

The Committee of 100 on the Federal City



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Scott York, Chairman
National Capital Region Transportation Planning Board
777 North Capitol Street., N.E., Suite 300
Washington, DC 20002-4239

Dear Chairman York:

The Committee of 100 on the Federal City is pleased to present comments and recommendations on the draft 2013 Regional Transportation Priorities Plan.

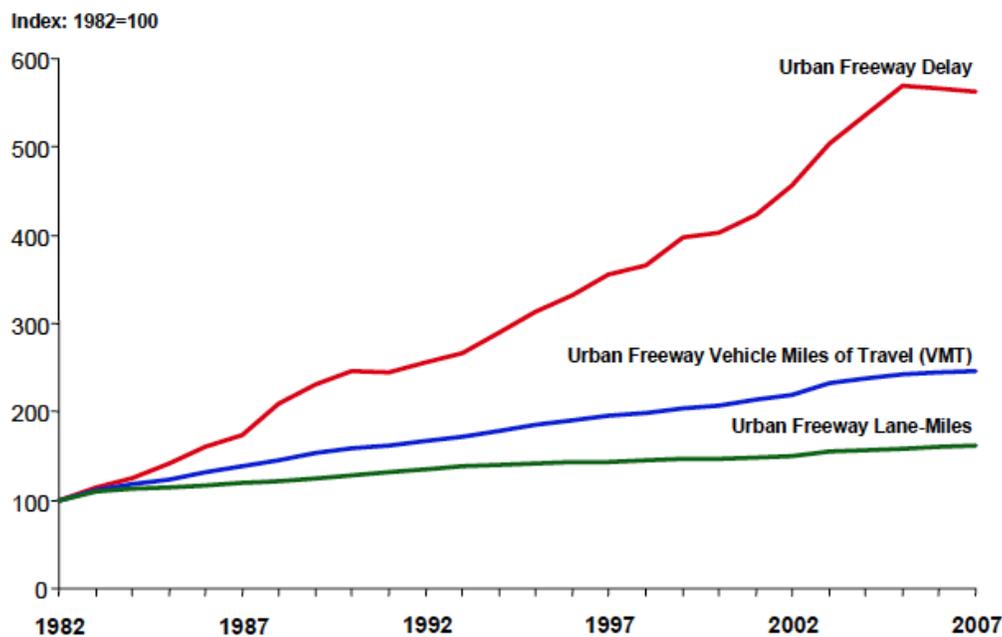
While we agree with your broad goals, we believe that you have missed a critical element in *Goal #1 - Provide a Comprehensive Range of Transportation Options* and *Goal #6 - Support Inter-Regional and International Travel and Commerce*: **commuter rail expansion and its relationship to the anticipated large increase in freight rail through the region.**

Increasing commuter rail is essential.

The Problem: One thing that gets overlooked in the discussion of various zoning, transportation, parking and pedestrian/bicycle safety proposals is that two-thirds of the cars on DC's streets during rush hour are from out of state and those cars impose increasing demands on parking and pressures on congestion. Of US cities with more than 100,000 residents, DC has the highest daytime percentage increase in population due to commuters, and in terms of absolute numbers of people coming into the city each workday, we're second only to Manhattan. Our car problem is largely a commuter problem and it's not one we can solve simply by helping people move around within the city. Our major challenge is getting large numbers of people in and out of the city efficiently. And it's a problem that will only get bigger in the future.

In terms of the percentage of those commuters using cars, trucks or vans, DC again has the highest percentage at 54%, compared to Manhattan at 13% and Boston at 50%. DC is the lowest in the use of commuter rail: DC 2.8%, Manhattan 11% and Boston 8%. Manhattan has just under three times the number of commuters

Figure 2.3 Mid-Atlantic Region Highway System Capacity, 1982 to 2007



Sources: Federal Highway Administration, *Highway Statistics, 1982 to 2007*; and Texas Transportation Institute, *The 2009 Urban Mobility Report*.

coming in each day as DC does, but more than 12 times as many traveling by commuter rail¹. The Regional Transportation Priorities must include serious focus on how to expand passenger rail service into the District through MARC and VRE, as well as Amtrak.²

¹ US Census Bureau, 2007-2011 American Community Survey 5-Year Estimates:

| | Total Commuters | Work in Place of Residence | Commute by Car/Truck/Van | Commute by Railroad |
|----------------------|-----------------|----------------------------|--------------------------|---------------------|
| District of Columbia | 773,735 | 220,409 | 420,454 | 21,523 |
| Manhattan | 2,334,100 | 769,884 | 321,070 | 270,690 |
| Boston | 555,227 | 209,100 | 278,990 | 44,295 |

² The MoveDC Plan Element on Freight, Maritime, and Railroads currently states:

“This element will evaluate the needs of freight in the District, its impacts to the transportation system, and recommendations for freight. In this element, data, facility, and route information will be evaluated to better understand the short- and long-term needs of freight, whether on rail or road. In addition, in the railroads section of this element, passenger as well as freight railroad needs will be evaluated based on Amtrak and freight railroad plans. Recommendations of this element will focus on maintaining efficient and effective freight access in and through the District, whether it is carried on road or by rail. Recommendations also will identify where coordination is needed between this element and others to reduce the impact of freight and other transportation modes on freight, within the transportation system. Freight and rail recommendations will be integrated with other plan elements.”

The Approach: *The obvious solution is to separate freight and passenger rail operations in Southwest by building an additional Potomac River rail crossing to route freight traffic around Southwest and thereby enable existing rail facilities to accommodate greatly expanded commuter rail.*

Constraints to increasing passenger rail must be addressed.

The constraints that restrict increasing commuter and passenger rail are considerable:

- River crossings. Currently, freight, passenger and commuter trains compete to use the Long Bridge, the only Potomac River rail crossing within 70 miles, and also compete in sharing rail tracks in Southwest (SW). The proposed rebuilding of the Virginia Avenue Tunnel will greatly increase CSX freight traffic as a result of the expansion of the Panama Canal and the capacity of the ports of Norfolk, Baltimore and New York to accommodate those larger container ships. But freight trains will still have to come across the Potomac River.
- CSX restrictions. The current operating agreement for the Potomac River rail crossing at the Long Bridge precludes any increase in the frequency of VRE commuter trains. In the future, with the increase in freight traffic, that competition will increase, and unless there is a new rail river crossing, commuter rail traffic will be decreased. CSX refuses to disclose their expected increase in freight traffic, so the amount of additional river crossing capacity is not known.
- Electric versus diesel. MARC's Penn Line is electric, the Brunswick Line (that operates on CSX tracks) is diesel and VRE is diesel (as required by CSX). Because of the lack of electric catenaries in SW, AMTRAK has to change locomotives at Union Station to use diesel to the south and electric to the north. Electrification of the tracks south of Union Station is desirable for passenger and commuter trains, but opposed by CSX because of possible interference with their planned double-stacked container trains.
- Operational restrictions. CSX designs their rail lines for freight loads, not for passenger loads. Freight operations are typically slower and 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 would avoid conflicts and inefficiencies associated with the Long Bridge and shared rail operations in Southwest if commuter/passenger and freight rail were operated on separate networks.

Passenger and Freight Rail Operations Must be Separated. We need to figure out how to separate passenger and freight rail operation in Southwest and provide an additional Potomac River rail crossing. Most importantly, the study area for the Long Bridge Study needs to be expanded to address separating freight and passenger/commuter rail operations.

The proposed rebuilding of the Virginia Avenue Tunnel will greatly increase CSX freight traffic as a result of the expansion of the Panama Canal and the capacity of Norfolk, Baltimore and New York to accommodate those larger container ships. But freight trains will still have to come across the Potomac River. In 2005, the Federal Railroad Administration issued its *Report to Congress: Baltimore's Railroad Network: Challenges and Alternatives*. Page 4-13 of the report projects that the number of CSX trains traveling between Washington and Baltimore will increase from 33 trains a day in 2012 to a

high of 56 trains a day in 2050.³ This projection, performed in 2005, did not take into account the increased freight that will result from expansion of the Panama Canal.

Active Rail Lines within the District of Columbia

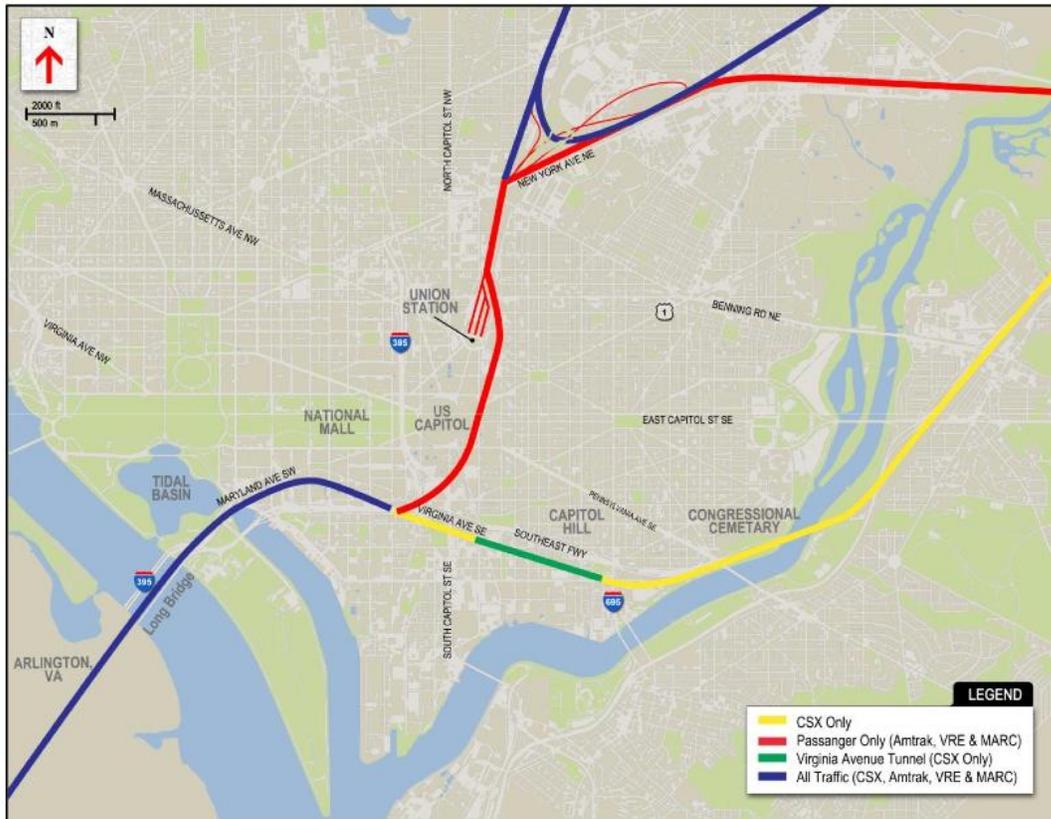


Table 4 - 5: Projected Annual Growth Rates in Freight Train-Miles

| Time Period | Service Type | | | | | | | |
|-------------|--------------|-------|-------|-------|-------------|-------|-------|-------|
| | Premium | | Unit | | Merchandise | | Local | |
| | Low | High | Low | High | Low | High | Low | High |
| 2001 – 2007 | 1.23% | | 1.16% | | 1.19% | | 1.19% | |
| 2007 – 2012 | 0.85% | 1.36% | 0.58% | 0.93% | 0.67% | 1.07% | 0.67% | 1.07% |
| 2012 – 2020 | 0.85% | 1.36% | 0.58% | 0.93% | 0.67% | 1.07% | 0.67% | 1.07% |
| 2020 – 2030 | 1.00% | 1.61% | 0.53% | 0.86% | 0.78% | 1.25% | 0.67% | 1.07% |
| 2030 – 2050 | 0.89% | 1.43% | 0.53% | 0.86% | 0.67% | 1.07% | 0.67% | 1.07% |

The projections in Table 4 - 5 reflect those provided by CSXT¹² by train type for the period 2001-2007. The post-2007 projections use, as their upper limit for the “high” case, the historical growth in tonnage for the Eastern Class I railroads (1.6 percent compounded annually between 1985 and 2001); this maximum growth rate is adjusted downward to acknowledge long-term increases in tonnage per train. The “low” case assumes growth rates on the order of two-thirds of the “high.”

In this same time frame, the Union Station Expansion Plans is to triple the number of passengers and double the number of passenger and commuter trains;⁴ and the SW Ecodistrict Plan plans to through-run MARC to Virginia and increase the commuter trains using L'Enfant Station.⁵ That will result in a lot of competition for use of the Long Bridge and the SW rail tracks, and since those facilities are owned by CSX, it is likely that CSX will resolve that competition in their favor and thereby frustrate the proposed increases in Amtrak, VRE and MARC service.

In the *MidAtlantic Rail Operations Phase I Report* of 2002, CSX proposed an additional Potomac River double track bridge at a cost of \$300 million (*Mid-Atlantic Rail Operations Phase II Report*, December 2009 page 2-11)⁶. ***If a new river crossing (bridge or tunnel) could be located south of the present Long Bridge, freight would not have to come through SW⁷, rebuilding the Virginia Avenue tunnel could be avoided, and freight and passenger/commuter operations could be separated,*** as is being done with the Howard Street tunnel in Baltimore.⁸

⁴ *Union Station Master Plan*, Washington, DC (July 25, 2012) Executive Summary, page 2. The southbound tracks at Union station will be designed for expanded commuter rail and Amtrak's Superliner equipment and equipped with an overhead catenary system to accommodate electric locomotives (*id.* page 11). Between 2018 and 2022, all new tracks will be provided that run through the 1st Street tunnel to Virginia and points south of DC (*id.* page 22). Future tracks could be extended to the south, enabling extension of high-performance, high-speed rail service to Virginia, North Carolina and the southeastern United States (*id.* page 13).

⁵ The recently adopted *Southwest Ecodistrict Plan* proposes 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 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 (page 31).

⁶ Rebuilding the Virginia Avenue tunnel at that time was estimated to cost \$117 million. That figure is now \$165 million, or 41% higher. Escalating the 2002 cost of the additional Potomac River rail bridge by 31% would result in a current estimate of \$423 million

⁷ The southern terminus of the Blue Plains tracks is Laboratory Road, SE, lines up nicely with the Potomac Generating Plant (GenOn) on the Virginia side. The GenOn plant has been decommissioned and is currently undergoing demolition and environmental clean up. The rail tracks that served that plant, apparently owned by Norfolk and Southern, are apparently still in use to serve the Robinson Terminal. The Blue Plains rail line joins the CSX rail line that emerges from the Virginia Avenue Tunnel and crosses the Anacostia at about 32nd and D St., SE. The Blue Plains ROW and most of the tracks still exist. The route is generally single track, there are several at-grade street crossings and certain short sections of track have been removed due to new, major streets, such as Malcolm X Avenue, Duncan Street, South Capitol Street and Suitland Pkwy ramps, 11th Street bridge, and Penn Ave. To accommodate the quantity of freight that would hopefully use this route, tracks would have to be upgraded and underpasses/overpasses would be required, or possibly, lowering the tracks and decking over them, like the SW tracks along Maryland Avenue.

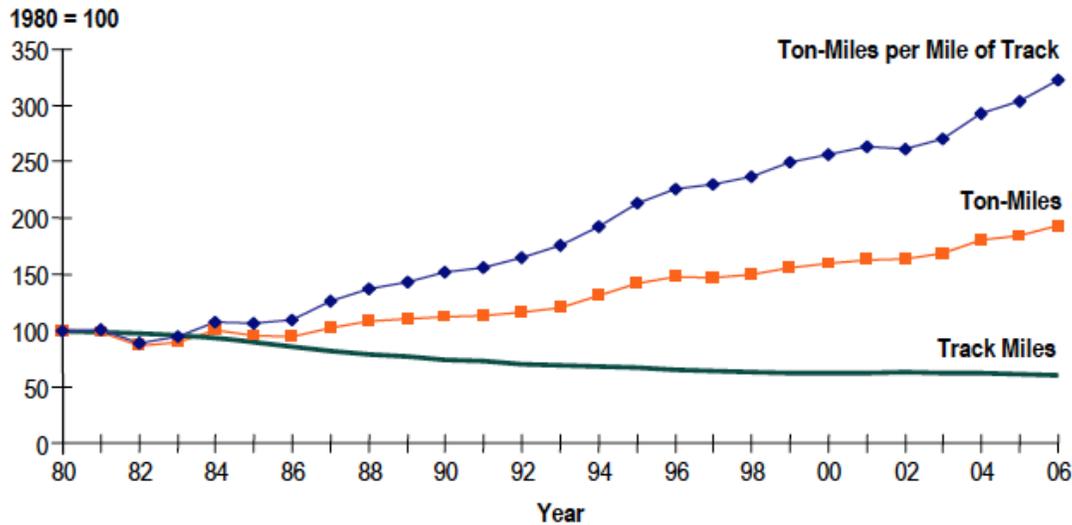
⁸ *Mid-Atlantic Rail Operations Phase II Report*, December 2009, states at page 6-

- **Improving or replacing the B&P and Union tunnels, which provide access to Amtrak's Penn Station in Baltimore. The Federal Railroad Administration (FRA) study of the Baltimore tunnels suggests providing combined freight operations for CSX and Norfolk Southern in a replacement tunnel for the Howard Street tunnel. The passenger tunnel replacement for the B&P and Union tunnels would have grades and curves that would not accommodate freight trains.**

And at page 9-3: "In the environment of Baltimore's topography and development patterns, the needs of freight

In the Draft EIS process for the Virginal Avenue tunnel, CSX has refused to disclose their expected increase in freight traffic, or to otherwise update the projections they provided in the 2005 Federal Railroad Administration *Report to Congress*, so the amount of additional river crossing capacity is not known, but will likely be greater than was projected in 2005. We do have historic data quantifying the amount of rail freight delivered along the I-95 corridor, but that data was historic actual, ending in 2006 and did not consider any projected increase in the amount of freight due to the expanded capacity of the Panama Canal that will allow much larger container ships to make deliveries to Norfolk and Baltimore, a large portion of their cargo would likely be delivered by CSX (*Mid-Atlantic Rail Operations Phase II Report*, December 2009, page 2- 5):

Figure 2.4 Freight Ton-Miles and Track Miles, Class I Railroads, 1980 to 2006



Source: AAR and Annual Report Form R1.

Conclusion:

We can't solve our congestion problems unless we find a different way to get lots of people in and out of the city to work everyday. The congestion of the streets and bridges because of automobiles, trucks and buses is painfully obvious, and Metro is at or near capacity. By removing the constraints now imposed on commuter and passenger rail, we can move a lot more people into and out of the city. The major constraint is the combined freight and passenger/commuter rail operations in Southwest together with the capacity limitations of a single rail river crossing that today precludes any increase in the amount of

and passenger service differ so greatly as to mandate separate freight and passenger facilities. To attempt to meet the challenge with a single facility would likely result in compromises that would undermine the justification for any restructuring plan so designed. Indeed, analogous compromises made in the nineteenth century by two separate railroads, each developing a multipurpose facility on limited funds, produced the two inadequate facilities inherited by the railroads of today.”

commuter traffic. In the future, that problem will be greatly magnified, and we know additional commuter rail capacity will be needed.

Thank you for this opportunity to comment on the priorities for our region.

Sincerely yours,



Monte Edwards
Vice Chair

Cc: Ronald Kirby, Director, Department of Transportation Planning
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