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July 2, 2020

Ms. Julia Koster

Secretary and Director OPE

National Capital Planning Commission

401 9th St NW #500N,

Washington, DC 20004

Re: Union Station DEIS

The Committee of 100 on the Federal City requests that this letter be made a part of the record of the July 9, 2020 meeting of the National Capital Planning Commission.

This DEIS proposes a Union Station] expansion plan that will cost between 5.8 and 7.5 billion dollars¹, require 11 to 14 years to build² and will not be able to meet the requirements of projected rail operations when it is finished. In fact, as explained in the next paragraph, if it could be completed by 2030, it might meet the capacity requirements of rail operators, but only at that time.

Amtrak's July 25, 2012 *Union Station Master Plan* called for eight east-side run-through tracks and 12 west-side stub tracks (page 13). The run-through tracks (which travel under the station through the 1st Street tunnel to points south) would have to be reconstructed and two new run-through tracks added (pages 4 and 10). It was estimated³ that by 2030 those tracks would be at capacity, and it would be necessary to increase the capacity by adding six to nine new additional below grade tracks that would serve rail operation north of Union Station.³ But, the DEIS does not consider that option.⁴

¹ DEIS, Executive Summary, page ES-34.

² *Id.*, page ES-1

³ 2012 *Union Station Master Plan*, page 13:

Demand for rail services will rise to the level where the practical capacity of these facilities is reached. This could happen as early as 2030, depending on the pace of growth and investment in overall rail system capacity. To provide for this future capacity the Master Plan allows for the development of a new lower level of tracks and platforms in a zone beneath the west side stub tracks that can be excavated to create six additional station tracks (or up to nine if needed for additional capacity).

* * *

The lower track level would be connected to the Northeast Corridor main line by means of a bored tunnel from Union Station northeast to the vicinity of the Anacostia River.

⁴ DEIS, page ES-9 states that: "The nine eliminated preliminary concepts included below-grade tracks [the 2012 Union Station Master Plan proposed below-grade tracks would be located about 70 feet below grade in the area below the west-side stub tracks] that Amtrak determined it did not need to meet its operational requirements."

Amtrak's *Union Station Master Plan* was issued in 2012. But now, eight years later, Amtrak, VRE and MARC have developed expansion plans that would greatly increase the number of trains and the number of rail passengers using Union Station, including plans for High Speed Rail south of Union Station. The state of Virginia and VRE have approved funding to acquire over 100 miles of CSX track, pay for, own and control the new Long Bridge Potomac River rail crossing and thru-run its trains through Union Station into Maryland, and MARC plans to run its trains into Virginia.

The DEIS references the source documents it relied on in several sections.⁵ But those source documents were prepared as early as 2013 and last accessed by FRA in 2017. Perhaps that is the reason that the DEIS reaches the following planning conclusions:

- Provides fewer tracks than were ever in service at Union Station
- Will only accommodate the needs of train operators through 2030
- Offers no alternative to accommodate post-2030 expansion
- Offers no alternative to accommodate expansion south of Union Station
- Provides for high-speed rail north of Union Station
- Does not even discuss high-speed rail south of Union Station
- Assumes that rail operation south of Union Station will continue to be controlled by CSX
- Completely ignores the Virginia/VRE plans to operate, control and own rail tracks south of Union Station.

Fewer rail tracks than ever

Union Station originally had a total of 33 tracks⁶. There were 24 stub-end tracks that ran north of Union Station on the upper level and nine run-through tracks, plus two tracks that terminated on the lower level that are labeled "mail tracks."⁷

Currently, Union Station has 20 revenue service tracks. Fourteen are stub-end tracks, located on the upper level and six are run-through tracks on the lower level. An additional 3 tracks (or more, see footnote 3) exist, but they are used for storage and "pooling".⁸

⁵ Federal Railroad Administration. 2017. *NEC FUTURE Tier I Final Environmental Impact Statement*. http://www.necfuture.com/tier1_eis/feis/. Accessed June 6, 2017.
Virginia Railway Express. 2014. *System Plan 2040*. <http://www.vre.org/vre/assets/File/2040%20Sys%20Plan%20VRE%20finaltech%20memo%20combined.pdf>. Accessed June 6, 2017.
Maryland Transit Administration. 2013. *MARC Growth and Improvement Plan Update: 2013 to 2050*. https://mta.maryland.gov/sites/default/files/mgip_update_2013-09-13.pdf. Accessed June 6, 2017.

⁶ *Union Station Historic Preservation Application*, page 8, dated 2012, jointly sponsored by C100 and DC Preservation League

⁷ 1921 Baist map, attached, see last page.

⁸ DEIS page 2-5, Section, 2.2.3. But, according to Appendix A-3, page 23: "The Lower Level has nine (9) tracks, of which only six (6) are currently used for revenue service. ... Tracks 22 and 29 are through tracks without usable platform faces used by trains to travel through the station without loading/unloading passengers; Tracks 23

The DEIS proposes to provide 19 revenue tracks. Twelve would be stub-end tracks serving rail operations north of Union Station and seven would be run-through tracks.⁹ The reduced number of tracks is in large measure determined by the much wider platforms that are planned. All of the current platforms are less than 20-feet wide, and many have columns supporting the parking garage or the H Street Bridge. Widening the platforms to accommodate capacity growth and safety standards cannot be achieved without realigning and re-spacing the station tracks.¹⁰ But does this require platforms as wide as 30' to 35'6"?¹¹

While most of the DEIS is expressed in terms of number of rail passengers and percentage increases, it is in Appendix A3, the *Final Concept Development and Evaluation Report*, that one learns that the expansion plan is based on something called "Amtrak's Operating Plans for 2030+"¹² and learns that "there are presently 219 weekday revenue trips". The expansion plan is based on Amtrak's 2030+ operating Plan of 360 daily trips, although the FRA is currently projecting 630 daily trips in 2040.¹³

High Speed Rail, but only North of Union Station

The upper-level stub-end tracks (Tracks 7-20) are used by MARC and by Amtrak's Acela Express, Northeast 40 Regional, Vermonter, and Capitol Limited trains (DEIS, Chapter 2, page 2-5). The DEIS states that at least four (4) tracks must have 1200' platforms for future Acela HSR service for future growth.¹⁴

The 2012 *Union Station Master Plan* (page 13) "provides that future tracks from the lower level of Union Station could be extended to the south, enabling extension of high-performance high-speed rail service to Virginia, North Carolina, and the Southeastern United States."

High speed rail south of Union Station is not discussed or even acknowledged in the DEIS. The DEIS does not address any increased operational efficiencies south of Union Station, but takes into account operational efficiencies and their effect on increasing the number of trains arriving from the north.¹⁵

to 28 are used in revenue service to load and unload passengers, and Track 30 is a Stub End storage track used for midday storage and to switch locomotives.

⁹ DEIS, page 3-3, section 3.1.1.2

¹⁰ 2012 *Union Station Expansion Plan*, page 3.

¹¹ DEIS, Appendix A-3a, pages 128-189

¹² DEIS Appendix B, page 22 explains: "the "+" symbol representing the intent of this plan to cover the 2030 decade from 2030 to 2039, including 360 daily trips, is based on future plans of each of the rail operators.

¹³ *Id.* The 2040 NEC FUTURE Operating Plan includes 630 daily trips and presents the long-range vision of the FRA for WUS operations, including the addition of new services."

¹⁴ Appendix A-3, page 24

¹⁵ DEIS Appendix B, page 23: "The 2040 simulation retains operating variability for trains arriving from the south, given assumed continued ownership and dispatch by freight railroads in the future. In contrast, the 2040

The Virginia/VRE plans to own, operate and control rail tracks south of Union Station are ignored.

Just last year VRE and Virginia announced they have acquired over 100 miles of tracks from CSX in Virginia so the tracks can be dedicated exclusively to commuter and passenger rail and the operations will no longer be controlled by CSX. Also, the new rail bridge that is the subject of the Long Bridge EIS will be paid for by Virginia/VRE and controlled as a commuter and passenger rail bridge. The result will be greatly increased rail operating capacity. Right now, the Richmond to DC High Speed Rail Plan ends on the Virginia side of the Long Bridge.¹⁶ VRE's actions will allow high-speed rail to enter DC from the south, but the DEIS does not provide for that. The DEIS does not acknowledge any of these developments that will greatly improve the efficiency of moving passenger and more commuter trains south of Union Station.

The DEIS is seriously flawed by the use of out-of-date projections, and the proposed redevelopment is grossly deficient in providing for known and projected growth in rail service. The plan and the DEIS must take into account that Union Station is first and foremost a train station—a critical piece of the area's transportation infrastructure.

Sincerely,



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simulation assumes much more reliable operation for trains arriving from the north, given the significant NEC reliability investments represented by NEC FUTUR” [*emphasis supplied*]

¹⁶ New York's Penn Station is similar to our rail operations south of Union Stations, and like our First Street rail tunnels, is served by two tunnels (the North River Tunnels) under the Hudson River. In both cases there are two tunnels with one rail track in each tunnel.

The North River Tunnel accommodate up to 24 trains per hour in each direction, requiring very precise scheduling and control. Achieving that south of Union Station would be an order of magnitude increase over the DEIS projections in passenger and commuter rail traffic and needs to be addressed in this DEIS.

1921 Baist Map

