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Emily Stock, Manager of Rail Planning
Virginia Department of Rail and Public Transportation
801 East Main Street, Suite 1000
Richmond, Virginia 23219

Re: Washington, D.C. to Richmond Southeast High Speed Rail (DC2RVA)

Dear Ms. Stock:

The Virginia Rail Policy Institute (VRPI) submits the following comments regarding the Alternatives for Detailed Evaluation for the DC2RVA Tier II EIS which were presented at recent public meetings.

Our members have extensive and diverse experience in the areas of both freight and passenger rail, transportation public policy, government, and economics, among others. We continue to study and analyze the options that have been presented. *It is our intention to submit more detailed comments during the coming weeks*, but for the moment we will make a few observations that we believe represent the broad views of our members. We will focus on the Richmond area, although we have a great interest in the entire project.

We believe that the alternatives being studied should focus on maintaining Main Street Station as one of two depots in Richmond, upgrading the "S" line so that speed can be maintained from Centralia to Main Street Station for trains from Norfolk and the South. The upgrade of Main Street Station should also encompass improvements for trains serving Newport News. Trains like the Silver Meteor and the Silver Star might continue to use the upgraded and improved Staples Mill Road station.

Public transportation and additional parking at Staples Mill should be included in the study to enhance the attractiveness of that station. The inauguration of regular bus transportation to downtown Richmond and stops in-between should also be considered, especially for the benefit of passengers from outside the Richmond area and others who do not have access to automobiles.

We continue to advocate for an appropriately-located 3rd rail crossing of the James River to reduce conflicts between passenger and freight traffic at Main Street station and on the route from Main Street to Acca Yard. We find it regrettable that as-yet-undocumented environmental concerns appear to be at the core of the recommendations against ten alternative crossing locations that have been considered. River crossings are, and always have been, essential elements of rail infrastructure. To invoke 21st Century environmental concerns as the reason none of the potential James River crossings should be further evaluated is to reverse centuries of safe, successful rail practice and, if followed as a general policy, will severely limit the state's options for solving rail congestion and capacity issues in the future. The importance of a new river crossing for the success of passenger rail at Main Street cannot be overstated and we urge the study team to reconsider their conclusions.

We believe that the concept of inserting a new "Broad Street Station" behind the old Broad Street Station with a ground level turnaround track is not a reasonable solution. Removing the seven-story DMV building and closing Leigh Street are non-starters in our judgment. The Boulevard Station alternative would certainly have merit, from a region-wide access perspective, but we foresee rail engineering and operating issues for this alternative that would need to be resolved to the satisfaction of all concerned.

We are concerned that the Tier I and II Raleigh-Richmond EIS adoption of Main Street Station as "the" Richmond terminus is disproportionately biasing the DC2RVA study to the point of justifying limiting the alternatives for further evaluation. The most detailed and in-depth investigations of the operational feasibility and practicality of Main Street Station are being conducted by your own study team at DRPT. The DC2RVA study far exceeds the rigor of the previous studies and also is the only study in a position to take into consideration what is in the best interests of both the greater Richmond and Hampton Roads regions. We urge you to put less weight on the previous study findings and to thoroughly consider other alternatives.

We see the two track bypass of Acca Yards, complementing the existing one track bypass on the west side, as having advantages to CSX, along with other operational improvements that this project will provide to CSX. We are concerned, however, that to make an additional bypass work, CSX must exercise good faith in respecting the purpose of the bypass. With respect to the existing bypass, CSX operates freight trains on all tracks at all hours and uses the bypass and even main tracks in the vicinity of Acca yard for extended-duration crew changes. These and other such practices are incompatible with the planning and ultimate objectives of DC2RVA.

Finally, VRPI is painfully aware of extended delays of Amtrak trains on the DC/Richmond/Newport News/Norfolk corridor. Amtrak's 2015 Monthly Performance Reports showed this corridor to be among the worst in the nation in terms of On-Time Performance of its regional trains. Delays of several hours have become more frequent. The fourth quarter ridership declines at Main Street Station are reflective, we believe, of growing public awareness of the unreliability of these services.

This is of general concern to DC2RVA because the success of both conventional and high speed passenger rail on the corridor depends upon both the speed and reliability of the service. More immediately, the DC2RVA ridership projections, which are to be made in coming months, will suffer from poor Amtrak train schedule performance, much (but not all) of which may be traced back to CSX freight problems.

As we said in VRPI's detailed statement on the DC2RVA study (" Comments from the Executive Committee of the Virginia Rail Policy Institute on the Washington to Richmond High Speed Rail Study, September 11, 2015"): *"CSX rail freight operations, as presently conducted, are fundamentally incompatible with quality intercity passenger and commuter rail services, regardless of whether the latter are operated at current relatively slow speeds or projected higher speeds....Given the private ownership, the paramount question overshadowing the program of work and stated objectives of the DC2RVA study is whether the potential public/private conflicts of rights, interests, and objectives can be reconciled to the satisfaction of all parties."*

VRPI appreciates having had the opportunity to comment in the public interest on the Alternatives for Detailed Evaluation in the DC2RVA Tier II EIS. With their divergent interests and experience, our members continue to debate the alternatives you have presented, and we will continue to refine our position. We sincerely hope and request that you will continue to welcome our input in the coming months.

Yours truly,

A handwritten signature in blue ink that reads "Meredith Richards". The signature is written in a cursive, flowing style.

Meredith Richards, President
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