

The Committee of 100
on the Federal City



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Founded 1923

July 7, 2014

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Nancy J. MacWood

Diane Sullivan, Senior Urban Planner
National Capital Planning Commission

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Suite 500 North
401 9th Street, NW

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Washington, D.C. 20004

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RE: Comments on the Draft Southwest Ecodistrict Plan Addendum

Dear Ms. Sullivan:

The Committee of 100 on the Federal City (Committee of 100), founded in 1923, is the District of Columbia's oldest citizen planning organization. We are pleased to provide selected comments on the Draft Southwest Ecodistrict Plan Addendum which the National Capital Planning Commission released on June 5, 2014 for a thirty-day public review period, ending July 7, 2014. The Committee of 100 previously provided comments and recommendations on *The Southwest Ecodistrict Plan: Creating a More Sustainable Future* (Public Review Draft, July 2012). Those comments were dated September 10, 2012.

Historical Background

The Committee of 100 on the Federal City has long been concerned with protecting and enhancing, in our time, Washington's historic distinction, natural beauty and overall livability. The Committee is concerned with respecting the L'Enfant Plan of 1791 and the McMillan Commission Plan of 1901-02, while accommodating the needs of the 21st Century. The Southwest Ecodistrict occupies an important location in Washington's Monumental Core, south of the National Mall. The Southwest Ecodistrict is also important in that it provides links from the National Mall to the Southwest Waterfront. At present, those links leave much to be desired. One of the benefits of the

945 G Street, N.W.
Washington, D.C.
20001
202.681.0225

info@committeeof100.net

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Southwest Ecodistrict is that it has the potential to greatly improve those linkages. The Southwest owes its origins to the street layout of the L'Enfant Plan, but that original street layout has undergone major modifications over time. Some key elements of the area, such as the railway alignment through the area, date from the mid 19th Century. One of the most egregious deviations from the L'Enfant Plan are the alterations of Maryland Avenue that were made for railroad use and continue today as depressed train tracks that represent a physical barrier to north-south connectivity.¹ Maryland Avenue was designed as a monumental street in the L'Enfant Plan as the sister street to Pennsylvania Avenue.² Many of the changes to the area result from urban renewal plans from the 1950s and implemented over the next 30 years. In many respects those urban renewal design concepts have not proven satisfactory and this area is now cut off from adjacent areas, has limited activity and activity linkages, and has not achieved its potential as a contributing neighborhood in the city.

The SW Ecodistrict Plan seeks to address many of these problem issues, while also setting a high environmental standard. We commend NCPC for undertaking this project and for undertaking the additional studies that are summarized in *The SW Ecodistrict Plan Addendum*, particularly the study of building heights within the study area. The Committee raises a number of issues and questions with respect to transportation planning and building heights. In evaluating the potential impacts new buildings would have on iconic landscapes and views, e.g. views to and from the Mall and views and street sections along the monumental Virginia, Maryland and Independence Avenue corridors, the Committee stresses caution and restraint and additional studies.

The SW Ecodistrict Plan Will Provide Important Input for the DC Rail Plan

The addendum contains technical and background information that informed the development of the *SW Ecodistrict Plan* and is intended to inform future planning and development proposals (*SWE Add.*, p. 3). An important recent development is the DC Council's appropriation of a half million dollars to prepare a DC Rail Plan.

¹ *The SW Ecodistrict, A Vision Plan for a More Sustainable Future*, January, 2013, page 71: "Although planned as prominent avenues, the portions of Maryland and Virginia Avenues that are located in the study area are considered non-contributing elements to the NRHP listing because of alternations made to the corridors when the rail line was constructed in the mid-1800s."

² *SWE Addendum*, page 22.

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Currently, we are the only state³ without a rail plan,⁴ yet we are a growing hub of commuter and long distance rail transportation. The SW Ecodistrict will contribute significantly to that growth. The DC Rail Plan has the potential to set policy for freight, passenger and commuter rail transportation within DC, including coordination with other DC transportation planning programs – the statewide multimodal context (moveDC) and the transportation planning programs of neighboring states (COG’s Transportation Planning Board) – as well as the Union Station Master Plan and the SW Ecodistrict Plan.

The SW Ecodistrict Plan recognizes that the southwest tracks and the Long Bridge present bottlenecks for passenger, commuter and freight rail operations and further recognizes the importance of adding a fourth track in SW (*SWE Plan*, pp. 72 and 75) in order “to accommodate freight and maximize commuter rail” (*id.*, p.70). Indeed, to move the projected 28,000 people a day that will make the SW Ecodistrict work, commuter rail will likely have to be greatly expanded to move a proportion of those people into and out of the city.

Can the SW Tracks be Expanded?

Buildings have encroached on the Maryland Avenue right-of-way (*id.*, p.75). The concepts for adding a fourth track are based on the 160-foot original width of Maryland Avenue, but a significant section of the 160-foot original right-of-way of Maryland Avenue is currently closed. The *Maryland Avenue Southwest Plan* (April 2012) 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.

In this area, the property controlled by the railroad is reduced to the point that adding a fourth track does not appear to be possible. This drawing illustrates the diminished width controlled by the railroad (*MD Ave SW Plan*, page 1-9):

³ 49 US Code §22701 (Definitions) provides:

(3) State.— The term “State” means any of the 50 States and the District of Columbia.

(4) State rail transportation authority.— The term “State rail transportation authority” means the State agency or official responsible under the direction of the Governor of the State or a State law for preparation, maintenance, coordination, and administration of the State rail plan.

⁴ Statewide Rail Plans are required under the Passenger Rail Investment and Improvement Act of 2008 (Public Law 110-432) (PRIIA). PRIIA also requires the inclusion of projects in rail plans to be eligible for federal funding. Section 302 of the Act authorizes the appropriation of funds for “congestion grants” to States or to Amtrak (in cooperation with States) for capital projects to reduce train delay and increase ridership on high priority rail corridors. The regulations that implement these requirements are contained in U.S. Code, Title 49, Subtitle V, Part B, Chapter 227

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In this area between 9th and 12th Streets, the width of the area controlled by the railroad appears to be the 58 feet that Congress authorized in 1901 (where the “tracks are depressed on Maryland Avenue shall not exceed fifty-eight feet between the inside faces and profiles of the parallel retaining walls, measured at the level of the said tracks”), allowing room for only the tracks that now exist. Using the design criteria that CSX has proposed in the Virginia Avenue Tunnel DEIS the existing width of the right-of-way for the SW tracks cannot accommodate a fourth track.⁵

To assist in the preparation of the DC Rail Plan, the *SWE Addendum* needs to address whether and how the existing three SW rail tracks can be expanded to four tracks.⁶ The addendum apparently is based on the ability to restore Maryland Avenue to its original 160 foot width, but the addendum needs to explain the rationale for how Maryland Avenue will be restored and how a fourth track can be accommodated.

Expanding The Long Bridge is Not a Permanent Solution.

The current two-track Long Bridge is at capacity today and a new four-track bridge shared by passenger, commuter and freight rail as proposed in the Long Bridge Study will be at capacity by 2040. However, the data contained in the current Long Bridge Study considerably understates the number of freight and commuter trains that will need to cross the Potomac River by 2040. As

⁵ Applying this design criteria to the SW tracks would mean the current three track configuration, with its width of 58', does not have sufficient side clearance to meet current design standards (46 feet for two tracks, plus 3 feet, plus 18 feet, plus 3 feet for the third track equals 70 feet). To add a fourth track would require a width of 92 feet (46 feet for two tracks times two for four tracks). Using current CSX design criteria, the existing width of the right-of-way for the SW tracks cannot accommodate a fourth track.

⁶ In discussing the height of buildings, the addendum appears to assume that Maryland Avenue will be restored to its original width as the basis for Assumption 2 on page 6 of the *SWE Addendum*: “All of the parcels that are adjacent to the Maryland Avenue can achieve 130' in height from other adjacent streets (so with regard to building height, it does not matter if Maryland Avenue is built).” That conclusion is reinforced by the table at page 10, that specifies a Proposed Right-of-Way of 160 feet, but under the heading “Existing” states: “section not built.”

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explained in the attached January 7, 2014 letter to the Long Bridge Project Manager a new four-track bridge will barely provide the capacity needed for the Amtrak, VRE and CSX trains that are projected to use the rebuilt bridge. Both the Office of Planning's *Maryland Avenue Southwest Plan* and NCPC's *SW Ecodistrict Plan* recommend that MARC trains though-run from Union Station to Alexandria. If more than three MARC trains attempt to use the projected four-track Long Bridge the capacity will be exceeded. If the goals and objective of the *Maryland Avenue* and the *SW Ecodistrict Plans* are to be realized, the criteria for evaluation and the recommendations of the Long Bridge Study need to change.

In fact, the capacity of a four track bridge will be even less adequate because the projections for commuter expansion are understated in the Long Bridge Study. DDOT's current draft *moveDC Plan* understates the current number of VRE passengers by 20 percent and understates current MARC passengers by a similar factor. In fact, in 2012, VRE carried upwards of 19,000 passenger trips per day, not the 16,000 as stated in the *moveDC* draft (page 3-25, *Virginia State Rail Plan*, November 2013). MARC's ridership has doubled in the past 15 years, and in 2012 amounted to 36,000 daily riders, not the 30,000 stated in the draft *moveDC Plan (MARC Growth and Investment Plan Update 2013 to 2050, September 9, 2013)*.

VRE's ridership growth has averaged 6 percent annually between 2002 and 2012 and VRE is predicted to grow between 60 and 85 percent by 2025. (p. 3-25, *Virginia State Rail Plan*, November 2013). By 2020, Phase I of the VRE System Plan calls for maximizing the number of trains VRE can operate under existing agreements, which effectively limits VRE capacity to about 25,000 weekday passengers. Railroad capacity investments proposed for Phases II and III will provide the additional capacity needed to enable VRE to carry up to 50,000 weekday passenger trips by 2040, which is consistent with identified demand (p. 3, *Virginia Railway Express System Plan 2040 Brochure*, March 27, 2014).

MARC's plan shows that ridership has doubled in the last 15 years to 36,000 daily riders and will increase to 75,000 daily riders by 2040; and MARC has instituted reverse commute and weekend service, further increasing the service it provides. In the future, MARC plans to "thru-run" trains from Maryland, through Union Station to L'Enfant Station and on to Virginia. (*MARC Growth and Investment Plan Update 2013 to 2050, September 9, 2013*). Further discussion of projected commuter rail expansion is contained in the attached Committee of 100 Council testimony concerning the draft *moveDC Plan*.⁷

⁷ See Attachments: C100 Move DC Testimony, June 26, 2014 and C100 Long Bridge Letter, January 7, 2014

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Providing Four Tracks in SW and on the Long Bridge Will Not Be Adequate

These comments have discussed the physical constraints and the growth projections, but there is a simpler way to understand both the problem and the kind of solution that is needed. There are commuters in Maryland just as there are commuters in Virginia that would use commuter rail. Amtrak wants to expand high speed rail south of Union Station. The freight that travels through Maryland travels through Virginia.⁸ The infrastructure north of Union Station can provide a useful framework with which to consider what is needed south of Union Station.

North of Union Station MARC operates on shared tracks with CSX and Amtrak:

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

In this context the question becomes: Why are we talking about increasing the 3-track bottlenecks south of Union Station to 4-tracks, when the same rail operations north of Union Station require 7-8-tracks? It makes no sense.

The Need to Separate Passenger and Commuter Rail from Freight Rail Operations.

In order to provide service to the projected 125,000 commuter rail riders by 2040, the operations of VRE, MARC, and Amtrak will have to be separated from the operations of CSX. It's time to reexamine the NCPC proposal for a rail tunnel under the Potomac River between Virginia and Anacostia (*Extending the Legacy: Planning America's Capital for the 21st Century, 1997*). NCPC proposed a Potomac River crossing that would carry both freight and passenger trains. The freight segment could be either a tunnel or a bridge that would connect with the rail right-of-way that extends from Blue Plains to the Benning rail yard. That alignment would carry freight around the downtown, monumental core, leaving the Long Bridge and SW tracks for use by Amtrak and commuter rail, and allowing electrification of those tracks.

There is a significant interdependence between the SW Ecodistrict Plan and the DC Rail Plan: both will need to address how to greatly increase the capability of moving a lot more people using commuter rail.

Building Heights and Visual Impact on the National Mall

The Committee of 100 has concerns about the proposed guidelines for building height and massing along Independence Avenue. It appears from the photos in the report, that the proposed building heights

⁸ "DC is a gateway, rather than a destination, for rail freight" (Draft *moveDC Plan*, page F-14)

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would have significant visual impacts with respect to the National Mall and the Smithsonian buildings on the south side of the National Mall, particularly the sky line and sky views from the Mall as well as along the length of Independence Avenue.

Land Use

There is very little discussion in the Addendum about the land use mix envisioned, except for statements about ground floor retail. Yet achieving some amount of new private development, especially hotel, residential and retail, is critical to obtaining additional activity in the area, and a reason for people to go there.

We also have some questions about building footprints. For example, building site 1A appears to be a very small building footprint. Is major development on that site feasible and, if not, what kind of use might be located on the parcel?

Open Space

While some open spaces are discussed (Reservation 113 for example), additional information on the landscape quality of other spaces would be useful, such as along Virginia Avenue and Maryland Avenue, where the Office of Planning study provides some background.

Areas to the East and West

It appears that NCPC has kept the SW Ecodistrict relatively compact in order to make the study work manageable. Future studies should address the neighboring areas to the east and west and in order to efficiently manage the initiative long term, extend east to Second Street SW and the Center Leg Freeway. At some time, the “area to the west”, bounded by 12th Street, Independence Avenue, 15th Street, and Maine Avenues should also be addressed, an area comprised largely of 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 could also be addressed in that work.

Next Steps

The Committee of 100 on the Federal City appreciates the opportunity to comment on *The SW Ecodistrict Plan Addendum*. We look forward to the next steps as specific issues are refined and the SW Ecodistrict moves forward into implementation.

Respectfully submitted,

Richard Houghton, Chair

Monte Edwards, Member

John Fondersmith, AICP, Member

Planning Subcommittee, Committee of 100 on the Federal City