

CAPITOL HILL RESTORATION SOCIETY



P. O. Box 15264  
Washington, D.C. 20003

January 18, 2012

Mr. Joseph C. Lawson, Division Administrator  
U.S. Department of Transportation  
Federal Highway Administration  
District of Columbia Division Office  
1990 K Street, N.W., Suite 510  
Washington, DC 20006-1103

Subject: Virginia Avenue Tunnel

Dear Mr. Lawson:

The Capitol Hill Restoration Society (CHRS) hereby provides preliminary comments set forth below on the concepts presented at the November 30, 2011 meeting. Please keep in mind that because these preliminary comments are provided at this early stage in the NEPA, Section 106, and Section 4(f) processes, CHRS reserves the right to change these comments and views in the future as additional information becomes available and/or as additional concerns are brought to our attention. Our preliminary comments follow, with these reservations:

1. Our primary concern remains the effects of the project on the well-being of the residents and businesses in the project area, and the potential effects on the Capitol Hill Historic District and other historic properties. Please see our scoping comments dated October 13, 2011, for details.
2. At this stage, there are no comparative costs for any of the concepts, and only out-of-date costs for Concepts 9-10. For this reason, these comments do not take costs into consideration.
3. At this stage, there are no engineering studies on noise and vibration during construction and post-construction (promised at the November 30 meeting), nor are any of the other studies described in the FAQ available. Nor are there estimates of the construction time for the various concepts. For these reasons, CHRS's comments may change greatly after results of these studies are made available. We understand that these studies will be conducted after some of the concepts are de-selected in February or March 2012.

## Preliminary comments

Concept 1: No action. Do not rebuild the tunnel and continue to utilize it for freight movement. We are not clear whether “No action” simply means no action in the VAT area only – but possibly in other areas as shown in Concepts 9 and 10 – or means no action anywhere at all. While CHRS would prefer to see no construction-related upheaval in the project area and no damage to or demolition of the historic VAT, we understand the need to move freight more effectively and efficiently. We look forward to CSX’s completed Purpose and Need Statement for a better understanding of the needs this proposed project is intended to meet. We have been told that the project could be successfully undertaken with minimal adverse effects, as described in Concepts 2 through 11, and look forward to more information about how this could take place. For these and other reasons, we feel it would be premature for CHRS to call for “No action” at this time.

Concept 2: Rebuild. Rebuild the tunnel. Temporarily route trains in a below-ground trench south of the current tunnel. This concept places excavation and rail traffic closer to residences and businesses than Concept 3.

Concept 3: Rebuild. Rebuild the tunnel. Temporarily route trains in a below-ground trench north of the current tunnel. This concept places excavation and rail traffic closer to the SE Freeway and further away from residences and businesses. For this reason, it appears preferable to Concept 2. However, it is unknown whether this concept is feasible, depending on its effects on the freeway and its structural integrity.

Concept 4: Rebuild. Rebuild the tunnel. Temporarily route trains in a below-ground trench that alternates north or south of the current tunnel based on freeway obstructions. As CSX representatives stated at the December 9 CHRS membership forum, this concept raises “operational challenges” and would make the project take longer to complete. As with Concept 2, having any or all of the run-around track on the south side of the VAT is less preferable.

Concept 5: Rebuild. Build two permanent single-track double-stack tunnels. We understand that with this concept it may be possible to retain parts of the eight-foot-thick wall of the existing tunnel. CSX may need additional right-of-way for Concept 5. This raises some of the same concerns as Concept 2, though we understand it would eliminate the need to have a run-around track operating in an open trench during construction.

Concept 6: Rebuild. Reconstruct the tunnel while concurrently using the tunnel for freight traffic. This concept was described as renovating your house while living in it. This concept has no runaround track. Concept 6 may be less disruptive than Concepts 2 through 5. This concept might take longer to complete because it would require very complex staging and phasing. [We understand this concept requires removing and excavating the top of the tunnel, and thus an open trench over Virginia Avenue and disruption of the intersections crossing Virginia Avenue for a longer period of time.]

Concept 7A: Rebuild. Rebuild the tunnel. During construction reroute trains through Union Station. At the December 9 CHRS membership forum, CSX representatives said that there are many operational issues with Concept 7A, including capacity and equipment compatibility. They also stated that in the past CSX has occasionally routed one or two trains per day through Union Station. We understand that 30-40 trains per day currently use the VAT. Future freight volume is hard to predict, but we understand that CSX expects volume to increase. Concept 7A has the advantage of eliminating need for a run-around track on Virginia Avenue.

Concept 7B: Rebuild. Rebuild the tunnel. During construction reroute trains outside the District on existing rail lines. Concept 7B has the advantage of eliminating need for a run-around track on Virginia Avenue.

Concepts 2 through 7 would all require an open trench on Virginia Avenue. Some intersections would need to be closed during certain periods (for days, if not weeks, according to CSX representatives). Crossings would be installed at the numbered street intersections. The ramps to the SE freeway may be also closed for short time periods. Concepts 2 through 7 are all less preferable for these reasons.

Concept 8: Reroute. Build a freight railroad tunnel under the existing tunnel. A new tunnel would be constructed approximately 80 feet underneath the existing tunnel. The new tunnel would run from Reagan National Airport to the Deanwood Metro Station. The current tunnel would be retained and maintained, and would be used to serve shippers within the District of Columbia. Concept 8 might minimize effects on residents, businesses, and buildings, and if so, would be preferable to Concepts 2 through 7.

Concept 9: Reroute. Establish a new railroad route using the NCPC's "Indian Head Alignment." This concept is appealing but may be uneconomical. Because there is no cost data on the other concepts, it is not possible to compare relative costs and feasibility at this time.

Concept 10: Reroute. Establish a new railroad route using the NCPC's "Dahlgren Alignment." This concept too is appealing but may be uneconomical. Since there is no cost data on the other concepts, it is not possible to compare relative costs and feasibility at this time.

Concept 11: Reroute. Reroute trains to other rail corridors or freight traffic to trucks. This concept is probably not feasible, as increasing truck traffic appears likely to be detrimental to the environment because additional trucks would require more fuel and produce more emissions. Trucks might also be uneconomical as well, though we have no cost projections at this time.

During consideration, analysis, and narrowing of project alternatives, it will be important when weighing options that would alter, damage, or demolish the existing VAT to take into account its historic nature. While it may be premature to raise mitigation issues, it is not premature to consider options that would avoid or minimize alteration, damage, or

destruction. Whatever decision is ultimately made regarding the VAT, CSX should consider the importance of fully documenting this historic structure to HABS/HAER standards (if it has not already done so) so there will be a record of its construction, engineering, and history. If such documentation already exists, we urge CSX to share it with the community as soon as possible so we can better evaluate options and their possible effects on the VAT.

CHRS remains concerned about all the issues raised in our scoping comments, and we incorporate our scoping comments into this document by reference.

We also offer the following additional comments:

Minimizing noise and vibration: In connection with all the build alternatives, we understand that there are types of rail bed and track designed to minimize noise and vibration. If a build alternative is approved, we request additional information and an evaluation of these technologies.

Marine Annex: We understand that the fences around the playing fields may need to be moved during tunnel construction. This would affect the Marines and community members (including children) who use the field.

Coordination with other projects: We understand it is possible that work on the Virginia Avenue Tunnel may begin before all the work on the 11<sup>th</sup> Street Bridges is completed. We encourage CSX, DDOT, and the other involved agencies to work together to ensure that the two projects are coordinated. We also encourage ongoing coordination with DC WASA on its tunnel project, as well as with the South Capitol Street project and other projects mentioned in CHRS's scoping comments, including the Maryland Avenue Small Area Plan, the draft of which was released on December 16 by the city's Office of Planning.

Sincerely,

Elizabeth Purcell  
President

Cc: David Maloney, DC State Historic Preservation Officer  
C. Andrew Lewis, Senior Preservation Specialist, DC Historic Preservation Office  
Reid Nelson, Director, Office of Federal Agency Programs, ACHP  
Carol Legard, FHWA Liaison, ACHP  
Michael Hicks, Environmental/Urban Engineer, FHWA  
Faisal Hameed, Chief, Project Development, Environment and Sustainability  
Planning, DC Department of Transportation  
Shane L. Dettman, Acting Director, Urban Design and Plan Review, NCPC  
Steve Whitesell, Regional Director, National Capital Region, NPS

Thomas Luebke, Secretary, Commission of Fine Arts  
Chip Dobson, Director of Strategic Infrastructure Initiatives, CSX  
Stephen Flippin, Director of Federal Affairs, CSX  
Steve Plano, Parsons Brinckerhoff