



Comments Concerning

Washington Union Station Expansion Project

NCPC File Number: 7746

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The update on the Union Station expansion plans to eliminate the parking garage, and thereby allow reconfiguration of the tracks north of Union Station. *But there is no discussion about realignment of the tracks and only very limited and dated information about the lower-level tracks that provide access to the First Street Tunnel and south.* The new rail bridge across the Potomac and the additional SW tracks will allow commuter trains to through-run and allow increased Amtrak service south. The new rail bridge and SW tracks will result in separation of passenger and freight rail operation south of Union Station. This momentous change in rail operation will transform our rail system into a more modern, efficient and inclusive rail network that will better serve the DC region and the east coast rail network. But this dramatic change in rail operations is completely ignored in the Union Station DEIS. In fact, the DEIS clearly states the contrary – that passenger and commuter rail operations south of Union Station will be controlled by CSX. Appendix B, page 23 states: “The 2040 simulation retains operating variability for trains arriving from the south, given assumed continued ownership and dispatch by freight railroads in the future [emphasis added].”

The run-through tracks on the lower level will need to accommodate the increased passenger/commuter traffic to and from the south. But sheet 19 of NCPC File 7746 “Modernized Tracks and Platforms” shows only seven run-through tracks – the same number of run-through tracks in the June 20, 2020 Union Station DEIS that did not take into consideration the new two-track Long Bridge river-crossing, substantial CSX trackage in Virginia that VRE would acquire, as well as the new fourth track in SW that will separate passenger/commuter from freight operations

The 2020 Union Station DEIS failed to take into account the increased number of Amtrak trains to and from and to the south, as well as Marc through running to Virginia and VRE through-running to Maryland.

- Appendix B, Page 23 of the Union Station DEIS showed 29 Amtrak trains 8 Marc trains and 46 VRE trains that would use the SW tracks and new long Bridge by 2040.
- But page 3-29 of the 2020 Long Bridge EIS shows 44 Amtrak trains, 8 MARC trains and 92 VRE trains, and 6 Norfolk Southern trains would use the SW tracks and new Long Bridge by 2040.

The updated Union Station expansion analysis needs to account for this increased rail traffic in design of the lower-level Run through tracks.

Table 7-1 Ops. Table 1 - Revenue Train Volumes for Existing and Future Operating Plans per Direction

Operator	Service	Existing Baseline		2030+		2040 NEC FUTURE	
		Peak Hour	Full Day	Peak Hour	Full Day	Peak Hour	Full Day
Amtrak	HSR	1	16	3	45	4	57
	Regional/SEHSR/ Intercity (LD excluded)	3	22	3	27	1.5	23
	Long Distance	1	7	1	6	0.5	6
TBD	Metropolitan	0	0	0	0	4	58
MARC	Penn	4	27/28	6	39	7*	57*
	Camden	2	10	2	10	4	30
	Brunswick	3	9/10	2	12	6	38
VRE	Fredericksburg	2	8	3	19	4*	23*
	Manassas	2	8	3	22	4*	23*

* Includes MARC/VRE run-through service at 4 trains per hour per direction in the peak hour.

Table 3-9 | Train Volumes in the Long Bridge Corridor

Train Operator	Current Number of Trains per Day ¹	No Action Alternative Number of Trains per Day ²	Action Alternatives Number of Trains per Day ³
VRE	34 ⁴	38	92
MARC	0	0	8
Amtrak/DC2RVA	24	26	44
CSXT	18	42	42
Norfolk Southern	0	6	6
TOTAL	76	112	192

Current train volumes are based on existing operation agreements and confirmed by bridge stakeholders.
 Planning year 2040 No Action train volumes were established based on the concurrent DC2RVA EIS, Rail Service Growth in the No Build Alternative, Table 2.5-2, http://www.dc2rvairail.com/files/5315/0412/9086/Chapter_02_Alternatives_DC2RVA_DEIS.pdf, and confirmed by bridge stakeholders.
 Planning year 2040 planned train volumes were established based on input from bridge stakeholders, including CSXT, VRE, Amtrak, Norfolk Southern, and MARC, as well as the concurrent DC2RVA EIS.
 The current number of VRE trains per day includes non-revenue movements.