



September 25, 2013

Parsons Brinckerhoff
Attn: Virginia Avenue Tunnel Project
1401 K Street NW
Suite 701
Washington, DC 20005

The DC Office of Planning has prepared the following comments on the Draft Environmental Impact Statement (DEIS) on the Reconstruction of the Virginia Avenue Tunnel.

After review of the DEIS and interdepartmental discussion, the DC Office of Planning recognizes the Project's purpose and need as both valid and necessary. The intent of our commentary is to make both DDOT and FHWA aware of our agency's mission and interests, broader planning issues not adequately addressed by the DEIS, and concerns that we have as the Project goes forward. This submission of comments will primarily address our concerns about the Project's connection to larger planning efforts within the District of Columbia, potential impact on passenger rail operations, noise and vibration impact in the surrounding neighborhoods, and opportunities to enhance the public realm within and near the Project area.

DC Office of Planning Mission and Interests

The Mission of the Office of Planning (OP) is to guide development of the District of Columbia, including the preservation and revitalization of our distinctive neighborhoods, by informing decisions, advancing strategic goals, encouraging the highest quality outcomes, and engaging all communities. As an agency, we are interested in the long-term advancement and improvement of the District's infrastructure in such a manner that benefits affected neighborhoods and communities.

Implications for Passenger Rail Service and Broader Planning Initiatives

Although we recognize the importance of the Project and generally support its goals, we have concluded that the DEIS fails to address how increased freight capacity through the Virginia Avenue tunnel will affect passenger/commuter services in the larger rail network. A two-track tunnel that allows for double-stack intermodal container freight trains would



relieve freight train bottlenecks but will have uncertain impacts on the ability to provide passenger rail service on the rail corridor connecting Union Station with points south and north. The DC Office of Planning is requesting additional information concerning this issue, including how potential negative impacts on passenger rail movement could be avoided or mitigated.

In addition, we note that as the rail line through the Virginia Avenue tunnel continues westward, it passes through an area of the District that has been the subject of recent planning efforts by OP and the National Capital Planning Commission (NCPC). OP's Maryland Avenue Small Area Plan (the SAP) and NCPC's Southwest EcoDistrict plan cover the federal district bounded by Maine Avenue to the south, 12th Street to the west, 4th Street to the east, and Independence Avenue and the National Mall to the north. This area includes above-grade rail tracks extending along the Virginia Avenue and Maryland Avenue rights-of-way, along with a Virginia Railway Express (VRE) commuter station near L'Enfant Plaza.

The SAP and Southwest EcoDistrict plans envision a transformation of this federal office district into a walkable, vibrant, mixed-use neighborhood with a significant residential presence. They also call for reestablishing a substantial portion of the original grid of L'Enfant Plan streets in the area, including a portion of Maryland Avenue now occupied by the rail line. The proposed solution to effectuate this reintroduction of streets is to construct a deck over this rail line. Currently, DDOT is conducting a transportation study to determine the feasibility and order-of-magnitude costs of these infrastructure investments.

While we understand that CSX has been involved in these planning discussions and is open to seeing their fruition, there remain a number of unanswered questions regarding the compatibility of the potential decking of Maryland Avenue with CSX's plans. Chief among these are the potential changes in vertical or horizontal alignment of the tracks that would impact any future decking infrastructure, as well as the scheduling of work and potential for coordination of activities. OP requests that the Final Environmental Impact Statement address these issues in as much detail as possible.

Noise and Vibration Impact

We note that all alternatives (other than the no-build) will have significant noise and vibration impacts on the surrounding community, and stress the importance of reducing or mitigating these to the maximum extent possible. Advisory Neighborhood Commission 6B has provided an accounting of the major concerns in this regard, and OP requests that their concerns be addressed in detail.

Reconstruction and Community Enhancements

Our agency is also concerned with long-term sustainability of the areas surrounding the site of the Virginia Avenue tunnel reconstruction project, particularly the social and community conditions, as well as the condition of parks and availability of recreational resources. The DEIS notes that parks and roadways within the Limits of Disturbance would be restored to at least pre-construction conditions after the Project period is completed.

The DEIS also suggests that as Virginia Avenue is reconstructed, streetscape enhancements such as improved pedestrian and bicycle facilities and new street trees are being considered. OP supports reconstruction efforts that improve pedestrian, bicycle, and transit connectivity and provide greater opportunities for District residents to engage in recreation in improved park space within and around the Project area.

Conclusion

The DC Office of Planning recognizes the critical need for additional freight rail capacity in this region and supports the Project's purpose and need. We ask that additional attention be paid to the broader planning context surrounding this Project area, and for the FEIS to recognize that the Project may have far-reaching impacts on other planning efforts, such as the service expansion plans of the various passenger rail carriers and the neighborhood transformation initiatives promoted by the District.

Thank you for this opportunity to comment on the Virginia Avenue Tunnel project. If you have any questions about OP's comments, I may be reached at (202) 442-8812 or dan.emerine@dc.gov.

Sincerely,

Dan Emerine
Transportation Planner