washington, D.C. Our work is guided by the values inherited from the L'Enfant Plan (1791-92) and the McMillan Commission (1901-02), while responding to the challenges, needs and opportunities of the 21<sup>st</sup> century city.

The SW Ecodistrict Plan (SWE Plan) put forward by the National Capital Planning Commission (NCPC) envisions a high performance environmental showcase, with state-of-the-art energy efficiency, green roofs, waste and storm water management and other sustainability initiatives within the context of the L'Enfant grid, restored vistas and a more walkable, vibrant and programmatically diverse 24-7 neighborhood. The Committee of 100 encourages these goals and objectives, applauds the guiding document that has been produced and recognizes that considerably more work is needed to move the vision to reality. The Committee also suggests that flexibility and adaptability will be essential in the future, as sustainable technologies evolve over an optimistic 20 to 25 year—or longer—build out.

With these goals in mind, the Committee of 100 would like to highlight three major issues that we feel have not yet been adequately addressed by the Plan:

- Success of the Ecodistrict is premised on bringing 28,000 new people into the Study Area, about double the current number, and with constraints on existing highway and Metro capacity, commuter rail is the only viable transportation option to move those people.
- The benefits of expanding commuter rail capacity and connectivity within the Ecodistrict will not be realized unless capacity constraints outside of the Study Area are simultaneously addressed.

- While rerouting and redesigning rail and freeway connections in the district are an essential first step in creating a new neighborhood in this area, the next challenge will be to figure out how to integrate a high-volume transit hub into a smaller scale community in a way that invigorates rather than simply overwhelms the neighborhood.

Parallel with the DC Office of Planning’s Maryland Avenue Small Area Plan, the SWE Plan greatly increases the number of residents, commuting workers and visitors to the neighborhood and recognizes the need to expand transportation capacity to move those residents, commuters and visitors into and out of the Ecodistrict. The success of the vision for Maryland Avenue and 10<sup>th</sup> Street is dependent on correcting the excesses of transportation infrastructure, viz. the Maryland Avenue railroad right of way and the I-395/SE/SW Freeway, that shredded the traditional urban fabric and have been an encumbrance to the neighborhood for decades. In addition, the interconnectedness and linearity of means of conveyance (roads, streets, railroad tracks, etc.) requires that transportation solutions within the SW Ecodistrict have implications well beyond the study’s borders. Many of the Committee’s comments, therefore, focus on the rail challenges to achieve the transportation capacity expansion necessary to accommodate additional residents and commuters.

### **Rail is Key in Expanding Transportation Capacity**

The Committee of 100 is particularly supportive of the Revitalization Scenario that "expands the rail corridor and the L’Enfant Station to increase commuter transit capacity in the region."<sup>1</sup> The plan recognizes the urgent need for rail revitalization stating that “VRE and MARC are either at or nearing their daily ridership capacity. Both rail lines have identified the need to improve operations and to expand their services to meet ridership demands and projected growth.”<sup>2</sup> The need to expand transportation capacity is a recurring theme throughout the Plan.<sup>3</sup>

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<sup>1</sup> Page 10.

<sup>2</sup> Page 70.

<sup>3</sup> In terms of transportation strategies to achieve a Revitalized And Reconnected Community the Plan will “build on existing road, rail and bus infrastructure to enhance transportation capacity . . . and better connect all modes of travel.” (page 13) The SWE Plan explains that “achieving the SW Ecodistrict’s goal to improve mobility to, from, and within the area will require expanding the transit capacity and enhancing intermodal connections by using multiple types of transit services.” (page 25) When fully executed, the SWE Plan strategies will result in “improving access to and between all transit modes” and will establish a primary transit center at L’Enfant Station and improve commuter rail service.” (page 31) And page 13 points out that expanded levels of commuter rail will produce benefits by helping to "reduce roadway congestion and air pollution, lessen dependence on fossil fuels, increase public health, and business productivity, and makes it easier to access jobs and contribute to the local and regional economy. The SWE Plan would implement the transportation

The SWE Plan builds on the District’s Maryland Avenue SW Small Area Plan in terms of an expanded L’Enfant commuter rail station that will serve Virginia Railway Express (VRE), Maryland Area Regional Commuter (MARC) and Amtrak commuters with convenient access to the L’Enfant Plaza Metro Station with Blue/Orange and Yellow/Green Line service. An improved intermodal station is an opportunity to create a memorable civic transportation facility. The image on page 3 illustrates a vision for an improved rail platform at L’Enfant, a shed type structure with the re-established Virginia Avenue view to the Washington Monument.

*The Committee of 100 urges further study to take greater advantage of the station’s advantageous location to create a point of arrival complimentary to and sharing design vocabulary with the proposed Union Station expansion, expressing its purpose and adding to the civic realm. The opportunity to showcase green infrastructure can and should be incorporated into the design.*

A key element in the Maryland Avenue Plan involves decking over the existing train tracks and creating a vibrant well-connected place to live and work. To establish neighborhood identity and support retail will require a high level of residential units—a threshold of 1,000 units plus 600 hotel rooms.<sup>4</sup> The SWE Plan envisions 19,000 additional office workers, 5,000 – 6,000 additional workers, 1,250 new residents and up to 2,000 visitors.<sup>5</sup> The long build out suggests that these target numbers may adjust over time in response to market conditions; nevertheless the proposed population increase within the Ecodistrict is substantial, and broadens the population beyond the “9 to 5 commuter.”

Currently, there are 32,000 employees in the Study Area. Many of the federal buildings provide below-grade parking<sup>6</sup> that represents 4,964 garage parking spaces.<sup>7</sup> The existing number of automobile commuters is not quantified, but needs to be as well as an analysis of the environmental benefits of converting a substantial portion of those automobile commuters to public transit. Some of that capacity can be provide by busses, but for Virginia commuters, the realistic alternatives are commuter rail or Metro. Increasing VRE commuter and Amtrak passenger rail capacity will reduce dependency on automobiles and thereby advance the goals of the SW Ecodistrict and support the local initiative put forth in the District’s Vision for a Sustainable DC.

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element of the Comprehensive Plan policy of “expanded levels of service for commuter rail between the District of Columbia and the states of Maryland and Virginia.”

<sup>4</sup> Page 10.

<sup>5</sup> Page 31.

<sup>6</sup> Page 19.

<sup>7</sup> Page 25.

*The SWE Plan needs to evaluate current and projected use levels of the Blue, Orange, Yellow and Green lines and how that will be affected by system-wide operational factors, such as the new Silver Line. In the case of commuter rail, the Plan needs to address how additional trains can operate to accommodate increased passenger levels in the context of whether those operations can coexist with increased freight operation.*

### **Rail Usage**

The Maryland Avenue Plan quantifies existing Metro and commuter rail usage at approximately 20,000 riders using L'Enfant Plaza Metro Station on an average weekday and only 5,000 on an average weekend day. In addition it is estimated that over 15,000 VRE riders use the L'Enfant commuter rail station on an average weekday and over 30,000 riders use the MARC system on an average weekday, which terminates at Union Station.<sup>8</sup> Clearly, use is heavily weighted toward workday, commuter use.

Combining the Metro and VRE ridership results in about 30,000 commuters a day coming into the Study Area by rail, which may indicate that most of the current employees in the Study Area already use rail; the Committee of 100 recommends that fact needs to be verified in order to evaluate the impact of almost doubling that number as a result of the 28,000 additional employees, residents, workers and visitors that the SWE Plan projects will be coming into the Study Area.

Union Station enhancements are currently being planned to accommodate a doubling of MARC and VRE commuter rail services, with MARC trains coming into the L'Enfant VRE platform, and perhaps continuing on to Virginia. It makes sense to increase commuter rail usage and reduce commuter dependence on automobiles, but improving Union Station and the L'Enfant platform to accommodate more trains is only part of the solution.

*The other part requires providing a means for increasing the number of commuter trains that can get to Union Station and the L'Enfant platform.*

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<sup>8</sup> Page 2-6. It is also noted that over 30,000 riders use the MARC system which terminates at Union Station on an average weekday. If MARC service is extended to the L'Enfant Station, a significant number of MARC commuters will further increase the number of commuters coming into the Study Area.

## **Constraints Affecting Rail and Metro**

Numerous physical, jurisdictional, legal and business constraints affect commuter rail and Metro operations. Among them are:

- The current operating agreement for the Potomac River rail crossing at the Long Bridge precludes any increase in the frequency of VRE commuter trains.
- The Yellow line crosses the Potomac on the Fenwick Bridge going from L'Enfant to the Pentagon and that bridge is not designed to accommodate the weight of VRE or Amtrak equipment.
- The Blue-Orange line crosses the Potomac in a tunnel that is already at capacity, and scheduling changes are being considered to accommodate the Silver line in the same tunnel. A new tunnel or bridge from Georgetown to Virginia has been proposed.
- CSX owns the right-of-way over which VRE trains operate and requires low station platforms to accommodate over-wide freight trains. Amtrak and MARC use high platforms, and accommodations will be required for MARC trains to proceed to L'Enfant and Virginia and for VRE to proceed to Union Station.
- CSX designs their rail for freight loads, not for passenger loads. Freight operations are typically slower, less time critical compared to passenger rail. As a result, signaling, scheduling, and basically all operations are optimized for CSX's freight operations. Rail operations within the Study Area would avoid conflicts and inefficiencies associated with the Long Bridge and shared rail operations in SW if passenger and freight rail were separately operated networks.
- Electrification of the tracks south of Union Station is desirable for passenger and commuter trains, but opposed by CSX because of possible interference with planned double-stacked container trains.
- Rebuilding the Virginia Avenue Tunnel to accommodate double tracked, double-stacked container freight will result in increased freight traffic that will result in a bottle neck to the Long Bridge, a place where passenger rail competes with freight trains and where CSX, by virtue of its ownership of the bridge, will be in a position to limit the number of passenger trains with access to it.
- Long Bridge use is already highly leveraged. Currently 90 trains a day cross the Potomac on the Long Bridge, the only Potomac River rail crossing within 70 miles. 28 of those trains are CSX trains that also use the Virginian Avenue tunnel, and the

rest are Amtrak and VRE trains. West of the Virginia Avenue tunnel, the passenger trains tracks enter a tunnel under 1<sup>st</sup> Street, NE that emerges at Union Station.<sup>9</sup>

*Given that the Long Bridge is the only Potomac River rail crossing within 70 miles of Washington, DC, restriction of its use by commuter and passenger trains is likely to have a devastating impact on the ability to increase commuter rail.*

This isn't a hypothetical or long-term prospect. Changes in rail freight are imminent and their impact on passenger and commuter trains will be substantial. East coast freight traffic is expected to increase dramatically starting in 2015 when the widening of the Panama Canal is complete. Expanded capacity through the canal will result in more business at east coast ports and subsequent movement of goods by all means of conveyance, but especially rail, up and down the coast and inland. The proposed reconstruction of the Virginia Avenue Tunnel and other enhancements will enable CSX to accommodate that increase in demand. But if the capacity of the Long Bridge isn't expanded as the capacity of the Virginia Avenue tunnel increases, then any major expansion of freight service will inevitably come at the expense of passenger rail service. This is undesirable and counter productive to building passenger capacity. Yet this outcome is avoidable if approval of the reconstruction of the Virginia Avenue Tunnel is conditional upon a corresponding increase in the capacity of the Long Bridge or an additional Potomac River rail crossing is implemented.

While the public is familiar with VRE as the Virginia commuter rail, AmtrakVirginia appears to be developing a considerable system that serves a commuter function in addition to its more traditional trunk line operations.<sup>10</sup> Current planning takes into account VRE and traditional Amtrak trips across the Long Bridge, but we don't what will be the impact of the additional trains that AmtrakVirginia will be adding.

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<sup>9</sup> Page 70 and additional sources including the Metro website, the Report of the Virginia Department of Rail and Public Transportation titled Washington, DC to Richmond Third Track Feasibility Study (<http://www.drpt.virginia.gov/activities/files/HD78.pdf>).

<sup>10</sup> A July 2010 News Release describes AmtrakVirginia as a pilot program developed by the Virginia Department of Rail and Public Transportation and Amtrak to provide "more rail choices" to Virginia. It focuses on hourly morning departures from Richmond and "convenient afternoon return trips" from Washington DC with service from Clifton Forge and Danville into Charlottesville, from Roanoke Rapids and Newport News into Richmond, with the lines from Richmond and Charlottesville on to Washington. Additionally, "service extension to and from Norfolk will start December 12, 2012, providing a same-seat trip from Norfolk to Washington, DC." (<http://www.amtrakvirginia.com/>)

## **Enhanced Passenger Rail Requires Enhanced River Crossings for Rail**

To our knowledge no one has evaluated the impact of increased freight trains on passenger train capacity. Since the increased capacity of the reconstructed Virginia Avenue Tunnel is what will allow the increase in freight traffic, there is an urgent need for a comprehensive evaluation of projected increased CSX freight traffic on the rail tracks in the Southwest and Southeast quadrants of our City. That evaluation needs to address the impact of the increased freight traffic on the passenger train operations of Amtrak and VRE along the rail tracks and the Long Bridge that are shared with CSX, VRE and Amtrak. The City (DDOT) recently received \$2.9 million from the American Recovery and Reinvestment Act and \$100,000 from CSX to examine the structural integrity and feasibility of adding additional capacity to the Long Bridge. That examination needs to include a focus on commuter rail and passenger rail operations, as well as freight operations.

*With the current constraints on the Metro river crossings and the increased need to accommodate VRE and Amtrak (and eventually MARC) trains across the Potomac, together with the constraints and incompatible requirements of shared passenger and freight operations, the C100 recommends that a study be taken to evaluate an additional rail crossing of the Potomac, that would divert freight traffic away from the SW and SE quadrants of the City.<sup>11</sup>*

### **The Scale of the Plan Extends Beyond the Study Area**

But confronting and solving the “railroad problem” is not the only issue.

The SWE Plan states “The foundation of Ecodistrict planning is the fact that implementing and operating at the neighborhood or “district scale” achieves greater sustainability than using traditional individual building-scale strategies.”<sup>12</sup> The “district scale” encompasses the Study Area, a 15 block area bounded by Independence Avenue, 12th Street, Maine Avenue and 4<sup>th</sup> Street, SW. The Committee of 100 suggests that a broader, city-wide approach is appropriate to address several elements of the SWE Plan and would like to comment on additional aspects of the SWE Plan:

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<sup>11</sup> In 2007 NCPC published the *Freight Railroad Realignment Feasibility Study* which examined three alternative Potomac River crossings for freight trains. A fourth alternative, unexamined in that study would be to use the Shepard’s Landing crossing, where the US Army constructed a rail bridge during WW II. Shepard’s Landing is a part of Blue Plains, and the rail right-of-way that was used to supply the Blue Plains treatment plant connects with the existing CSX tracks about where Benning Road crosses the Anacostia, just east of the existing Virginia Avenue Tunnel. Such an alternative would likely be a less expensive solution.

<sup>12</sup> Page 1.

### Metrics/City-wide Implications

There are numerous unanswered questions about what future energy independence within the Ecodistrict mean in terms of the city as a whole. Does the then-available electric capacity reduce the amount of electricity generated and thereby reduce ratepayer costs across the board? Does it allow for additional development in other parts of the city, and if so, how to account for the real estate taxes that result from that new development, income taxes of the residents of the new development and sales taxes generated by those new residents?

Regarding water and waste management, if the SWE Plan is able to control storm water and recycle waste water in a manner that does not impose any demand on WASA, how will that unused sewer and water capacity be accounted for? Will it be available for new development or does it reduce WASA's obligation, and associated costs, under its EPA MS-4 discharge permit?

Another concern is the time-frame over which some of the benefits will be realized. A key component to energy independence is retrofitting the 1933 steam plant at 12<sup>th</sup> and C SW into a cogeneration plant that can supply electricity and cooling, in addition to heating, and converting from its current natural gas fuel to a non-carbon "Electrofuel" fuel, such as anhydrous ammonia, "when the technology us available"<sup>13</sup>

As the Ecodistrict moves toward implementation, these and other questions of equitability will need to be resolved.

### Southwest Freeway

The successful bridging of the freeway is a critical part of creating a humanized 10<sup>th</sup> Street and establishing the civic decorum that is central to the plan. Bridging would seem to be financially and demographically critical, creating heretofore non-existent building sites for new residents and workers and generating long term revenue streams.<sup>14</sup>

In this regard it is interesting to compare the SW Ecodistrict aerial, for instance on the cover of the report, with the 2009 Monumental Core Framework Plan, opposite p. i. The 2009 plan illustrates a substantially sublimated freeway and a more continuous urban fabric north and south of the line of the freeway.

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<sup>13</sup> Page 40.

<sup>14</sup> The drawings on pages 64-65, and other illustrations, indicate some dramatic changes. More information could be made available on widths of lively Washington streets, as well as successful street revitalization projects elsewhere.



The Committee of 100 looks forward to additional studies that begin to address building program and feasibility. The Committee of 100 urges continued study for a more radical intervention in healing the civic scar that is the SW Freeway, at the same time recognizing the challenges that such a massive system of infrastructure presents physically (ramps, frontages, building lines, access roads, utility and communication lines easements and rights of way) and jurisdictionally.

### Connections and Edges

The boundaries of the Study Area suggest a limited scope of work and defined precinct, necessary for any planning effort. Countering this need for definable boundaries, the Committee suggests that special attention be paid to the edges and transitions of the Ecodistrict and interconnectedness with existing urban fabric. We note several areas:

- **Banneker Park:** From the number of different massing model studies on page 67 this is an area that is subject to significant future study as the plan evolves and the program for the site solidifies. With the development of the SW Waterfront, the expansive prospect of the Potomac River and the Channel from this natural escarpment is lost. Nonetheless it is hoped that the open space qualities of Banneker Park can be retained as the physical connection between the 10<sup>th</sup> Street promenade and the waterfront is developed.
- **Independence Quarter:** The urban design of the area bounded by Independence Avenue, 10<sup>th</sup> and 12<sup>th</sup> Streets, and Maryland Avenue is a great opportunity to reknit the city through the continuation of the street grid. Further design studies will help establish guidelines on the design of buildings, streets and pedestrian links.
- **12<sup>th</sup> Street to 15<sup>th</sup> Street Area:** What are the connections to the west, the area bounded by 12<sup>th</sup> Street, Independence Avenue, 15<sup>th</sup> Street, and Maine Avenue? This is an area of mostly Federal buildings. Integrating this area, especially as it is redeveloped and reused, with the SW Ecodistrict, is critical. Linkages along Maryland Avenue to the Tidal Basin should be addressed.

### **Conclusions**

The SW Ecodistrict is a bold vision for an area of the city that is not generally considered memorable. The report suggests that the planning ideas and urban design concepts that were approved in the past, and are now reflected in the development pattern, are the cause of today's perception and which now are in need of correction. But building cities takes place over generations and is a slow and should be a deliberate and—in a democratic society—a

transparent process. This makes it even more important that the present planning effort be careful and not repeat the missteps of the past.

The potential of the SW Ecodistrict to be both a revitalized neighborhood in the broad sense and a regionally important transportation node is possible and the SW Ecodistrict Plan begins to outline a vision for achieving that dual purpose neighborhood.

The Committee of 100 encourages the sustainability goals and objectives of the SWE Plan and also recommends:

- A coordinated, comprehensive, joint effort by DDOT and the Office of Planning to study the Long Bridge and the impact of increased freight trains on passenger train capacity and to find means to enhance Amtrak, VRE and CSX rail service and optimize the greatest public benefit from their operations and advance the Mayor's Sustainability Vision.
- A comprehensive evaluation of an additional rail crossing of the Potomac River.
- A coordinated analysis that would include VRE, Amtrak, MARK and CSX to evaluate the benefits of converting the Long Bridge to passenger and commuter rail only and constructing a new freight rail bridge that would obviate the need to reconstruct the Virginia Avenue Tunnel.
- Quantification of the number of existing employees in the study area that use automobile to commute to work and the environmental benefit that would result from converting a portion of those automobile cotransit.

We thank the National Capital Planning Commission for the opportunity to comment on this important plan and look forward to its future refinements.

Respectfully submitted,

Richard Houghton, Chair

Monte Edwards, Member

Planning Subcommittee

Committee of 100 on the Federal City