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NEC FUTURE

U.S. DOT Federal Railroad Administration
One Bowling Green, Suite 429
New York, NY 10004

The Virginia Rail Policy Institute (VRPI) responds to the invitation to comment on the NEC Future Tier I Draft EIS. The following comments are submitted by the Executive Committee on behalf of the Board of Directors and Fellows of VRPI.

VRPI's mission is to strengthen and improve public policy with respect to both freight and passenger rail in the Commonwealth of Virginia through objective and rigorous research, publication, education, and outreach. Our Executive Committee, Directors, and Fellows have extensive private and public sector experience in both freight and passenger rail, as well as in economics, law, public policy and planning. A roster of our members, including brief biographies, can be found at <http://www.varpi.org/node/27>.

VRPI's Comments

The Virginia Commonwealth has an enormous stake in the future of the Northeast Corridor (NEC). Although Virginia is not within the official scope of the NEC Future Study, everything Virginia has done, is currently doing, and aspires to do in the future relative to intercity passenger and commuter rail, is critically dependent upon Virginia's trains being accommodated efficiently, reliably and on-time in the NEC.

Virginia's Investments in Passenger Rail

In recent years, Virginia has advanced a statewide policy to be one of the nation's most progressive and vigorous states in developing and funding rail passenger service. Since 2005, Virginia has maintained a dedicated capital fund exclusively for improvements to rail facilities, and with it has made capacity improvements for dozens of freight and passenger projects. In 2013, in direct anticipation of the PRIIA Section 209 requirements, Virginia created one of the nation's few sustaining public funds dedicated exclusively to intercity passenger rail. With this fund, Virginia has assumed financial responsibility for the operation and capital requirements of the Virginia portion of six Northeast Regional (NER) trains, all of which travel to Washington, DC and from there directly through the 457 mile NEC.

Between its regional and long-distance services, more than 1.6 million passengers boarded or alighted Amtrak trains at Virginia stations in FY2015, generating almost \$80 million in revenue. Additionally, Amtrak estimates that well over one million of the five million Amtrak passengers using Washington Union Station reside in Northern Virginia. Virginia Amtrak ridership increased 50% between 2009 - 2014, ten times greater than the state's population growth during the same period.

Virginia's Growing Stake in the Northeast Corridor

Virginia continues to add routes, frequencies and new station facilities to expand its intercity passenger and commuter rail network. Additional frequencies of NER trains are scheduled for the Hampton Roads/Richmond/DC corridor and the Lynchburg/DC corridor, with a service extension to Roanoke underway. New stations in Newport News, Norfolk and Roanoke will serve additional Amtrak trains destined for the NEC. Through its efforts in planning and funding six of Amtrak's twenty NER trains, Virginia contributes both ridership and revenue to the NEC. To quote Fred W. Fraley in *Trains Magazine* (Corridor Conundrum, *Trains*, April 2014, p. 27):

"None of these origins lies within the strict definition of the Northeast Corridor... But in the scheme of things, places like Lynchburg are as much a part of the NEC as Manhattan's Pennsylvania Station."

Virginia also supports Virginia Railway Express commuter service, which has 4.7 million passenger trips annually, will likely introduce run-through service with MARC and is anticipated to grow significantly over the next thirty years.

Amtrak long-distance trains from the South (Crescent) , Southeast (Silver Service; Palmetto) and Midwest (Cardinal) all converge in Virginia as the gateway to the NEC, as does a daily state-supported train from North Carolina (Carolinian). In bringing these out-of-state trains to Virginia on their way to the NEC, Amtrak relies upon the Commonwealth to maintain sufficient capacity and state of good repair of its rail infrastructure, as well as provide safe, convenient stations for its passengers.

Virginia is also the essential link between the NEC and the future Southeast High Speed Rail Corridor, which will connect Florida and the cities of the emerging Piedmont Atlantic Megaregion with the NEC. A DC2RVA Tier II EIS currently underway contemplates an additional eight (8) daily round trips over the same 2040 time horizon as the NEC study. Both state and federal investments have already been made in critical sections of the DC2RVA corridor. According to US Transportation Secretary Anthony Foxx, *"This segment is the key to the whole South. If we don't get it done right and get it done relatively soon, I think we may miss the window."* (Presentation to Virginians for High Speed Rail, July 22, 2015, Richmond, VA).

When all of this is considered, one cannot escape the conclusion that the Commonwealth of Virginia has a material interest in the future of the NEC. It is probable that no other off-corridor intercity feeder or connecting route to and from the NEC, including Amtrak's Keystone and Empire routes, has a greater dependence upon the NEC than does Virginia. As Virginia invests in new routes, frequencies and

extensions of its passenger rail network, and as a ridership rapidly grows, it is important that such increases be accommodated in the NEC.

VRPI Opposes the No Action Alternative

VRPI does not support the No Action Alternative as outlined in the NEC Future study. Obviously the current NEC desperately requires major infrastructure upgrades, but it is our view that NEC needs to GROW, at a minimum, and ideally be transformed into a higher capacity system. Otherwise, Virginia passenger rail will eventually wither as the NEC experiences more congestion, breakdowns in facilities, slower runtimes and service interruptions. These outcomes are simply unacceptable for the future of the NEC.

VRPI Supports Alternative 1 of the NEC Future Tier I EIS

The improvements outlined in Alternative 1 will add the needed capacity for the corridor to grow, and at the same time will remove the chokepoints that slow rail traffic, including the additional Hudson River tunnels and new bridges, improvements to the Baltimore & Potomac Tunnel in Baltimore, etc. Alternative 1 promises to add 75% more capacity to the corridor, with higher speeds on some parts, more frequent trains and unblocked chokepoints. We believe these improvements will be sufficient to accommodate the expected increases in the frequency of Virginia's regional trains and the higher speeds of Southeast High Speed Rail. Alternative 1 provides for the greatest increment in capacity at the least expense and will increase the reliability and performance of trains in connecting corridors such as Virginia — all at a cost that can realistically be expected to be funded through federal, state and private partnerships.

VRPI is concerned that the additional projects in Alternatives 2 and 3, besides their enormous costs, will stir local opposition from communities in the Northern parts of the corridor most affected by the environmental changes they entail. We note that even the relatively modest north bypass of the Connecticut shoreline (and its bridges and grade crossings) contained in Alternative 1 has already stirred up massive opposition from Connecticut communities.

Prioritize the Gateway Project

VRPI urges the FRA to implement the Gateway Project with all deliberate speed. Virginia and all the constituents of the NEC have too much at stake to allow these tunnels to close. Following the construction of a second Hudson Tunnel and needed repairs to the old tunnel, the additional tracks from the project will double the capacity of the NEC and open slots for more frequent and reliable Amtrak service. We are encouraged by recent agreements to move forward with the project. Anything else risks the catastrophic failure of the NEC and with it, the loss of years of progress in state-supported intercity rail for Virginia.

Virginia and the South End of the NEC

Some solutions to the NEC Future are uniquely available in the South End of the corridor. The CSX Long Bridge across the Potomac dates to 1904 (with parts of the structure even older). It suffers from neglect and is a chokepoint for current rail traffic entering the NEC from the south. It is perhaps the greatest limiting factor to the further expansion of passenger rail from Virginia and the south, as all Amtrak long-distance, Virginia NER and VRE commuter trains must schedule bridge crossings at times available to CSX. The greatest relief on the South End of the NEC would be to route some CSX freight around DC by constructing an additional Potomac River rail crossing downstream in the vicinity of the Route 301 bridge.

Another Virginia solution comes from the fact that, for every Amtrak NEC train that is extended south into Virginia's state-supported network, the state assumes the responsibility for turning and servicing that train. By increasing Virginia's network of NER trains, the state is assuming an ever-larger share of the South End NEC turning and servicing requirements at facilities in Northern Virginia, Richmond, Lynchburg, and elsewhere.

Ultimately, VRPI believes that a radical redesign of the south end of NEC would be the optimal solution in order to achieve European-levels of intercity passenger service.

Thank you for the opportunity to comment on the NEC Future Tier I EIS draft report.

Yours truly,

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

Meredith Richards, President