

The Committee of 100

on the Federal City



**Council of the District of Columbia
Committee on Transportation and the Environment**

***Performance Oversight Hearing
District Department of Transportation***

Statement of Monte Edwards
February 9, 2024

The Committee of 100 on the Federal City is concerned that DDOT has yet again ignored the 2017 DC State Rail Plan. This time in formulating its 2022 Freight Plan Update. The 2017 DC Rail Plan was approved by Council and assigned to DDOT to provide an actionable and pragmatic roadmap for future rail investment and policies in the District. As stated at page 1-1 of the 2017 DC State Rail Plan:

The intent of the District of Columbia State Rail Plan (SRP) is to ***provide an actionable and pragmatic roadmap for future rail investment and policies in the District.*** The plan has been prepared by the District Department of Transportation (DDOT) to meet the requirements of the federal Passenger Rail Investment and Improvement Act (PRIIA), passed in 2008... the Act requires each state to have an approved rail plan ***as a condition of receiving future rail funding for either passenger or freight improvements.***
[emphasis supplied]

That has not been done in the draft 2022 District Freight Plan Update and ignoring the 2017 DC Rail Plan has been a continuing practice of DDOT. In 2020, the Committee of 100 pointed out to Council that DDOT erroneously ignored the 2017 DC State Rail Plan in the context of passenger and commuter rail (see attachment A to these comments). The 2017 DC State Rail Plan has been adopted by Council and needs to be followed by DDOT. The 2022 DFP as well as other rail plans need to be extensively revised to address the recommended solutions proposed in the 2017 DC State Rail Plan.

Freight is Important, But Delivery of Freight by Truck is Harmful to the District

Almost all freight is delivered to the District by trucks and the amount of freight delivered to the District is projected to increase considerably.¹ But the DFP fails to acknowledge the adverse effects of pollution, greenhouse gas emissions congestion and effect on roadway safety that could be materially reduced if freight were moved by rail rather than by truck.² The DFP acknowledges the District's goals of congestion management, the goal of becoming carbon neutral by 2050, and the importance of transportation in achieving these goals.³ But the DFP ignores the fact that moving freight by rail, rather than by truck, addresses all of those concerns by reducing emissions of greenhouse gases, being more fuel efficient, reducing congestion, and improving safety. These benefits are described and quantified in the 2017 Rail Plan, but are ignored in the DC Freight Plan.⁴

¹ 2022 DFP Page 9-15

Trucking accounts for almost all of the inbound and outbound freight shipments in the District. Rail traffic is nearly 100% "through" with essentially no pickups or drop-offs in the District. Freight traffic in the District is expected to grow by 74 percent from 2011 to 2040 in terms of tons. ... population growth increases demand for housing, employment, and goods and services, all of which create increasing pressure on the city's transportation network.

² 2017 SRP Pages 3-67 thru 3-68

... by relieving truck traffic on I-95, I-495, the I-66, and I-270, freight rail brings a number of benefits to the Metropolitan Washington region that also accrue to District residents and businesses. Some impacts, such as emissions, by their nature are regional. Greenhouse gases, nitrous oxides (NOx), and other pollutants impact District residents, whether generated in the District or not. Other impacts benefit District residents when they travel outside of the District. Positive impacts of freight rail include:

- Freight rail reduces emissions of greenhouse gases and other harmful pollutants because rail is more fuel efficient and lower emitting than trucking; Rail reduces highway congestion;

³ 2022 DFP Page 19

The District's moveDC goal of mobility, which includes improving system reliability, accessibility and congestion management for goods movement as well as commuters, The District has a goal to be carbon neutral by 2050, and transportation will be a key sector for achieving this goal. The District's Sustainable 2.0 plan sets a target of reducing GHG emissions from the transportation sector by 60 percent.

⁴ 2017 SRP Pages 3-67 thru 3-68

Air Quality

Freight trains are more fuel efficient than trucks. As can be seen in Table 3-10, trucks emits 83 percent more NOx, 273 percent more PM, and 412 percent more VOC per ton-mile shipped. A single train can carry hundreds of containers or carloads, which reduces significantly the environmental impacts associated with moving each carload or unit. Shifting freight from rail to truck would directly lead to an increase in emissions from additional trucks traveling on I-495.

Greenhouse Gas Emissions

Benefits of Using Micro-hubs or Transload Facilities for Deliveries to End Users

The use of large delivery trucks for freight delivery causes many negative impacts. But in addressing potential solutions to these negative impacts, the 2022 Freight Plan addresses only the final delivery (the “last mile”) thru the use of micro-hubs and e-bikes or small electric vehicles as a solution (DFP, page 66)

Many of the negative impacts from current deliveries are due to the large size of current delivery vehicles and their high emissions. Smaller and more sustainable last-mile delivery modes can help to reduce these impacts; examples include deliveries by e-cargo bikes, bikes, on foot, or small electric vehicles. Often, these last-mile delivery modes work best when supported by staging areas called “micro-hubs.” **DDOT has received funding to conduct a delivery micro-hub feasibility study** and then implement a sustainable delivery mode pilot. These projects should provide insights into what infrastructure is needed for sustainable delivery modes and should help to reduce the negative impacts of last-mile deliveries in the District [*emphasis supplied*].

But where is that micro-hub feasibility study? Although funds were appropriated for such a study,⁵ there is no evidence that it was conducted. The more comprehensive solution offered by

Moving cargo by truck on average leads to 370 percent more emissions of greenhouse gasses per ton mile shipped (Table 3-12). Unlike with emissions of the criteria pollutants, greenhouse gas emissions have the same negative impact regardless of where they are emitted.

Congestion

For the past several decades the Washington Metropolitan region has been consistently ranked as one of the most congested regions in the United States by some metrics. One study found that Metropolitan Washington has the highest congestion costs and delay per-vehicle out of the largest 101 urban areas of the country.

The rail freight network plays a critical role by taking many trucks off the roads. Conservatively assuming that each of the 31 trains that cross through the District carry cargo equivalent to 120 trucks each, shifting this cargo to trucks could generate an additional 3,700 truck trips on I-495 each day. This would represent an increase of truck traffic on I-495 by 50 to 100 percent. Each truck in turn takes up the space of two to four personal vehicles.

Safety

Moving trucks off the roads also improves safety. Rail has a significantly lower rate of accidents than trucking, as can be seen in Table 3-12. A truck’s risk of causing fatal accidents is 3.2 times higher, 4.9 times higher for injury accidents, and 6.2 times higher for property damage only accidents.

⁵ 2022 DFP, Page 97

Figure 30 | District of Columbia Apportionments under the National Freight Program FY 2023-2030:

Fiscal Year NHFP Apportionment
FY 2023 \$6,585,599 F
FY 2024 \$5,753,167
FY 2025 \$5,925,762
FY 2026 \$6,103,535
FY 2027 \$6,286,641
FY 2028 \$6,475,241
FY 2029 \$6,669,498
FY 2030 \$6,869,583
TOTAL \$50,669,027

the 2017 Rail Plan provides the first step in evaluating a freight transfer facility, but the 2022 DFP ignores it (SRP, page 5-7):

... the District lacks a commercial transload center or intermodal terminal where cargoes could be transferred between rail and truck. Research beyond the scope of this SRP would be required to study specific market opportunities for a transload or intermodal terminal that would anchor industrial businesses and COD in the District. Similarly, detailed land use and traffic studies will be needed to determine the feasibility of any particular site for a freight transfer facility. **However, this plan takes the first step in exploring a COD strategy for District by identifying potentially viable sites for a transload or intermodal terminal.** The SRP analyzed potential locations for COD facilities, facility requirements, and feasibility. Ten sites were evaluated as part of this analysis...*[emphasis supplied]*

The Way Forward

DDOT already has over \$50 million dollars appropriated for freight programs (see footnote 5). It's time for DDOT to use those funds to move the transload or intermodal terminal study forward and thereby advance the *moveDC* Plan⁶ and the 2017 DC State rail Plan. Further, while DC has historically contributed little towards funding for rail projects,⁷ it is clearly in DC's interest to enter into discussions with CSX. Further, DC should offer funding for such a transload center in order to improve DC's environmental quality, reduce congestion, reduce greenhouse gases and generally benefit all of DC by reducing and hopefully, eventually eliminating the large tractor-trailer trucks that now deliver freight.

Respectfully submitted:

Monte Edwards, on behalf of The
Committee of 100 on the Federal City

⁶ 2022 DFP Pages 95-96

Innovative Freight Delivery Practices – Research & Analysis: As mentioned in the 2014 state freight plan and *moveDC* long range transportation plan, DDOT seeks to encourage innovative practices to mitigate the impacts of freight movement in the District.

⁷ 2017 DCRP, page 6-4:

The District has a unique relationship with many of the rail-related investments that occur within its borders. In many cases, the District will help plan or play a coordinating role and represent an important stakeholder, but funding and project management will primarily fall to other governmental or private entities.